

**Epping Forest District Council – Air Quality**  
**14 July 2021**

I have reviewed the air quality assessment produced by Phlorum in support of this application. On the proviso that the applicant's traffic assessment and sustainability assessment are approved with no further amendments required from the relevant teams at EFDC and ECC, I accept the conclusions of the submitted air quality assessment.

**NHS – West Essex CCG**  
**14 July 2021 / Revised 12/10/21**

Existing Healthcare position proximate to the Planning Application site

The proposed developments [EPF/0918,0918,0919/21] are likely to have an impact on the services of 2 GP practices operating within the vicinity of the application sites. These GP practices do not have capacity for the additional growth resulting from these developments and cumulative growth in the area.

The proposed developments will likely have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the developments. West Essex CCG would therefore expect these impacts to be fully assessed and mitigated.

Review of Planning Application

West Essex CCG acknowledge that the planning applications do include a Health Impact Assessment (HIA), however this does not appear to recognise that a capital contribution may be required to mitigate the primary healthcare impacts arising from the proposed developments.

Assessment of development impact on existing healthcare provision

The existing GP practices do not have capacity to accommodate the additional growth resulting from the proposed developments. The developments could generate approx. 648 residents and subsequently increase demand upon existing constrained services.

The developments would have an impact on primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed developments must therefore, in order to be considered under presumption 'in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

Healthcare needs arising from the proposed development

The intention of West Essex CCG is to promote Primary Healthcare Hubs with co-ordinated mixed professionals.

The developments would give rise to a need for improvements to capacity, in line with the emerging CCG estates strategy, by way of an extension, refurbishment, reconfiguration or potential relocation for the benefit of the patients at Limes Medical Centre; a proportion of the cost of which would need to be met by the developer.

A developer contribution will be required to mitigate the impact of these proposals. West CCG calculates the level of contribution required, in this instance £131,850 [for EPF/0917,0918,0919/21]. Payment should be made before the development commences.

West Essex CC therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission, in the form of a S106 planning obligation.

Assuming that the above is considered in conjunction with the current application process, West Essex CCG would not wish to raise an objection to the proposed developments.

**Essex County Council – Highways**  
**9 July 2021**

The Highway Authority has assessed the application and submitted information, visited the site, and has concluded that in highway terms it is not contrary to national and local highway and transportation policy and current safety criteria.

The Transport Assessment has analysed the impact of the traffic generation, to the satisfaction of the Highway Authority, and is not considered to have a significant or severe impact at this location, or on the wider highway network. Given the previous sports centre use, and the low parking provision, the proposal will generate fewer trips than the existing use.

The site is considered well located with regards to access to other modes of sustainable travel, and that coupled with the lower parking provision, will help reduce the reliance on the private motor vehicle.

Consequently, the Highway Authority has concluded that the proposal will not be detrimental to highway safety, capacity, or efficiency.

**Essex County Council – Green Infrastructure**  
**7 June 2021**

Do not object the granting of planning permission; however, do advise a number of recommendations are considered to improve the GI network and help achieve net environmental aims.

**Essex County Council – Schools**  
**7 June 2021 / Updated 4 October 2021**

if planning permission for this development is granted it should be subject to a section 106 agreement to mitigate its impact on EY&C, primary and secondary education, secondary transport and libraries.

Early Years and Childcare

Essex County Council has a statutory duty under the Childcare Act 2006 to ensure that there is sufficient and accessible high-quality early years and childcare provision to meet local demand and parental choice. This includes provision of childcare places for children aged between 0-5 years as well as wrap around provision for school aged children (5-11 or up to 19 with additional needs).

The proposed development is located within Epping Hemnall ward (postcode CM16 4LU) and according to latest available childcare sufficiency data, there are only 2 early years and childcare providers (both childminders) within the ward and there were no unfilled places recorded.

The data shows that there is insufficient provision to meet the additional demand created by this development, therefore a developer contribution of £29,528.00 index linked to Q1- 2020, is sought to mitigate its impact on local primary school provision. This equates to £17,268 per place.

Primary Education

This development would sit within the priority admission area of Ivy Chimneys Primary School, which offers up to 45 places per year. As at the last census in January, the school was at or close to capacity in some year groups. Figures received from Essex County Council's Admissions team, on National Offers Day, show a small waiting list for entry into Reception this September. Looking at the wider area (Epping Group 2), figures set out in the Essex School Organisation Service's 10 Year Plan show rising demand with a potential need for 52 additional Reception places by the end of the Plan period. Epping Forest District Council's emerging Local Plan reflects this need (policy P1 para K iii) by allocating land for a new school.

The demand generated by this development would be in addition to this demand, therefore, a developer contribution of £98,428.00 index linked to Q1-2020, is sought to mitigate its impact on local primary school provision. This equates to £17,268 per place.

Secondary Education

The secondary age range priority admissions area school for this development would be Epping St John's Church of England School. Cohort sizes in the area have increased, and continue to rise, and the school has been close to capacity for the last two intakes. Provisional figures for September 2021 suggest there may be just two unfilled places in Year 7 (the first year of secondary education). Forecasts for the wider area which includes Waltham Abbey (Group 2), set out in the 10 Year Plan, suggest a potential need for additional places during the 2024/25 academic year with a more sustained need towards the end of the Plan period. The emerging Local Plan (policy SP5 para F ix) again recognises this need, with a potential new school on the District's border with Harlow, to serve both the proposed Garden Communities and reduce wider development pressure that would otherwise fall on the schools in Group 2.

The demand generated by this development would be in addition to this demand, therefore, a developer contribution of £90,345.00 index linked to Q1-2020, is sought to mitigate its impact on local secondary school provision. This equates to £23,775 per place.

Libraries

ECC may seek contributions to support the expansion of the library service to meet customer needs generated by residential developments of 20+ homes. The provision of a Library Service is a statutory duty under the 1964 Public Libraries and Museums Act and it's increasingly become a shared gateway for other services such as for accessing digital information and communications.

The suggested population increase brought about by the proposed development is expected to create additional usage of Epping library. In accordance with the Essex County Council Developers' Guide to Infrastructure Contribution (Revised 2020), a contribution is therefore considered necessary to improve, enhance and extend the facilities and services provided.

It is calculated that a contribution of £3,112.00 is requested and should be included in any Section 106 Agreement should the Council be minded to grant permission. This equates to £77.80 per unit.

