

## UTTLESFORD DISTRICT COUNCIL

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Mr S Brown  
Woolf Bond Planning  
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Basingstoke Road  
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Reading  
RG7 1AT

4<sup>th</sup> August 2022

Your ref:

Our ref: UTT/22/1539/PA

Please ask for Mr Lindsay Trevillian on [REDACTED]  
email: [REDACTED]

Dear Mr Brown,

**PROPOSAL: DEVELOPMENT OF THE SITE FOR UP TO 180 DWELLINGS,  
ASSOCIATED LANDSCAPING AND OPEN SPACE, WITH ACCESS FROM  
THAXTED ROAD.**

**SITE: LAND WEST OF THAXTED ROAD, SAFFRON WALDEN**

I refer to your preliminary enquiry submitted to Uttlesford District Council on the 14<sup>th</sup> June 2022 and our subsequent meetings on the 20<sup>th</sup> July and 1<sup>st</sup> August 2022. I have examined your submitted documents, including all indicative drawings which inform the submitted proposal.

### **Site Description**

The proposed application site is located to the south west of Thaxted Road on the edge of the town of Saffron Walden. The site is approximately 7.8 hectares in size and its topography consists of a modest slope falling from the rear western boundary to the front eastern boundary.

The site is formed by three distinct fields currently in arable production and free of any established built form. Mature vegetation in the form of established hedgerows and medium size trees are located along the boundaries of the site and internally splitting the fields.

Immediately adjacent to the northern boundary is a small area of public open space with residential housing, a community skate park, and the Lord Butler Leisure Centre. To the west lies further residential housing and a primary school. New development in the form of a retail park consisting of commercial premises, restaurants and a hotel, along with new residential housing is located on the opposite side of Thaxted Road to the east.

In terms of local designations, the site is defined as being outside of the settlement boundary of the Town of Saffron Walden and thereby located in the countryside. The Environmental Agency Flood Risk Maps identifies a proportion of the front of the site lying within 'Flood Zone 2'. The site does not fall within or abuts a conservation area, although a grade two

listed building known as 'The Granary' lies to the south west of the site. There are no local landscape designations within or abutting the site.

### **The Proposal**

The proposals forming this pre-application submission seeks advice in respect to the construction of 180 dwellings alongside associated works including open space & landscaping and a new vehicle and pedestrian access off Thaxted Road.

### **Planning History**

A search of Council's records indicates the following relevant recorded planning history for the application site:

- UTT/12/6004/SCO - Request for screen opinion in respect of proposed residential development (225 dwellings) including extension to Stake Park
- UTT/13/2060/OP - Outline application with all matters reserved except access for residential development of up to 300 dwellings, pavilion building, extension to skate park and provision of land for open space/recreation use, including an option for a new primary school on a 2.4 ha site. (Application Refused 2nd May 2014). (Dismissed at Appeal Ref: APP/C1570/A/2221494 2nd June 2015).

### **Development Plan Documents**

Uttlesford Local Plan (2005) – Provides the basis for all planning decisions within the district. It contains policies relating to the location of development and protection of environmental features.

Below is a list of the most relevant Development Management Policies in relation to this proposal the subject of this pre-application.

- Policy S7 (Countryside)
- Policy GEN1 (Access)
- Policy GEN2 (Design)
- Policy GEN3 (Flood Risk)
- Policy GEN4 (Good Neighbourliness)
- Policy GEN5 (Light Pollution)
- Policy GEN6 (Infrastructure Provision)
- Policy GEN7 (Nature Conservation)
- Policy GEN8 (Parking)
- Policy ENV2 (Development affecting Listed Buildings)
- Policy ENV5 (Protection of Agricultural Land)
- Policy ENV7 (The Protection of the Natural Environment Designated Sites)
- Policy ENV8 (Other Landscape Elements of Importance for Nature Conservation)
- Policy ENV11 (Noise Sensitive Development and Disturbance from Aircraft)
- Policy ENV12 (Groundwater Protection)
- Policy ENV13 (Exposure to Poor Air Quality)
- Policy ENV14 (Contaminated Land)
- Policy H9 (Housing Mix)
- Policy H10 (Affordable Housing)

### **Emerging Local Plan**

Although, the Council was in the process of preparing a new Local Plan to cover the period up to 2033, the Inspector who undertook the examination of the Emerging Local Plan sent a

letter to the Council on the 10th January 2020 which described the strategy of the Plan as unsound. As a consequence, the Council took the decision on 30th April 2020 to withdraw the draft Uttlesford Local Plan 2019. There are therefore no draft Local Plan policies at this present time. The Council have been working on a revised draft Local Plan and it is anticipated that (Regulation 18) Local Plan is scheduled for consultation in November 2022.

