



Saffron Walden Town Council objects to application S62A/2022/0014 Land west of Thaxted Road, Saffron Walden for 170 dwellings as agreed at the Planning and Transport committee meeting held on 15 December 2022.

SWTC objects to the application on the following grounds:

1. The proposed public open space is on a small scale with limited benefit for community uses and is poorly situated.  
Neither its location nor scale complies with the provisions of the SWNP. The proposed development does not provide other community facilities required by the SWNP.
2. Location / Land use – the development would result in a loss of open space not compensated for by the benefits of the proposed development.
3. The affordable housing locations need to be thoroughly dispersed within the development and do not comply with the SWNP.
4. The Housing Mix must meet local needs, which it does not as currently proposed.
5. The development would result in an increase in traffic creating a need for sustainable transport provision to mitigate it under the SWNP, and adequate provision is not proposed.

The above concerns are detailed below, with reference to the Uttlesford Local Plan 2005 (ULP), Saffron Walden Neighbourhood Plan (SWNP) and National Planning Policy Framework (NPPF).

#### **Poor Quality and Limited Public Open Space (POS)**

The proposal does not provide public open space that passes the litmus test and policy requirements set out in the SNWP (11.3.8, *the litmus test question for whether a site is suitable for consideration as an open space for informal recreation is “Can several people use it at once for activities such as flying a kite and throwing a ball for a dog?”. If the answer is no, then it is likely to be too small to be useful for and counted as recreational space.*)

The illustrated POS all either neighbour the primary road or have attenuation bowls situated within the space and are therefore unsuitable for community use. SWNP policy SW17 clearly states POS *must be usable; any area which is unusable, sloping or by a road should not be counted towards the greenspace requirements.* None of the POS satisfies the requirements of Policy SW17.

Section 11 of the SWNP details the shortfall in sports and playing field provision in Saffron Walden and provides that any new development must provide appropriate provision in line with the Sports England Playing Field Calculator (see in particular paragraphs 11.2.15 and 11.2.16 and Policy SW16).

The proposal therefore is contrary to the SWNP and as a result SWTC objects. The proposal must provide viable POS in order for it to be included within the POS calculation. Currently the POS illustrated is too small and not fit for purpose due to being adjacent to the SUDs and/or the primary road.

ULP GEN6 notes that development will not be permitted unless it makes provision for community facilities and this proposal does not appear to do so. No play areas or community contributions are detailed within the proposals, failing therefore to also meet the NPPF.



NPPF Paragraph 98 details the importance of access to high quality open spaces and sports opportunities for the importance of health and wellbeing. This proposal does not demonstrate to SWTC that the POS provided is appropriate for 170 homes and, together with the lack of sports facilities, means that therefore the proposal is also contrary to NPPF paragraph 98.

Whilst it is possible for appropriate sports provisions to be either on-site or off-site, it is important in this case that the appropriate provision be on site since under the terms of Planning Application UTT/13/3467/OP. The developer of that site is obliged to contribute £220,000 for community facilities on the Applicant site. This s.106 contribution was negotiated by Uttlesford District Council when the owner of the Applicant site was proposing that it would all be used for sports provision, and the Applicant is therefore fully aware of this provision. This contribution would be lost if the Applicant fails to provide adequate space.

In the opinion of SWTC, the site is too small for 170 new homes and provision of proper facilities as required by the SWNP, the ULP and the NPPF. The proposed lack of POS and Sports facilities is in breach of SWNP Policies SW16 and SW17 and NPPF paragraph 98 and ULP GEN6; the failure to make adequate community contributions is further contrary to ULP GEN6

**SWTC therefore objects to the proposal as the application is contrary to all of these Policy provisions.**

#### **Location / Land Use**

This site is currently enjoyed by the community both visually and as an area in which to walk and enjoy the views of both it and the surrounding beautiful countryside.

The proposed development is contrary to ULP Policy ENV3 – ‘Open Spaces and Trees’ on the basis that the site proposed for the housing development is a visually important space within the landscape, on the edge of the town, and no evidence has been presented to demonstrate that the proposed development outweighs the site’s amenity value.

The proposals also breach ULP Policy S1, the site sits outside of the development limit and any proposed extensions for Saffron Walden.

The SWNP states (5.2.12) *Saffron Walden has a lack of public parks, with many housing developments being further away from public open space than the Fields in Trust guidelines. In the absence of the ready availability of public parks and gardens, private gardens gain extra importance for the health and well-being of residents.* (11.3.3) *Saffron Walden has a deficit of public open spaces estimated to be around 107ha.*

Should the proposal be approved the neighbouring field known as ‘the green mile’ would have a substantial increase in usage from the new residents at the development and Saffron Walden already has a deficit in open spaces. Should the application be approved the usage and maintenance of the green mile will increase and therefore a provision should be provided for the open space maintenance of the green mile, which is managed by SWTC.

