

**Our ref: JCG25988**

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Date: 29 July 2022

Planning Inspectorate  
Temple Quay House  
2 The Square  
Temple Quay  
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BS1 6PN

Dear Sir / Madam,

## **TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 2017, REGULATION 6 (1) AND (2) – REQUEST FOR SCREENING OPINION**

We write on behalf of Countryside Partnerships PLC ('the Applicant') to request an EIA Screening Opinion from the Planning Inspectorate (PINS) in respect to the proposed outline planning application for the development of up to 130 dwellings with all matters reserved except for access on land south of Henham Road, Elsenham ('the Site').

The Site is located in Uttlesford District Council (UDC). In February 2022, the Department for Levelling Up, Housing and Communities (DLUHC) announced that major development applications in UTC can be applied for to PINS. Countryside therefore intends to submit the outline planning application and this EIA Screening Opinion request directly to PINS.

The purpose of this report is to provide PINS with the requisite information it needs to reach an EIA Screening Opinion on the proposed development, in accordance with Regulation 6 (1) of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 (referred to hereafter as the 'EIA Regulations').

To assess whether the proposed development requires an EIA or not, this report considers the nature, scale and potential environmental effects of the proposal and then determines whether such effects are likely to be 'significant' in the context of EIA, as judged against Schedules 1, 2 and 3 of the EIA Regulations, and Government Guidance set out in the Planning Practice Guidance<sup>1</sup> (PPG).

The evidence presented in this EIA Screening review is developed from the environmental reporting that is submitted with the outline application and produced by technical specialists. In conclusion, the review demonstrates that there is no reasonable likelihood of significant adverse environmental effects arising from either the construction or future operation of the site, provided that conventional and proportionate planning controls are imposed upon such development. Accordingly, with reference to the EIA Regulations and accompanying Government guidance, we believe that PINS should conclude that a formal EIA is not required.

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<sup>1</sup> [www.gov.uk/guidance/environmental-impact-assessment](http://www.gov.uk/guidance/environmental-impact-assessment)

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## **Site Context**

The Site is located on the southeast edge of Elsenham, south of Henham Road (B1015) and east of Hall Road both which bound the Site to the north and west respectively. The southern boundary of the Site is formed by Stansted Brook and a dense tree belt, beyond which is an animal shelter, the Grade I listed St Mary the Virgin Church and Grade II listed Elsenham Hall and designated Wood Pasture & Parkland.

A public bridleway runs south of Stansted Brook (outside the Site boundary). The southeast boundary is formed by a dense hedgerow beyond which is agricultural land, and the northeast boundary is currently a wooden fence beyond which are the Grade II listed Elsenham Place, Elsenham Place Barns and Dovecote.

Along the northern and northwest boundaries of the Site are residential properties and The Crown Public House. West of the Site, beyond Hall Road to the south, is the development site known as Land at Hall Road which was granted outline planning permission for 130 dwellings in 2013 and has in July 2022 received detailed consent for a similar scheme of 130 dwellings (planning reference UT/19/0462/FUL).

The Site itself extends to 5.3 hectares and comprises two agricultural fields divided by an interspersed hedgerow. A public footpath cuts diagonally across the northwest corner of the site.

The Site lies outside of the designated Green Belt. Photographs of the Site are shown below (Photos 1.1 to 1.4). A Site location plan is shown in Figure 1.



**Photo 1.1** – View across the site from north field boundary.



**Photo 1.2** – View east across the site.



**Photo 1.3** – View of Stansted Brook along the southern boundary.



**Photo 1.4** – View north across the site taken from southern boundary.

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The Site is located approximately 2km north of Stansted Airport and 1.1km to the east of the M11 motorway. The main A120 is 4km south of the Site which provides connection to the M11. The A120 is access via Hall Road that leads south from the Site and around the airport perimeter.

Henham Road (B1051) road passes along the north Site boundary and continues eastwards through the Elsenham village and beyond to the larger community of Stansted Mountfitchet located 3km southwest of the Site. The town of Bishop Stortford is located 6.8km southwest of the Site.

Elsenham Railway Station is located approximately 1.2km walking distance northwest of the Site and provides hourly weekday services to Cambridge and London Liverpool Street.

There are no environmental or heritage designations on the Site. A number of neighbouring properties to the Site are Grade II listed including the Barns and Dovecote at Elsenham Place. The Grade I listed Church of St Mary the Virgin is located 250m to the south of the Site.

The Site lies within the Impact Risk Zone of two Sites of Special Scientific Interest (SSSI); Elsenham Woods and Hatfield Forest. Elsenham Woods is located 1.7km east of the Site and is designated as a SSSI due to its predominant ancient woodland mix. Hatfield Forest SSSI is also a National Nature Reserve. Its designation is stated by Natural England to be based on it *'supporting an ancient forest mosaic of wood pasture, coppice, old grassland plains and wetlands, that collectively support grassland, woodland, wetland habitat features and notable assemblages of veteran trees, invertebrates, fungi, lichen and breeding birds.'*

Site levels fall steadily from around 94m Above Ordnance Datum (AOD) at the north boundary alongside Henham Road to around 81m AOD at the southern boundary alongside Stansted Brook.