### **Supplementary Planning Documents**

- Accessible Homes and Play Space (November 2005)
- Urban Place Supplement to the Essex Design Guide (March 2007)
- Uttlesford Adopted Parking Standards
- Essex County Council Parking Standards (September 2006)
- Interim Climate Change Planning Policy (February 2021)
- Building for a Healthy Lifestyle (November 2021)
- First Homes Planning Advice Note (March 2022)

### **Saffron Walden Neighbourhood Plan**

The Saffron Walden Neighbourhood Plan has been prepared in draft and has currently just been to examination. In respect to the SWNP, the examiner has confirmed that the Plan on the 28<sup>th</sup> April 2022 has undergone Examination and that the Plan can now go to referendum subject to the suggested modifications which includes the deletion of a number of policies and amending the wording to others. It officers understanding that these modifications are currently being prepared to the Plan prior to it going to a referendum. It is therefore considered that limited to moderate weight can be given to the SWNP.

### **National Planning Policy Framework**

The National Planning Policy Framework (hereafter “the NPPF”) was first published in 2012 and was revised in July 2021. It sets out the Government’s national planning policies for England. It identifies the Government’s vision, objectives and goals for the planning system and provides a series of aids in the determination of planning applications.

### **Councils 5 Year Land Supply**

Our housing trajectory and 5-year housing land supply calculation has now been reviewed and updated. It represents the housing land supply position as of 1 April 2021 and demonstrates that the district has 3.52 years of housing supply for the 2021-2026 five-year period. Further details can be found in the latest document ‘Housing Trajectory and Five Year Land Supply’ (December 2021) on the Council’s website.

### **Planning Assessment**

#### **Principle of Development**

The application site is located outside the development limits of both the town of Saffron Walden within open countryside and is therefore located within the Countryside where ULP policy S7 applies.

This specifies that the countryside will be protected for its own sake and planning permission will only be given for development that needs to take place there or is appropriate to a rural area. Development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set or there are special reasons why the development in the form proposed needs to be there. A review of policy S7 for its compatibility with the NPPF has concluded that it is partially compatible but has a more protective rather than positive approach towards development in rural areas. It is not

considered that the development would meet the requirements of Policy S7 of the Local Plan and that, as a consequence the proposal is contrary to that policy

The landscape of the site itself is not particularly unusual and contains features which are present within the wider area. This does not mean however, that the site has no value, and that it is regarded as having a medium to high sensitivity to change.

The proposal would introduce built form onto an area of open countryside. The application would elongate development into the open countryside where it is currently devoid of buildings.

The development of the site will impact upon the cross-valley views and characteristic views across the meadow fields in the locality that would be widely seen from public vantage points including the Public Rights of Way (PRoW) to the south and north of the site, residential receptors to the north and west, and nearby highways.

The proposals will cause harm upon the character and openness of this part of the countryside due to the changing nature of the site from arable fields to one consisting of new built form of a substantial size.

However, one must weigh up the impact as to whether this would amount to limited harm or significant harm. For this reason, it is suggested that a detailed Landscape Visual Impact Assessment (LVIA) is submitted with the scheme to identify and assess the significance of the effects of change resulting from the development on both the landscape as an environmental resource and on people's views and visual amenity. Given the location of the site on the settlement edge of the town, it is important that it forms and connects to the town rather than being disjointed or isolated. Although the site is outside the settlement boundary limits of the village, a well design scheme should consider how the new residential units and ancillary works would be an extension of the town that would be well contained within the established structure and fabric of the town. This would ensure that the proposal, therefore, provides a strong and logical relationship with the existing town.

Saffron Walden is identified within the Local Plan settlement hierarchy as being an "Key Urban Area" in acknowledgement of its wide variety of local amenities and facilities, being an attractive place to live, work and for recreation. Services include a retail and commercial premises, cultural and religious buildings, restaurants and public houses, education and health facilities, employment opportunities and recreation and playing fields. It is acknowledged that local bus services run through the town with several bus stops in the vicinity of the site to meet the needs of future residents.

