

**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 – Conservation  
3 September 2021**

The scheme cannot be supported as it stands and suggest the applicant revise the scheme in line with the advice provided.

The review of drawing no.: EDS\_S5 - CW - S - DR - XX - A – 0313 rev p3, Connection to Civic Offices - Plan and Elevation, does not raise any concerns. Details of materials and finishes to be conditioned; a match with the existing brick bond, texture and pointing of the Civic Offices would be required.

The part of the Civic Offices to which the Conder building is linked was purposely built as a connector between the Civic Offices, No. 323 and the Conder building. Once removed the Conder building will therefore reveal a wall that was never designed to be seen. Despite the non-related use of Block A with the Civic Offices, it was agreed to remain attached, subject to the provision of a suitable buffer element. This buffer should act as a visual break, clearly denoting the Civic Offices from the new residential block and lessening its dominance.

Concerns were raised previously regarding the treatment of this part of the development. While recessed, it was felt that, as designed and scaled, it would fail to operate as a visual break between the two buildings and their different uses and make the new block overbearing. It was considered that this should be addressed by increasing the span of the buffer between the two buildings whilst reducing its height and treating it with different materials and design.

The amended design as shown on Drg. No. EDS\_S5 - CW - S - DR - XX - A – 0313 rev p3, Connection to Civic Offices - Plan and Elevation proposes a wider buffer element, which has been slightly reduced in height. It also now appears recessed on both elevations through the deepening of Block A by moving forward its north east elevation. The proposed facing materials have been amended to show a darker brick; this is welcomed as it should assist this element in remaining subdued. Further amendments should, however, be associated with this:

- To reduce the residential paraphernalia associated with the proposed windows, it is felt that high level horizontal windows, should be considered. The window frames and brick colour should be tonally similar.
- The buffer element should all be faced with the same plain darker brick, replacing the fascia with a brick parapet that would stand below the level of the stone cornice detailing of the Civic Offices.
- A contrasting soldier bond, applied to the whole of the buffer, could also assist this.

The character of the Civic Offices is that of formal and consistent order and the introduction of private residential dwellings within its setting would be in contrast to this. Private residences bring the paraphernalia of domestic life, including furniture on balconies, window dressings, etc. Block A, and more specifically the South-East elevation, is due to its position (attached to the Civic Offices and at the entrance of the site) considered to be particularly sensitive to these issues. The removal

of the balconies, directly adjacent to the Civic Offices is considered to be an improvement and this should help contain the impact of any domestic paraphernalia.

Conservation areas should provide opportunities for innovative design approaches that ensure the continuity of the identity of the area, its sense of place and what makes it special. Concerns were raised previously regarding the scale and massing, as well as the generic character of the scheme. As a response to this, the scale of Block B has been reduced and pitched roofs have been introduced on parts of Block A and Block C. The reduction in massing of Block B is welcomed. We acknowledge that the introduction of pitched roofs has been done to soften the sharp angled edges of the new blocks and for them to relate better to their context, however, it is felt that the additional bulk that it creates is counterproductive. Therefore, while the introduction of a pitched roof on Block C could be felt acceptable (lower in scale), it will not be supported for Block A.

The plans show that slates are proposed to be laid on the pitched roofs. In Essex, red plain clay tiles are traditionally laid on 40 / 45 degrees pitched roofs, where slates and pantiles are used on shallower roofs. The proposed pitched roofs, which appear to be of 45 degrees, would therefore be expected to be covered with red plain clay tiles rather than slates, given their steep gradient.

**Epping Forest District Council – Conservation**  
**28 May 2021**

The principle of the demolition of the Conder building has been agreed at pre-application stage, subject to a sensitive approach for its replacement. As mentioned earlier, the Conder building predates the construction of the Civic Offices and has been specifically excluded from the listing of the Civic Offices at grade II due to its lack of significance.

The review of drawing no.: EDS\_S5 - CW - S - DR - XX - A – 0313, Connection to Civic Offices - Plan and Elevation, does not raise any concerns. Details of materials and finishes to be conditioned. We assume that the mention “Bricks to match the existing Conder building” is a typo and that it should read “Bricks to match the existing Civic Offices building Please clarify.

The review of drawing no.: 0314, Rev.P1-, Civic Offices Alterations, does not raise any concerns. The removal of the existing stair and stair enclosure is considered noncontentious.

The part of the Civic Offices to which the Conder building is linked was purposely built as a connector between the Civic Offices, No. 323 and the Conder building. Once removed the Conder building will therefore reveal a wall that was never designed to be seen. Despite the non-related use of Block A with the Civic Offices, it was agreed to remain attached, subject to the provision of a suitable buffer element. This buffer should act as a visual break, clearly denoting the Civic Offices from the new residential block and lessening its dominance.

The proposed buffer element is, while well recessed, extremely narrow and almost meets the eaves of the Civic Offices building. It is felt that, as designed and scaled, it will fail to operate as a visual break between the two buildings and their different uses, and will make the new block overbearing. It is considered that this should be addressed by increasing the span of the buffer between the two buildings while reducing its height and treating it with more contrasting materials.

Alternatively, the visual separation of the two buildings could be achieved by a physical break. Careful consideration would therefore have to be given to the treatment of the revealed wall in order to provide it with enough presence to become the new end wall of the listed building. Existing

architectural references should inform the design. The end wall (south elevation) of Block A would then need to reflect this new relationship.

The character of the Civic Offices is that of formal and consistent order and the introduction of private residential dwellings within its setting would be in contrast to this. Private residences bring the paraphernalia of domestic life, including furniture on balconies, window dressings, etc. Block A and more specifically the South-East elevation is, due to its position (attached to the Civic Offices and at the entrance of the site) considered to be particularly sensitive to these issues. The treatment of the balconies, now enclosed and no longer projecting, is considered to be an improvement as it should contain the impact of any domestic paraphernalia.

The proposed layout, massing, building forms and detailing of the new residential buildings is felt to result in a very generic scheme, failing to reflect the distinctive character and appearance of the Epping Conservation Area. Conservation areas should provide opportunities for innovative design approaches that ensure the continuity of the identity of the area, its sense of place and what makes it special. For example, while the strong presence of bricks as facing materials has been recognised, the distinctiveness of the roof scape appears to have been missed. The different roofing materials in the conservation area create a varied and interesting roofscape; particularly along the north western side of the High Street. Here it largely consists of steeply pitched handmade red clay tile roofs at different heights with several gables, chimneys and dormer windows breaking the roofline at intervals. Further consideration should therefore be given to the design at roof level.

In line with the above, we cannot support the scheme as it stands and suggest the applicant revise the scheme in line with the advice given in these comments.

**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.

**Epping Town Council  
27 August 2021**

Committee object to this application.

The Committee acknowledged receipt of the amended plans but cannot see what changes specifically have been made to address the previous comments from the Committee.

The Committee still stands by their previous comments. Whilst the Committee acknowledges and welcomes the mixed residential accommodation development of this part-brownfield site, there are some issues with the proposal.