To note, the Transport Assessment 3.4 incorrectly states the “north of the site is an area of public open space that is owned and maintained by UBC” this field is managed by Saffron Walden Town Council, not Uttlesford District Council (UDC). This is the field commonly known as the ‘green mile’.

The design and access statement (4.3) describes section 2 of the below map as *Landscaped strategic open space forming arrival space into development, opportunities for play, SUDs and flood mitigation, and permeability with the existing public open space to the north and leisure facilities for pedestrians and cyclists.*



Design & Access Statement 4.3.1

The opportunities for play and SUDs are contradictory and the area should be designed as a play area OR SUDs. SWNP SW17 states amenity green space *must also be usable; any area which is unusable, sloping or by a road should not be counted towards the greenspace requirements.*

Should the land be utilised as SUDs it can NOT also be included as a leisure facility for residents.

The proposal neighbours the existing skate park. NPPF 130(c) states *planning decisions should ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).* The development would increase footfall and usage on the green mile and the skate park. The proposal therefore breaches NPPF 130(c) because it is not sympathetic to the existing facilities. In fact, the proposal is suggesting installation of a SUDs next to the skate park which would not be suitable or safe for children. It would be better that the land is safeguarded as a future extension to the skate park, SWTC has the monies aside from a separate S106 to provide this facility should the land become available.

The proposal does not comply with SWNP SW3 which requests developments must *Evidence a positive response to the landscape, local and longer views and the natural and historic environments and integrate well with existing neighbourhoods while seeking, where appropriate, to improve the aesthetic of the immediate area.* The proposals would have a negative visual impact on the existing residents as their current views of the fields would be removed.

**Due to the loss of agricultural land (which is contrary to ULP ENV3, S1) and the SWNP which notes Saffron Walden already has a deficit of open space SWTC object to the proposal.**



### **Affordable Housing Location**

Whilst the affordable dwellings are somewhat spread within the development the affordable houses do still sit in clusters together, rather than being dispersed throughout. The entrance to the site includes four buildings all of which are affordable dwellings, facing the road and sit in the highest flood risk area.

**SWNP SW2 states *affordable housing units will be distributed through the development in appropriately sized, non-contiguous clusters.* This proposal does not meet the SWNP as the proposal sits the affordable houses together in different areas.**

SWTC believes the affordable housing locations should be properly dispersed and not all front facing the main road.

### **Housing Mix**

The design and access statement illustrates that the development will mostly provide three-bedroom dwellings.

SWNP Policy SW1 requires that the mix of housing on new developments reflects local requirements and the Uttlesford Housing Strategy 2021-2026 states 83% of applicants upon the housing register are seeking one- or two-bedroom properties. This development does not provide dwelling sizes reflecting local needs, it is providing mostly 3-bedroom homes whereas 1 and 2 bedrooms are being sought the most.

**The housing mix therefore needs to be clarified and reflect local needs. As the application stands it fails to meet SWNP SW1.**

### **Sustainable Transport Provision**

These proposals would exacerbate the already excessive and unacceptable levels of traffic congestion in the town, which will add to the existing AQMA. The SWNP (10.1.2) confirms *Traffic congestion in Saffron Walden is of great concern, particularly in relation to transport in the east of the town, as businesses find it less appealing to use sites in the east because access is difficult.*

The Uttlesford Highway Impact Assessment 2013 recommends *“demand management methods are investigated in order to reduce overall traffic flows in the town. Activities such as travel planning [...] would help to improve awareness of alternative travel modes and encourage a shift towards non-car modes of travel and reduce traffic congestion in town”.*

Well suited sustainable transport links are therefore a must and should be considered from the earliest stage of development (this conforms with NPPF 104). Considering the sustainable transport links at the earliest stages allows an easier transfer of adoption, which should be Essex County Council. SWNP Policy SW12 states all new paths must be built to ECC’s standard for future adoption – this then relieves residents of a management charge.



The draft heads of terms refer to the following off-site mitigations:

- Thaxted Road for a shared cycle and pedestrian path.
- New bus stops on Thaxted Road.

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.