The option a public transport option linking the site to the town centre and to other larger nearby towns and rail networks, including cycling and walking helps to reduce the need to travel by private motor vehicle in recognition of sustainable transport options. It is thereby concluded that the site is situated within an accessible and sustainable location, close to local amenities and facilities including local transport (bus) links.

It is acknowledged that the proposal cannot be tested against a fully up-to-date Development Plan, and the Council are currently unable to demonstrate a 5-year housing land supply. In either scenario or both, in this case, paragraph 11 is fully engaged along with the "tilted balance" in favour of the proposals.

Paragraph 11 requires the decision maker to grant planning permission unless having undertaken a balancing exercise there are (a) adverse impacts and (b) such impacts would 'significantly and demonstrably' outweigh the benefits of the proposal.

As this stage the potential adverse impacts that would need to be overcome or mitigated would be countryside impact, significance and setting of heritage assets including flooding and drainage, transportation and highway safety, air quality/pollution and biodiversity. The

significance of any harm would need to be demonstrated with relevant supporting documentation and fully assessed during the assessment of the application. Presently, it is too early to advise without all the appropriate surveys and consultations being undertaken to identify any potential significant harm, and as such it is too early to tell whether the benefits of the proposals would outweigh any identified harm.

### Character and Design

In terms of design policy, good design is central to the objectives of both National and Local planning policies. The NPPF requires policies to plan positively for the achievement of high quality and inclusive design for the wider area and development schemes. These criteria are reflected in Policy GEN2 (Design) of the adopted Local Plan which also requires that development is compatible with the scale, form, layout, appearance and materials of surrounding buildings.

#### Layout:

It is advised that the overall final indicative layout should evolved through good design practice taking into account the design principles of the scheme and that the architect makes the best and most efficient use of the site whilst respecting the character of the surrounding locality and the amenities of surrounding dwellings.

The layout should take into consideration the constraints of the site, namely the neighbouring residential properties, the sites topography as well as the required parking/access standards, amenity space, the inclusion of landscaping and sustainable drainage requirements.

The layout of the development should provide an efficient layout and ensure its arrangement enhances the character of the surrounding area and establishes a clear, legible and permeable layout.

The siting of the dwellings within the development should be arranged to follow the curve of the highways within the site which allows more harmonious street scene appearance. The frontage of the buildings along the internal highway should be sited at the back edge of the public footways allowing for car parking to be sited between houses reducing the visual impact of on-site parked cars and also allows as much private rear gardens as possible to the rear of the dwellings.

The street layout should generally encourage walking and cycling in that internal paths and existing highways are well connected allowing pedestrians and cyclists a choice of direct routes and to move freely between all parts of the site and to wider destinations including that of the village.

#### Appearance:

It is acknowledged that the challenge for applicants is to design new characterful buildings which reconcile the requirements of a modern lifestyle with the need for integration into their context. Successful and appropriate new development often has simple proportions and details, based on those of their traditional rural equivalent.

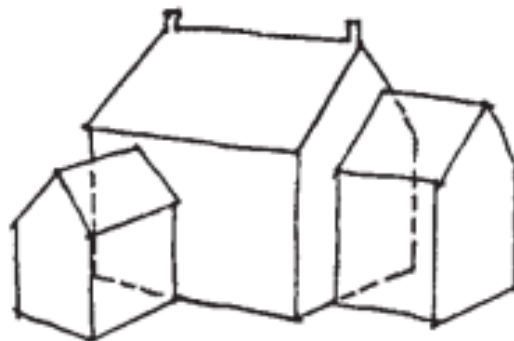
Getting the architectural details right is critical to ensuring new developments are appropriate to the setting and context. The traditional buildings of Essex are typically made up of rectangular rather than square plan forms, with pitched roofs spanning the narrower plan dimension. Chimney stacks are commonly found on buildings and help to punctuate rooflines and provide visual interest. Openings should be arranged so as to emphasise the visual strength of the wall by allowing as wide as a solid pier as possible between openings. Furthermore, external facing and roof materials should be selected from the range of regional materials characteristic of Essex, or similar to that of its surroundings.

Each of the residential units should provide their own sense of individuality because of their own interpretation of design using different proportions, roof forms and footprints which helps to break up any strict plain forms in the street scene.