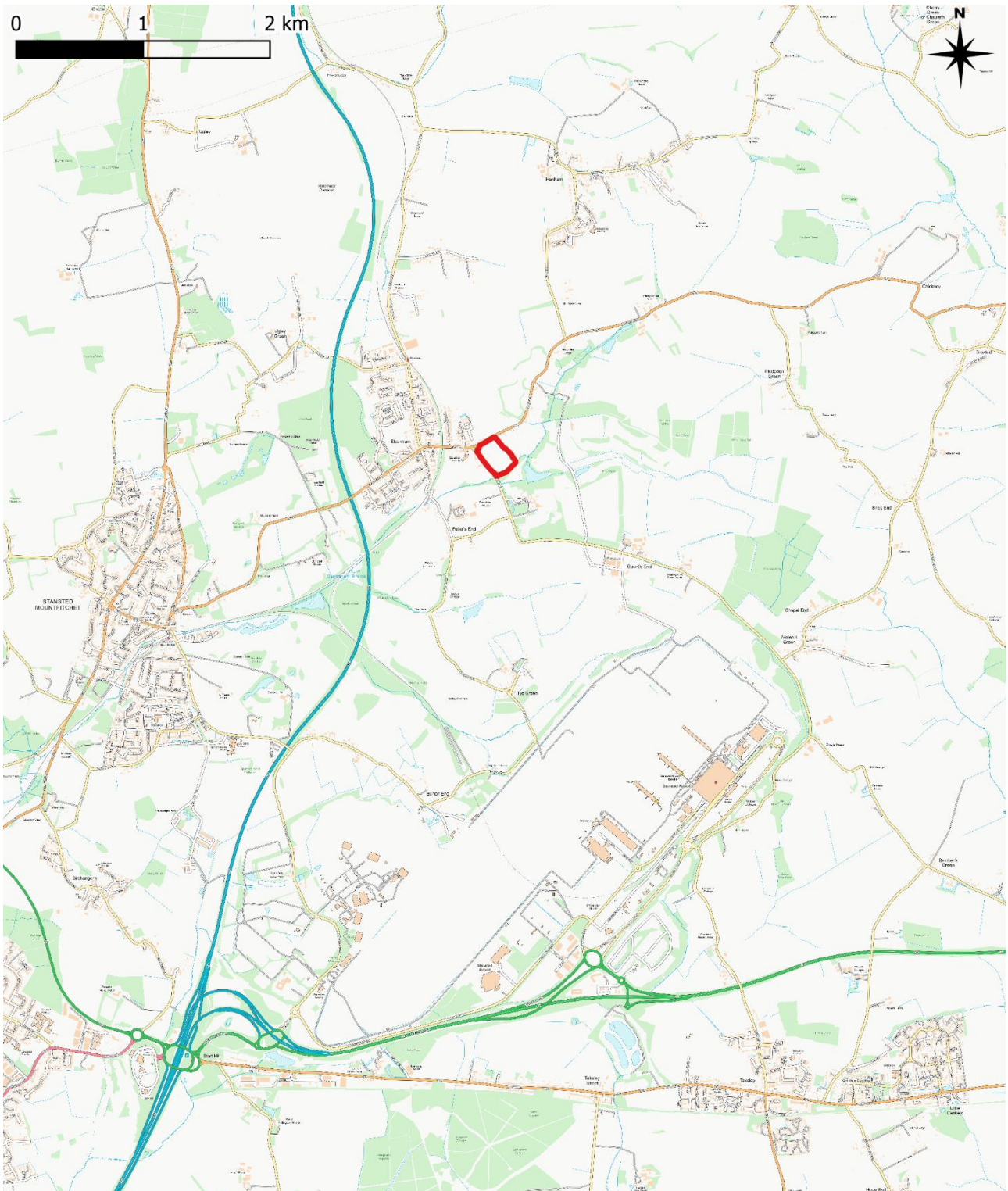


Figure 1: Site Location

### The Proposed Development

It is proposed to develop up to 130 residential units (40% affordable) comprising a mix of housing, bungalows and apartments (predominantly 2 storey dwellings with ridge heights of up to 9.63m). The proposed number of market housing dwellings equate to 60% of the total (78 dwellings) with affordable housing provision equating to 40% (52 dwellings). A final mix will be determined at the reserved matters stage.

Open and accessible green spaces and corridors are designed in the landscaping strategy. Most dwellings have private gardens with exception of the apartment units where communal garden areas will be provided. An indicated site layout is shown in Figure 2.