**Epping Forest District Council – Affordable Housing  
14 May 2021**

Level of Affordable Housing:

This development proposes 41 dwellings overall with 17 of the dwellings provided as affordable

housing. This represents 40% of the total quantum of dwellings proposed, in line with the requirements of the Local Plan (SV) which is welcomed.

**Tenure, Mix & Design:**

The District Council requires all new housing developments to be 'tenure blind' and therefore to include a range of house types and sizes as affordable housing which is reflective of the mix of house types provided as market housing. The Council also requires the affordable housing mix to reflect the local affordable housing needs. From the details provided in the planning application this requirement seems to have been met in that the mix of the affordable housing offer appears to be reflective of the market housing.

Further, it should be noted that the following are not required for affordable housing, therefore, should not be included within the mix for the affordable housing:

- Studio flats
- 1 bed 1-person unit
- Properties larger than 3 bedrooms; although these may be provided where necessary in accordance with local affordable housing needs.
- Garages

The applicant should note that the Council's Shared Ownership Policy requires at least 75% of the affordable housing to be provided as affordable rented housing, and no more than 25% to be provided as shared ownership. This will need to be confirmed before we can support the application from an affordable housing point of view.

Further, the Council's Local Plan (Submission Version) 2017 sets out required design and quality requirements for new housing developments including space standards. Policy DM10-Housing Design and Quality requires all new housing development to meet or exceed the Nationally Described Space Standards. However, a number of units in this proposed development fall below these requirements and are therefore neither acceptable as affordable housing provision nor market housing.

All new housing is also required to meet the accessible and adaptable homes standards as defined by the current Building Regulations. Additionally, residential developments must be designed to ensure homes across different tenures are indistinguishable from one another in terms of quality of design, space standards and building materials.

**Delivery of Affordable Housing:**

Epping Forest District Council (EFDC) are a part of a housing partnership with some preferred registered providers as detailed below. However, EFDC are equally open to discussions regarding affordable housing provisions within the District and therefore welcome development proposals directly.

- B3Living
- CHP
- Habinteg
- Hastoe Housing Association
- Legal and General Affordable Housing
- Moat Housing Group
- Network Homes

The applicant may want to contact one or more of the above to discuss the delivery of the affordable housing offer including the sale price. We encourage early engagement with these

partners and any offer and funding should be factored into the applicant's financial viability assessment. I have, therefore, attached their contact details, which can be provided to the applicant.

Although, this proposed development incorporates flats it is acknowledged that a portion of the service charge applicable to the scheme will be shared with the housing association partner who then passes that to their tenants and shared-owners. However, it is useful to ensure that the service charge payable is affordable and continues to be affordable for future tenants and shared owners.

However, the landowner should note that the purchase price, even if agreed through a competitive process amongst the Preferred Registered Provider Partners, would be much lower than the open market value, and reflects the net present value (NPV) of the affordable housing based on the difference between the income the registered provider receives from (subsidised) rents (and any grant) over a period of time and the costs of purchase, management, maintenance, loan interest payments and other costs over the same period of time. It should also be noted that the service charges would not be subsidised in any way.

**Recommendations:**

As currently presented, apart from any other planning reasons that may apply, I can support the application from an affordable housing point of view subject to the applicant amending the application to meet the detailed requirements for affordable housing delivery set out above. This includes ensuring that all of the affordable housing is provided to the minimum space standards required and the applicant confirming that at least 75% of the affordable housing will be provided as affordable rented housing with the remaining affordable housing provided as shared ownership units.

**Epping Town Council  
27 August 2021**

Committee object to this application.

While the Committee acknowledges the amendments made to this proposed development on this part-brownfield site, there are still some issues with the proposal.

While there is a reduction to the height of Block A, the proposed building is still a high building in a low-rise residential area. Committee acknowledge the removal of the maisonette apartment block and replacement with houses and felt that this was an improvement.

The Committee are still concerned with how this development may affect the nearby residential roads and if there are any loss of amenities such as the height of the development affecting neighbouring properties, loss of car parking spaces and the loss of mature trees on the site.

**Epping Town Council  
14 May 2021**

Committee object to this application.

While the Committee acknowledge and welcomes the mixed accommodation development of this part-brownfield site, there are some issues with the proposal. The Committee acknowledge receipt of objections from residents and the Epping Society. The design of the layout needs to be looked at and how the three storey block may affect the nearby residential roads and any loss of amenity.

The development includes the loss of a number of mature trees to facilitate development and replacement trees being proposed are as small as 20cm – 25cm. The Committee also disagree with the proposed removal of the mature evergreen boundary which is used to screen Nicholl Road. The proposed green infrastructure is not sustainable and is a token gesture. The green infrastructure needs to take into account the procurement of greenery, its appropriateness for the site and the future aftercare needed. The Committee note EFDC's Tree Team objection which states that there is inadequate provision for landscape retention.

There is also the issue of insufficient car parking for the number of residential units and no visitor parking being proposed on the site. There are severe parking issues in Epping and the insufficient parking from this scheme will put additional pressures on the surrounding roads.

The Town Council's Planning Committee would like to work with Qualis/EFDC to see how this development could be improved and be more acceptable to the community.

Relevant policies:

CP1 (ii), CP2 (iv), DBE1, DBE2, DBE4, DBE5, DBE6, DBE9, LL7 (ii) & (iii), LL10 (i) & (ii), ST6. (Local Plan 1998 & Alterations 2006)

DM2, DM5, DM9A, DM10 (Emerging Local Plan).

NPPF paras 8, 9, 124, 127, 180.

Epping Town Council confirm they will attend and speak at Plans East to object to this proposal.

**Essex County Council – Ecology**  
**12 May 2021**

No objection subject to securing

- a) A proportionate financial contribution towards Epping Forest SAC Mitigation Strategy and
- b) biodiversity mitigation and enhancement measures

Summary

The site is within the 6.2km Zone of influence (Zoi) for the emerging Epping Forest SAC Mitigation Strategy (within which residents of new housing are likely to regularly visit relevant designated sites for recreation) and the development is relevant to Natural England's advice to the LPA. We therefore advise that the LPA will need to prepare a HRA Appropriate Assessment record for this development and secure a proportionate financial contribution towards visitor management measures as mitigation for recreational disturbance. This contribution needs to be secured by a legal agreement. Subject to this mitigation, the LPA can conclude no adverse effect on the integrity of Epping Forest SAC.