However, it is considered that the final design of the units should incorporate more traditional detail influence by the Essex Design Guide and the local context to allow for the buildings to appear more in keeping with their rural setting.

Traditionally, buildings in countryside locations are integrated into the landscape by their siting and form, and by a blend of countryside elements producing a harmonious composition.

Individual units should have a simple dominant form which may be based on a rectangular plan and have a pitched roof with a central ridge. This basic form may be extended and added-to. Carefully placed 'additions' can enhance the overall composition. Simple forms are the key to success such as Figure 1 below.



**Figure 1: Appropriate traditional built form.**

Individual windows can, if badly designed, spoil the appearance of an elevation and unbalance the whole building. Harmony and balance can be achieved in a number of ways. The simplest solution to window design is to choose windows that are symmetrical about both axes. Setting the glazing into the structure by at least a half brick width creates a shadow and gives articulation to the elevation. Please keep this in mind when finalising the design and appearance of the units.

Buildings in the open countryside may be seen from great distances and this is why form and setting are so important. The simple outline and modest form of a traditional countryside building has a dignity of its own. Over elaborate details can be of an unsuitable scale and also spoil a pleasantly-proportioned building. It is suggested that the design of the proposals need to be of a more simplified design that reflect their setting.

It is not unacceptable for dwellings to have garages or undercover parking, however these should not dominate the landscape or the proposed new residential units.

There are a number of traditional building forms that are seen as models for garages or car ports. Cart sheds are a readily acceptable form that are of timber structures with plain tiled roofs help to complement a more traditional form. This design would be more preferable and if possible, for the garages/ cart lodges to be to the side of dwellings. Where garages must be attached, they may take the form of a subsidiary element to the main house or as a lean-to extension.

The new buildings should blend with the landscape, its form, planting and boundaries. The proposals should retain existing trees and hedgerows and where possible allow for sufficient

space around and between buildings with sufficient distance away from boundaries for planting of new trees and vegetation to help soften the new built form.

#### Scale:

It is suggested to look at simple building forms in combination with its landscape setting. Aim to minimise their visual impact by keeping building masses small, with large buildings broken down into components of a satisfactory scale. Roof forms are all-important. It would be beneficial to use lower eaves lines and extended roofs to help to relate the building to the landscape. The use of bungalows in the scheme would help to minimise bulk and massing thereby providing some mitigations in respect to the visual impact upon the openness of this part of the countryside.

When working up the final design, consideration should be given to the harmony of design in that the new buildings should relate to distant views as well as close-to. Repeated patterns should generally be avoided in favour of organic forms and traditional countryside buildings such as small cottages.

#### Quality of accommodation:

Homes should be arranged to make an 'efficient' layout and have regard to solar orientation and passive design. The proposals should be supported by meaningful references to any passive design measures, renewable energy, building fabric specifications, or any other measures that would meaningfully reduce carbon emissions, in accordance with the Interim Climate Change policy. Reference should also be thought of in respect to how energy use can be reduced by designs and specifications considering the energy hierarchy, embodied carbon, or new construction techniques.

The proposals should comply and meet internal space standards and have acceptable levels of daylight and privacy so that the home will function, be adaptable and cater to changing lifestyles that meet the needs of its occupiers.

Proposed new build footprints must not result in unacceptably small rear gardens for proposed properties. Although garden sizes will to an extent be determined by the back-to-back separation distance between new development (25m, which may need to be increased due to topography/a significant levels difference), developments will be expected to meet the minimum garden standards in accordance with the Essex Design Guide. Dwellings consisting of one and two bedrooms require 50sqm whilst three or more bedrooms would need at least 100sq.m of private garden space to meet the needs of its occupiers. These areas should be usable, provide natural light and patio areas and ensure that they are not overlooked. Outdoor amenity space should provide outlook from habitable rooms and be directly accessible from the individual dwellings.

All waste management should be integrated into the design of developments from the outset and be achieved with minimal impact upon the quality of the public realm and the amenity of neighbouring and future residents. Where possible, waste storage should be at the rear of the dwellings. Where waste is stored at the front of properties, it must be carefully integrated into the frontage and appropriately screened from the public realm

#### Design Codes

Within our meeting we discussed the benefits of a detailed design code being submitted in support of the outline application to ensure that a high-quality design come forward during the submission of reserve matters applications if outline permission is approved.