**As the proposal would increase traffic on the already over capacity roads and the proposed mitigation does not comply with SWNP Policy SW12, SWTC object to the proposal**

## Heads of Terms

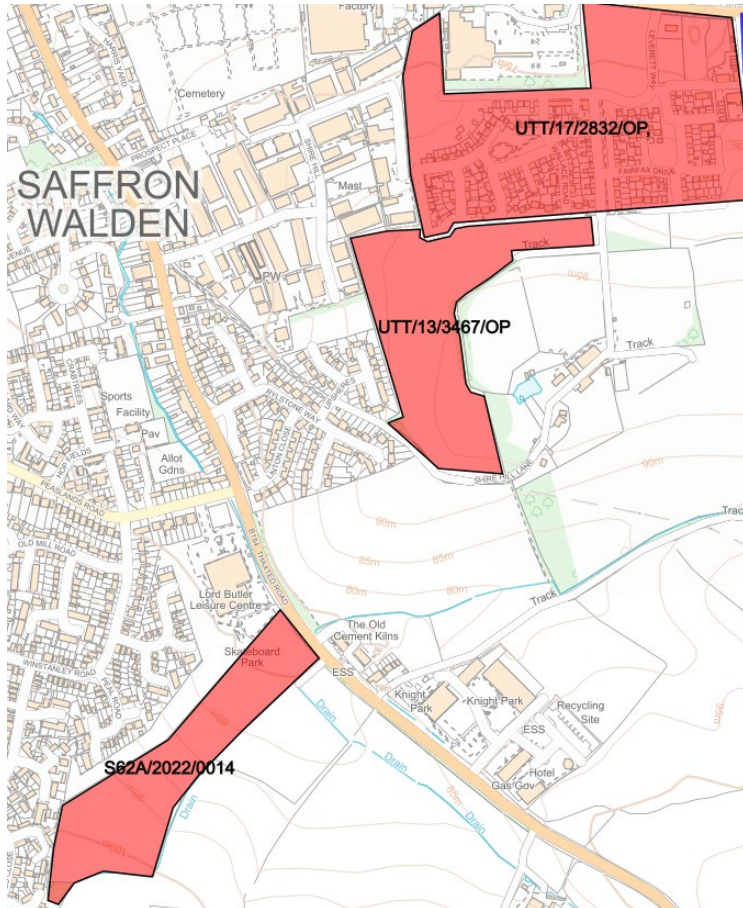
The proposed heads of terms have no reference to:

- Secondary education – confirmation on this requirement is required from ECC. Within the public consultation responses, a local primary school headteacher has commented noting “*Our school is full/oversubscribed as all the schools in Saffron Walden are. We are concerned as to how the children who potentially may move into these would be schooled.*” To this due concern should be taken into account as to whether there is enough capacity for all the school and all infrastructure.
- Community facilities or provision – the UDC Open Space Standards 2019 paper illustrates (4.3.3) there is a deficit in Saffron Walden of community parks, gardens, natural and semi-natural spaces and play spaces (4.3.4).
- Sporting and recreational facilities – there is no provision for sporting or play areas. The UDC Playing Pitch Strategy and Action Plan 2019 explains there is a shortfall in sporting facilities. (Should the proposal be approved the additional 150 homes this will add to pressure to the existing deficits of open spaces and sports facilities therefore a provision should be provided.)



- Existing infrastructure maintenance. (Should the proposal be approved the demand on the existing skate park and green mile will increase. This will be due to the loss of the development land and additional residents.)

The NPPF Paragraph 98 states *Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. Due consideration is therefore a must for the above community services.*



Application UTT/17/2832/OP, Land North Shire Hill, of 100 dwellings siting almost opposite this proposal is providing £81,553 as a SWTC community facilities contribution for a community centre and/or enhancements.

This proposal (S62A/2022/0014) is almost twice the size and therefore should provide a similar community contribution.

Application UTT/13/3467/OP, Land South Radwinter Road, Saffron Walden of 230 dwellings is providing £220,000 for strategic open space and is currently earmarked for a future skate park extension.

This proposal (S62A/2022/0014) is of comparable scale and therefore should again provide a community provision.

Reference should be made to the attached Saffron Walden Town Council Developer Contribution wish list.