We are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable. The mitigation measures identified in the Environmental Impact Assessment should be secured and implemented in full. This is necessary to conserve and enhance protected and Priority Species. This includes precautionary measures for Hedgehogs (including Hedgehog Holes) and Nesting birds.

The Environmental Impact Assessment - Residential Sites Chapter 6 - Ecology and Biodiversity (Stephenson-halliday, March 2021) recommends a Construction Environmental Management Plan (CEMP) Biodiversity should be produced with input from a professional ecologist. The CEMP Biodiversity should describe ecology mitigation works and should set out standard pollution prevention and dust control measures to be implemented during site clearance and construction works. This should also include appropriate management of trenches, waste and materials storage, and protection of boundary features (including suitable tree and hedgerow protection).

We support the proposed reasonable biodiversity enhancements, which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 170d of the National Planning Policy Framework 2019. This includes five bird nesting boxes, neutral grassland (referred to as 'woodland groundcover mix' in the landscape plan), and a biodiversity roof. The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Strategy and should be secured as a condition of any consent.

The Environmental Impact Assessment has also advised the management and monitoring of each habitat should be secured within a Landscape and Ecological Management Plan. This should out details of how retained and created habitats will be managed. Furthermore the Environmental Impact Assessment recommends an information board should be put up to inform residents of the importance of the retained wildlife areas, the species they may see and how they can help conserve these areas, including discouraging fly-tipping or the introduction of invasive species. This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

Recommended conditions**1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS**

“All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Epping Forest Environmental Impact Assessment - Residential Sites Chapter 6 - Ecology and Biodiversity (Stephenson-halliday, March 2021) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.”

Reason: To conserve and enhance Protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

**2. PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (BIODIVERSITY)**

A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority following the recommendations made within the Epping Forest Environmental Impact Assessment - Residential Sites Chapter 6 - Ecology and Biodiversity (Stephenson-halliday, March 2021).

The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of “biodiversity protection zones”.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority

Reason: To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

**3. PRIOR TO SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**

“A Biodiversity Enhancement Strategy for protected and Priority species shall be submitted to and approved in writing by the local planning authority, following the details contained within the Epping Forest Environmental Impact Assessment - Residential Sites Chapter 6 - Ecology and Biodiversity (Stephenson-halliday, March 2021).

The content of the Biodiversity Enhancement Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed enhancement measures;
- b) detailed designs to achieve stated objectives;
- c) locations of proposed enhancement measures by appropriate maps and plans;
- d) persons responsible for implementing the enhancement measures;
- e) details of initial aftercare and long-term maintenance (where relevant).

The works shall be implemented in accordance with the approved details and shall be retained in



that manner thereafter.”

Reason: To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the NPPF 2019 and s40 of the NERC Act 2006 (Priority habitats & species).

**4. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN**

“A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior occupation of the development.

The content of the LEMP shall include the following:

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organisation responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.”

Reason: To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

**Environment Agency  
12 May 2021**

The Environment Agency is a statutory consultee on all development projects subject to Environmental Impact Assessment. There are however, no environmental constraints within our remit on this site and we therefore have no comments at this time.

**Essex County Council – Development and Flood Risk**  
**7 May 2021**

Having reviewed the Flood Risk Assessment and the associated documents which accompanied the planning application, we do not object to the granting of planning permission based on the following:

**Condition 1**

No works except demolition shall take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme should include but not be limited to:

- Limiting discharge rates to 1.5l/s for all storm events up to and including the 1 in 100 year plus 40% allowance for climate change storm event subject to agreement with the relevant third party. All relevant permissions to discharge from the site into any outfall should be demonstrated.
- Final modelling and calculations for all areas of the drainage system.
- Detailed engineering drawings of each component of the drainage scheme.
- A final drainage plan which details exceedance and conveyance routes, FFL and ground levels, and location and sizing of any drainage features.
- A written report summarising the final strategy and highlighting any minor changes to the approved strategy.

**Reason**

- To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.
- To ensure the effective operation of SuDS features over the lifetime of the development.
- To provide mitigation of any environmental harm which may be caused to the local water environment
- Failure to provide the above required information before commencement of works may result in a system being installed that is not sufficient to deal with surface water occurring during rainfall events and may lead to increased flood risk and pollution hazard from the site.

**Condition 2**

The applicant or any successor in title must maintain yearly logs of maintenance which should be carried out in accordance with any approved Maintenance Plan. These must be available for inspection upon a request by the Local Planning Authority.

**Reason**

To ensure the SuDS are maintained for the lifetime of the development as outlined in any approved Maintenance Plan so that they continue to function as intended to ensure mitigation against flood risk.

**Epping Forest District Council – Contaminated Land**

**4 May 2021**

The results of the intrusive site investigation showed no contamination on site. However, I have a few observations to make.

Imported soils are likely to be required to provide a suitable growing condition for landscaping and garden areas. Any imported material must be tested to ensure that it is suitable for the proposed use.

In the event of reusing any of the site won materials, the applicant is required to provide the Council with appropriate chemical testing.

Additional sampling should be undertaken underneath the footprints of the buildings after the demolition works.

Remediation Method Statement and Verification Reports will be required.

Due to the sensitive nature of the proposed residential use, condition NSCN57 should be attached to any approval granted.

**Epping Forest District Council – Trees and Landscape**

**29 April 2021**

We object to this application on the grounds that it is contrary to:

Policy LL10 – Adequacy for the provision of landscape retention

Policy DM5 Submission version of EFDC Local Plan (Dec 2017) – ‘Development proposals must demonstrate they have been designed to –A i) retain and where possible enhance existing green infrastructure..... Bi) should be accompanied by sufficient evidence to demonstrate that the retention and protection of trees (including veteran trees)... ....’

**Justification**

These comments only relate to the existing trees / hedges on / adjacent to the site and their retention / protection during any development proposals. It is not a full assessment of the layout of the proposed site – for those comments please refer to our Design / Landscape colleagues in the Local Plan Implementation Team.

There are 3 trees on / close to the northern site boundary that are protected by Tree Preservation orders. Taking the numbers from the submitted arb report these are the London Plane (T12) within the garden of 23a Hemnall Street ; the yew (T16) and Holm oak (T17) in the garden of 20 Nicholl Road. It has been demonstrated within the Arb report that these can be protected during development of the site.