The design of the layout needs to be looked at and how these three storey blocks will affect the nearby residential roads in a Conservation Area. Located on Buttercross Lane and Homefield Close in particular, there are two-storey and bungalow properties with direct loss of amenity including overlooking, loss of privacy and sunlight for one property which borders the site.

The Committee welcome the retention of the pond on the development. However, the Committee have concerns as regards public safety in the environs around the pond.

The development includes the loss of a number of matures trees and replacement trees being proposed are as small as 20cm-25cm. The Committee also disagree with the possible removal of hedgerow by the car park which will also affect the local wildlife. 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.

There is also the issue of insufficient car parking for the number of residential units and no provision for visitor parking from this scheme will put additional pressures on the surrounding roads.

**Epping Town Council  
14 May 2021**

Committee object to this application.

While the Committee acknowledge and welcomes the mixed residential accommodation development of this part-brownfield site, there are some issues with the proposal. The Committee acknowledge receipt of the two neighbour objections as well as objections from the Epping Society. The design of the layout needs to be looked at and how these three storey blocks will affect the nearby residential roads in a Conservation Area. Located on Buttercross Lane and Homefield Close in particular, there are two-storey and bungalow properties with direct loss of amenity including overlooking, loss of privacy and sunlight for one property which borders the site.

The Committee welcome the retention of the pond on the development. However, the Committee have concerns as regards public safety in the environs around the pond.

The development includes the loss of a number of mature trees and replacement trees being proposed are as small as 20cm – 25cm. The Committee also disagree with the possible removal of the hedgerow by the car park which will also affect the local wildlife. 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.

There is also the issue of insufficient car parking for the number of residential units and no provision for 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.

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 – Development and Flood Risk  
16 July 2021**

Having reviewed the Flood Risk Assessment and the associated documents which accompanied the planning application, we wish to issue a holding objection to the granting of planning permission based on the following:

- Urban creep – a 10% allowance for urban creep needs to be included
- Water treatment – the swales have not been included on the drainage plan
- Drainage strategy – it is recommended to include all the drainage and conveyance features to demonstrate how the runoff from the western side of the development would be managed
- Construction drawings – these need to be provided for all elements of the surface water drainage system including the permeable paving and flow control. This can be conditions

- Exceedance routes – this needs to be provided and can be conditioned
- Infiltration testing – this needs to be provided to demonstrate this is not a viable option and it can be condition

**Essex County Council – Development and Flood Risk**

**11 May 2021**

Having reviewed the Flood Risk Assessment and the associated documents which accompanied the planning application, we wish to issue a holding objection to the granting of planning permission based on the following:

- Urban creep - a 10% allowance for urban creep needs to be included.
- Water treatment – the swales have not been included on the drainage plan – it is not clear how water coming off the road is being treated.
- Construction drawings – these need to be provided for all elements of the surface water drainage system including the permeable paving and flow control
- Exceedance routes need to be provided.
- Infiltration testing needs to be provided to demonstrate this is not a viable option.

We also have the following advisory comments:

We strongly recommend looking at the Essex Green Infrastructure Strategy to ensure that the proposals are implementing multifunctional green/blue features effectively.

**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 and sustainability assessment are approved with no further amendments required from the relevant teams at EFDC and ECC, I accept the conclusion of the submitted Air Quality Assessment.

**Essex County Council – Highways**

**13 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 on this location, or on the wider highway network. Given the previous office use, and the low parking provision, the proposal will generate fewer trips than the existing use.

Furthermore, the applicant is improving the existing environment for walking and cycling, as well as providing improved bus facilities along the High Street, that will help encourage more use of sustainable transport options to and from the site, and help reduce the reliance on the private motor vehicle.

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

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

**Level of Affordable Housing:**

Since this development proposes 45 units, the applicant will need to provide at least 18 of the overall number of homes as affordable housing. The Planning Statement attached with this application showed that 18 affordable housing units are proposed on the site, this meets the Local Plan (SV) requirements in terms of numbers of units.

**Tenure, Mix & Design:**

The District Council expects new housing developments to include a range of house types and sizes to address local need including downsizing. The Local Plan (SV) requires the affordable housing provision to be integrated into the wider development to create mixed and balanced communities, therefore, the housing mix should reflect the types, sizes and the overall number of habitable rooms in the development and for completeness, reflect the local need.

As indicated above, the expectation is that new housing developments should deliver a range house types and sizes to address local need. I note from the accommodation schedule provided for the proposed housing mix for the development does not specify the housing mix for the affordable housing offer. It is important to understand the housing mix and it should be reflective of the broader development thus ensure that the development creates a mixed and balanced community.

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 need.
- 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.

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.

The composite plans and drawings attached with this application showed some inconsistencies with the unit sizes. Given this, it will be useful that the unit sizes are reviewed to ensure that all the units comply with the relevant space standard.

In addition, all new housing is also 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.

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, therefore welcome development proposals directly.

- B3Living
- CHP
- Habinteg
- Hastoe Housing Association
- Legal and General Affordable Housing
- Moat Housing Group
- Network Homes
- Epping Forest District Council (EFDC)

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 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.

The landowner should note that the purchase price, even if agreed through a competitive process amongst the 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 housing association 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, and subject to meeting the detailed requirements for affordable housing delivery set out above, I can support the application from an affordable housing point of view. However, it is necessary that we have clarity on the affordable housing mix and the unit sizes including the tenure split. Also, that we continue to be involved in further discussions regarding the affordable housing offer.

**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 the single native hedgerow present around the northern boundary of the Site is to be retained as part of the proposals. This hedgerow is predominantly made up of native species and is identified as being a Priority habitat. Therefore, the LPA has a biodiversity duty to conserve this hedgerow.

We are further satisfied the pond within the Site is to be retained as part of the proposals. Great Crested Newt (European Protected Species) were identified as being present within this pond. We are satisfied with the precautionary measures for Great Crested Newts identified within the Environmental Impact Assessment. We note works are not currently planned within the terrestrial or aquatic habitat, however any works that are required (e.g. temporary works to the wall) within this area will need to be carried out under a strict method statement, and appropriate European Protected Species Mitigation licence. Therefore, we recommend that a Method Statement for Great Crested Newts should be secured as a condition of any consent.

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 Epping Forest 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 gaps in fencing), 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 a biodiversity roof, five bird nesting boxes installed on site and new planting. 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 set out details of how retained and created habitats (including the retained native hedgerows) will be managed and how the pond and surrounding terrestrial habitat (scrub/ grassland mosaic) will be managed for Great Crested Newt and other amphibians. 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.

Submission for approval and implementation of the details below should be a condition of any planning consent.

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 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 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) – This should include a Method Statement for Great Crested Newts
- 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.

