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**From:** Marcus Bennett  
**Sent:** 26 April 2021 11:56  
**To:** Ian Ansell  
**Cc:** Cuma Ahmet  
**Subject:** RE: 46 Stradbroke Drive - 0403/21From Subject Received Size

Hi Ian,

I have reviewed this case on its merits and conclude that further assessment are not necessary based on each of the following points combined:

- While the size of the previous 4-bedroom house vs. the proposed 2-bedroom flats are not interchangeable in terms of the total number of AADT likely to be generated, the difference would be minimal (less than 1 AADT). Furthermore, a review of journey to work data suggests only a small proportion of trips from this site could be expected to use modelled EFSAC routes. The fraction of additional AADT multiplied by the distribution through the EFSAC results in a negligible net increase (less than 0.1 of an AADT).
- The number of parking spaces on the site is not proposed to change from the extant permission.
- The applicant is willing to pay the per-dwelling contribution towards the APMS.
- The applicant is willing to provide 6 no. EV charging points which will allow the vast majority of spaces on the site to have access to charging, not just those serving the two new flats, and so this offers a net improvement to the extant permission.

Subject to the per-dwelling contribution towards implementation of the APMS as well as the provision of EV charging points across the site as has been proposed (these can each be shared between two parking spaces to maximise the overall number of spaces with access to a charging point within the site), no further assessment needs to be undertaken.

In terms of EFDCs fees, I have spent 2.5 hrs reviewing this application for a total fee of £266.67 + VAT.

Marcus

Marcus Bennett

Interim Transport Planner | Planning Policy and Implementation  
Epping Forest District Council

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**From:** Ian Ansell <iansell@eppingforestdc.gov.uk>  
**Sent:** 20 April 2021 10:41  
**To:** Cuma Ahmet <Cahmet@eppingforestdc.gov.uk>; Marcus Bennett <mbennett@eppingforestdc.gov.uk>  
**Subject:** FW: 46 Stradbroke Drive - 0403/21From Subject Received Size

This application proposes the subdivision of a flat in a development that is under construction from a large3 (or 4) bed penthouse into two x two bed flats. There are four other flats in the development

A previous application for the same development was refused (EPF/1025/19) on amenity and parking grounds. This was appealed and in the appeal, we also introduced SAC grounds. The Inspector rejected both of the original reasons and dismissed the appeal on SAC grounds alone.

In progressing the new application, I have asked for the assessment and the email below is the agent's response. I attach two further emails, further comments from the agent and confirmation that the applicant will pay the fees for review.

Let me know if we need anything more.

Thanks

Ian

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**From:** Chris Maltby <[chris.maltby@edgeplan.co.uk](mailto:chris.maltby@edgeplan.co.uk)>

**Sent:** 16 April 2021 16:55

**To:** Ian Ansell <[iansell@eppingforestdc.gov.uk](mailto:iansell@eppingforestdc.gov.uk)>

**Cc:** Anthony Davis <[anthony@imperialdevelopments.com](mailto:anthony@imperialdevelopments.com)>; Robert Davis <[robertd@imperialdevelopments.com](mailto:robertd@imperialdevelopments.com)>

**Subject:** RE: 46 Stradbroke Drive - 0403/21

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Dear Ian,

Thank you very much for calling me the other day in respect of the Project Based HRA Assessment. I've spent some more time looking into this and discussed it further with a Transport Consultant. As discussed the proposals subject of this application do not neatly follow the advice set out in your note for many reasons, the note is clearly aimed at new developments where there is a demonstrable increase in traffic movements when compared with a baseline position in 2017.

Here we agreed that using this baseline position isn't appropriate as there is an existing consent that is under construction. The baseline position from which to determine the increased impact of traffic on air pollution in this case is clearly the consented scheme that include 5 flats, 1 of which is the large top floor apartment.

Any HRA Assessment is therefore required to consider the difference in vehicle trips between a large 3 bedroom penthouse apartment and two smaller 2 bedroom apartments. Being realistic about this the difference in vehicle trips between the consented scheme and that now proposed is likely to be negligible. The large penthouse could be occupied by a family and could therefore generate significant vehicle trips whereas the 2 bedroom apartments are more likely to be occupied by couples, or single people. It is unlikely there that there wouldn't be any discernible difference in the amount of traffic generated. There would also be no difference in the amount of parking available between the two schemes.

A Transport Modelling exercise wouldn't differentiate between the size of the flat and would therefore just see the proposals as an increase of 1 flat which would consequently lead to an increase in vehicle movements. Even looking at it on this basis the average increased vehicle movements associated with a single private flat in a suburban location such as Stradbroke Drive would only generate the following trip rates (per unit):

AM	Arrivals	0.101
	Departures	0.286
PM	Arrivals	0.317
	Departures	0.174

The daily average increased vehicle trips is therefore minimal. It is also reasonable to assume that these flats will be appealing to down sizers and therefore an older demographic which could result in even lower average daily trip rates.