Likewise the lime trees (‘B’ category trees) along Hemnall Street are also shown to be retained – T4, T9 T11.

However, the following are shown to be removed to facilitate development – London Plane (T1) ; Black Pine (T7) ; and the mixed evergreen boundary along Nicholl Road (G21).

The London Plane has been categorised (using BS5837:2012 ‘Trees in relation to design, demolition and construction – Recommendations’) as a B1/B2 ie Trees of moderate quality in terms of arboricultural value and making a positive landscape impact. It is currently growing in a compact, slightly raised planter, and the surrounding tarmac has been disturbed – probably due to the trees root growth. But, it is in good health, it is a mature tree, that has a very high public amenity value. There is no arboricultural justification for its removal. We therefore object to this trees removal.

Similarly for the Black Pine, whilst this has been categorised as a C1/ C2 ie a tree of low quality that offers low landscape value ; we disagree with this, and would consider it to be a B category tree. Again, we do not consider that there is a sound arboricultural reason to remove this tree. For both of these trees the redevelopment of this site should be used as an opportunity to greatly enhance their immediate environment, and in doing so, could provided two significantly 'structural' elements of Green Infrastructure to the site.

Similarly the proposal would necessitate the entire removal of the mature, largely evergreen boundary along Nicholl Road (G21).

Whilst the proposal does provide some elements of replacement landscaping – we consider this is insufficient to result in a gain in green infrastructure. We therefore object to the proposal.

**Cadent  
26 April 2021**

Searches based on your enquiry have identified that there is apparatus in the vicinity of your enquiry which may be affected by the activities specified.

The apparatus that has been identified as being in the vicinity of your proposed works is:

- Low or Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result it is highly likely that there are gas services and associated apparatus in the vicinity).

**Essex County Council – Archaeology  
26 April 2021**

Recommendation:

1. No development or preliminary groundworks of any kind shall take place until a programme of archaeological investigation has been secured in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority.
2. No development or preliminary groundworks of any kind shall take place until the completion of the programme of archaeological investigation identified in the WSI defined in 1 above.
3. The applicant will submit to the local planning authority a post excavation assessment (to be submitted within six months of the completion of the fieldwork, unless otherwise agreed in advance with the Planning Authority). This will result in the completion of post excavation analysis, preparation of a full site archive and report ready for deposition at the local museum, and submission of a publication report.

Building Recording:

1. No demolition, conversion or alterations shall commence until a programme of historic building recording has been secured in accordance with a written scheme of investigation (WSI) to be submitted by the applicant and approved in writing by the local planning authority.
2. No demolition, conversion or alterations shall take place until the satisfactory completion of the recording in accordance with the WSI submitted.

3. The applicant will submit to the local planning authority a report detailing the results of the recording programme and confirm the deposition of the archive to an appropriate depository as identified and agreed in the WSI.

Further recommendations: *A professional team of archaeologists should undertake the archaeological work. The archaeological work will consist of a historic building record of the historic buildings to be demolished, identified by the heritage statement, and a single trial trench to the north outside the area of demolition to identify the extent and depth of archaeological deposits followed by open area excavation if archaeological deposits are identified.*

**Epping Forest District Council – Environmental Enforcement  
26 April 2021**

Further to the above application, I have no objection to the proposed application, providing the following conditions are included.

**1 Development Stage**

If you are minded to permit the application the demolition/construction phase is likely to be of significant duration and close enough to neighbouring residential premises to warrant a number of conditions to control any disturbance. I note that there appears to be some basement parking, which may also require piling to occur, which can be significantly disturbing. As such, I would welcome the following conditions:

**1.1 Construction methodology**

It is likely that the construction of the development will involve piling and other intrusive methods, which will need to be controlled to some degree. As such, I would suggest the following condition:

Before any phase of the hear by permitted development commences, the construction methodology shall be agreed in writing with the Local Planning Authority to ensure that the impact on nearby noise sensitive premises is minimised from activities such as (but not exclusively) excavation, piling, vehicle and plant movements, etc. Only construction methods in accordance with the written approval shall be undertaken.

**Reason-** In the interests of the amenities of noise sensitive properties

**1.2 Construction work – Permitted hours**

All construction/demolition works and ancillary operations (which includes deliveries and other commercial vehicles to and from the site) which are audible at the boundary of noise sensitive premises, shall only take place on site between the hours of 0730 to 1830 Monday to Friday & 0800 to 1300 hours on Saturday, and at no time during Sundays and Bank Holidays unless otherwise agreed in writing by the Local Planning Authority.

**Reason-** In the interests of the amenities of noise sensitive properties

**1.3 Bonfires**

No bonfires shall be permitted on site throughout the demolition and construction phase of the development.

**Reason –** In order to protect residential amenity

#### 1.4 Dust control

All reasonable steps to minimise dust emissions from the site shall be employed throughout the demolition and construction phase of the development. The dust suppression methodology shall be agreed in writing with the Local Planning Authority before construction commences.

**Reason** – To protect the amenity of the area from excessive dust emissions

#### 1.5 Wheel washers

Wheel washing or other cleaning facilities for vehicles leaving the site during demolition and construction works shall be installed in accordance with details which shall be submitted and agreed in writing by the Local Planning Authority. The facilities shall be installed prior to commencement of any works on the site and shall be used to clean vehicles leaving the site.

**Reason** – To avoid the deposit of material on the public highway in the interest of highway safety and control of dust.

### 2. Habitation Stage

I note that the noise survey indicates that some mitigation will be required for some of the residential properties to protect the new occupiers from noise to ensure that they benefit from reasonable sleeping/resting conditions. As such, I would recommend the following conditions:

The acoustic performance of the design and construction of the development should be agreed in writing with the Local Authority before construction commences. The design and construction should provide the performance to provide reasonable resting/sleeping conditions with reference to British Standard BS8233: 2014 – Guidance on Sound Insulation and Noise Reduction for buildings – Code of practice (or such other standard which may supersede it from time to time). This may necessitate the developer to employ a suitably qualified acoustics consultant to carry out any necessary survey and provide recommendations.

**Reason:** To protect the occupiers of the properties constructed from excessive noise levels from the local environment.