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)

**Essex County Council – Landscape  
11 May 2021**

**ECC GI position**

Having reviewed the Design and Access Statement (DAS), Landscape Strategy, Arboricultural Survey and other associated documents which accompanied the planning application we do not object the granting of planning permission; however, we would advise the following recommendations are considered to improve the GI network and help achieve net environmental gains:

Environmental/ Biodiversity Net Gain

It is recommended that amenity grassland (low biodiversity value) is replaced where possible by features with high biodiversity value (e.g. amenity grassland with bulbs/naturalised grassland and flowering lawns). Amenity grass can also be described as a "green desert" but does provide some carbon sequestration. Some specific grass varieties sequester 13t/Ha/Pa, produce 45% less clippings and are wear tolerant. For example, deep rooting grass mixes are more drought resistant, reduce need for irrigation, increase rainwater infiltration, reduce surface runoff and improve performance of sustainable drainage schemes. From a management point of view, this means a reduction in mowing costs and time, savings on fuel usage and emissions, reductions in green waste resulting in reduced environmental impact and significant less maintenance are all beneficial.

Rigby Taylor have been working on carbon sequestering grasses and doing some very comprehensive trials, see Carbon4Grass: [https://www.rigbytaylor.com/wp-content/uploads/Fixing-the-Greenhouse-effect\\_Carbon4Grass.pdf](https://www.rigbytaylor.com/wp-content/uploads/Fixing-the-Greenhouse-effect_Carbon4Grass.pdf) We would therefore advise that these seed mixes are explored as an alternative to the standard amenity grass / turf proposed.

Long-term Stewardship & mitigating measures

Green infrastructure will require sustainable management and maintenance if it is to provide benefits and services in the long term. Documents such as the Construction Environmental Management Plan (CEMP) and Landscape and Ecological Management Plan (LEMP) are documents that will help ensure appropriate tasks, mitigating measures and methods are in place to:

- Protect the retained trees and hedgerows.
- Schedule of advanced planting to create a landscape structure or evidence is shown that substantive GI is secured as early as possible in subsequent phases.
- Landscape management and maintenance plan and work schedule for a minimum of 10 years including how management company services for the maintenance of GI assets and green spaces shall be funded and managed for the lifetime of the development.
- Demonstrate measurable net gains for biodiversity, as outlined under paragraph 170[d] & 175[d] of the National Planning Policy Framework 2019.

The inclusion of phased implementation within the CEMP of new GI and protection of retained vegetation during construction will allow for the GI to mature and it will provide further benefit of reducing/buffering the aesthetic impact from the construction work. While the LEMP will ensure appropriate management and maintenance arrangements and funding mechanisms are put in place to maintain high-quality value and benefits of the GI assets. We would recommend these are submitted at the earliest opportunity of the planning process.

GI Standards

It is recommended that the development proposal explores and applies the Building with Nature standards and achieves an accreditation to highlight what 'good' looks like at each stage of the green

infrastructure lifecycle and strengthen the development and demonstrate the development goes beyond the statutory minima, to create places that really deliver for people and wildlife.

**Epping Forest District Council – Contaminated Land  
7 May 2021**

The results of the intrusive site investigation showed exceedance levels of 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.

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

After removal of electrical sub-station, the soil should be tested for PCB's contamination.

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 pipes 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.

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

Early Years and Childcare

The proposed development is located within the Epping Lindsey and Thornwood ward. The latest childcare sufficiency collection for Summer 2021 demonstrates that there are 27 reported childcare vacancies which exceeds the number of childcare places that would be generated by this development. A developer contribution is not requested at this time.

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. Therefore, a developer contribution of £139,871.00 index linked to Q1-2021, is sought to mitigate its impact on local primary school provision. This equates to £17,268.00 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 £128,385.00 index linked to Q1-2021, is sought to mitigate its impact on local secondary school provision. This equates to £23,775.00 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 population increase brought about by the proposed development is expected to create additional usage of the local 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. Improvements could include, but is not limited to, additional facilities, additional furniture, provision of learning equipment / play equipment for younger children, improved access, external works such as parking and bike racks and IT.

Therefore, a developer contribution of £3,501.00 index linked to Q1-2021, is sought to mitigate its impact on local library provision. This equates to a cost of £77.80 per unit.

In view of the above, I request on behalf of Essex County Council that if planning permission for this development is granted it should be subject to a section 106 agreement to mitigate its impact on primary and secondary education and libraries. The contributions requested have been considered in connection with the CIL Regulations 2010 (as Amended) and are CIL compliant. Our standard formula s106 agreement clauses that ensure the contribution would be necessary and fairly and reasonably related in scale and kind to the development are available from Essex Legal Services.

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

The proximity of the application area to the medieval centre of Epping, and the existence of buildings within the site on the First Edition Ordnance Survey map of 1971, indicates the potential for surviving medieval and post medieval archaeological remains being impacted on by the proposed development.

The following recommendation is made in line with the National Planning Policy Framework.

Recommendation:

**Programme of archaeological trial trenching and excavation**

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.

*Further Recommendations: A professional team of archaeologists should undertake the archaeological work. The archaeological work will consist of a programme of archaeological trial trenching within the car park 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**

**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.

### **Epping Forest District Council – Building Control**

**26 April 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.

### **Thames Water**

**23 April 2021**

### Waste Comments

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>.

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.

Following initial investigations, Thames Water has identified an inability of the existing SURFACE WATER infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position for surface water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all surface water network upgrades required to accommodate the additional flows from the development have been completed; or - a development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents." The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

#### Water Comments

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

#### Supplementary Comments

Waste - Thames Water would recommend the developer to limit to discharge rate of surface water.

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

**22 April 2021**

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

SCN39 – Tree Protection

SCN31 – retention of trees and shrubs

SCN35 – Hard and soft landscaping

#### 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.

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.

Please also include the above condition for hard and soft landscaping, and retention of trees.

**Epping Society**  
**27 August 2021**

We wish to object for the following reasons given below:

Document 00836160: Daylight, Sunlight and Overshadowing Report – it is unacceptable that reports considered by the applicant to be critical to the application are not tabled until demanded and weeks later.

00836162 – this document from Q+A Planning introduced a “series of the substituted documents” which arose out of an analysis of public consultation responses. As Council Tax payers with a financial interest in minimising the losses or maximising the gains of Qualis (the applicant), and as members of the public entitled to comment on the application, we strongly object to their failure to adequately respond to the earlier consultation. At the time we noted the lack of awareness, information and general lack of attentiveness by Qualis.

The letter seems to say that the changes are significant and important but not so significant or important they have to do any further townscape analysis.

We wonder how Qualis could possibly know what consultees said about the application as those responses are not published by EFDC. The practice of EFDC is to have an officer’s summary of the consultations prepared and presented to the planning committee. Accordingly Qualis cannot yet know what was said. We would like to see all responses published in full on the planning portal but as the EFDC policy is not to do so we ask for an explanation on how Qualis could know what respondents wrote.

00836156: D&A Statement Addendum – the font size of this document is unacceptably small.

Foreword – unable to find in this document sections 1 and 2.