Figure 2: Indicative Site Layout (DAP architects)

The site layout, building typology and landscaping have been informed by the Applicant's technical specialist team. The layout and design recognise neighbouring heritage assets including St Marys Church, the barns at Elsenham Place and the important grouping around Elsenham Cross. Landscaping incorporates buffer areas providing open greenspace predominantly towards the east and south boundaries. Development is proposed to be set back on the east, west and north boundaries to reflect neighbouring built form. Imagery of indicative housing typology, and arrival point with views of St. Mary's Church is show in **Figure 3**.



**Figure 3: Indicative housing typology (DAP architects)**

Vehicular access to the developed Site will be from Henham Road by means of a new simple priority junction. Car and cycle parking provision will be in accordance with Essex County Council's (ECC) parking standards. The development aims to promote sustainable travel and a Travel Plan is submitted with the Application.

In conjunction with the development, a package of improvements to transport infrastructure are proposed including a new signage for a bus stop, informal crossing points to existing infrastructure, pedestrian improvements to the nearby Hall Road/Henham Road/High Street junction, new cycle stands located at the local shops and bus service contributions towards higher frequency service. Further details are provided in the Transport Assessment<sup>2</sup> submitted with the Application.

The surface water drainage design follows the design principles of the SuDS management train and will utilise the line of the existing drainage ditch running east-west across the Site and that is formed along the boundary of the two fields that make up the Site area. Peripheral landscaping on the east and south area will incorporate swales and channelling for runoff water to drain towards the Stansted Brook. Runoff and discharge rates from the Site to the Stansted Brook would not increase above the existing greenfield rate.

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<sup>2</sup> Transport Assessment. Ardent, July 2022.

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## **Determination of EIA Requirement**

In determining whether the proposed development needs to be assessed under the EIA Regulations, there are three main aspects for consideration. These are:

- The type of development: is it of a type referenced in the EIA Regulations, as either:
  - a Schedule 1 development; or,
  - of sufficient scale to fall within the specified thresholds of development identified in Schedule 2;
- The location of the Application Site: is the development within, adjacent or in close proximity to a particularly sensitive location; and/or,
- The nature of the development: is the development of a type that is likely to give rise to significant environmental effects.

For those developments in Schedule 2, it is important to consider the potential for significant environmental effects based on the context of the site and proposals, with the PPG noting in Paragraph 018 (Reference 4-018-20170728) that *'only a very small proportion of Schedule 2 developments will require an Environmental Impact Assessment'* and that *'it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects'*.

The Proposed Development, as described above, does not fall within any of the Schedule 1 development types under the EIA Regulations. The Proposed Development would be considered an urban development project (Development type 10b) under Schedule 2 of the Regulations, for which the following thresholds are applicable:

- The development includes more than 1 hectare of urban development which is not dwellinghouse development; or,
- The development includes more than 150 dwellings; or,
- The overall area of the development exceeds 5 hectares.

The proposed development is entirely residential and would provide up to 130 residential units. The first two threshold are therefore not applicable. The area of the Site is 5.3 ha and therefore marginally exceeds the third threshold of 5 ha.

The indicative threshold criteria (Annex A of the PPG) identify that EIA is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination. Key issues to consider are identified to be the physical scale of development and their potential increase in traffic, emissions and noise.

## **Environmental Sensitivities**

The following sections provide discussion on environmental sensitivity based on the Screening Checklist referenced in the PPG. This Checklist is produced by PINS to aide Planning Authorities in provide a clear audit of considerations in assessing whether proposed development should be considered under the EIA Regulations.

## **Natural Resources**

The superficial geology of the Site is Sand and Gravel (Kesgrave Catchment Subgroup) with some Head deposits (Clay, Silt Sand and Gravel). The area is within a Mineral Resource Safeguarded area as defined by the British Geological Survey. The Application is submitted with a Mineral Resource Assessment<sup>3</sup> that concludes that despite potentially favourable granular lithologies, the environmental sensitivity of the area, particularly the buffer zone requirements from existing dwellings, presents limited economic and viable

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<sup>3</sup> Green Earth Management Co Ltd, March 2022.

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opportunity for sand and gravel extraction. Given this, further discussion on any potential for the extraction of sand and gravel is not considered necessary.

Furthermore, sufficient sand and gravel deposits are identified from allocated mineral abstraction sites capable of providing sufficient supply volume over the period of the adopted Minerals Local Plan<sup>4</sup>. The sterilisation of mineral deposits through the development of the Site is not considered likely to result in significant environmental effects.

The Site is undeveloped agricultural land that is understood to have been used in recent years for grazing cattle. Reference to Natural England mapping of agricultural land classification, grades soils into five bands - Grade 1 'excellent' to Grade 5 'very poor'. Grade 3 is subdivided into 3a 'good' and 3b 'moderate'. The soils within the area of the Site are Grade 3a 'good' quality and fall within the 1 to 3a grouping used to define 'Best and Most Versatile Agricultural Land'.