**The below tables refer to specific documents provided by Kier with comments from SWTC.**

**Kier Ventures – Socio Economic Statement**

	<b>Kier Statement</b>	<b>ULP</b>	<b>SWNP</b>	<b>NPPF</b>	<b>SWTC Comments</b>
1	1.2 The site is currently in agricultural use and occupied by arable fields.	ENV5 protection of agricultural land ENV8 development will only be permitted if it outweighs the need to retain elements for their importance (hedgerows, grass land)	8.2 Development must compensate for this loss of environment for wildlife and prevent excessive urbanisation of the town’s location by implementing planning measures which will maintain the town’s rural feel and enhance the wildlife. For example, simple measures such as hedgehog holes in fences will allow for wildlife corridors.	174 b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;	The land should be retained for community uses. Should the application be approved suitable contributions in the way of a S106 should compensate for this loss of environment.
2	1.3 The Proposed Development will deliver 170 new residential units, including  68 affordable homes,  as well as new pedestrian and cycle routes, landscape areas and approximately 3 hectares of open space.	15.2. Traffic in Saffron Walden is a significant problem with its historic street pattern, restricted carriageway widths and junction geometry posing particular problems for heavy goods vehicles. At various times during the day the existing road system is unable to cope with the number of trips being made.	11.3.8 open space must pass the litmus test for open space reiterated in policy SW17	98. access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities	Whilst the proposal is providing 3 hectares of open space it must be large enough to be beneficial for community use to promote residents’ well-being. 170 homes will add to the already high levels of traffic in Saffron Walden.



Saffron Walden Town Council Response to Section 62A Planning Application:  
 S62A/2022/0014 Land west of Thaxted Road, Saffron Walden  
 6<sup>th</sup> January 2023

	<b>Kier Statement</b>	<b>ULP</b>	<b>SWNP</b>	<b>NPPF</b>	<b>SWTC Comments</b>
3	<p>5.3 In addition to council tax receipts, it is expected that planning contributions will be made to Uttlesford District Council to help pay for infrastructure and other services.</p> <p>The overall value of planning contributions is estimated to be over £1 million in the form of Section 106 contributions.</p>	<p>GEN6          Development will not be permitted unless it makes <b>provision at the appropriate time for community facilities</b>, school capacity, public services, transport provision, drainage and other infrastructure that are made necessary by the proposed development.</p>	<p>SW12 developer contributions to any off-site highways schemes or improvements:          The scheme design will conform to the hierarchy outlined in the NPPF which is to give priority to pedestrian and cycle movement first,</p>	<p>93: <b>provide the social, recreational and cultural facilities</b> and services the community needs, planning policies and decisions should:          a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</p>	<p>Kier states an overall value of £1 million in S106 contributions. But these contributions must have a community benefit in terms of community facilities for a community centre or sporting facilities and/or sustainable transport methods (walking and cycling).</p>





**Statement of Community Involvement**

	<b>Kier</b>	<b>SWTC Comments</b>
1	Page 3. Kier Ventures is seeking to deliver 150 -180 new homes	Application is for 170 homes not 180.
2	<p>Page 3. Kier Ventures has engaged with the local community ... feedback form was included and was open for submission from the 28th October to 13th November 2022. In total, 107 people provided feedback via the electronic feedback form and three people got in touch using the consultation email address.</p> <p>Page 4. opportunity to provide feedback regarding the proposals via a project email and website that hosted an electronic feedback form.</p>	<p>The consultation was only open for 15 working days and focused online.</p> <p>Saffron Walden has an ageing demographic, SWNP (2.15) details <i>“Forecasted changes in the population, as relevant to housing need, are published in the Uttlesford District Council Housing Strategy 2016-2021 (Dec 2015). Page 13 states: The number of residents living in the district who are aged 65 and over is expected to increase from 15,800 people to 28,000. And the Growing ageing population with 1,070 people aged over 65 in Uttlesford are thought to have dementia. This figure is estimated to rise to 1,920 by 2030.”</i></p> <p>Residents had a very short window to respond and typically those aged over 65 do not use web-based software.</p>
3	<p>Page 6. Many of the new homes will be designed to face the open countryside that surrounds the development.</p> <p>Page 7. This site and the adjacent fields, if included in the local plan, will have a capacity of 450 new homes.</p>	<p>These two statements are contradictory. The first describes the homes facing on open countryside explaining how the homes will be of <i>“the highest standard in order to create a welcoming homely environment”</i>.</p> <p>The next page explains how these same fields are being promoted as part of the local plan and therefore the homes from this proposal might not be designed facing open fields.</p>



