

**Epping Forest District Council – Environmental Protection & Drainage
10 September 2021**

The Environmental Protection & Drainage Team have lifted previous objection on the basis of amended design information provided and the proposed planning conditions.

**Epping Forest District Council Building Control
8 August 2021**

It is advised that early consultation is carried out with Essex Fire and Rescue Service with regards to B5 of the Building Regulations (Access and facilities for the fire service), to ensure compliant access can be achieved under the planning approved scheme.

A full Building Regulations application will be required for these works and at that stage will be subject to assessment for compliance with the Building Regulations.

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

Existing Healthcare position proximate to the Planning Application site

The proposed developments [EPF/0917,0918,0919/21] 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.

Epping Forest District Council – Air Quality
29 June 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.

Epping Forest District Council - Affordable Housing
14 May 2021

Whilst the application is supported, the following points are made:

Level of Affordable Housing:

It is noted that the Planning statements and other relevant documents provided with the application specified that 74 units will be provided as the affordable housing offer, complying with the requirements of the Local Plan (SV).

Tenure, Mix & Design:

The importance of understanding the housing mix is emphasised and it should be reflective of the broader development thus ensuring that the development creates a mixed and balanced community.

It is also emphasised that the applicant works closely with the Housing Department to identify the housing need of the relevant applicants and the allocation process for the affordable housing provision.

It is noted that the housing mix for the affordable housing provision should comprise the following:

- 1 bed 2 person apartments
- 2 bed 4 person apartments
- 3 bed 5 person for the Maisonettes
- 3 bed 6 person for the Maisonettes

There is a request that the unit sizes are reviewed to ensure that all the units comply with the relevant space standards as set out in the Council's Local Plan (Submission Version) 2017, specifically as the size (GIA) of one of the three-bedroom units is smaller at 91.50sqm than the others in the scheme which were 94.62sqm.

There is also a request that the service charge applicable to the scheme is affordable and continues to be affordable for future tenants.

It is noted that all new housing is required to meet the accessible and adaptable homes standards as defined by the current Building Regulations and mixed tenure residential developments must be designed to be 'tenure blind' to ensure homes across tenures are indistinguishable from one another in terms of quality of design, space standards and building materials.

It is also noted that the applicant has explored and potentially agreed the S106 obligations with a suggested 15 years minimum for the rental covenant, and it is suggested that there is some flexibility to extend that.

**Epping Town Council
17 September 2021**

Committee object to this application. While the Committee acknowledge and welcomes the development of this part-brownfield site, there are considerable issues with this proposal. While Committee recognise and welcome the opening up of the blocks, with gaps in between, they still consider the four and five storey blocks to result in a very dense development. The size and design of the blocks still do not respect the character of the surrounding area, because of their bulk and scale and would have a detrimental effect on the street scene and character of the historic town of Epping.

The design of the development does not seem to respect the character of the area and Committee would request that very careful consideration is given to the materials and style of the buildings, to make them more reflective of the historic town, conservation area and predominance of carefully styled buildings in the locale. This is particularly important as Committee view the proposal as massing and too high in density and would suggest this may be improved by very careful design. Committee are still concerned about the mix of accommodation types and would welcome more properties that cater for families, such as house, not just flatted accommodation. Most of the proposed apartments will be one-bedroom (114) and two-bedroom (63) so not very suitable for families. Committee welcome the fact that this scheme will now offer private for sale properties, as well as rental and social housing, but would request that changes such as this, that are made to the detail of the scheme, are more prominently communicated, as this is an important element of the scheme's impact on the town as a whole, relating to the vitality of the High Street and town as a whole.

Committee welcome the proposed green infrastructure and public amenity space and would request that this is maximised. The green infrastructure needs to take into account the procurement of greenery, its appropriateness for the site and the future aftercare.

While Committee recognise the parking constraint as a result of the Local Plan/Special Area of Conservation/Air Quality, they must highlight the insufficient car parking of the number of residential units being proposed for 184 apartments. There are severe parking issues in Epping and the insufficient parking from this scheme will put additional pressures on the surrounding roads. Public transport in Epping is not sufficient (the tube is located down at the bottom of a steep hill and buses do not serve many of the adjoining areas) and improved public transport must be negotiated as part of this development, in order to reduce pressure on the town's parking. While the proposal focuses on the those Qualis believe will not add pressure to the roads, many one bedroom town dwellers still own cars.

**Epping Town Council
14 May 2021**

Whilst the Committee acknowledge and welcome the development of this part-brownfield site, they consider there are considerable issues with this proposal and therefore object to the application.