Development of the site would result in the loss of cultivable land albeit land that has not been used for crop growth for a number of years and where cattle grazing has resulted in the pocketing and degradation of soils. The development would seek to reuse soils in the landscaping design and thereby minimise offsite removal. Where offsite removal is required then the developer would seek to deposit soils in local area schemes. No clean soils would be sent as waste to landfill. It is inevitable that any development of agricultural land would result in the loss of cultivable soils and in context of the use of the Site in recent years, this is considered to result in a minor environmental effect.

### **Waste**

Development of the Site will generate waste typical of any major housing project. The development contractor will be responsible for producing a Construction Environmental Management Plan including a Waste Management Strategy setting out measures to reduce waste and promote recycling. Off-site manufacturing of building material will be encouraged to reduce on-site waste generation. Surplus imported materials will be returned to suppliers.

Once developed, waste streams will be that typical of standard municipal waste and collected under arrangement of the local authority.

Through a Waste Management Strategy, wastes generated in both the construction and operation of the Site can be adequately controlled to ensure wastes are managed through the waste hierarchy. Consequently, considering the nature and scale of the Proposed Development, additional waste generation is not considered likely to cause a significant effect.

### **Pollution and Nuisances**

Construction works will result in construction vehicle traffic associated with excavation and foundation earthworks, transport of materials and wastes and landscaping activities. Use of vehicles and plant will generate noise, pollutants emission, and dust from vehicle tracking and earthworks. There is also potential for adverse effects as a result of noise and lighting during construction.

The Site is neighboured closely by housing principally on its north and west boundaries. Construction vehicles will enter the Site from the north boundary. Construction traffic will be subject to a Construction Traffic Management Plan which will mitigate impact by routeing vehicles away from Elsenham village where practical either eastwards or south along Hall Road.

Development of rural sites on the outskirts of residential settlements are not untypical and environmental effects from pollution, noise and vibration can generally be satisfactorily mitigated through Construction Environmental Management implemented and monitored by the contractor. It is anticipated that the contractor will engage with the local community and provide notification of main work activities and what controls will be put into place to mitigate pollution and nuisance onto surrounding sensitive properties.

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<sup>4</sup> Essex Minerals Local Plan. Essex County Council 2014.



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The operational development will lead to emissions from private vehicle use although this will be minimised through the promotion of sustainable travel. Significant noise and vibration or light, heat or energy or electromagnetic radiation releases are not expected to arise from the operation development.

The Site is not within an Air Quality Management Area.

The Site is undeveloped and significant contamination is unlikely. Exposure, handling and remediation of significant contamination is considered unlikely. The Application is submitted with a Phase I Environmental Assessment which provide further details on ground conditions.

Overall, and development on the Site will result in some pollution and nuisance effects. However, through effective site construction management, environmental effects during this period are not considered to be significant. The operation of the development will result in noise and low-level vehicle pollutant emissions that are unlikely to result in significant effects. It is to be noted that the Site lies close to the flight path of Stansted Airport and 2km from its runway threshold and that Elsenham residents will be exposed to prolonged background aircraft noise.

### **Population and Human Health**

The new residential population would help attract investment to the area through the increased spending power that the population could bring to the local economy. A significant number of temporary jobs would be created during the construction phase and it is estimated that during the construction phase a number of direct and indirect jobs would be created. The construction phase would also potentially provide a number of opportunities for apprentices, graduates and other trainees.

The Site provides no other core social infrastructure. As the new residential dwellings will in turn introduce an increase in population, there is the potential that surrounding community services would feel an increased pressure. However, Elsenham Church of England Primary School is located less than 100m west of the site and currently has a surplus pupil capacity of 104. Forest Hall Secondary School is located within 2 miles of the site, within the neighbouring village of Stansted Mountfitchet, with a surplus capacity of 173. Application of the child yield factors stated within the ECC Developers' Guide to Infrastructure Contributions<sup>5</sup> indicates an anticipated child yield of 39 primary and 26 secondary school aged children. Both of which can be absorbed within the existing surplus capacities of the local schools. With regards to other community services, Elsenham Surgery GP practice is located within 600m of the site with a current GP to patient ratio of 1:1,071, well below the national standard of 1:1,800 and therefore indicating capacity. Furthermore, there are two dentists within 4 miles of the site.

The proposed development would also provide new open amenity and play spaces, which will provide a 'soft' socio-economic and health benefit to users of the site. These spaces will provide new opportunities for leisure and community cohesion. It is anticipated for these spaces to be provided along the eastern and southern boundary of the site. These spaces will be provided in addition to the parks and open space within 2km of the site, including Elsenham Park and Playing fields and The Spinney Park to the north-west and west of the site.