Page 9 – it is likely people will want to sit on a bench which backs on to a bin store, especially with hit and miss brickwork.

Buttercross Lane – overlooking does not seem satisfactory even after changes.

Homefield Close – is the maintenance of the hedge a planning condition? If not the overlooking issue cannot be said to have been resolved or even improved.

Page 12 – the pitched roof designs are not convincing although the revised design of block A may be a small improvement over the previous proposal. The designs of the blocks does not relate to anything else in the immediate vicinity or the town generally, which is ought to.

The proposed bricks and brick patters have no relation to the town. The drawings on document (EDC portal 00836116) EDS\_S5-CQ-S-XX-DR-A-0305 and (EFDC portal 19756) EDS\_S5-CW-BA-XX-DR-A-0312 demonstrate how ill suited to Epping the design is.

3.15 we do not find the height and masses acceptable.

4 Landscape – it is not clear how newts and other wildlife other than birds will be able to migrate into and out of the pond.

5.3 we welcome the redesign at the point where block A joins the listed building.

5.4 the previous design appeared to show that flower planters were to be removed (presumably for slight line reasons). In their place trees were shown but the revised drawings now seem to show planters but no trees. We did not see any discussion of this.

Parking and traffic – doubts over the limited parking provision.

Design – disagree that the buildings are of high quality or respond to and reflect the site.

Drainage – although not trained to assess the report, knowledge of flooding and poor drainage in Epping lead us to be sceptical.

Wind vortex – no reference to potential impacts.

Questions around whether the development is needed.

**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 that 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**

This letter of objection relates to both the application for demolition and the application to construct new building at the Conder/Civic Offices site.

General issues – Conder

EFDC planning portal shows the applicant of Conder to be EFDC. The application Form says it is Qualis Commercial Ltd. Which is it? The application form has a question about conflicts which has been written as if for staff only but clearly Qualis has a conflict with EFDC as it is owned by them. No such conflict has been declared and ought to be.

Document 00913183 “Planning Statement”

“5.33 in respect of the second bullet and the potential for active frontage on the ground floor to the High Street, as presented in the supporting documentation this is not a possible route because the red line for the application site does not extend to the frontage of the High Street other than access, which of course is required to access the site itself. This means the site is slightly smaller than as presented in the LPSV allocation. Therefore, it is established that additional retail use is not feasible for this site.” This suggests there is some inconsistency in the Local Plan which ought to be resolved and then plan adopted before this application can be determined.

35 Documents concerning “Environment” (sic) or “Environmental (sic) Impact Assessment” it says. Including “Technical...” (Sic). Documents on the planning portal are not well named and the sequence is illogical. This makes it difficult for readers to navigate. These suggest a lack of attention to some of the most significant planning applications to be made to EFDC in a decade and we wonder if adequate attention will be given to the consideration their merits or shortcomings.

We propose that PD rights are excluded from any planning consent. Our reasons are threefold:

1. All three current sites are sensitive and changes to the initially built design could seriously damage any coherence that exists at the beginning;
2. The sites are highly designed. This is not a comment on the particular designs so much as that the density and approach has led to a strong feeling across the sites that could be seriously damaged by uncoordinated PD;
3. While Qualis is controlled by EFDC at present we do not know if that will always be so nor do we

know if Qualis might sell-on the completed developments to an institutional or offshore investor. Indeed, EFDC deny any control over Qualis day-to-day operations so future policies cannot be assumed.

As Qualis appear to already control the sites, regardless of ownership, TPO orders should be made immediately. TPO orders should be added to all new trees on the site.

#### Proposed ground and first floor layout plans

It is not clear what is the boundary of the planning application. The D&A statement refers to many issues outside the red line on this plan which one might think was the extent of the application. For instance the replacement of raised flower beds with trees; no reason is given for this but it might be visibility splays. Clarification is needed. What effect on light in the buildings behind these trees?

#### Vegetation Retention and Removal plan

It would be helpful if new vegetation to which the applicant is committed were also shown on this drawing.

#### Sustainability Report

-“The purpose of this report is to establish different measures that have been developed and implemented to provide a holistic approach to sustainability for the Civic Offices/Conder development site.” Council officers should satisfy themselves that the development is sustainable as the purpose of this report does not seem to aspire to show that but only to describe (in glowing terms) what has been included – not whether it is adequate.

-It is not clear how the flattering descriptions of the design layout (on page 5 for example) assist in establishing that the proposals are sustainable.

-The report includes text which is difficult to read 100 per cent scale on a high quality flat screen monitor. This is not reasonable if public involvement is to be encouraged, I am not sure I could read it.

-This report unhelpfully includes many value judgements on aspects of the proposals which are not relevant to this question of sustainability and accordingly make the reader’s task more difficult and time-consuming. Examples include “around high-quality amenity spaces, to create an oasis of family housing”.

-“Photovoltaic panels integrated where viable” should be specified on the roof plans submitted If the grey oblong areas on otherwise green roofs in the three dimensional impression of the development are PV panels, one wonders why there are not used more extensively where they cannot be easily seen from street level.

-“Green roofs integrated throughout the scheme” means what, exactly.

-It is not clear on plans where collected rainwater is to be stored.

-It is not clear what aspects of the building designs are thought “to promote health and wellbeing” so could this be clarified please.

-We did not see evidence of the absorbency rate of the sub soil to demonstrate that water released from swales and SUDS, etc would be absorbed at the required rates.

It is unclear whether the report claims the proposed development will be carbon neutral by 2030 taking account of the demolition and rebuilding of the site as well as its day-to-day operations after completion or whether the performance is considered carbon neutral only on an operating basis. Please can this be clarified. In each case where is the energy to be sourced which is also carbon neutral and does that refer solely to day-to-day operations or a whole of life basis for the plant and conduits involved?

-Which aspects of the emerging local plan have been taken into account in the designs for the proposed development?

