

UTTLESFORD DISTRICT COUNCIL

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Leanne Palmer
Inquiries and Major Casework
The Planning Inspectorate
Room 3/J Kite Wing, Temple Quay
House
2 The Square, Temple Quay
Bristol
BS1 6PN

30th October 2023

Your ref: S62A/2023/0021

Our ref: UTT/23/1848/PINS

Please ask for Mr Lindsay Trevillian [REDACTED]
[REDACTED]

Dear Madam,

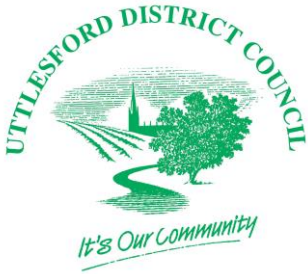
LOCATION: MOORS FIELDS, STATION ROAD, LITTLE DUNMOW
PROPOSALS: CONSULTATION ON S62A/2023/0021 - APPLICATION FOR THE APPROVAL OF RESERVED MATTERS FOR APPEARANCE, LANDSCAPING, LAYOUT AND SCALE FOR 160 DWELLINGS AND A COUNTRYSIDE PARK PURSUANT TO CONDITIONS 1 AND 2 OF OUTLINE PLANNING PERMISSION UTT/21/3596/OP

Thank you for your letter of 13th October 2023 confirming that the Planning Inspectorate have accepted additional documentation for consideration from the Applicant relating to the above application.

The Council has now had the opportunity to review all the revised documentation that was submitted by the Applicant in respect to the proposals and wishes to make representations in respect of the documentation. The Council requests that these comment and observations should be read in conjunction with the original comments sent by the Council to the Inspectorate on 14th September 2023.

However, prior to the Council providing additional comments in relation to the revised documentation, it is acknowledged that several concerns have been raised by relevant statutory consultees including Essex County Council who are the lead local highway authority and Active Travel England during the original consultation process.

The Council requests that the Inspectorate specifically reviews the additional documentation and any further comments from the Highway Authority and Active Travel England to ensure that the proposals address the previous concerns raised by these consultees and any other consultees. If these concerns are not addressed, then the Council maintains its objection to the proposals in that they would be contrary to Policies GEN1, GEN2, and GEN8 of the Uttlesford District Local Plan 2005 (as Adopted) and the National Planning Policy Framework.



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The Applicant has provided a letter 6th October 2023 outlining the concerns raised by interested parties and a summary of the comments received from different statutory consultees alongside an explanation of the changes made. The Applicant has made changes to the proposals in response to comments from Active Travel England, Essex County Council Highways and Uttlesford District Council.

The Council will rely on the professional assessment of the Inspectorate to review and ensure that the additional documentation submitted by the Applicant address those concerns by the Highway Authority and Active Travel England.

The Council feels that it is necessary to make further comments in response to additional documentation provided by the Applicant in response to the concerns that the Council previously made on 14th September 2023.

Building for a Healthy Life:

It is acknowledged that as part of the additional documentation that the Applicant has submitted a 'Building for Healthy Life Statement' prepared by Pegasus Urban Design. The Council have no comments to make in relation to this additional document.

Design:

Nodal buildings:

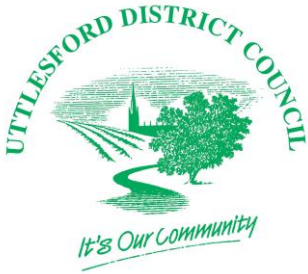
The Council accepts that the Design Code does not specifically relate to the need of nodal buildings, however, it is submitted that such buildings will improve the overall quality and place making of the development.

Built form is determined by good urban design principles that combine layout, form and scale in a way that responds positively to the context. Well-designed places use the right mix of building types, forms, and scale of buildings to create a coherent form of development that people enjoy.

The use of nodal buildings throughout the scheme will help identify the character of the development in the wider place; defines a pattern of streets, provides visual interest, and create a sense of place, promoting inclusion and cohesion specially in relation to the proposed character areas.