Life expectancy and mortality rates within Uttlesford are significantly better than the national averages<sup>6</sup>. The 2019 Indices of Multiple Deprivation (IMD) indicated 44.0% of Uttlesford residents were within the top 2 least deprived Lower-layer Super Output Areas in England. Furthermore, the Elsenham and Henham Ward of which the site is located within the top 10% of least deprived areas within England. Although the proposed development does not propose any direct health infrastructure, the provision of suitable housing, open space and the existing health baseline for the surrounding area means that significant health impacts are unlikely. Furthermore, adverse significant environmental effects on air quality, contamination, noise and other direct and indirect human health factors are shown to be unlikely in the above sections.

In view of this, it is concluded that the proposed development is not expected to result in any significant adverse population or human health effects. Accordingly, the proposed development will provide beneficial

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<sup>5</sup> Developers' Guide to Infrastructure Contributions. Essex County Council 2020.

<sup>6</sup> Office for Health Improvement and Disparities

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outcomes to the wellbeing of the future residents and the surrounding businesses. Where any additional social infrastructure is identified, this can be dealt with by way of financial contributions, as appropriate.

### **Water Resources**

The Application Site area exceeds 1ha and therefore a detailed Flood Risk Assessment (FRA) <sup>7</sup> is submitted with the Application in accordance with the requirement of the NPPF.

The Environment Agency's surface water flood maps show that the Site is in an area that predominantly has a 'Low' risk of surface water flooding, with a small section of 'medium' surface water flooding risk along the southern boundary of the Site. No other means of flooding is identified as posing a risk to the Site. The Site does not lie within an Environment Agency Groundwater Source Protection Zone (SPZ).

The landscaping design include drainage measures and will integrate SuDS utilising the natural levels on the Site, attenuating surface water and conveying for controlled discharge to the Stansted Brook at Greenfield Rates.

Runoff from highways and other hardstanding will be conveyed to permeable pavements, underdrained swales and a buried cellular storage tank and ultimately to two attenuation basins located in the east and south areas of the Site. SuDS have been integrated into the landscaping strategy, forming a SuDS treatment train in line with the UK Government's National Planning Policy Framework<sup>8</sup> (NPPF) Hierarchy of Drainage.

The SuDS strategy follows CIRIA C753 SuDS Management Train approach and provides appropriate water quality treatment prior to discharge into the Stansted Brook.

Following proposed flood mitigation works, the Site will have a low/negligible risk of fluvial flooding (including when taking into account the impacts of climate change), ground water flooding and flooding from other sources and will not exacerbate flooding of neighbouring areas. Consequently, significant effects are not considered likely.

### **Biodiversity and Species**

The Application is submitted with an Ecological Assessment<sup>9</sup> and Air Quality Assessment<sup>10</sup>.

The Site comprises improved grassland, species-poor hedgerows and trees. The Stansted Brook and woodland are adjacent to the southern site boundary and the wider landscape comprised residential housing and arable land.

Recommendations have been provided for bats and nesting birds. These are primarily to retain suitable habitats wherever possible and to incorporate enhancements within the development. Where retention of habitat is not possible, further surveys will be required.

Badgers, breeding birds, reptiles, hedgehog and common toad may utilise the habitats available onsite in a transient nature, and therefore mitigation and enhancement measures are proposed for these species, including precautionary working methods, retention and protection of existing habitats and new habitat creation.

Overall, the habitats on site are considered to be of up to local ecological value only.

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<sup>7</sup> Flood Risk Assessment & Drainage Strategy. Ardent, June 2022.

<sup>8</sup> National Planning Policy Framework. Ministry for Housing, Communities and Local Government 2021.

<sup>9</sup> Ecological Assessment. Southern Ecological Solutions, July 2022

<sup>10</sup> Air Quality Assessment. Ardent, July 2022.

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Air quality modelling of traffic emissions presented in the Air Quality Assessment<sup>10</sup> conclude that the effects of operational traffic emissions on nearby areas of Ancient Woodland (Hawland Wood, Eastend Wood and areas of Ancient Woodland to the south) may be screened out as being 'not significant'.

Detailed emissions modelling has been completed on Elsenham Woods SSSI and conclude that there is a potential for non-significant impacts to occur at a small proportion of this SSSI.

The Site falls within the Zone of Influence (ZOI) of Hatfield Forest SSSI and Elsenham Woods SSSI and indirect impacts on these sites are possible as a result of the development. Provision of onsite open space, links to public rights of way and financial contribution towards the Hatfield Forest mitigation strategy will be required.

Through implementing the recommended measures detailed in Ecological Assessment report, it is considered that any adverse effects from the proposed development on the habitats and species on Site will be adequately mitigated. With on- and off-site enhancement of habitats (details set out in the Ecological Report and associated BNG Design Stage Report), there will be a 20% net gain for local biodiversity in line with relevant wildlife legislation and the NPPF, and local planning policies related to biodiversity. Consequently, significant beneficial effects from the development will result.