- Reference is made to the Essex Design Guide. Does the applicant claim the proposed designs comply with that; we strongly suggest officers checked that it is so as it is not apparent to us. It is unclear (page 8) what relevance it is to sustainability report to state “The Epping Sites project has been designed to create a **vibrant, inclusive, and economically positive** development.” (my emphasis added). There is no data in this report to support those claims and we would not expect them in a sustainability report but perhaps, instead, in an economics report which we have not seen.
- Does the phrase “The sequence of development sites” suggest the sites will not be under construction at the same time? If not what does it mean.
- Reference to “Neighbourhood Plan 2018 Policy 19-Sustainability” needs to be treated with caution as that document has not yet been completed nor even yet circulated for public comment. The document which was circulated before work of the consultative group was circulated was a draft one.
- “Figure 3 Example of façade response, moderated + focused glazing”. Please explain how the glazing is focused and how the design of fenestration affects sustainability.
- The report states that “energy modelling studies and assessments” are “ongoing”; does this suggest that the designs are not yet finalised or that the energy efficiency has not yet been ascertained? If so, how will any planning consent be conditioned in this regard? See also section 4.7 which states that design work is still incomplete. 4.7.13 seems explicit in this matter.
- Are the statements about energy etc consumption in this report the responsibility of Elementa Consulting or was the data from models developed by the design team (see page 9)?
- Page 12. What or where is “Conder Lane” and what is a “Revit model”?
- Is it correct that the carbon forecasts have been done using models from the other local authorities and on selected buildings in three (?4) separate planning applications? Is it also correct that carbon use has been estimated only for building the dwellings and not for demolition or for additional works such as roads, paving, utilities, paved areas etc. (Page 13 is not clear to me).
- The report discusses building materials to be sourced locally and mentioned bricks; will all bulk, high volume and high value components be sourced as close to Epping as possible?
- Sustainability Report – Appendix, page 12 CE.1 says 95 per cent: is this by value, number of components or mass.
- 6.3 “Electric vehicle charging points are proposed for each of the limited car park spaces proposed” – is that a commitment, an aspiration of a theoretical possibility? All such statements in all documents ought to be clarified in this regard by planning officers in conjunction with Qualis before the application goes before the planning committee.
- 6.4.2 “Noise during operation” – what technical standards will be specified in the building contract.
- Section 7 – what have these points got to do with a sustainability statement?

#### Statement of Community Involvement

Our members who attended the Qualis exhibition and online sessions did not conclude they were well organised and information provided was confusing. Like many documents in the application, reference were made to aspects which were not part of the proposals. Qualis representatives could not answer questions put forward and at later events submitted questions were ignored.

#### Planning statement

Conder is 0.66 Ha and the application is for [45] dwellings. That is a poor development ratio (68 per Ha) for the town centre. (Actually Policy SP3 – Place Shaping is quoted as 50 per Ha (Planning Statement page 23).

Did EFDC/Qualis attempt to acquire the car park of the black Lion or otherwise to include it this development? The plans suggest it will become a very difficult site to develop effectively in the

future. Similarly the Army training site could have been cheaply relocated and the old area incorporated in to the development at the sports centre. Indeed, a cadet training building only needs single storey so flats above and/or move it to the school to exploit the space in the evenings? Or move to Bower Hill or above the station car park – all sorts of opportunities.

I think the conclusion drawn from contentious evidence in 6.26 (second bullet) is very adventurous. I do not object to a preponderance of flats but the squirming done to convince us (and themselves) that it is right stretches credibility. I also object to the characterisation of young people as being attracted to small rental flats whereas, they assume, older people are not.

The additional population in the town centre which I have estimated is large enough to be relevant to the need for a policy of preserving town centre pubs and other possible effects on local demand.

2.12 – vehicular access only from St John’s Road – what road studies say this is viable, especially with the additional roundabouts proposed?

General point – lifts in multi-storey buildings – will these be adequately maintained and cleaned and will there be a fall-back for the disabled or less fit residents?

3.2 Consultation with the public – we object as it was wholly inadequate.

3.4 Between March 2020 from a standing start EFDC/Qualis and contractors have produced 3 schemes and submitted 4 application with thousands of pages of material. Yet over the similar period they have failed to complete the Main Modifications for the Planning Inspector. See also Planning Statement 4.23 “The LPSV was subject to an examination in August and then November 2019 setting out the further work needed to ensure the LPSV can be found sound and adopted. The advice from the Inspector covers several matters and the Council are working on Main Modifications to respond to this advice. The main issue hat is being addressed concerns the LPSV’s effect on the Epping Forest Special Area of Conservation (the EFSAC). The Council’s Habitats Regulation Assessment (HRA) found that the LPSV would be likely to have a significant effect upon the EFSAC.”

3.5 It is unhelpful to switch between site names and site codes. The public cannot be expected to research what the connection was or is now.

3.16 “It is noteworthy that in the first QRP report from March 2020, it was stated that ‘the panel urges holistic view of the whole town centre is needed to inform key design moved on each site...’ We note that a proposal as far back as 2012 would have provided a pedestrian route to the High Street which avoided the narrow corner by St John’s Church. This has not been included in the proposals and we deplore that omission. The tight corner will become busier with large numbers of residents walking (or cycling – sic) to the shops and station.

4.4 “Thirdly, we explain how the contents of the draft Epping Town Neighbourhood Plan (2018) is relevant” – it cannot be, it isn’t finished and the public have not given their approval.

4.5 “The Council have pledged and pledged to do everything within its power to make Epping Forest District Council area carbon neutral by 2030”. – how about less wasted time, effort and paper of pointless gibberish in reports and less hot air from EFDC. “everything in its power” would include EV vehicles for Qualis, which has not happened.

4.10 page 18 Heritage Conservation and 4.17 page 20 Design and the Built Environment. The policies listed here suggest the design fails to meet the requirement. Bear in mind the terms of the quality review panel do not include them issuing certificates of compliance with policies.

4.11 Nature conservation and 4.12 Recycling and pollution. I have yet to see and review any report on studies into potential pollutants underground or the effect of the development on the life cycles of the newts and other fauna (Planning Statement page 25 – Policy DM1 – Habitat Protection and Improving Biodiversity).

4.14 “Policy E4A ‘Protection of Employment Sites’ – this policy states that the sites currently or last in use for employment but outside the defined employment areas will be safeguarded from redevelopment or change of use to other land-uses. Housing on redundant employment land will be regarded favourably”. EFDC seems to have made no effort to seek (or require private owners to seek) alternative employment uses for employment land before granting permission for housing development. The site in Bower Hill is one example and Conder Building might be a second.

4.28 They are still saying 1,305 additional dwellings in Epping. If not is not the current position the application paperwork should be updated.

4.35 Policy T1 – Sustainable Transport Choices – Given the number of homes without access to motor cars, there needs to be one or two taxi ranks in the town. These should not take away parking from the High Street.

4.32 Policy H2 – Affordable Housing – the EFDC policy of 40 per cent is rehearsed but there is no commitment from Qualis that I can see as to how many and what size accommodation will be provided on which sites. See Planning statement 6.33 which refers to Affordable Housing Statement at Appendix 2.

4.53 Policies D1 and D2 – Delivery of Infrastructure and Essential Facilities and Services. Is there any evidence on buses or taxis?

4.57 Epping Town Neighbourhood Plan – the statement remind us the plan is not finalised but lists the draft objectives which seem to counter and not support aspects of the applications. What weight will EFDC give to that?

4.72 Section 15 – Conserving and enhancing the historic environment. Each of the sites is close to the conservation area and close to listed buildings but evidence for the way these designs are claimed to respect that is not at all clear.

Civic Offices (Part) (EPP.R8) – principle of proposed use

5.29 “Policy E4A concerns the protection of employment sites and states that housing on redundant employment land will be regarded favourably. EFDC have decided that the office building is no longer required and, as such, the land can be considered as redundant for employment purposes. The socio-economic chapter of the ES considers the implications from an economic perspective.” We should not accept a decision by EFDC as definitive. Potential alternative employment uses do not seem to have been looked for with any vigour, presumably because EFDC did not want to find them.