Design

There is a request to look at the design of the layout and how three storey blocks may affect loss of amenity, overlooking and a Conservation Area. It is noted that the size and design of the blocks do not respect the character of the surrounding area and would have a detrimental effect on the street scene and character of the historic town of Epping.

Housing Mix

It is suggested there be more of a mix of accommodation types such as houses, rather than flats only and the proposal is described as an overdevelopment of the site in terms of its accommodation density. As the majority of the proposed apartments will be one-bedroom (114) and two-bedroom apartments (63) they are not believed to be suitable for families. It is noted that 40% is being proposed as affordable housing, and it will be mainly aimed at the private rental market, not for sale. It is also noted that the large number of residential units does not include any allowance for essential services needed in the town such as access to doctors, school places etc.

The Committee noted from resident feedback that the two existing locally listed semi-detached caretaker cottages are privately owned and not part of this development, they request this be clarified and if this is the case, the description of the proposed development should be amended to reflect this.

Green Infrastructure

There are concerns as the development includes the loss of a number of mature trees to facilitate the development, and the proposed replacement trees are as small as 20cm – 25cm. It is believed that the removal and loss of greenery will affect the local wildlife. The proposed green infrastructure is viewed as unsustainable; it is believed it should take into account the procurement of greenery, its appropriateness for the site and the future aftercare needed.

Parking

There are concerns around the insufficient car parking proposed for the number of residential units being proposed, with no allowance for visitor parking. The current parking issues in Epping are described as “severe” and the insufficient parking from this scheme is believed will place additional pressure on the surrounding roads.

Epping Forest District Council - Conservation
12 May 2021/ 21 September 2021

The scheme cannot be supported as it stands due to the harm it would cause to the locally listed buildings, the setting of the listed buildings and the Epping Conservation Area. The application is therefore recommended to be refused as supported by the full comments provided and following policies: HC6, HC7, HC12 and HC13A of our Local Plan and Alterations (1998 and 2006), policy DM7 of our Submission Version Local Plan (2017), and paragraphs 189, 190, 192, 194, 196, 200 and 201 of the NPPF (2019).

The submission of a comprehensive Heritage Statement has been requested for all the heritage assets affected by the scheme and more particularly the three locally listed buildings, the Centrepoint, the Cottages and the Cookery School, as required by para.195 of the NPPF 2021. A Heritage Statement serves a dual purpose, to inform the scheme through the understanding of the historic, architectural significance of the heritage assets affected, and help the LPA's officers in their assessment of the impact of the scheme on that significance. To date, no Heritage Statement that addresses this has been submitted and our understanding is that the scheme has been developed without this essential information.

The scheme cannot be supported as it stands due to the harm it would cause to the locally listed buildings, the setting of the listed buildings and the character and appearance of the Epping Conservation Area.

Environment Agency
9 June 2021

The previous land use at this site suggests the potential presence of contamination. As the site is situated in a vulnerable groundwater area within a secondary aquifer these proposals need to be dealt with in a way which protects the underlying groundwater. Please therefore take note of the following advice.

Where land contamination may be an issue for a prospective development we encourage developers to employ specialist consultants/contractors working under the National Quality Mark Scheme.

Essex County Council – Green Infrastructure
2 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
2 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 early years & childcare, primary and secondary education and library provision.

Early Years and Childcare

The proposed development is located within the Theydon Bois ward and according to latest available childcare information, there are no vacancies that would enable parents to be able to access their

Free Entitlement for early years places. Therefore, a developer contribution of £53,617 index linked to Q1-2020, is sought to mitigate its impact on EY&C provision. This equates to £17,268 per place.

Primary Education

This development would sit within the priority admission area of Epping Primary School, which offers up to 60 places per year. As at the last census in January, the school was at or close to capacity in the majority of 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. In accordance with the Essex County Council Developers' Guide to Infrastructure Contributions (Revised 2020), a developer contribution of £178,724 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. In accordance with the Essex County Council Developers' Guide to Infrastructure Contributions (Revised 2020), a developer contribution of £164,048 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 £14,159.60 index linked to Q1-2020 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.

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 (Zol) 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 the native hedgerow that runs along the northern boundary of the St John's Road Site will be retained. This hedgerow is identified as being a Priority habitat, therefore the LPA has a biodiversity duty to conserve this habitat.