Notwithstanding the above that clearly demonstrates the proposed development will not lead to any significant increase in vehicle trips it should also be appreciated as noted above that the proposed parking at the site does not change between the consented and now proposed scheme. So in physical terms there is no increase in the amount of parking on the site and therefore can be no increase in vehicle movements when compared with the extant permission.

Finally despite it being unlikely that there would be any demonstrable increase in traffic trips generated by the proposals the applicant is willing to install 6no. electric vehicle charging points. This will encourage future occupiers to use electric vehicles further mitigating the harmful impact on air quality resulting from vehicle trips generated by the approved development.

It is hoped that given the above and the specific circumstances of this proposal, the fact the proposed development is unlikely to result in any increased vehicle movements and therefore air pollution and the applicants agreement to include 6no. EV charging points as well as making the agreed financial contribution as set out in the submitted draft S.106 that you can now recommend this application for approval.

I'd be grateful if you could confirm at your earliest opportunity.

Regards,

Chris

Chris Maltby  
EdgePlan  
m. 07908 046060

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**From:** Chris Maltby  
**Sent:** 08 April 2021 17:20  
**To:** Ian Ansell <[iansell@eppingforestdc.gov.uk](mailto:iansell@eppingforestdc.gov.uk)>  
**Cc:** Anthony Davis <[anthony@imperialdevelopments.com](mailto:anthony@imperialdevelopments.com)>; Craig Dobson <[Craig@rdaarchitects.co.uk](mailto:Craig@rdaarchitects.co.uk)>  
**Subject:** RE: 46 Stradbroke Drive - 0403/21

Ian,

Thanks very much for coming back to me, please see my response and queries in relation to the matters covered in your e-mail.

With regard to the parking at ground level the Inspector noted *"I consider it is unlikely that it would be possible to comfortably accommodate parking for 3 larger vehicles"* We considered that 3 spaces would however be suitable for 3 smaller or medium sized vehicles which is why we retained the layout as originally proposed. Nevertheless we take your point and I attach a revised ground floor layout showing a total of 3 spaces at ground floor level (2 adjacent to no.44 and a single space) and if necessary please supersede this for the ground floor plan submitted with the application.

In respect of parking I note that the NMA application (ref: EPF/0745/21) that you are currently considering proposes to reduce the parking in the basement by 1 space, given the comments by the Inspector that 14 spaces would be acceptable we have asked the architect dealing with that application to reinstate the space in the basement. The architect will submit a revised basement plan to you in respect of the NMA application. Both applications will therefore propose 11 spaces at basement and 3 spaces at ground floor level.

I note your comments about the number of objections, would it be possible to see the letters of objection so that we may respond to the issues raised?

With regard to the Project Based HRA Assessment I would welcome a conversation with you on this point. I have reviewed the advice in your note and it is difficult to see how this should be applied to these proposals. As you know the proposal is to replace a large penthouse flat with two smaller flats. The proposal does not result in an increase in

floor area over the originally approved scheme and the number of habitable rooms also remains the same. As a result of the amendment referred to above the level of parking is also reduced when compared with the consented scheme. It is therefore inconceivable to consider that these proposals would result in an increase in the level of traffic generated above the consented scheme.

Your advice note suggests that the AADT should be calculated from a baseline of February 2017, but this would not take account of the now consented scheme that is currently under construction. Also even if we do take February 2017 as the baseline (a large 5 bedroom detached house) when compared with the proposed development (1 x 2 bedroom flat) there would be a net reduction in the AADT. It would be inappropriate to consider the 5 consented flats as they are not part of the proposed development.

I'd welcome your further advice on this, firstly whether an HRA Assessment is necessary and if you do consider it necessary what you consider the scope should be. I think it would be best to discuss this if you could let me know if there is a convenient time to speak tomorrow?

Regards,

Chris

Chris Maltby  
EdgePlan  
m. 07908 046060

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**From:** Ian Ansell <[iansell@eppingforestdc.gov.uk](mailto:iansell@eppingforestdc.gov.uk)>  
**Sent:** 08 April 2021 13:27  
**To:** Chris Maltby <[chris.maltby@edgeplan.co.uk](mailto:chris.maltby@edgeplan.co.uk)>  
**Cc:** Anthony Davis <[anthony@imperialdevelopments.com](mailto:anthony@imperialdevelopments.com)>  
**Subject:** RE: 46 Stradbroke Drive - 0403/21

Chris

Apologies for the delay in coming back – we had an IT upgrade last week and it probably won't surprise that all did not go well.