As discussed, on too many occasions the Council have experienced following the granting of outline planning permission whereby the developer has promised a high quality scheme, this

has not been delivered, during reserved matters applications with the submission of stock standard housing types pulled off the shelf along with basic place making details.

Upon review of the pre-application submission, there are some good principles shown in the 'vision document' and we would look to have these captured in a design code which forms part of the permission documents and is conditioned to be complied with - this is a more robust approach than masterplans and design and access statements which usually accompany outline planning applications as they are illustrative. The design code needs to have some principles that are 'musts' and therefore must be complied with at reserved matters stage.

In terms of what could be included in the code, I would suggest the following:

- Overall, this document: [Uttlesford Building for a Healthy Life accessible.pdf](#) sets out some clear principles that should be captured in the code to give more certainty at reserved matters stage.
- Street type sections showing elements that must be provided for each street type including green corridor, orbital greenway, widths of pavements, types of boundary treatments and front garden depths, street trees, soft landscaping, rain gardens and linear swales where appropriate, also parking strategy e.g. on-street etc.
- Edge type sections showing active frontages forming outward facing development, height ranges, boundary treatment options e.g. estate rail, surface material options e.g. pavers rather than blacktop, timber bollards to avoid anti-social parking, visitor parking spots, edge landscaping, permeable edges i.e. pedestrian/cycle connectivity around all edges etc.
- Hedgerow sections showing how these will be treated i.e. not with blank timber garden fences.
- Junction and street active travel principles i.e. continuity of pedestrian routes with raised tables/blended crossings, 3m kerb radii as much as possible.
- A character study of quality local vernacular which could be well informed by this document: [Uttlesford Building for a Healthy Life accessible.pdf](#) the aim is to set down some high-quality local principles, materials, layouts etc that can inform reserved matters applications. An issue we have at reserved matters is mediocre quality developments being referenced to justify more of the same and agreeing a good initial character study would help mitigate against this. Looking at good examples of local 3-storey and apartment/mixed-use typologies would also be useful.
- We need to set some good principles for how higher density typologies like terraces and flats come forward, such as amenity space including balconies as per Essex design guide, ensuring parking does not dominate street scene, materials and massing to avoid overbearing apartment blocks, on-street parking with soft landscaping, shared surfaces, and spatial enclosure rather than long runs of on-street parking, how to design well for buildings at risk of flooding etc.
- Location of LAPS, amenity greens and good layout principles as per Fields in Trust guidance, making sure max. distances from homes are complied with, safe access i.e. not over primary streets etc.
- SUDs detailing to avoid (such as deep fenced areas with poor planting) - SUDs in green streets - attenuation ponds also used as play areas/POS?
- Air source heat pumps, building fabric standards improvements as per Uttlesford Interim Climate Change Guidance, solar panels, other renewables, measures to avoid over-heating that fit with the Uttlesford vernacular e.g. light render, light brick on south facing facades, overhangs over windows, external shading, change window sizes according to orientation, orienting homes within 30 degrees of south where possible for passive principles.
- Important to understand road angle and detail through steep central section because will compromise open space potentially.



- There should be an overall plan which maps these key principles. It will show different things to a parameter plan i.e. design principles rather than uses and will need to be complied with rather than purely illustrative like a typical outline planning masterplan would be. However, it would be loose enough to allow the reserved matters design to come forward flexibly.

### Neighbouring Amenity

Policy GEN2 and GEN4 of the Local Plan states that development will not be permitted unless its design meets a variety of given criteria, including that it minimises the environmental impact on neighbouring properties by appropriate mitigating measures and that it will not have a materially adverse effect on the reasonable occupation and enjoyment of residential property, as a result of loss of privacy, loss of daylight, overbearing impact or overshadowing.

Due consideration needs to be given regarding the potential impact the proposal would have on the amenities enjoyed by adjoining occupiers in relation to loss of privacy, loss of light and visual blight.

It is acknowledged that due to the sitting, orientation, and separation distance, it is not anticipated that the proposals would result in significant harm to the amenities of existing occupiers of those properties abutting the northern and western boundaries of the site. However, the potential impact upon the amenities of adjoining occupiers will be carried out during the assessment of the scheme.