An Arboricultural Survey and Constraints Advice report<sup>11</sup> has been undertaken for the Site and is submitted with the Application. The Constraints Plan shows a number of 'moderate value' trees to be largely located along the south and east boundary of the Site. All other trees are considered to be 'low value'.

The report concludes that the development layout can be designed to be sympathetic to the existing tree cover assuming mitigation measures are provided for.

## Landscape and Visual

A Landscape and Visual Statement<sup>12</sup> is submitted with the Application that sets out to demonstrate the layout has been formulated to respond to site-specific opportunities and constraints and adhere to best practice urban design principles. A strategy has been adopted to place development blocks and building frontage behind a series of green buffers to achieve the following:

- Address Henham Road and Hall Road
- Respect the setting of St Marys Church, Elsenham Cross and the barns at Elsenham Place and create key vistas towards these historical landmarks
- Create a welcoming entrance green and an 'Arrival Point' feature
- Define and overlook the existing public footpath
- Consider the existing water pipe easement along Hall Road
- Allow space for existing vegetation and watercourses
- Provide public open space and SUDS
- Offer surveillance over a circular pedestrian route.

The Site is located within the Countryside Protection Zone (CPZ), a local policy designation which seeks to maintain a local belt of countryside around Stansted Airport that will not be eroded by coalescing developments. Elsenham Hall is located to the southeast of the site and is identified in the Local Plan as 'historic parkland'<sup>13</sup>.

The Site is located within the Stort River Valley landscape character area, which has a relatively high sensitivity to change. While effects would arise from the change of land use from pastoral to residential and loss of openness, the Site lies adjacent to the settlement edge of Elsenham and the site layout has been

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<sup>11</sup> Hallwood Associates, March 2022

<sup>12</sup> Landscape and Visual Statement, RPS, June 2022

<sup>13</sup> This area is not recorded as 'Historic Parkland' in the Historic England Register of Historic Parks and Gardens

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designed to retain views across to St Mary's Church and provide a green buffer at Elsenham Place and at the gateway to Elsenham village.

The mature tree belts to the south and east of the Site will minimise the potential for impact on the adjoining landscape to the south and east.

The proposed residential development of this scale would not result in significant effects to the value of the landscape of the A3 Stort Valley LCA as there would be no loss of important landscape features, elements and characteristics.

There would be effects to the PRoW which crosses the Site, although this is retained and respected by the Proposed Development. A new pedestrian heritage trail is proposed for the Site which increases public amenity within the Site and would provide additional connections to the wider PRoW network whilst creating opportunity for people to experience the wider landscape and views from locations previously unavailable within the Site.

The loss of openness through development would not significantly change the pattern and grain of the settlement or the urban fringe landscape. The residential district of Elsenham and the houses and church within and in proximity to the historic core would continue to have an influence over the townscape/landscape interface on the urban edge, providing an established context for the development of a further, small residential scheme.

The appropriate scale, massing and layout of the new houses and the use of materials, colours and textures that reference locally distinctive architecture, within a landscape structure provided by hedgerows and trees on the edge of a settlement would limit the effects on the wider landscape.

The zone of theoretical visibility (ZTV) for the proposed scheme is relatively localised and well defined by surrounding vegetation and built development. The assessment concludes that the greatest change in views would be experienced by walkers using the right of way which passes between the new houses within the Site.

Due to the high sensitivity of receptors, the close proximity of viewing locations and the prominence of the new houses there would inevitably be a change in the character and composition of these views.

Overall, it is concluded that the proposed scheme would not result in significant harm to visual amenity within the wider study area and therefore significant environmental effect are unlikely.

## **Cultural Heritage/Archaeology**

The Application is submitted with a Built Heritage Assessment<sup>14</sup>. This assessment has shown that there are 15 listed buildings which have the potential to be impacted in some way by the development of the Site. It is concluded that impacts to the identified listed buildings vary between negligible and a low-moderate level of less than substantial harm. This is principally due to their proximity to the Site and changes within their wider settings that affect visual and historical functional connections.

The wider planning benefits and heritage benefits are set out in the accompanying planning statement prepared by Savills, and as part of their planning assessments, these benefits are weighed against the less than substantial harm identified and described in this heritage statement, including:

- Provision of Heritage Trail and new opportunities to appreciate local assets;
- Open space buffer zone to the north and east edges of the Site, including community orchard;
- Careful massing on single storey buildings adjacent to historic group at Elsenham Cross;
- Retention of Public Right of Way with views to Elsenham Place and Elsenham Cross;
- 20% Biodiversity Net Gain on land within the landowners control just to the east of the application site.

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<sup>14</sup> Built Heritage Assessment. RPS, March 2022.

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The proposed development's impact on the setting of the identified listed buildings would introduce a change in the experience of those settings but not to the extent that it would outweigh the wider planning benefits of the application proposals.