All rooms within the development hereby approved shall be provided with sufficient double glazing and acoustically treated trickle ventilators, or other means of ventilation that will provide adequate ventilation with the windows closed, to ensure that the occupiers are provided with reasonable resting/sleeping conditions with reference to British Standard BS8233:2014 – Guidance on Sound Insulation and Noise Reduction for buildings – Code of practice (or such other standard which may supersede it from time to time)

**Reason:** To protect occupiers of the premises from excessive noise from the nearby road and other uses.

Details of the double glazing and acoustically treated trickle ventilators, or other means of ventilation, referred to the above condition shall be submitted to and agreed in writing by the Local Planning Authority and installed before any of the proposed residential development is occupied.

**Reason:** To protect occupiers of the premises from excessive noise.

It may be that mechanical plant would be required to fulfil the above condition and/or the developer may wish to install it anyway. You therefore may wish to consider the following condition:

The cumulative rating level of any mechanical plant installed on the site (as defined by BS4142:2014) shall not exceed the prevailing background noise level. If the background noise level is exceeded, the use of the mechanical plant shall cease until it is brought below this level.

The measurement position and assessment shall be made according to BS4142:2014.

**Reason:** To protect occupiers of the premises, and other neighbouring noise sensitive premises, from excessive noise from mechanical plant.

### 3. Lighting.

I note that the applicatoin has an overarching lighting report, which may have an impact on neighbouring residential properties once the development is occupied. I would therefore recommend the following condition is applied:

Details of any external lighting of the site shall be submitted to, and approved in writing by, the Local Planning Authority prior to the commencement of the development. This information shall include a layout plan with beam orientation and a schedule of equipment in the design (luminaire type, mounting height, aiming angles and luminaire profiles), and the impact on neighbouring residential properties. The lighting shall be installed, maintained and operated in accordance with the approved details unless the Local Planning Authority gives its written consent to the variation.

**Reason:** To protect the appearance of the area, the environment and local residents from light pollution.

### **Thames Water 22 April 2021**

#### Waste Comments

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

#### Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company.

### **Sport England 20 May 2021**

Sport England raises no objection to this application as a non-statutory consultee subject to a section 106 agreement or planning condition addressing the phasing and delivery of the replacement leisure centre;

Phasing and Delivery: A section 106 agreement (or a Grampian type planning condition) should require the Epping Sports Centre not to close or any development to commence until the replacement leisure centre on the Bakers Lane car park site is completed and operational in accordance with planning permission EPF/2924/20 (assuming this application is granted planning permission). This is justified to ensure that the replacement leisure centre is completed and

operational before the sports centre closes and any development starts on the Epping Sports Centre site in order to ensure continuity of community sports facility provision. The wording used in model condition 4 from our model conditions schedule [https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing_fields_policy) may be of assistance in this regard. Due to the acceptability of the Epping Sports Centre application being dependent on the replacement leisure centre being delivered, it is requested that the determination of the two applications is co-ordinated to ensure that the Bakers Lane car park application is determined in advance of, or at the same time as, the Epping Sports Centre application in order to provide certainty that the replacement leisure centre could be delivered in planning terms. It should be noted that in the event that the related Bakers Lane car park application was refused, withdrawn or not determined by the time the current application is determined Sport England may need to review its position on this application as there would be uncertainty over whether an acceptable replacement leisure centre scheme could be delivered in practice.



**Epping Society**  
**26 August 2021**

The application has been considered by the committee of this Society and wish to object to this proposal, for the following reasons.

Parking and vehicle access

The suggestion of 40 units and only 20 spaces is woeful and totally unworkable in Epping. Car parking requirements should be a minimum of 1 space per new unit, the suggestion of car parking numbers less than the number of units proposed may be acceptable in shop conversion in the town, but it is totally unrealistic for a major development in Epping.

Access to Block A, will be by walking from the on-site car park. Alternatively, by bicycle or on foot via Nicholl Road or Hemnall Street. Each property in Block B, will only have 1 parking space directly outside their front doors.

National Planning Policy Framework for development proposals states in Section 110 d) "Allow for the efficient delivery of goods, and access by service and emergency vehicles." Approval of this application will increase on-street parking from new residents. It will generate dangerous congestion from service vehicles. It could also potentially endanger occupants of the proposed development if it does not meet these criteria.

All delivery vehicles will find access and safe parking a major problem. The whole of the site's south eastern boundary, in Nicholl Road, is fronted by parking bays. The car park entrance and woodland walk take up the remaining frontage. Therefore, vehicles will not be able to park to access the 4-storey flats in block A. The site's north western boundary, in Hemnall Street, is currently subject to parking restrictions. We understand that these restrictions will continue.

We expect significant numbers of delivery vehicles to visit the development. The on-site parking area must be kept clear for these drivers. It is not stated in any document what is the expectation for the "visitor" parking. No information is given on how these valuable spaces will be 'policed'.

The parking layout for the extended terrace in Nicholl Road is cramped and poorly designed. The proposed spaces share a boundary. Therefore, it will very difficult to open car doors sufficiently. This will be exacerbated by the sub-standard size of the parking spaces proposed. These parking spaces will be permanently occupied as there will only one space per house. Consequently, the whole area in front of the townhouses will be dominated by cars.

There should be undercroft parking as proposed on the St Johns Site. A minimum of one space per household must be allowed. The shortfall of 20 spaces will only be possible if ownership or residence of the flats is conditioned that no car is used or owned. Residents must not have access to the exiting Epping resident's parking permit scheme.

Traffic and Transport Impact report – Section 7.6 Data Sources. The Survey advises that peak traffic times used for Station Road to High Street are 8.45 – 9.45 and 16.30 – 17.30. Peak times are earlier and later than those stated. The station car park is full by 8.00 for commuter journeys and peak return time is from around 18.00 for commuters from London.

All parking arrangements should be conditional and include Electric Vehicle Charging points.

Design concerns

We totally disagree that the buildings are of high quality or respond to and reflect the site. The proposed buildings follow from one or two vernacular fashionable examples, for example the

Marmalade Estate design in Cambridge. The choice of materials and style neither follows an Epping context in a pastiche, nor does it try and bring a contextual but modern solution. It is 'copycat' design and offers nothing to respond to the site. This goes completely against the statements made in the original Design and Access Statement. We would prefer imaginative and novel approach with reference to Epping context. For example, the choice of brick is an architectural fashion choice. The use of a gable front to the houses is again a fashion choice.