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4	<p>Page 10. all feedback was received online and a summary of the feedback received is set out below.</p> <p>In total 107 people provided feedback about the scheme, with the majority of feedback coming from residents in the immediate vicinity of the site</p>	<p>Reiterating the SWTC comment in the above box (2). All feedback was received online, and the survey was carried out online with one leaflet drop. Saffron Walden’s demographic is older who are less likely to use web-based software.</p> <p>The SCI states most feedback was received from residents within the vicinity, which is those who received the leaflet drop. The consultation was not wildly advertised outside the area to residents or commuters who might be affected.</p>
5	<p>Page 32.          Support for the development” feedback</p>	<p>This title is misleading, being called support for the development. Reading the feedback specifically is about elements of the application and not the proposal as a whole.</p> <p>For example, one comment reads <i>The development IN ISOLATION is fine and looks well designed</i>. This does not rectify the other issues raised for instance transport and traffic.</p>
6	<p>Page 38. Once the link road is completed then the capacity of the B184 Thaxted Road / B1053 Radwinter Road junction significantly improves</p>	<p>Assuming the <i>link road</i> is referring to the road from Radwinter Road through the Linden Homes, Redrow Homes and Bellway Homes sites (via Shire Hill) this is not yet a certainty.</p> <p>Application UTT/22/1598/DOV has not yet been formally approved which will rectify the bridleway issues linking the two southern sites. (Redrow and Bellway.)</p>



**Supporting Planning and Affordable housing statement**

	<b>Kier</b>	<b>SWTC Comment</b>
1	<p>1.42 benefits of the scheme include:</p> <ul style="list-style-type: none"> <li>• Provision of much needed housing in a sustainable location, helping to meet identified housing needs.</li> <li>• Delivery of a significant proportion of affordable housing (40%).</li> <li>• A high quality design-led development scheme.</li> <li>• Provision of substantial areas of landscaped open space, accessible by the wider community.</li> <li>• Enabling a Green Orbital Route by providing a pedestrian and cycle route through the Site and provision of a new crossing.</li> <li>• Support for enhanced bus service facilities to the benefit of the wider population.</li> <li>• A form of development, including by means of the proposed landscaping strategy, that can be assimilated into the character of the surrounding area and provide an improved landscape buffer to the existing urban edge.</li> <li>• Increased local expenditure to sustain and support local services and facilities.</li> <li>• Job opportunities and increased economic activity</li> </ul>	<ul style="list-style-type: none"> <li>• Housing bedroom sizes must reflect the local needs per SWNP SW1.</li> <li>• Substantial areas of landscaped open space must be SWNP litmus test 11.3.8</li> <li>• The draft heads of terms list additional bus stops on Thaxted Road but not an enhanced bus service</li> </ul>

**Design and access statement**

	<b>Kier</b>	<b>SWTC comment</b>
1	<p>2.10            To the north of the site is an area of public open space that is owned and maintained by UBC</p>	<p>This is incorrect this area is managed by SWTC</p>
2	<p>3.7 suds ponds            4.1 open space</p>	<p>The northern open space is the same location as the SUDS ponds. Typically SUDS are not suitable as public open space and therefore these areas should not be included within the POS allocation, per SW17. Notably Essex County Council has issued a holding objection with informatives which must be considered.</p>



### Transport Assessment

	Kier	SWTC Comment
1	<p>2.52 From a review of the existing infrastructure and the potential opportunities to increase the proportion of trips made by cycle, the CAP makes a number of recommendations for route and infrastructure enhancements within Saffron Walden. This includes the implementation of advisory cycle lanes along Borough Lane/ Mount Pleasant Road and Peaslands Road as well as Cromwell Road/ Winstanley Road.</p>	<p>The draft heads of terms refer to a shared cycle and pedestrian lane this could be extended to include the Peas lands Road proposal.</p>
2	<p>3.5 To the north of the site is an area of public open space that is owned and maintained by UBC and is regularly used by residents of the adjoining residential estate to the north for recreational purposes.</p>	<p>This is incorrect this area is managed by SWTC</p>
3	<p>5.17 Once the link road is completed between the B184 Thaxted Road and the B1053 Radwinter Road, the impact of development on the Site is further lessened at the current traffic signal controlled junction between these two roads.</p> <p>6.3 For the purposes of this TA, the road connection that will ultimately be delivered through consented and committed development to link the B184 Thaxted Road to the B1053 Radwinter Road is referred to as the Southern Link Road (or SLR).</p>	<p>Assuming the <i>link road</i> is referring to the road from Radwinter Road through the Linden Homes, Redrow Homes and Bellway Homes sites (via Shire Hill) this is not yet a certainty.</p> <p>Application UTT/22/1598/DOV has not yet been formally approved which will rectify the bridleway issues linking the two southern sites. (Redrow and Bellway.)</p>

**For the above reasons SWTC object to the application. It would have a detrimental effect to the existing neighbourhood along with a larger impact on the highway network.**