A geophysical survey of the site was completed in March 2022<sup>15</sup> and did not identify any anomalies that can confidently be interpreted as archaeology. A small number of anomalies of possible archaeological origin were recorded in the northern area of the Site and thought to be associated with a single ditch and a small number of possible pit-like features.

Overall, a moderate to high archaeological potential for Bronze Age and Iron Age occupation remains on the Study Site, a moderate potential for Neolithic remains. If present, then these are likely to be of low/local significance.

No significant archaeological assets have been recorded for the Site. If deemed to be required, any requirement for excavation and recording of features will be conducted in consultation with English Heritage and undertaken prior to any development works. This requirement is anticipated to form a pre-commencement condition.

With the archaeological investigation and reporting works detailed above, the development is not likely to result in significant archaeological effects.

### **Transport and Access**

Traffic would be generated during construction and operation of the development that will impact on some local junctions in the area. Access to the Site would be from Henham Road (B1051) along the north boundary.

Pre-Application discussions on transport have been conducted with ECC. Construction traffic would be managed and controlled through measures set out in a Construction Logistics Plan (CLP) or Construction Management Plan (CMP). Overall, construction traffic is expected to be much less in the peak hours than the operational traffic associated with the operation development. In addition, construction deliveries will be timed outside of peak hours to reduce any local disruption. Where practical, construction traffic will be routed east of south from the Site away from the centre of Elsenham village.

For the operational development, car and cycle parking will be in accordance with UDC's local parking standard guidance. The standards are based on the minimum parking requirements in line with ECC's (Essex Parking Officer's Association, EPOA) parking guidance but with additional car parking for 4+ bedroom dwellings.

There will be an emphasis on sustainable travel through the Travel Plan measures including promotion of use of public transport (Elsenham railway station is 1.2km walking distance from the Site). A package of improvements is offered for improvements to transport infrastructure including a new signage for a bus stop, informal crossing points to existing infrastructure, pedestrian improvements to the nearby Hall Road/Henham Road/High Street junction, new cycle stands located at the local shops and bus service contributions towards higher frequency service. Bus service contributions are expected to be provided in line with other consented developments in the area.

In summary, construction traffic is considered unlikely to result in significant traffic impact to local road junctions. The operational development will result in additional road traffic particularly at peak times. However, through the promotion of green travel, it is anticipated that some alleviation of impacts can result through future residents opting to use public transport. Traffic and Access impacts from the operational development are therefore considered to be of minor adverse significance.

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<sup>15</sup> Archaeological Desk Based Assessment. RPS, July 2022.

## Land Use

The Site is undeveloped and located within the Countryside Protection Zone (CPZ). With exception of a public footpath that run diagonally through the northwest of the Site provides limited formal accessible open green space to the wider community. The development of the Site will have impact, albeit non-significant, on the area setting and environmental characteristics.

A number of earmarked and in-application developments within the surrounding areas are listed in Table 1 (see section below on Cumulative Effects). Individually, the impacts of these developments will be assessed through submitted environmental reporting and mitigation set out or conditioned to prevent unacceptable future impacts. In this regard, the future development of the Site has been produced mindful of these developments and is therefore considered unlikely to introduce impact on these surrounding existing and future land uses.

The future land use and its context with the surrounding area are not considered likely to result in significant environmental effects.

## Land Stability and Climate

The Site is not located within an area that is considered to be susceptible to extreme or adverse climatic conditions that could lead to the project causing environmental problems. The site is not in an area known to be particularly susceptible to severe winds, fog or cause temperature inversions. The site is also not known to be susceptible to subsidence, landslides or erosion.

## Cumulative Effects

The EIA Screening process requires due consideration to be given to the potential for significant effects to arise from the proposal in combination with other consented and highly likely developments in the area. There are several 'major' development sites in the vicinity of the site (within 1km) which are detailed in the Planning Statement submitted with the Application and are listed in Table 1 below.

**Table 1 – Cumulative Schemes**

Ref.	Reference and Address	Description	Distance from Site	Process
1.	<b>UTT/20/2908/OP</b> Land south of Bedwell Road, Ugley	Outline application for up to 50 market and affordable dwellings, public open space and associated highways and drainage infrastructure - all matters reserved except access.	1km NE	Awaiting decision.
2.	<b>UTT/19/2266/OP</b> Land North Of Bedwell Road And East Of Old Mead Road, Ugley	Outline planning application for the erection of up to 220 dwellings including affordable housing with public open space, structural planting and landscaping and sustainable drainage system (SuDS) with vehicular access point from Bedwell Road. All matters reserved except for means of access.	1.1km NE	Refused. Awaiting outcome of appeal.
3.	<b>UTT/19/2470/OP</b> Land west of Elsenham	Outline application with all matters reserved except access for residential development of up to 99 no. dwellings including affordable homes, with areas of landscaping and public open space, including points of access of Stansted Road and Isabel Drive and associated infrastructure works.	1km W	Awaiting outcome of appeal.
4.	<b>UTT/19/0462/FUL*</b> Land West of Hall Road, Elsenham	Full planning application comprising a residential development for 130 dwellings (including affordable housing); the provision of open space; play areas; car parking; new pedestrian linkages; landscaping and ancillary works, with access off Hall Road, and the change of use of 0.371ha of agricultural land for educational use.	0.2km W	Approved.

