

Loughton Residents Association Plans Group



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Essex IG10 2DX
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The Head of Planning & Economic Development
EFDC
Civic Offices
Epping
Essex CM16 4BZ

Dear Sir

EPF/2913/23 - Former Pyrles Lane Nursery, Pyrles Lane, Loughton IG10 2NL

Proposal: Residential Development of 48 dwellings with associated vehicular access point off Pyrles Lane, car parking, open space, landscaping, and associated infrastructure.

We object to this application.

The application proposes additional dwellings which means more car pollution and a subsequent impact on the air quality to the SAC. Any additional dwelling that leads to more traffic in the SAC is unacceptable. The additional dwellings will also result in more pressure for the overstressed recreational services and subsequent damage to the SAC.

The current proposed solution to bring in a Clean Air Zone (CAZ) in 2025 is not guaranteed to happen and in any event does not stop additional cars associated with new dwellings from polluting the SAC before the CAZ is brought into operation.

We are very concerned that the Council has been giving planning approvals for housing developments near to the Epping Forest Special Area of Conservation (EFDSAC); in doing so it is requiring sums to be paid under s106 agreements with reference to the Council's Interim Air Pollution Mitigation Strategy (IAPMS).

Not only is it impossible for the Council to know whether or not the sums required under the s106 agreements will turn out to be adequate, the mitigation measures are not being implemented in advance of the new dwellings being built and the subsequent harm to the SAC from the additional traffic. This approach is in clear breach of UK law, as set out in Holohan and other related judgements.

We consider 8% affordable housing is unacceptable. This is a council promoted site and the affordable housing should be policy compliant (40%). We also note there is no viability report to justify the lower rate.

The four-storey building is too high and the design is considered to look cheap, ugly and out of character with the area, contrary to the Government's build beautiful standards, particularly considering this is backland development. Buildings in the area are predominately two/three storey. The observation that on the opposite side of Pyrles Lane are "four-storeys with retail units at ground floor." is irrelevant as these are on a main road, and set well back from the

road. The 4-storey block proposed in this development has no set back, being surrounded by other dwellings and a frontage straight onto the open area.

We object to the amount of trees being lost and the loss of open green space. There are no provisions for supporting infrastructure in the way of doctors' surgeries and education provision. The additional housing will add to further pressure on local services.

Rectory Lane is already over congested, with cars backing up from Debden Broadway all the way back to Church Hill at busy times. It will only get worse when the developments on Borders Lane are completed.

The parking spaces on the northern end of the development will impact on the amenity of the homes at Hillyfields by reason of noise and headlights from cars.

We also consider the layouts of the residences are very poor for the following reasons:

- The ground floors of the multi-storey blocks have issues regarding Secure By Design (SBD) and privacy.
- The bin store behind the 3-storey block will have noise issues especially during the bin collection. In the case of the houses, the living room windows are right on the pedestrian path. The windows are likely to open outwards therefore will be a potential safety hazard.
- The ground floor of the 4-storey block lack in privacy and security. The apartments face the high embankments and directly to the car parking, hence the outlook is pretty dire.
- The opened top of the ASHP acoustic enclosure will not stop the noise rising up to the upper apartments. The upper floor apartments will look down onto the roofs (likely to be ugly) over the plant rooms and the bin stores.
- The 3-storey block does not have a lift.
- The sub-station design could be much better.

Overall, we consider this is an overdevelopment of the site which is probably why the design and layout of the residences are so poor. The statement of community involvement, which consulted on a considerably less dense development showed overwhelming opposition to the development. As the application is significantly different to the previous scheme a second public consultation should have taken place before submitting the planning application.

We give permission for our comments to be made available on the Council Website

Yours faithfully



John Walker MRTPI
for Loughton Residents Association Plans Group