

This is an additional response to planning application S62A/2022/0014 from Saffron Walden Town Council. This response relates to the additional documents submitted by the applicant listed on the online portal as March 2023.

SWTC continues to object to this application; this response is split into the following sections:

1. Public Open Space
2. Sustainable Transport
3. Location
4. Affordable Housing & Location
5. S106

Public Open Space

SWTC continues with the stance that the POS does not pass the SWNP litmus test and policy requirements set out in SW17, which is clear that amenity space must be in a single well-placed location and not divided into small pockets. Notably, SWNP 11.3.6 refers to LAPs, which in reality are typically small parcels of land left over from the developer's preferred layout.

The revised Design and Access Statement features the below map, on page 34, which indicates the green as including "green infrastructure, to include POS, amenity space, equipped children's play areas, landscaping, ecological requirements, drainage, utilities and service infrastructure..."



This illustrated green infrastructure should more properly make separate assessments and calculations for the services and the POS.

For instance, the claim on page 65 of the Design and Access statement that “*Sustainable drainage schemes [...] contribute towards an attractive and accessible network of streets and public spaces*” should acknowledge that they are not the same as well-designed POS which passes the SWNP litmus test.

Both the below maps are from the design and access statement (pages 26 and 28), illustrating the flood zones and open spaces. The map on the right shows three green circles of open space. However:

- The largest, northern area is in the flood zone and SUDs, meaning the land will be of poor quality.
- The middle green circle is adjacent to the main road, so it does not comply with SWNP SW17, which says that *any area sloping or by a road should not be counted towards the greenspace requirements*.
- The two smaller green circles close to Peal Road are likely to be LEAPs, breaching SWNP SW17, which states that *development land may not be divided into separate parcels so as to reduce the overall size of the development and reduce liability for provision for amenity space*.



SWTC continues therefore to disagree with the proposals and objects to the application due to the poor and limited open space provided.

Whilst Woolfbond’s covering letter proposes that this application is only to cover the development in outline and to determine matters of access, with detail to follow at the reserved matters stage, it is critical to set out the principle of what open space is suitable for the site. SWNP 11.3.9 notes that the *optimum layout for POS is an important matter and should be planned in as an integral part of the development layout*.

The design and access statement and covering letter both refer¹ to the existing land adjacent to the site known as the green mile, claiming that this land is suitable for throwing a ball and flying a kite (meeting SWNP SW17). Although it is correct to point out that there is existing POS nearby that residents can use, the application should seek to make suitable provision for

¹ Page 34, section 4.7 of the Design Statement: “*The area of existing open space known as the Green Mile is located immediately to the north of the site, within close walking distance of the proposed dwellings. Consequently, the proposed development must be very well connected to this area of existing open space, which can accommodate ball kicking, kite flying etc.*”



appropriate POS within the site and not add to the pressure on the existing field, which is already well used. Additional residents and usage would add to management costs.

The addendum travel assessment 6.4 says SWTC and UDC would support the delivery of a footpath across the green mile with a S106 contribution. We (SWTC) have not said as such; an initial brief conversation was had on 06.03.2023 and no decision has been reached. However, should a pedestrian footpath or paths be implemented, the green mile POS would thereby be subdivided, breaching the SWNP, and would not provide the development with suitable POS.

The majority of the play spaces in the proposal also remain adjacent to the main road, breaching SWNP SW17 (*“any area which is unusable, sloping or by a road should not be counted towards the green space requirements”*) and so they should not be calculated as open space.

In conclusion, SWTC disagrees with the covering letter’s statement (3.56) that the proposal “complies with GEN6”, as it does not make adequate provision for community facilities. It will add pressure to the use of the Green Mile and so a S106 contribution for the maintenance of must be sought.

Sustainable Transport

Whilst the detailed sustainable transport measures are welcome, the proposed cycleway will only get users to the north of the site and not into the town centre.

Although a sustainable transport package of S106 measures seems to be a matter of discussion between the applicant and Essex Highways, limited physical cycling infrastructure is proposed, with *“a new shared footway / cycle way on the western side of Thaxted Road to complement the same facilities on the eastern carriageway”* (from 3.27 of the covering letter). This proposed cycle link would not be enough to encourage residents to travel sustainably into the town centre.