<p>5. <b>UTT/19/0437/OP*</b> Land south of Rush Lane, Elsenham</p>	<p>Outline application for the erection of up to 40 dwellings with all matters reserved except for access.</p>	<p>0.5km SW</p>	<p>Refused. Appeal allowed.</p>
<p>6. <b>UTT/17/3573/OP*</b> Land to North West of Henham Road, Elsenham</p>	<p>Outline application with all matters reserved except for access for: up to 350 dwellings, 1 no. primary school including early years and childcare setting for up to 56 places, open spaces and landscaping including junior football pitch and changing rooms, access from B1051 Henham Road with associated street lighting and street furniture, pedestrian, cycle and vehicle routes. pedestrian and cycles link to Elsenham Station and potential link to Hailes Wood, vehicular and cycles parking. provision and/or upgrade/diversion of services including water, sewerage, telecommunications. electricity, gas and services media and apparatus, on-plot renewable energy measures including photo-voltaics, solar heating and ground source heat pumps, drainage works, sustainable drainage systems and ground and surface water attenuation features, associated ground works, boundary treatments and construction hoardings.</p>	<p>0.2km NE</p>	<p>Approved.</p>
<p>7. <b>UTT/13/0177/OP*</b> Land West of Hall Road, Elsenham</p>	<p>Erection of up to 130 dwellings with associated open space, play areas, land for educational use and other ancillary works. All matters reserved except means of access.</p>	<p>0.2km W</p>	<p>Approved.  Note, this is the same application site as for UTT/19/0462/OP</p>

It can be reasonably expected that the identified Cumulative Schemes will all be designed and constructed in accordance with good practice environmental standards and would be subject to appropriate planning conditions (e.g. with respect to minimising noise, dust and other effects), as well as S106 financial contributions and other obligations to mitigate against increased pressure on community infrastructure. Furthermore, a number of the larger residential developments include social infrastructure as part of their proposals, including UTT/17/3573/OP which comprises a primary school.

The Site and a number of the Cumulative Schemes are located in the Countryside Protection Zone (CPZ), a local policy designation which seeks to maintain a local belt of countryside. However, recent decisions and appeals have questioned the justification of this policy designation (S8 in the adopted Local Plan) and therefore what weight should be applied to planning decisions due to the inability to demonstrate a supply of housing above 5 years. Regardless, the potential impact on landscape and visual will be considered as part of the Landscape Strategy. It can be reasonably assumed the same approach will be taken for the identified permitted Cumulative Schemes. Furthermore, given the flat topography surrounding the site and the level of screening from existing built form and vegetation, there would be limited visibility of the proposed development together with Cumulative Schemes.

In the unlikely event that the peak construction activity for each of these developments overlap, the principal contractors of these construction projects would be expected to liaise with each other and identify suitable mitigation measures in their Construction Logistic Plans (CLPs) to minimise the cumulative impact on local road networks. Accordingly, it can be reasonably assumed that significant cumulative effects are unlikely or can be suitably mitigated by way of suitable design, appropriate conditions or S106 financial contributions.

### Transboundary Effects

Due to the nature and scale of the Proposed Development, transboundary effects are not considered likely to occur.

### Conclusion of EIA Requirement

In consideration of the information discussed above, it is our assessment that whilst the Proposed Development is of sufficient size to qualify as a Schedule 2 development the considerations above indicates

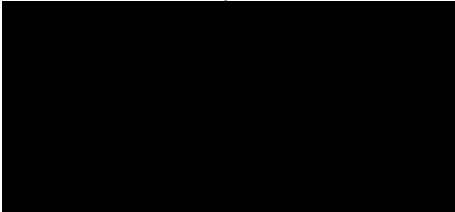
**Our ref: JCG25988**

that the location is not in an area of particular environmental sensitivity and the nature of the development aligns with the adjoining land uses and is not one that is likely to give rise to significant environmental effects.

Consequently, it is our assessment that the Proposed Development does not constitute an EIA development. Any negative effects that may arise from the Proposed Development can be adequately mitigated controlled through mitigation as the standard planning documents to support an application.

We would be grateful if PINS could confirm that it concurs with our interpretation of this matter and is able to provide its formal Screening Opinion within the statutory period of 21 days of receiving this request.

Yours sincerely,  
for RPS Group Limited



**Toby Andrews**  
Technical Director - EIA