The Environmental Impact Assessment advises the proposals will result in the loss of bat roosts (day roosts for very low numbers of Common Pipistrelle and Single Brown Long Eared bat from Buildings 3, 4 and 5). Therefore, a European Protected Species Mitigation licence from Natural England will be required for these European Protected Species to lawfully complete the works. It is recommended that a copy of the bat mitigation licence is secured under a condition of any consent to be provided to the LPA prior to commencement

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 Common toad, Hedgehogs (including hedgehog holes), and Nesting birds.

The Environmental Impact Assessment 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 ten bird nesting boxes, neutral grassland (referred to as both 'woodland grass mix' and 'wildflower landscape turf' in the landscape plan), a native hedgerow 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 prescriptions of each habitat should be secured within a Landscape and Ecological Management

Plan. This should out details of how retained and created habitats (including the retained native hedgerows) will be managed. 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 based on BS42020:2013.

**Essex County Council – Development and Flood Risk
11 May 2021/ 16 July 2021 / 4 October 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.

Epping Forest District Council – Trees & Landscape
6 May 2021

We have **NO OBJECTION** to this application subject to the addition of the following conditions:

SCN31 – retention of trees and shrubs

SCN39 – Tree Protection

Soft landscaping

Soft landscaping shall be implemented as shown on Macgregor Smith drawing number 1270-01-200 rev P1 and 1270-01-201 rev P1 both dated 8th March 2021 and the accompanying planting schedule. The works shall be carried out prior to the occupation of the building or completion of the development, whichever is the sooner. If any plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

Reason: To secure the provision and retention of the landscaping in the interests of the visual amenity of the area in accordance with policies CP2 & LL11 of the adopted Local Plan 1998 & 2006, policies DM3 and DM5 of the Local Plan Submission Version 2017, the NPPF 2019, and Section 197 of the Town and Country Planning Act 1990 (as amended).

Justification

Whilst the applicant has provided a tree report and / or an Arb Method Statement, the above condition does need to be included in full, and updated reports will need to be submitted for approval prior to commencement. This is because at this stage, all the applicant is required to do is to show that the development is feasible without a detrimental impact on trees. Following permission being granted the information that will be required to be submitted will include;

- Tree protection plan to include the alignment of utility apparatus (including drainage and ground source heat pumps), and the site set up ie locations for site huts, temporary toilets, contractor parking, storage of materials, cement mixing etc. This information is not yet known.
- A detailed Arboricultural Method statement including a list of contact details for all relevant parties. This information is not yet known.
- Schedule of works to retained trees eg works required to facilitate demolition / construction activities. This information is not yet known.
- Arboricultural site monitoring schedule, A detailed schedule of visits is required.

Please therefore, do not condition the Tree Report / Arb Method Statement that has been submitted with the application, but include the condition un-amended.

Epping Forest District Council – Contaminated Land

3 May 2021

The results of the intrusive site investigation showed high exceedance levels of lead, PAH's, TPH's and sulphide. The soil sampling was only tested at shallow levels, no chemical analysis was conducted at deeper levels. Please provide additional chemical analysis in areas of identified contamination.

The gas monitoring visits were conducted only during high atmospheric pressure. There are no records of atmospheric pressure during December 2020 visits. At least two visits should be scheduled during falling atmospheric pressure. Please may you provide this.

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

The groundwater monitoring only provides the groundwater levels, no chemical analysis was conducted. The applicant is required to contact the Environment Agency in respect to controlled waters.

The design of water supply pumps should also be taken into consideration when installed in the remaining Made Ground. The applicant is required to contact the Utility provider directly.

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.

**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

It is recommended that a programme of building recording be undertaken on the site, so that the historic structures be 'preserved by record' through archaeological survey.

Recommendation:

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 proposed for demolition or conversion.*

Epping Forest District Council – Environmental Enforcement
26 April 2021

I have no objection to the proposed application in principle. However, I have some concern regarding the predicted noise levels at the façade of the residential properties which will be replacing the current Council Depot (facing onto the High Street) which are above the recommended levels set in BS8233.

BS8233 states that for the design criteria of external noise:

“For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq,T, with an upper guideline value of 55 dB LAeq,T which would be acceptable in noisier environments. However, it is also recognized that these guideline values are not achievable in all circumstances where development might be desirable. In higher noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met, might be warranted. In such a situation, development should be designed to achieve the lowest practicable levels in these external amenity spaces, but should not be prohibited’

I would prefer to see these amenity areas reduced to a more appropriate level – either by redesigning Block G (or even removing the balcony areas in this block) to mitigate the disturbance to the proposed residents.