The main block is an awful looking, clumsy ugly building. It is out of scale, bulky and incongruous. It is a complete over development of the site. We feel the Essex Design Guide has not been followed to a sufficient degree. The revised Hemnall Street entrance is an improvement.

The scale and height of the 4-storey block in the centre of the site, is clearly out of scale and character with the site context. The small reduction in the south western footprint is an improvement.

We are not trained at reviewing Ground Investigation Reports. All housing and any approved applications should be conditional on resolving any found contamination. We are not trained at reviewing Acoustic Strategies, Environmental Assessments, Ecology etc.

We expect the District Council to appoint third parties to scrutinise all technical submissions.

All housing and any approved applications should be conditional so the use of photovoltaics and Green Energy solutions are not engineered out later. All housing and any approved applications should be conditional on betterment of Building Regulations in relation to energy.

The six revised drawings relating to boundary conditions are still tight to the site. For example, 'Boundary Section E-EE' does not show the building opposite in Nicholl Road. This is unacceptable. They are totally inadequate to assess the impact on neighbouring sites and houses. All drawings should show heights and window positions of the proposed and existing conditions, so this can be fully assessed. Impacts to amenity and overlooking cannot be fully assessed.

### Trees and Landscape

Trees and Landscape Report from EFDC Trees and Landscape objects to the application due to the adequacy of landscape retention. They also question the condition of trees to be removed suggesting they are in better condition than stated in the application. Existing trees and shrubs should be retained and enhanced.

Existing trees and shrubs should be retained and enhanced. All trees must have preservation orders applied before any permission is granted.

We note that the new planting of mature trees is shown in illustrations across the site in the Design and Access Statement. In the 'Boundary Sections' these trees are described as "Proposed Semi-Mature Tree" The scale on 'Boundary Section E-EE' suggests the trees in front of Block B will be around 8 metres (26'03") tall. We welcome using mature trees but suggest that professional advice is taken on the implications of mature planting, in this case, just over 5 metres away from the property line.

We note these trees are described as "6no. Acer campestre 'Elsrijk' 30-35cm CS" on Planting Plan Ground Level. This does not clearly describe the size.

The plan appears to show a high-quality level of planting. We expect this to be carried through to construction and not watered down through later Value Engineering. These drawings should be noted in any approvals.

#### Drainage plan for surface and foul water

The document 'Essex County Council - Suds comment' and a subsequent one dated 7th May 2021 gives conditions "No works except demolition shall take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority" It should be noted that there is a 2.3 metre height difference across the site between Hemnall Street and Nicholl Road. Undoubtedly, this will impact the drainage plan for surface and foul water from the development. We feel that the 150mm pipes will not cope with high rainfall on impervious soil at peak rainfall periods.

The 150mm foul sewage pipes may not accommodate flow during peak usage periods due to the massive increase in demand from the 40 new dwellings as well as the existing properties.

It should be noted that the sewage drain manholes are in private garages in Amesbury Close These are at risk of overflowing in peak usage periods.

We note that the 'Utility Report' was prepared by a graduate trainee in March 2020 and we are concerned to read on page 8 that sewerage is not within the scope of the report. Clearly, more work is needed.

The application must not be approved until this extremely important issue is fully resolved.

#### Safety issues

There is a proposed pedestrian link, closely following the existing route, between Hemnall Street and Nicholl Road. This must be a protected right of way. This paved walk way does not have any proposed 'traffic calming' measures. The gradient is just over 3%. Therefore, as this is a slope, curved and without any long sight-lines we feel pedestrians risk injury from inconsiderate use of bicycles, scooter and skateboards.

No emergency vehicles can access the centre of the site. Given to obvious lack of access and absence of any Fire Service advice - please install fire hydrants at strategic points.

#### General

Roof arrangements are not clear. 'General Arrangement Plan Roof Level' Complete vagueness on whether photovoltaics are proposed or not. This will affect the look of the building, it's green credentials or whether a living roof is used or not. This confusion needs to be revised and resolved. 'Typical Detail – Biodiversity' Blue Roof – there is an ambiguity between this and the architects roof plan. This needs to be Conditioned with Green Roof Information and Biodiversity Submission.

We do not read any specific details of broadband connections. These must be in the form of a hard-wired network, with 3 access points, this must be installed within every individual home.

The following drawings show a high-quality level of site furniture and detailing proposed. We expect this to be carried through to construction and not watered down through later 'Value Engineering'. These drawings should be noted in any approvals. [Manhole covers - McGregor Smith Drawing No 1270-02-424, Kerbs - McGregor Smith Drawing No 1270-02-425, Granite - McGregor Smith Drawing No 1270-02-422, Drainage - McGregor Smith Drawing No 1270-02-426, Paving - McGregor Smith Drawing No 1270-02-420, Paving - McGregor Smith Drawing No 1270-02-421, Timber Cube - McGregor Smith Drawing No 1270-02-431, Bench - McGregor Smith Drawing No 1270-02-430, Bins - McGregor Smith Drawing No 1270-02-433, Bike Hoops - McGregor Smith Drawing No 1270-02-432, Bollard - McGregor Smith Drawing No 1270-02-434]

Block A is not a high-quality design, there is a number of design decisions that appear to be wrong, specifically the room proportions and use of long thin bedrooms. [We refer to the following files 'Block A - Proposed first floor plan' 3211, 'Block A - Proposed ground floor plan' 3210, 'Block A - Proposed second floor plan' 3212, 'Block A - Proposed third floor plan' 3213, 'Block A - Proposed elevation Sheet 1 of 2' 3220 and the following document.]

#### Impact on Nicholl Road

The dominant gable end design of Block B is not a feature of the Epping vernacular. At present, the residents in Nicholl Road look out on a plain featureless wall. This wall is lower and significantly screened by shrubs and small trees.

Block B (HT1) has dominating elevations. These rise to a height of 9.2 metres. This is significantly taller than the existing sports hall elevation. The existing sports hall wall is 3.0m from the site edge. This is the distance at the point where 'Boundary Section E-EE' shows the proposed wall of Block B (HT1) We note at this point the sheer wall of Block B will be only 6.8 metres from the site's edge. That is to say only just under 4 metres further back than the existing. Therefore, its overbearing impact is still significant.

There are no facing views, 'existing elevations', of the Nicholl Road facing sports hall block. There are 'proposes elevations' across the whole site. Again, this omission, this makes accurate comparison impossible.