### Housing mix and Tenure:

In accordance with Policy H9 of the Local Plan, the Council has adopted a housing strategy which sets out Council's approach to housing provisions. The Council commissioned a Strategic Housing Market Assessment (SHMA) which identified the need for affordable housing market type and tenure across the district. Section 5 of the Framework requires that developments deliver a wide choice of high-quality homes, including affordable homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

On 24th May 2021, the Government published a Written Ministerial Statement that sets out plans for delivery of a new type of affordable home ownership product called First Homes. First Homes are the Government's preferred discounted market tenure and should account for a minimum 25% of affordable housing secured through planning obligations.

Uttlesford District Council requires the provision of 40% of the total number of residential units to meet the national definition of 'affordable housing' within all new residential developments that comprise 15 or more residential units or a site of 0.5 hectares and above. In this instance, the provision of affordable housing will be sought to comply with local policy.

To meet housing need the 40% affordable housing policy requirement must incorporate 70% affordable housing for rent, provided as either social or affordable rented housing. The remaining 30% required to meet demand for affordable shared home ownership. The First Homes Requirement (25%) can be accounted for within the 30% affordable home ownership element of the contribution. As such, the following affordable housing contribution will be considered policy compliant:

- 70% of the affordable units will be required as affordable housing for rent.
- 25% of the affordable units on new residential developments will be required as First Homes.
- 5% of the affordable units on new residential developments will be required as Shared Ownership Housing.

In respect to First Homes, the developer should provide their own calculations to assess what size/type of properties fall below the £250k price cap after the 30% discount has been applied.

Policy H10 requires that developments of 3 or more dwellings should provide a significant proportion of small 2 and 3 bedroom market dwellings. However, since the policy was adopted, the Council in joint partnership with Braintree District Council have issued the 'Housing for New Communities in Uttlesford and Braintree (ARK Consultancy, June 2020)'. The study recommends appropriate housing options and delivery approaches for the district. It identifies that the market housing need for 1 bed units is 11%, 2-bed units 50%, 3-bed units 35.6% and 4 or more bed units being 3.4%. Further to the above, the Council also requires that 5% of the market units also need to be M4(3) wheelchair adaptable standard.

It is acknowledged that at this stage that the scheme is likely to be submitted seeking outline permission and thereby details of the housing mix has not been defined to date. However, the final design should consider the Council's preferred housing mix.

#### Access and Parking:

Policy GEN1 of the Local Plan requires developments to be designed so that they do not have unacceptable impacts upon the existing road network, that they must compromise road safety and take account of cyclists, pedestrians, public transport users, horse riders and people whose mobility is impaired and encourage movement by means other than a vehicle.

It is understood that an outline application would be submitted seeking approval in principle of the development with all matters reserved apart from access.

Any application would be consulted to Essex County Council who are the lead local highway authority who will provide comments regarding highway safety in respect to the proposed access arrangements. It is understood from our conversations that separate pre-application discussions have been ongoing between the applicant and the highway authority concerning the access arrangements and matters of the final access arrangements are still a waiting to be finalised.

I acknowledged that the highways authority has already provided some initial advice and in addition to this advice, the highway authority would like to once again confirm that consideration should be given to the below points:

1. Orbital greenway proposals - PROW through site will need to be bridleway/active travel route to accommodate cyclists and equestrians as well and link to the south towards Debden Hill along the lane leading to Herbets Farm.
2. Like to see the southern/eastern boundary of the site future proofed so that if adjacent development was to come forward in the future, then active travel connections can be made through this boundary.
3. Permeability and pedestrian routes along the western boundary into The Glebe and Tukes Way via the existing green open space are to be supported but further details on access rights and current condition of these routes required - how will they ensure these routes are safe and accessible for pedestrians, currently no formal paths.
4. Where the primary road meets the southern section of the site - road might be better along eastern boundary - again futureproof so that a connection to the south of the site can be made if adjacent development to the south comes forward (not suggesting for general vehicular traffic).
5. Thaxted Road B184 considerations: incremental development along the road now on both sides mean it is evolving in its character and activity intensifying becoming a more urban site.
6. New access road will mean a significant increase in conflicting movements on short stretch of Thaxted Rd, risk of increase in collisions and congestion – may require

review of 40mph speed limit to reduce risks, assuming TA and modelling suggests it can work.