Similarly, some additional design/removal of balconies may have to be considered on the facades facing St John’s Road, however I appreciate that these are less of an issue than those facades facing the High Street. However, I do accept that such a decision is one to be made on planning terms, rather than purely acoustic terms.

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. As such, I would welcome the following conditions:

1.1 Construction methodology

It is possible 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 application 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.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

<https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

Water Comments

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

Ancient Monuments Society
21 May 2021

The Ancient Monuments Society objects to the application in its current form, with the following points noted:

The former education buildings and semi-detached cottages are locally listed heritage assets and are partly within the Epping Conservation Area. The Gothic styled Centerpoint Building is an important local landmark that makes a positive and valuable contribution to the historic character of the town centre. We note the CA Appraisal recognises the need to bring these buildings back into active use.

Epping Forest Local Plan Policy HC6 - Character, Appearance and Setting of Conservation Areas: "Within or adjacent to a conservation area, the Council will not grant planning permission for any development, or give listed building consent or consent for works to trees, which could be detrimental to the character, appearance or setting of the conservation area."

Paragraph 197 of the NPPF states: "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

We welcome the retention of Block I (former cookery school) as a community building, as well as the works to the cottage and reinstatement of the two original dwellings. However, we object to the installation of aluminium window and door frames to both these buildings and to the large panels of glazing proposed. This would affect both their visual and historic interest and we recommend the

plans are revised to include traditional timber fittings with a glazing pattern that would be appropriate to the conservation and characteristics of these Victorian and early C20 buildings.

Regarding the Centerpoint Building, the scheme proposes its conversion to residential flats and the introduction of a third level, including the rebuilding of the rear infill area between the two wings to create a third central gable. This results in apartments to the upper levels that require the installation of rooflights to provide the light needed to make the upper levels habitable spaces. The proposed plans show the significant and detrimental impact to the appearance and historic character of the building, and to the wider streetscape, by the sheer number of rooflights to the main and side elevations. This likely represents an overdevelopment of the building and should be reviewed. We also object to the installation of aluminium framed windows and doors within this historic Victorian building.

We note the Conservation Officer's concerns about the "presence of hammer beams supported by stone corbels and quatrefoils embedded into the laths and plaster vaulted ceilings" currently hidden by the existing suspended ceilings, which have not been considered in the plans for the building. Given the Gothic Revival style of the building's exterior, the AMS agrees that a hammer beam ceiling would make unequivocally make a historic and architectural contribution to the significance of this locally listed building and its conservation must be taken into consideration. We therefore recommend a historic building survey is undertaken to fully understand the significance of the building, the hammer beam roof, and how the proposed changes, such as the additional floors and partitions, will affect the historic building fabric and its significance.

In general, the scale of the proposed new buildings on the site are of concern. While they are mostly just outside the Conservation Area boundary, five storey buildings are not characteristic of the wider Conservation Area and they have a direct impact on the setting and significance of the adjoining buildings within the Conservation Area.

The role of the conservation area is to conserve the historic, architectural and social significance of the buildings and spaces within a local area, and unsympathetic alterations to historic buildings erodes this significance. It would also be contrary to the NPPF and Planning (Listed Buildings and Conservation Areas) Act 1990's requirement to have special regard to the desirability of preserving heritage assets, their setting, and any features of special architectural or historic interest which they possess.

It is therefore recommended that the application is withdrawn in order to address the heritage concerns outlined above, as well as the requirements of the NPPF and Local Plan.

Epping Society
1 September 2021

The Planning Committee of the Epping Society have considered this re-application. We wish to continue to object for the following reasons:

- Documentation and process: poorly drafted and inaccessible
- No credence appears to have been given to most of the concerns raised
- Our major concern about housing mixture remains
- Concerns with massing
- Considerable anxiety about overshadowing/ sunlight/ privacy
- Question of wind vortices still unaddressed
- Green/ecological matter could be further developed
- Community dissatisfaction about parking provision
- Schools, transport and GPs
- Overheating
- No consideration of how the plan would work post-Covid
- And a new question arisen about the affordable housing %

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, 23rd April. The 21-day point, the usual period, from that would be Friday 14th 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 10th, 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 27th, 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

General comments in relation to EPF/0917/21:

- Positive reaction to the site moving forward after a decade or so of dereliction.
- The site, as brownfield, is supported strongly.
- Concerns around whether attracting younger, economically active people, generally without children, is consistent with the existing population.

Grounds for Objection:

Sewers

A number of addresses in the vicinity provided which have/are experiencing sewerage issues causing doubt as to whether the current system can be used.