5.35 “Therefore, in our view, the proposal is supported by policies contained with the adopted Local Plan, the LPSV and the draft ETNP, as well as the provisions of the NPPF (2019).” It is not at all clear the design meets the Essex Design Guide or the need to fit in with the existing architecture of the traditional market town. The proposed fenestration, walls, presentation to the street and the lack of bargeboards on the roof verges are all strange to Epping. Materials, including the proposed brickwork are not familiar here.

Page 44 6.9 Five-year supply and housing delivery

This data is interesting. I have not seen it published by EFDC but it is damning. [Table 6.1 inserted to correspondence]

6.11 “This means EFDC is categorised as a ‘presumption’ authority, meaning that the presumption in favour of sustainable development applies consistent with paragraph 11 of the NPPF. This is the case for both housing supply and the housing delivery test”. It is unacceptable that an investment company who wholly-owned by the Local Planning Authority should argue its case in these terms. In essence it is saying it’s owner’s incompetence is a reason to build what they like, where they like.

6.18 basically says Arup did a poor job on site appraisals.

Page 51 6.36 “the proposed housing typology is for a Built to Rent scheme on the St John’s Road (EPP.R5) site. The proposed typology for the sports Centre (EPP.R5) and the Civic Centre (Part) site (EPP.R8) is a build to sell format, although the applicant requests flexibility from an affordable housing perspective to convert to a Build to Rent scheme”. It is not clear how this could work. Is it suggested Qualis might sell “affordable” housing or that affordable housing will all be on one site.

7.9 By what mechanism will Qualis/EFDC prevent residents in these developments from acquiring cars which they park in nearby residential streets using parking permits, parking illegally or in streets with no controls.

7.10 “The applicant is fully committed to delivering against these objectives and implementing its recommendations”. Public assurances from Qualis are not enough. This must be a planning condition and/or S106. In particular, the aspirations in many Qualis documentation must be removed or become a part of any unavoidable planning permission.

7.13 “The operational phase of the St John’s Road development and associated increased in traffic is not predicated to have a significant impact on local air quality in Epping. Indeed, this increase in traffic (and associated pollution) will be more than off-set by the net reduction in vehicle trips associated with the proposed developments at the Sports Centre (EPP.R5) and Civic Offices (part) (EPP.R8). In combination, the proposals are predicted to have a net negligible beneficial effect on air quality in Epping.” What this says is the old sports centre will be developed before the other two sites, otherwise there would be no saving to offset the heavy vehicles’ emissions. There is no schedule for the new sports centre. It is hard to see how heavy lorries will not increase pollution when in and out all day long with the detritus of the old sites, piling and the new materials coming in. We need data not bland assurances.

Much of this heavy traffic and workmen’s car too will come through the forest. During t works that must be an increase in pollution. Has Epping Forest Heritage Trust seen this?

We have not seen QRP reports which we have understood not to be in the public domain. It is impossible to judge Qualis reports its conclusions if their reports are not available to us.

Page 59 8.11 “Given that the Conder site is tucked away behind the High st and that is has limited street frontage, there is the opportunity to create an environment where family housing can be introduced”. But this does not excuse the designers from the Essex DG and the other policies relating to a market town.

8.13 the dismissal of archaeological remains and the statement no more investigation is needed is not acceptable. After demolition, trial pits should be dug and during works there must be an awareness among site managers to report anything found. “the renovation and re-use of the Local

Listed Buildings on the St John's School Application Site will likely necessitate the loss of elements of historic fabric;" – don't they know? Which fabric? Are they planning to gut the building? This should have been resolved before the applications were made. The application seems like rushed, incomplete projects, just like the Local Plan.

8.24 What are the mitigation arrangements to avoid damage to the pond and newts during works and to ensure the newts are able to live and breed normally after completion. For example, how to prevent accidental damage or human interference. How will they and other fauna migrate during and after works?

Page 79 Epping Town Centre Town Centre Strategy Report: what is the relevance of this document and which parts of it (if any) will be conditioned on any planning consent or subject to a S106? The inclusion of so much aspirational material, meaning less flow plans and artists' impression suggest there has been an attempt to confuse the public which one hopes will not work with officers and members of the planning committee.

Page 94: Precedent image: St Chads, Tilbury, Essex looks like a modern development and in any event it is not in keeping with their the Essex DG or Epping styles.

Page 99: the issue of the sports centre does not arise out of the Qualis "consultation" but at the very beginning of the Local Plan. "the perceived loss of sports facilities". What is this "perceived" word there for? Are Qualis taking issue with the public's views?

It is good to see, at last, a diagram of new sports facilities which was not included in the relevant planning application files on the planning portal, but these are not part of the current planning application. The planning application for the building in Bakers Lane does not show the layout or content of the facilities. I am not an expert but a single sports hall seems to me unlikely to provide all the sports now available and promised to be replicated.

"In respect of Sports Hall, the supply for sports hall for community use is at a deficit when compared with demand, for both 2917 and 2033, therefore there is a need to, at the very least, protect this quantity of supply. This does mean provision at the existing sites should be protected, as this re-location of facilities is not discouraged, to ensure the residents of the district have improved accessibility to high quality facility provision". Condescending by Qualis again. It is not their call. However, "in respect of squash courts, it is recommended that the existing level of provision of squash facilities are protected (2 courts in the case of Epping Sports Centre)" with which we agree.

"The conclusion of this exercise is that it is possible to deliver a swimming pool and and (sic) **all the existing sports facilities on the Bakers Lane site** (my emphasis added). This does results in the car parking being provided almost entirely on the Cottis Lane site as part of the multi-storey car park. As explained in the parking section, this is the most sustainable approach that responds to the no net loss requirement in the draft planning policy for the sites. Overall, the revised testing of the Bakers Lane site and the proposals for a full service leisure centre with Sports Hall and squash courts means that the strategy can be supported." This after several paragraphs basically saying the exact sports provided might be cut. As I understand it there will be a net reduction in parking places in Epping. The existing car parks at Cottis and Bakers Lane plus the existing sports centre do not seem to have been included.

Page 110 item 2 is an insult to private landlords. The reference to institutional landlords suggests it is EFDC/Qualis strategy to exploit friendly planning consent from the former so the latter can sell over developed sites to insurance companies offshore investors. Can we have some clarity on this please?

The danger of uncertainty by Qualis about “affordable” is they might sell a block to (say) London Boroughs so local needy don’t get a look in. Maybe they will sell the entire St John’s Road site to an LB? There is nothing on page 112 to prevent such a sale outside the district and EFDC would not be able to prevent the independent management of Qualis from doing so if a high quick completion offer was to be made.