SWTC upholds the following statements made in its original objection response dated 6th January:

“This provision would be grossly inadequate – once cyclists reached the Thaxted Road / Peaslands Road junction, there would be no provision for them. To make the transport impacts of the Application acceptable, the Applicant should provide proper off-site mitigation. The proposed development would introduce significant numbers of extra cars and the SWNP requires that this be mitigated through sustainable transport provision. Nothing in the Application demonstrates that the Applicant’s proposals for sustainable transport would fully mitigate the additional road traffic arising from the development.

“To be acceptable, the Application should demonstrate that it will provide sustainable transport facilities which fully mitigate the impact of the development. As a minimum, the Thaxted Road shared cycle and pedestrian path could be extended to run the length of Peaslands Road and Mount Pleasant Road. The Applicant will need to demonstrate that such mitigation is achievable, and we note that even the proposed Thaxted Road mitigation has not yet been confirmed as feasible.

“SWNP Policy SW12 requires that off-site mitigation measures ‘give priority to pedestrian and cycle movement first, then facilitate access to high quality public



transport'. Off-site cycling and pedestrian provision should take precedence therefore when considering highway mitigation, rather than bus stops."

Location

SWTC continues to object to the proposal due to the loss of land, contrary to Local Plan policy ENV3 and S1. The SWNP 11.3.3 states, "*Saffron Walden has a deficit of public open spaces estimated to be around 107ha*", and loss of this field would be detrimental, even with the tilted balance approach.

The proposals do not contribute to the neighbouring sites positively, breaching NPPF 130(c) which states, "*planning decisions should ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting.*"

The proposed change in access to the site next to the existing skate park would be unsympathetic to the existing asset. This is also contrary to SWNP SW3, which requires that, "*developments must evidence a positive response to the landscape...and integrate well with existing neighbourhoods while seeking, where appropriate, to improve the aesthetic of the immediate area*".

SWTC continues to object to the application due to the loss of land and the unsympathetic proposals which would be detrimental to the existing Green Mile and Skate Park.

Affordable housing and housing mix

The covering letter (3.24) proposes that affordable housing locations and housing mix are questions to be resolved at the reserved matters stage. However, it is still important to consider the number of affordable dwellings and the housing mix at the earliest opportunity to ensure compliance with the SWNP policies:

SW1 The housing mix of affordable homes is to be determined by local housing need and policies set out by the planning authority.

SW2 Affordable housing units will be distributed through the development in appropriately sized, non-contiguous clusters.

S106

Finally, it is important to note the following statements from Woolfbond's letter dated 3rd March:

(3.10) "*It sets out a requirement to provide the following for a scheme of up to 170 dwellings:*

- a) 0.6ha parks, gardens and amenity space*
- b) 0.7ha natural and semi-natural green spaces (accessible and usable)*
- c) Provision of a LAP, LEAP*
- d) Off-site contribution to multi-use games area*
- e) Contribution to circa 0.65ha of outdoor sports*

(3.41) "*The scheme achieves the on-site provision of points (a) to (c), with (d) and (e) secured by an off-site contribution.*"

It is not clear to SWTC what the proposed off-site mitigation contribution d-e is, as SWTC has not been party to the indicative, non-prejudicial S106 discussion.



The covering letter 3.55 explains that, due to the site typography, it is not well suited to the provision of a formal playing field, and so off-site sports provision would be provided to comply with SWNP SW16. Disappointingly, SWTC has not been party to the S106 discussion, and it is unclear to us what this contribution might be.

The Addendum travel assessment 6.4 says SWTC and UDC would support the delivery of a footpath across the green mile with a S106 contribution. As stated above, we (SWTC) have not said as such; an initial brief conversation was had on 06.03.2023 and no decision has been reached, nor have we given consent. Any new footpaths will require specific consent from UDC (as landowner) and ourselves (SWTC) as tenant. A S106 monetary contribution for pedestrian walking schemes would be better suited rather than ringfenced for one location.

To note, SWTC's Developer Contribution Wish List (provided in our initial response of January 2023), should also be given weight in the S106 discussions.

In summary, SWTC continues to oppose this application for the following reasons: it leads to a loss of land, adding to Saffron Walden's deficit of open spaces; the proposed POS is of poor quality; and the proposed sustainable transport measures do not encourage residents to use sustainable transport methods to travel into the town centre.