Drains

Whilst there is praise for tanks & green/blue roofs there are questions around how this fits with EFDC Green Criteria of June 2020, and Sustainability Guidance of Oct 2020.

Water supply

It is noted that the application makes no reference to existing problems with water pressure experiences by residents in St John's Road and examples provided.

Hazard

Question around large tanks of volatile liquids (possibly methane) being kept in the Council depot adjacent and whether this has been checked.

Weather

It is noted that there seems to have been no assessment of the likely wind tunnel effects generated by tall blocks, quite near the summit of the local topography, of which the results can create hostile microclimates.

Sunlight/Overlooking

A number of addresses provided which will be directly impacted by the development.

Trees

There are inconsistencies noted in the application "TPOs are now known" however a later document (the Health Impact Assessment) says there are no TPOs.

Also a suggestion that new trees should be mature where possible, and should all be TPO'ed on installation.

Recreational Impact

It is noted that the application states that recreational impact on Epping Forest "will be not significant"; however the data has been taken as a spatial and temporal average, whereas the impact will be heavily localised in time & space.

Question on whether the tenure of new properties will control pet ownership (specifically dogs) as dog walking is believed to be a specific recreational pressure on the forest.

Air Quality

Concerns around reference to a Clean Air Zone in the application, as the public were last advised that a CAZ would be an “absolute last resort”.

There is intention to increase EV in the application, however it is noted that Qualis have recently purchased a fleet of new diesel vans, casting doubt on their Green credentials and questioning their sense of equality.

Energy

It is suggested that the integration of “green” measures (such as air source heat pumps) should be conditional to any approval, and that more detail is provided in relation to “natural ventilation with heat recovery”. Request that a ‘window’ is left open for emerging technologies e.g. hydrogen fuel.

Communications (Internet, TV and radio signal strengths)

Suggestion that networks (e.g. broadband) are hard-wired into developments from the ground up (of increasing importance for residents working from home and may impact on the desirability of properties).

Question as to whether a risk assessment has been carried out for the potential effects a development (of specific height) can have on communications infrastructure/networks for adjacent properties.

Traffic

It is noted that the general consensus among many assessments is that the main roads and junctions in the area are at or well above capacity and therefore any additional traffic will worsen that. Traffic report data in the application show red (e.g. St John’s Rd) by 2025 an RFC of 1.26, with max wait of 7 minutes and blames this on the roundabout not working properly, however no mitigation is suggested. It is also noted that many professionals criticise the use of RFC.

There are questions around construction traffic only having a “minor” impact on St John’s Road (Ch 7) as 3 out of the 5 Qualis sites will have to use St John’s Rd as a principal access to High Road. There are also questions around the same document predicting Stonards Hill as expecting a “substantial” increase.

An inconsistency is noted as 7.10 states “cannot assess the impact of Travel Plans” but a later document promises to monitor and assess their impact. It is also noted that there is no acknowledgement of tube capacity problems during rush hour.

Whilst the application accepts that Epping is not ideal for cycling, it goes on to note that by bike the town is 6 minutes wide, which is questionable.

It is noted that the HRA (v3Ch6) seems to be based on 34 dwellings with retail and leisure causing confusion. The same HRA is also noted as being criticised by EFDC in 8 areas of which it is unclear how these have been clearly addressed.

Parking

Whilst Epping Society acknowledge some successful examples of Modal shift, they see the concept as aspirational with many practical issues as Epping’s terrain is difficult and the infrastructure is not yet developed for cycling (some roads lack pavements; bus services are sporadic, limited and expensive; vehicle stock is old and polluting; ageing population are increasingly less able to walk/cycle).

The practical issues with the proposed car parking provision are also noted:

- Who will decide which residents get a space – price or need?

- If need (e.g. disabled, parents with babies) – what happens when needs change?
- Who will police the car park usage?
- Can those with space be made to have EVs?
- Can others be prevented from having cars?
- Car park space size. Noted that some will be over the minimum 2.4x4.8m, at 2.9x5.2m, but some will have larger SUV designs (even if electric) (a readily observable trend locally).
- It is presumed the disabled spaces will be larger?
- Is there market research to prove that there are there enough of this socio-economic group, wanting to move to this type of accommodation, in Epping, with no car? No evidence is given.
- Request an assurance that new residents will not be permitted to have parking permits for adjacent Controlled Parking Zones.

Pedestrians

Clarity requested on the status of the spaces – will they be public or private?