7. Need for new centre island and ped/cycle/equestrian crossing point where Orbital Greenway crosses it into TipTofts Lane
8. Thaxted Road western side, south of site access - lack of existing footway to access northbound bus stop - construction of new footway from bus stop to the main access road of proposed development.
9. Thaxted Road western side north to Peaslands Road - to allow 24/7 access into town centre, leisure centre and bus stops requires construction of a footway on the western side between site access road and Peaslands Road.

The maximum refuse bin drag distance should be no more than 25m. Adequate turning circles and passing points may be required dependent upon the size and length and width of the access road of the development.

Policy GEN8 of the Local Plan states that development will not be permitted unless the number, design and layout of vehicle parking places proposed is appropriate for the location as set out in the Supplementary Planning guidance 'Vehicle Parking Standards'. The adopted Council parking standards recommended for at a minimal of one space is provided for each one bedroom residential unit, two vehicle spaces for dwellings consisting of two or three bedroom dwellings, and three spaces for a four or more bedroom dwelling house. Also, the provision of one visitor space should be provided for every four residential dwellings. Adequate provision for cycle storage should also be provided for each unit.

Please ensure that adequate off-street parking is provided on the site in accordance with the standards to meet the needs of future occupiers. Car parking should be considered from the outset of the scheme and should be provided as visually recessively as possible. Heavily car dominated frontages and streetscapes should be avoided with the preference of parking to the side of dwelling houses.

Triple tandem parking should be avoided where possible as this provides risk of anti-social parking. Triple tandem parking (particularly with garage arrangements) is not generally supported because the logistics of using the spaces and low likelihood of garages being used for parking, resulting in overspill anti-social parking on the street. Furthermore, the use of parking courts should be limited, and large areas of hard standing should be broken up with sufficient soft landscaping.

#### Heritage:

Policy ENV2 seeks to protect the historical significance, preserve and enhance the setting of heritage assets. The guidance contained within Section 16 of the NPPF, 'Conserving and enhancing the historic environment', relates to the historic environment, and developments which may have an effect upon it.

The application site also lies within the setting the grade two listed building known as 'The Granary'.

Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Paragraphs 201 and 202 address the balancing of harm against public benefits. If a balancing exercise is necessary (i.e. if there is any harm to the asset), considerable weight should be applied to the statutory duty where it arises. Proposals that would result in substantial harm or total loss of significance should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss (as per Paragraph 201). Whereas, Paragraph 202

emphasises that where less than substantial harm will arise as a result of a proposed development, this harm should be weighed against the public benefits of a proposal, including securing its optimum viable use.

The proposals will be consulted to Essex County Council Place Services conservation officer when a full application is submitted to seek specialist advice on any potential harm that the proposals may or may not have upon the setting and significance of the heritage asset as a result of the proposals. As such, the Local Planning Authority would expect that a detailed Heritage Statement be submitted as part of the proposals that identifies any harm and how this harm might be mitigated, or what public benefits the scheme provides if appropriate mitigation can't be provided in this instance.

#### Flooding:

The NPPF states that inappropriate development in areas of high-risk flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

The Environment Agency's (EA) indicative Fluvial and Tidal Flood Mapping demonstrates that the proposed development is primarily located within Flood Zone 1 with a proportion located in Flood Zone 2 towards the front of the site in accordance with Table 1 of the Flood Risk and Coastal Change PPG. The design of the proposals should consider surface water and foul water discharge into consideration including appropriate SuD's measures and it would be expected that a detailed Flood Risk Assessment and Drainage Strategy be submitted in support of the application.

#### Landscaping, Open Space and Ecology:

All larger developments should be designed around a landscape structure. The landscape structure should encompass the public open space system but should also provide visual contrast to the built environment and constitute a legible network based, where appropriate, on existing trees and hedgerows. The layout and design of the development, including landscaping, should seek to reflect the vernacular of the locality. Native species should be provided for structural planting and linked to existing vegetation to be retained.

In good landscape design, both soft landscaping and hard landscaping are essential elements, and both need consideration. The principal aims of a good quality landscape plan are to secure a coordinated and high standard of landscape management for the landscape areas within the site, to ensure the successful integration of the residential development with the surrounding landscape and to protect and enhance nature conservation interests in accordance with the design objectives. It is suggested that a high-quality indicative landscape plan be supported in support of the proposals.