#### Impact on Hemnall Street

The original Design and Access Statement on Page 62 - "Proposed Massing" the heights comparison suggests, in the image, that the proposed block is not much higher than the existing building. However, the proposed Block A is much closer to the front of the site than the existing. This isn't shown by a simple transverse height comparison. Again, this is a misleading view.

The original Design and Access Statement on Page 69 makes a ridiculous statement under the heading "Appearance - Hemnall Street Frontage" We do not see any justification for the statement that the "Proposed built form stitches together the stepped street frontage". This statement proposes a solution to a problematic area that is, in fact, a positive feature of the street! We note that these documents have been removed from the application but the proposed building line is unchanged.

The proposed "stitching together of the building line" is unnecessary; the area certainly doesn't need a stark 4-storey block. This would be less dominating being lowered to 3-storey. It would be better to remove the forward part of the block completely.

There are no direct height comparisons from the Hemnall facing 4-storey (Block A) to evaluate. There are no views that include the properties opposite.

The original 'Design and Access Statement Part 4' on page 113 has a drawing of the Hemnall Street street-scene this is rather generic. It does not show the properties opposite. The only visual reference to existing buildings appears to be a couple of wheelie bins outside number 60 Hemnall Street. Evidently, informed by Google Street View! The drawing does not show any part of the buildings opposite Block A. Neither does it show any buildings opposite along the whole of the site's frontage.

Again, with reference to this elevation, the 'Boundary Section A-AA' does not show the properties opposite in Hemnall Street. Rather bizarrely, it includes the front garden wall of number 58 Hemnall Street!

The original 'Design and Access Statement Part 5' on page 135 "Residential Quality – Apartment Design" Proposes a small "Dedicated space for study / working from home" this is a positive home working feature. This area does not feature now. We would expect this space to be included across all 3 of the Qualis applications. This must be a condition of approval.

The original 'Design and Access Statement Part 5' on page 137 "Conservation and Heritage" it states "BLEECO historic lampposts [sic], two of which are on the Sports Centre site. These could be refurbished and reinstalled on the public pedestrian link". These lamp posts are shown on the illustrations on pages 49, 56 and 137. They are also placed at either end of the walkway with "HLC" – "Existing Heritage Light Columns" designating their position on the General Arrangement Plan.

The use of the phrase "could be" suggests these and other features highlighted on the Design and Access Statement, as well as across the application, may be 'engineered out' after approval. Any highlighted features must be conditioned with approval. One wonders how many other "could be" qualifiers have been used on the Qualis applications!

#### Is the proposed design and scale acceptable?

We note that the 'Environmental Statement - Non-Technical Summary' covers the 3 Qualis sites.

The Sports Centre (EPP.R5) is discussed on page 10 "*The effects of the Sports Centre proposals on the Townscape during construction have been assessed as minor. This is because the existing Townscape Character of this area is not especially high, and construction work will be partially screened by existing trees. Effects on Townscape after construction will be moderately beneficial (positive). This is because the proposed townhouses fronting Nicholl Road will replace blank frontage with houses looking onto the street. This will add to the already varied character of houses along the street and will provide additional visual interest to the street scene. The proposed apartments fronting Hemnall Street will slightly improve the continuity of building frontages and sense of enclosure of the street.*

*Keeping the existing line of mature trees which partially screens the proposals will soften the perception of development, and the setback will reduce the potential for the building to be perceived as out of scale compared to lower-scaled houses, were it to be brought further forward. The visual effects of the proposals on the selected views will be beneficial (positive), except for one view from Hemnall Street, which is predicted to be moderately adverse (negative). While this view is not especially attractive, it will be sensitive to existing residents and will introduce a slightly higher building than most of the neighbouring buildings. However, the new building will be partially screened by existing mature trees and will also be further back from Hemnall Street, thereby reducing this effect."*

We do not agree with these conclusions. The exiting "blank frontage" in Nicholl Street is significantly lower and already effectively screened. The proposed gable end Block B is set back by a further 3 metres. However, it is still dominating and combined with the cramped parking it is certainly not an improvement!

The Environmental Statement goes on to say that the view in Hemnall Street is "predicted to be moderately adverse" this is obviously referring to the 4-storey, Block A, that "stitches together the stepped street frontage".

At best, the forward part of the block should be removed. We do not agree that moving to building line forward to match the adjacent is in any way positive. Most certainly the height of Block A must be reduced. Expecting the existing trees to reduce the impact is a somewhat tenuous deflection of the issue. Block A is just too big!

### Wind vortex concerns

All of the current Qualis proposals involve blocks of four or more storeys. Tall structures generate a 'venturi effect' as wind passes between adjacent blocks the velocity increases. Most of Epping is significantly more than 100 metres above sea level and the area is noticeably windier than even relatively nearby settlements. We do not find any reference to potential wind vortex impacts. This must be investigated as the proposed blocks are positioned close together on their respective sites.

### Is this type of development needed?

The 'Residential Mix Report' is another that reviews all of the Qualis sites. The executive summary refers to the "Justification study" We disagree with its conclusions.

Covid-19 has impacted on its assumptions and assertions, therefore the report has limited authority. The report does not demonstrate both a market demand or a demographic need for the proposal. It does not justify the undeniable impact of this proposal on its neighbours and the town due to the bland, over scaled and out of character design. The ludicrously inadequate parking provision is unacceptable.

All housing and any approved applications should be conditional on resolving, incoming services and drainage without effecting local areas. The reports pertaining to these issues do not have enough detail for the community to have confidence in their conclusions.

### Other

It must be conditioned that this site not be built on, or lost as a community and leisure site in favour of housing, until the new Swimming Pool and Leisure Centre is built and operational. To be clear, the site can only be closed and demolished, once the new pool and sports centre is fully open to the public. This must be a condition of approval.