Page 116 Heads of Terms is skeletal and unacceptable. It is noteworthy how much aspirational material in the application documents is not reflected in the actual design proposals nor in the Affordable Housing statement or “Draft Heads of Terms for a Planning Obligation (Section 106 Agreement)”

#### **Below ground drainage strategy**

Says estimated 1 in 100 year flow off the site would be 216/sec. That equates to 777.6 m<sup>3</sup>/hour. The proposed crate underground drainage capacity proposed in 296m<sup>3</sup>.

Something is wrong. Can this be clarified please? To have only half an hour for 1 in 100 years suggests that 1 in 10 year flows might be a problem.

I cannot see anything on the permeability of the sub-soil which is critical to a crate and SUDS system working.

#### **Contaminated (sic) Risk Assessment and Ground Investigation report**

This seemed to be a very limited survey with few bore holes and of limited depth.

I could not see any reference to the effect of development on the newt pond, short or longer term. For example, could groundwater be contaminated or could the piling drain the pond.

#### **EPF/1042/21 – Application to demolish**

Relates only to Conder and parking – not to Homefield House please confirm?

What is the significance of files being names “NEW”?

Label on document Connection to Civic Office Plan Elevation says “New bricks to face of civic offices which is exposed following the demolition (sic) of the conder building. Bricks to match the existing conder building”. Why would bricks not match the listed building whose façade is being reinstated thereby. What is the significance of the word “study” – is it not yet complete?

It is not clear from the documents what changes are proposed to the listed building and immediately-adjacent buildings.

Loss of 132 parking places but addition of 86 cycle places. What evidence is there this will work. It is EFDC policy to effect modal change but policy is not the same as outturn.

Application 17b – biodiversity – the issue of newts seems not to have been adequately studied.

Application says “Pre application meetings and QRP presentations held between April 2020 and March 2021 to discuss the details of the proposed application and supporting documentation.” How does that relate to the public meetings they held? We must hereby repeat the criticisms The Epping Society wrote about (our questions were ignored and at the physical meetings Qualis people did not understand the area and could not answer questions). Our Local Plan responses are also pertinent, for example have the matters been resolved? Are these applications fully in accordance with (which version of) the local plan? Challenge page 9 of the D&A.

Q28 asks “For the purposes of this question, “related to” means related, by birth or **otherwise**, closely enough that a fair-minded and informed observer, having considered the facts, would

concluded that there was bias on the part of the decision-maker in the Local Planning Authority.” (my emphasis added). As Qualis is wholly owned by EFDC there seems ample reason why and informed observer might think there was bias by the LPA.

Design and Access Statement Part 1, 27 pages

NB is this the same for the building application?

Are the design impressions a part of the application and can the public be confident the design and features shown will be what is to be built?

It is surely aspirational rather than factual and the following might mislead “Qualis Commercial Limited (QCL), one of the three such subsidiary companies, will maximise the revenue & capital receipts from the commercial development of EFDC’s strategic land and property assets”. Is that a planning consideration or is it improper pressure on the planning committee?

The D&S document introduction says it is a “Pre-application presentation”. When will we see the final one for the application. It is dated March 2021 so what presentation does it refer to?

It says “to provide new residential properties for the Epping community” but what restrictions will there be on the buyers and tenants of these dwellings to ensure that statement is met. “The development of this site aims to provide a range of residential property to serve local residents” – apart from the trite point that a resident will be “local” after they move in, in what way will these dwellings be for local people? D&A page 10 says “Reduce the reliance on car borne transport with the introduction of pedestrian only areas and cycle accessibility” – to achieve that residents must be prevented from owning cars which they park elsewhere. What arrangements have been proposed to enforce that?

“it contains a newt pond located within a brick enclosure” – does that allow the animals to migrate in and out and will the structure remain. Is it a good idea to have a play area adjacent to newt pond?

Page 8 is just meaningless tosh!

Page 8 – what is “PV” – would lay readers know?

Drainage strategy seems vague and under specified.

The D&A on this application (for demolition at Conder) is confusing as it also refers to the other sites Qualis are applying to develop. Accordingly it is hard to work out what they are promising here and what relates to other applications.

Page 9 “we are seeking to create residential communities” – we do not want new communities in Epping; we want a single community.

Page 10 talks of a “circuitous route” to join up these sites but this is just a back route through the town. Are funds to be set aside to achieve this and what progress has been made?

Re sports centre “create and attractive, usable eternal amenity space at the heart of the site for use by all residents” – what is “eternal” about it?

“Establish a confident architectural language that respects the heritage of the surrounding area” – I looked for evidence of what this means but the proposed designs seems foreign to our market town, How does that relate to the Essex Design Guide (now to be part of the Local Plan)? See planning statement page 25 Policy DM9 – High Quality Design 4.41 “All new development must achieve a high specification of design and contribute to the distinctive character and amenity of the local area” – I do not think the designs do that.

Page 11 shows a picture of woodland entitled “Epping Town Centre”. Where in any of the development sites will that be planted and in what time scale will the vegetation reach the maturity shown?

We should ask that any consents should require the facilities and features referred to in the D&A to be delivered and all these to be maintained in good condition until at least (say) 36 months after practical completion. We should ask for PD to be excluded. Also, what is the repair and maintenance contractual arrangement, will public parking be barred within the sites (commuters etc.) and will parking be strictly limited to the places shown so, for example, delivery vehicles and disabled ones come out of that not in addition to it). Will parking other than in designated bays be prohibited and policed? Page 13 says “the provision of on-site car club/car sharing or pooling arrangements, visitor parking and blue badge holders” – does that mean all these are included in the 18 parking places applied for? What specifically has Qualis done about car clubs?

Will full fibre broadband, EV charging be installed for every home/parking place?

Will there be restrictions on hanging washing on balconies or using them for general storage? If not these developments could become slums very quickly.

When appraising their designs against ‘Building for a Healthy Life’ has attention been paid to potential home working? Is there a check list to demonstrate compliance with this and other standards referred to?

Page 14 “The objective of the development is to create an oasis of family housing arranged around the central visual amenity of the ecological area and pond” – will the public generally have full free access at all times to the areas not allocated to private dwellings?

Page 24 is intended to show commuter movements before and after the proposed development but the diagrams are labelled the same as on the following page 25.

Page 27 shows two new roundabouts in the High Street but these have not been consulted upon and details of how they would related to existing roads and pavements and to the protected greens is not stated.

#### Design and Access Statement Part 2, 29 pages

Page 1 refers to opportunities the applicant has identified for improving the centre of Epping. Is the applicant committing to do this work, will the detail be consulted upon and will its delivery be a condition of planning consent? Given the time it has taken so far to not replace a removed tree with a living replacement (Theydon Pace, which has not been identified for improvement) what timetable have Qualis proposed for ordering and planting trees? What is the intended meaning of arrow heads on the lines which depict “Street tree improvements”?

Page 2 shows a number of works but their status is not made clear. A new pedestrian route is shown across Bell Common yet there are already two such paths; is it proposed to make these hard surfaces and has the Forest been consulted? A number of roads are coloured in relation to a legend “Wider Pedestrian Routes”; is it intended to consult on these, are Qualis committed to deliver these and when? What will be the effect on cyclists and motorists, delivery drivers and parking?