It is understood that the proposals would include where possible the retention of hedgerows and trees along the boundaries of the site and individual and groups of trees are proposed to be planted within the development to help define spaces and soften the building forms. This will help to provide natural screening of the development and enhance the public realm in order to enrich the open spaces to achieve a better sense of wellbeing and place making for future residents.

Open space areas should be suitably located and have appropriate proportions to their use and setting. Narrow or peripheral areas, which are difficult to access or maintain will not be considered appropriate. Open space provisions should form an integral part of the design and layout and meet the need generated by the development. This should be considered in respect to the final design of the layout. I don't foresee any concerns with the amount and location of the public open space provision as shown on the indicative plans.

Residential developments should normally be required to meet the need for play provision generated by the development on site, as an integral part of the design. A play area must be sited within an open space sufficient to accommodate the provision and its required buffer zone to ensure residential amenity is maintained. A development of this size would be expected to provide a Local Equip Area of Play (LEAP) and Local Area of Play (LAP) in accordance with the details outline in the 'Fields in Trust' guidance.

Policy GEN2 of the Local Plan applies a general requirement that development safeguards important environmental features in its setting whilst Policy GEN7 seeks to protect wildlife, particularly protected species and requires the potential impacts of the development to be mitigated.

The application site itself is not subject of any statutory nature conservation designation being largely used as an overgrown arable field. It is not foreseen that the proposals would result in harm to protected or priority species or their habitation, however, appropriate Preliminary Ecology Assessment (PEA) and biodiversity checklists should be submitted in support of the scheme.

The landscape proposals associated with the development should support and enhance biodiversity on each individual site, ideally through the retention of existing trees and vegetation deemed to be of ecological importance, including mature back garden vegetation. The provision of quality new landscaping will also be expected. In addition to such landscape provision on the site itself, biodiversity off-setting may be required to achieve the overall net biodiversity gain required by the NPPF and any subsequent national and/or local requirements.

#### Contamination:

Given the previous use of the site and the nearby uses, there may be the potential that the site contains contaminated deposits. It is the developer's responsibility to ensure that final ground conditions are fit for the end use of the site in accordance with policy ENV14 of the adopted Local Plan and thereby at least a Phase 1 Land Contamination Assessment should be submitted in support of the proposals.

#### Planning Obligations

Local Policy GEN6 requires that major development such as that proposed to make a positive contribution and provision for community facilities, school capacity, public services, transport provision etc to mitigate the impacts of a development proposal. This can be via a planning agreement entered into under section 106 of the Town and Country Planning Act 1990.

The full extent of what potential planning obligations will not be known until the application has been consulted to relevant statutory consultees, however, from experience I would expect at least a financial contribution would be required in relation to education, health and libraries mitigation and to secure affordable housing and public open space provisions including maintenance. There may be also other obligations required in respect to transport and highway improvements.

The Council will seek to reach agreement with the applicant over an appropriate contribution that fairly reflects the level of demand the scheme would generate.

#### **Summary and Conclusions**

In light of the above appraisal and for the reasons highlighted, it is officers' opinion that the principle of the development of the site could be considered appropriate when one applies the tilted balance.

However, this would involve the applicant to provide substantial evidence as part of the submission to clearly demonstrate that the benefits of the proposals would outweigh the potential harm that the proposals may cause.

At this stage, it is understood that further work is being undertaken in the background in the preparation of the supporting documentation to help illustrate that any perceived/potential negative harm is avoided, reduced, or offset as well as the benefits that the scheme will manufacture.

As such, officers are not in the position as to the potential recommendation as all final information and documentation would need to be viewed individually and collectively so that a full and quality assessment can be carried out.

**Core application statements and reports to include in your application**

The following core statements and reports should accompany any planning application submitted to inform the proposal:

- Planning Supporting Statement
- Design and Access Statement
- Statement of Community Consultation
- Heritage Statement
- Landscape and Visual Impact Appraisal
- Tree Survey and Arboricultural Report
- Preliminary Ecology Assessment (PEA)
- Biodiversity Checklist
- Transport Assessment
- Flood Risk Assessment
- Statement on Sustainable Drainage Systems
- Foul sewage and utilities statement
- Land Contamination Assessment
- Design Code

You will appreciate that the views expressed in this letter are those of an officer which do not bind any Members of the Council's planning committee should an application come before them for formal consideration.

Yours sincerely

**Mr Lindsay Trevillian**  
**Principal Planning Officer**  
email: [REDACTED]