In terms of the application progress, we have received over 30 objections to the application on a range of matters common to previous objections but primarily around the size of parking spaces. I have read the Inspectors decision where it refers in particular to the narrow width of the three spaces grouped on the frontage, and suggested that only two of these could be viewed as usable. I note the same layout has been submitted and would have thought this anomaly could have been addressed.

As a result of the public interest however, the application is required to go before the Area Planning Committee.

In terms of the draft UU submitted, I note this deals with the principle issues in the interim mitigation strategy. However, since the submission of the application, legal advice has been obtained that requires more detailed assessment of the potential impact on air quality through a project based HRA Appropriate Assessment. This is now included in the application validation requirements but your application was submitted just before the change. The attached guidance has been issued in order to assist in the preparation of such a study. In submitting your study, we will require confirmation that the applicant will meet the costs of review set out in the document.

Finally, I would draw your attention to another application EPF/0745/21 submitted by another for amendments to the basement layout of the site which may impact your scheme, this application is due for determination next week.

I await the review document in due course

Regards

Ian Ansell

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**From:** Chris Maltby <[chris.maltby@edgeplan.co.uk](mailto:chris.maltby@edgeplan.co.uk)>  
**Sent:** 06 April 2021 09:14  
**To:** Ian Ansell <[iansell@eppingforestdc.gov.uk](mailto:iansell@eppingforestdc.gov.uk)>  
**Cc:** Anthony Davis <[anthony@imperialdevelopments.com](mailto:anthony@imperialdevelopments.com)>  
**Subject:** RE: 46 Stradbroke Drive - 0403/21

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Hi Ian, hope you had a good weekend,

Further to my recent e-mails and voice messages please can we speak today? I'm keen to understand where we are on this application. Will it need to be referred to your planning committee or can it be dealt with under delegated powers?

I will try and call you again later this morning.

Regards,

Chris

Chris Maltby  
EdgePlan  
m. 07908 046060

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**From:** Chris Maltby  
**Sent:** 01 April 2021 10:08  
**To:** [iansell@eppingforestdc.gov.uk](mailto:iansell@eppingforestdc.gov.uk)  
**Cc:** Anthony Davis <[anthony@imperialdevelopments.com](mailto:anthony@imperialdevelopments.com)>  
**Subject:** RE: 46 Stradbroke Drive - 0403/21

Morning Ian,

I've left another voice message for you this morning but not sure if your able to pick them up at the moment so just following up with this e-mail.

If you could give us an update on the application that would be helpful, I note a decision is due on the 12<sup>th</sup> April which only leaves 4 working days between now and then due to the bank holidays coming up.

If you could please give us an update today.

Thanks very much,

Chris

Chris Maltby  
EdgePlan  
m. 07908 046060

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**From:** Chris Maltby  
**Sent:** 29 March 2021 11:04  
**To:** [iansell@eppingforestdc.gov.uk](mailto:iansell@eppingforestdc.gov.uk)  
**Cc:** Anthony Davis <[anthony@imperialdevelopments.com](mailto:anthony@imperialdevelopments.com)>  
**Subject:** RE: 46 Stradbroke Drive - 0403/21

Dear Ian,

I write further to my e-mail below and my voice message left just now. As mentioned please find attached a latter and now complete version of the S106 agreement. Please can you pass this onto the relevant person at the Council who will be finalising this in anticipation of it being signed.

As also mentioned could we also please get an up date on the application, we are keen to understand if there are any objections and whether the application can be determined under delegated powers or will need to be referred to committee. If the later please confirm the date at which the application will be referred to committee.

Look forward to hearing from you, I'm available all day if you want to call otherwise feel free to drop me an e-mail.

Regards,

Chris

Chris Maltby  
EdgePlan  
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**From:** Chris Maltby  
**Sent:** 25 March 2021 19:18  
**To:** [iansell@eppingforestdc.gov.uk](mailto:iansell@eppingforestdc.gov.uk)  
**Subject:** 46 Stradbroke Drive - 0403/21

Dear Ian,

I hope this e-mail finds you well. I'm just looking for a quick update on our application at 46 Stradbroke Drive.

Please can you confirm if there have been any objections so far and also whether you think this application will need to be referred to committee?

Also whilst writing I attached a first draft of the Section 106 agreement in respect of the Epping Forest SAC. Still waiting to confirm one of the details so I will forward you another final draft in the next few days but just wanted you to know this is in hand.

Look forward to hearing from you.

Kind regards,

Chris

Chris Maltby BA (Hons) Dip TP MRTPI  
Planning Associate

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