Concerns are also expressed around the link from High Street as to whether it will be bicycle permeable, whether the Council and Police are aware it is an area of high youth substance abuse with traces of NOx cylinders here. Suggestion to discourage this from spreading into the development.

Bins

Concerns around the low proposal of one bin per 7 dwellings which could result in fly-waste, pollution, rats, etc.

Public Toilets

It is raised that an earlier version of plans had public toilets.

Bats

It is noted that the application ticks “no” for protected species, but local people have seen bats on/near the site for years. Suggestion to confirm via survey as the proposals may lead to conflicts with EFDC policies and media complications.

Health

Concerns around provision as Epping is under-provided with GP services.

Demographics

It is noted that the date used in pre-Brexit and pre the Climate Crisis Declaration causing question around its validity. Suggestion that the data is tested for statistical significance. It is also noted that the deprivation data is given a different interpretation from that used in the Sports Centre application which appears as either an accidental inconsistency, or deliberate selective data targeting.

Plan & Design

It is noted that aspects of the application look encouraging and that the concept of a social area and concierge service in an old building is creative and innovative. It is questioned whether this will be staffed however.

Questions around the inclusion of a community café as one drawing appears to show people seated outside with drinks. It is suggested that the use of open spaces could bring a community feel to the development.

It is noted that planning for 4/5 storeys conflicts with the Town Neighbourhood Plan which calls for no more than 3 storeys.

Aspects of building design are described as “uncomfortable” and the grey/cream building face feels more Cotswolds than Essex, with dark grey window frames being a token nod modernism. It is felt that designs including street-facing gable-ends do not reflect vernacular and a meaningful reference to the Essex Design guide, or to several documents about “building beautifully”, is requested.

It is noted that some of the elevation drawings are hard to match with plans (possibly a result of small labels) and the trees, as sketched, do not always match the plans.

It is requested that the pedestrian access to Block C is checked as it seems to cross the car access route to the block with car parking below.

There are also safety concerns around the use of chicanes which often become parking spaces unless policed.

An elevation (Block B sheet 1) is noted as showing whole columns of windows put into shadow by adjacent set-forward frontages, creating a sunlight problem within the estate and breaching the 45 degree rule generally understood (resulting in less desirable flats).

The detail of the grounds are described as “fussy” (steps, walls, bird & bat facilities, trees, hard & soft areas, railings) which will require high levels of sweeping, cleansing, litter clearing etc. The maintenance schedule diagrams are noted and there are questions around whether these will be by a Managing company or agent. It is presumed that these are to be financed by Ground Rent/Maintenance Charges but no estimates provided in the application. It is noted that, if not maintained properly, the development might easily deteriorate.

RENTAL COSTS

It is noted that there is no assessment of the final rental charges for the properties, nor whether there is a general market demand at the rental level and subsequently a request to see this data.

Affordable Properties

The figure of 40% (Local Plan/Council minimum) is supported however there is no further detail as to whether it is to be mixed or segregated which can have an impact on social behaviour. It is requested that the % be conditional to any approval, and not “lost” during Feasibility Appraisals.

Tenure

The emphasis on Rentals is recognised as being a financial driver to long-term aims; but the hope that Qualis have factored in the implications is noted. I.e. renters tend to be more careless of their environment, less inclined to keep tidy, sweep up litter & leaves, less likely to report antisocial behaviour and graffiti etc. Epping Society would prefer a mixture of tenures which might go some way towards tackling such problems; and it should better reflect the existing local community. It is requested that there is a measure of preference for local people, especially those on EFDC housing need list. There are concerns that failure to do so may result in an enclave of Londoners seeking cheaper accommodation, and assurance is requested that the flats will not be rented to London Boroughs.

Assurance is also requested that Qualis will not be selling these properties on in the medium-term to realise capital. Epping Society do not want to see this landmark development become a mere vehicle for big business machinations as the land has come from the community, whose interest it should continue to preserve.

**Essex Police
21 April 2021**

It is noted that the applicant and Essex Police are already involved in constructive pre-application consultation regarding the development and Essex Police is content the ethos of Crime Prevention Through Environmental Design (CPTED) is being addressed adequately. Essex Police are confident the development will meet POLICY ST2 – ACCESSIBILITY OF DEVELOPMENT (v), design and layout which will reduce the potential for crime and fear of crime page 71 of the Epping Adopted Local Plan.

It is noted that the refurbishment of the listed properties was not discussed, however these properties could still have the opportunity to achieve a Secure By Design accreditation.