## **Epping Society**

**13 May 2021**

Wish to object to all four applications (EPF/0917/21, EPF/0918/21, EPF/0919/21 and EPF/1042/21), for the following reasons:

- The public was presented with far too much data in 4 applications with far too little time for review – there are 425 documents, in approx. 3 weeks. This is not fair or realistic.
- There has been a problem with deadlines. These 4 applications were published in the 'Weekly List' circulated by EFDC to the Epping Society (and others) via email at 4:45pm Friday, 23<sup>rd</sup> April. The 21-day point, the usual period, from that would be Friday 14<sup>th</sup> May. The 'Weekly List' says on the front page "Registered in the week up to: Friday 23 April; any representations on applications should be made in writing by Monday 17 May 2021" However the EFDC Planning Portal has "comment by" dates listed as 12-05-2021 for Hemnall (Sports Centre), the others are listed as 13-05-2021. So all less than 21 days, and having 4 different dates is highly challenging & confusing for all concerned.
- An extension was requested by emails & letters on 30 April; the request was acknowledged by the CEO of EFDC with a decision promised during the week. One might have assumed that Friday 7 May would cover that. On 10<sup>th</sup>, a delay was given, until the end of the month.
- This period included the conducting of Local Elections, in which many were involved.
- Is there access for those without a computer? Paper copies?

- A lack of effective publicity, whatever efforts are claimed, people did not know. The Epping Society has made efforts to increase public awareness.
- The lists of documents were confusing – instances of having several with the same name – eg St John’s Road -volume 3 Ch 11; some of these are identical in content, and some refer only to the other sites (eg Technical appendices 11.1 and 2) Much better to give the actual title on the EFDC table.
- Some documents are highly technical, with no explanation nor glossary, this made them impenetrable; but we believe that this process should be transparent & accessible to all.
- Some maps have keys which are so small as to be unusable
- Some diagrams/tables when zoomed in, pixilate; maybe once pdfs?
- Use of colours sometimes unhelpful eg map of SJR site has 4 very similar grey shades.
- Documents are not in order eg Appendix documents should be next to substantive item; also eg SJR Design & Access statements are not in order – starting “1, 10, 11” later “17, 2”
- Some documents are repeated eg Historical maps x3
- Some documents are very out of date eg an ecological report describes the St John’s secondary school as “approved for redevelopment” but is somehow dates March 2021 (reviewed but not edited?), eg an HRA which appears to be based on 34 dwellings (an earlier version); against 184. Suggest a lack of scrutiny and/or haste.
- Several documents refer to now-unnecessary EU Regulations.
- Some documents simply indicate a lack of care eg an Archaeology report refers to the “proposed nuclear power station” at SJR. This was spotted on 27<sup>th</sup>, reported to EFDC & authors immediately, but not corrected/withdrawn until 7 May.
- Similarly, spelling mistakes speak of haste eg environment several times wrong, eg the last few documents for SJR are labelled on the very title-listing as “layoluts” (layouts?). To make the error, o, but to then copy/paste it, and then to still not to proofread it??
- Lack of clarity sometimes about whether documents refer to just this site, or all 3, then some date is described as “cumulative”. To give a clearer picture, given that these 3 are the last part of 6 developments, all assessments should have been cumulative across all sites. This is what will be experience on the ground, particularly as 3 will be accessed via the one road, St John’s.
- There are many inconsistencies between various documents – so it would be unclear exactly what any Planning decisions would mean.
- Many documents contain conditionals eg “should”, “if viable” – these plans need certainty.
- The Epping Society has been told already by 2 statutory consulting bodies that they are struggling to review these applications by their (later) deadlines, for the reasons above. If we and they are finding this challenging, no wonder nearly all members of the community we have spoken to, say they find it too daunting.
- Very few documents consider the post-Covid world (exception being the Residential Mix report) and working from home – we would argue that potential changes to housing need should be at least considered.
- The Epping Society would like to learn the number/costs of obtaining these report, mostly from outside contracted agencies; we are considering a FoI request. The Archaeology people certainly should not get their full fee!
- Some applications are clearly from Qualis, some have an EFDC origin – if there is confusion about the inter-relation here, will there be confusion about the responsibility?

- Proceeding with planning in this much detail, before the Local Plan is found sound and approved, seems ill-advised; the LP may still be subject to further modifications. In Maidenhead, Inspector Philips is now into a third round of Public Hearings; things change.
- Epping society must ask that Any Planning Approvals must be interdependent on the other sites being approved, be **CONDITIONAL**, that the sports centre and pool remain in the plans, and are completed and open before the existing Sports facility is demolished. Not sure this can be done as a Planning Condition, but certainly at Council level it can.

Our principle thought is that these applications are so hastily and poorly constructed that we feel the Planning Officers should return them to Qualis for a re-presentation, with additional consultation time.

**Epping Society**  
**13 May 2021**

Sports Centre

“key trees to the boundaries of the site will be retained” is too loose – please clarify. At least one artist’s pretty impression suggests the trees on Hemnall Street will be replaced by “lollipop” new planting and if so why?

What is an “FFL”?

“2.19 This development will be served by a total of 20 car parking spaces, comprising 11 allocated spaces, 6 visitor spaces and 3 ‘Blue Badge’ spaces. A total of 62 cycle parking spaces will be provided (56 long-stay and 6 short-stay).” Is it suggested the cycle store will not be owned by residents but first-come-first-served including non-residents? I don’t like that much. Ditto other sites.

3.31 “As explained in Section 6, the three applications are submitted on their own merits and do not reply on any of the other two sites to establish their acceptability other than the policy requirement for an equivalent or better replacement sport centre to be provided” *my emphasis*. We need a better sports centre as more people will no longer have access to those in the City etc. where they used to work five days a week. Watering down must be prevented in the planning consent granted.

The development proposals for the sports centre site seem to pay no heed to the Essex Design Guide or to local architecture. I cannot see what the walls and fenestration will be like without more work than I have time for now but they do not look encouraging.

5.19 Sports Centre (EPP.R5) – principle of proposed uses

“The proposed development is for the redevelopment of the existing sports centre for residential use. The site falls just outside the defined Epping town centre boundary and is brownfield land in a sustainable location. It should be noted that a planning application for a replacement leisure centre that includes a swimming pool and provision of all existing sports facilities on the current sports centre has been submitted on the Bakers Lane car park site (EPP.R7) in Epping town centre.” *My emphasis added*.

The content of the proposed sports centre is not clear from any documents I have seen. Can officers ensure the statement by Qualis is an unavoidable condition of any planning consent.

5.21 to 5.2 seems to be an attempt by Qualis to pass the buck to EFDC which we must prevent through planning conditions – ie, no development at the old site until the new one is operational.



5.25 says “The current sports centre provides a sports hall, squash court, studio and gym. The proposed leisure centre on the Bakers Lane site will provide improved versions of these facilities together with a full-size swimming pool, learner pool and enhanced ancillary facilities including a café.”