A new pedestrian crossing is shown at the busy southern junction of Hemnall St with the High Road; is that the best place for it? St John’s Road is shown for “Potential Lane Enhancements”; what is that meant to indicate as there is already a two lane road with wide pavements each side? Will this be consulted upon and who pays for it and when?

Page 3. We believe the Black Lion is nationally listed and if not it should be without delay. I note that the Conder building is in the Conservation Area. What are EFDC/Qualis intention for EPP.R10 (is this in the current scheme as not clear on this page)? Will the views identified be preserved; page 29 does not indicate that is intended?

Page 8 Epping Neighbourhood Plan (a draft document not yet completed) refers to constraints the working group felt important. Can we be assured the existing sports centre will not suffer limitations in its functionality before new similar facilities are available in the town. The page refers to the Essex Design Guide; can we be assured the proposed new buildings comply with that in form and context?

Page 9 shows Qualis have had access to the QRPs meetings. Are these public documents? If not why has a private independent developer had access? If so, where can we see them?

Page 13 and other pages before and after it refer to the public consultation by Qualis. We did not consider that exercise was adequately carried out and it is not clear how the views of the public have been used to change and improve the proposals. Refer Adam Long's letter for the Epping Society at the time. I have not read most of the rest of this material on consultation and process because I think we should reject it all as a sham.

#### Design and Access Statement Part 3, 27 pages

Page 1 please confirm that gable to the street designs are acceptable under the Essex DG. Where in Epping does that design commonly appear, please? The flat roof appearance of block B is not a traditional Essex or Epping design feature, unless it is intended to imitate the facades often added to ancient buildings a century ago and which some of them demolished in the 1960s and 1970s would have had. The image of block B on page 3 and 4 shows the boxiness of the design. Please can you explain "Terraces transitioning in to area outside conservations area front-ing onto landscape"?

Page 3 will semi-mature trees be planted as shown in the illustrations. We urge native species? Page 7 shows an example of "robust brick detailing" but it is not made clear where such forms are found in Epping nor where it will appear in the proposed development.

Page 8 will the LPA confirm that parking in the site will be limited to allocated parking places for use only by residents and their visitors, plus emergency vehicles calling on residents, of course? Will the site be a public right of way?

Page 10 "particular feature corners are emphasised through projecting brickwork and recessed panels" these were not apparent in the images. Block A looks very boxy and if this is the intention it succeeds in being very forgettable. This is a missed opportunity.

Page 12 Please confirm the well-loved magnolia is to be retained and protected throughout the works. Trees generally: as the site is now controlled other than by EFDC, will TPOs be immediately put on important specimens within the sites?

Page 13 "new bricks to face of civic offices which is exposed following the demolision (sic) of the conder building. Bricks to match the existing conder building" seems wrong; the bricks should surely repair the corner of the listed building with matching brickwork. Why match the existing building which is to be demolished?

Page 16 The choice of bricks, fenestration and gables to the street do not seem to echo any existing degree of development in Epping. The gable edge with modern flashing is also not seem in Epping other than, perhaps on other recent (lower quality) commercial buildings. Please justify.

Page 18 where in Epping or Essex is soldier course banding a common feature?

Page 20 the balcony views emphasise how important it will be to prevent them being used for drying washing or storing household equipment and materials.

Page 23 where in the EFDC emerging local plan or in the Essex DG does it authorise “As the houses on the site are wholly outside the conservation area, a more modern roof has been used to bring dynamism to the key communal amenity”?

Page 24 In the writer’s experience, metal railings on balconies seriously reduces their amenity because of strong winds. What studies have been done to ascertain the possible wind tunnel effects of the new development as proposed?

#### Design and Access Statement Part 4, 29 pages

Page 2 this image does not relate in any way to established styles in Epping.

Page 5 LPSV?? Parking spaces of only “2.4m x 4.8” are impractical, especially for older and disabled users, unless they are adjacent to unobstructed open ground or pavement. For all the discussion of car clubs, there are none allocated in this site. There is no reference to EV charging points – why not? Cycle storage places are not marked – why? What is a “maintenance space”?

Page 6 what arrangements, in leases or otherwise, will ensure waste bins are put away?

Page 7 “private cycle storage for houses 2no cycle storage spaces have been allowed for within the gardens of all houses” – this seriously encroaches into already small private amenity areas.

Page 9 “Qualis have been requested by EFDC to provide this strategy document as a means of stimulating discussion and debate about the Town Centre public realm”. May we conclude that pages 9-12 only are outside the scope of the current planning application? Actually they have no place in this document which is intended to support a planning application and should be removed.

Page 13 is headed “Cottis Yard” – are we to assume it does not apply to the Conder application. It appears that Qualis will carry out works outside the application sites. Is that so and will the delivery be subject to a S106 agreement. Green roofs slow down the discharge of rainwater and in the right weather conditions they can dissipate water through evaporation. Water vapour is, of course, a principal greenhouse gas. Swales can do the same for ground surface water. Management of green roofs and swales is critical to their success and the appearance of the site; swales, in particular, are susceptible to vandalism and other damage. What management arrangements will exist? Have calculations demonstrated that these solutions will adequately handle the rainwater forecast because routes for run-off away from the site are very limited?

Pages 15-17 most people would regard the magnolia as above grade B (moderate with limited life expectancy) There seems to be an inconsistency between the plans on pages 16 (says removal) and 17 (says retained) for trees opposite the turning point in Homefield Close. Page 16 does not show that the existing planters will be removed and the reason for its removal stated elsewhere is not explained. What size lime trees will be planted on the High St at this point? May we be assured that the landscape masterplan will be delivered as part of any planning approval?

Page 23 swales are not easy to distinguish on the plan.

Pages 25-28 is this an idea, an aspiration, a plan or a commitment? We doubt the safety of a nature play area near the very busy roads of the High Road and Hemnall St. “Being centrally placed within

Epping Town Centre” – really? Have you measured how far away Stewards Green Road is, to say nothing of Epping South?

Design and Access Statement Part 5, 34 pages

It is difficult to tell how much of this is aspiration, how much recalling EFDC draft local plan and how much is a definite commitment which any planning approval would make enforceable.

Design and Access Statement Part 6, 3 pages

Page 1. Is “a single vehicular access point off the High Street” safe for emergency vehicles and residents exit in case emergency? Over what time period will the proposed development become sustainable given the considerable amount of high energy materials to be removed and (presumably) subject to low value recycling, and the cost of the materials to built and maintain the proposed structures and services?

It seems unclear to us that the heritage objectives have been met. We are not satisfied the materials fit well into Epping’s existing buildings and the designs seem to be out of line with EFDC policy and the Essex Design Guide.

**Essex Police  
21 April 2021**

The applicant and the Essex Police are already involved in constructive pre-application consultation regarding the development of new apartments and dwellings 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.