Dormers:

The Applicant acknowledges that the approved Design Code stipulates that that all dormer windows facing the street frontage must contained gable roofs. Upon review of the revised



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drawings, house type 'Bletchley' as referred in drawing reference P23-0555-HT08 still shows dormer windows with flat roof rather than gable. As such, this house type is still contrary to the requirements of the approved Design Code.

Bungalows:

The Council acknowledge that a revised storey heights plan ref: P23-0555_DE_011A has been submitted and now clearly identifies the location of the single storey bungalows.

The Council are satisfied with the location and position of the proposed bungalows in that they are in two different clusters, they form an integral part to the street scene, and ensure that appropriate space is provided around them to ensure that they are not heavily dominated by adjoining built form.

Nationally Described Space Standard (NDSS).

The Council recognise that the Applicant has confirmed that all residential units as per the figures shown in the schedule of the Technical Layout will meet the required Nationally Described Space Standard (NDSS). The Council request that the Inspector reviews each of the residential units to ensure that appropriate internal floor space is provided to ensure the amenities of future occupiers are met for all users.

Climate Change:

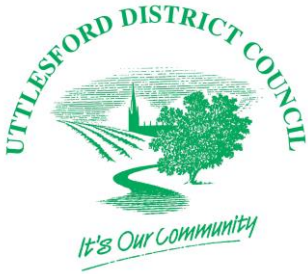
The Council accepts that Condition 37 imposed on the decision requires compliance with the Sustainability and Energy Statement (November 2021) prepared by Turley for the outline application.

Moors Wood:

The Applicant has provided an image within their supporting letter to identify that the tree survey overlaid on the Framework Plan shows that the woodland extends right up to and in fact over the proposed built form.

The Council submits that it is still unclear as to the buffer the proposed built form would be setback from Moors Wood and as to the potential impact upon the tree root protection areas. It is suggested that further clarity is required regarding specific setbacks and distances. A condition should be imposed if the Inspector is mindful to grant permission requiring the adequate protection of Moors Wood including the root protection zones to prevent any damage of the trees.

Highways and Parking:



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Off street parking provision:

Based on the accommodation mix provided, the Council state that a minimum of 348 off street parking spaces would be required across the residential element of the development. The Applicant has stipulated that by their count, the total number of on-plot spaces is 399 which is a significant overprovision.

If the count is indeed 399 spaces as the Applicant indicates, the Council are concerned that this is an overprescribed provision which is not necessary and could potentially result in unwanted car dominant frontages detrimental to the design and appearance of the development.

Garages:

Garage plans are now submitted as per drawings ref: P23-0555_HT26, P23-0555_HT27 & P23-0555_HT28 which show that they comply with minimal internal dimensions of 7m x 3m. These garages can and should be counted towards the provision of an off-street parking spaces for those residential units who have been provided with a garage.

Tripple Tandem Parking:

The Applicant indicates in their supporting letter that there are 35no. 4+ bedroom dwellings split quite evenly across the site that have triple tandem parking and the majority of these dwellings are located in close proximity to visitor bays.

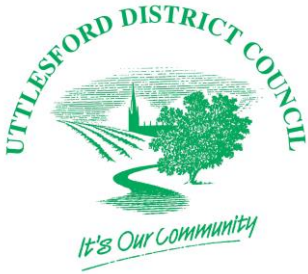
The Council notes as per the submitted Design and Access Statement, the accommodation schedule on p49 indicated that there would be 44 residential units across the scheme that consists of 4 or more bedrooms.

In addition, upon review of the revised Parking Strategy Plan Ref: P23-0555_DE_013 A, the Council count a total of 58 residential units that have been provided with triple tandem parking throughout the site. For the reasons provided in the Council's original statement 14th September 2023 this considered to be inappropriate.

Visitor Parking:

As a result of the previous concerns raised by the Council in relation to the inappropriate location and siting of the required visitor parking spaces, the Applicant has provided a revised drawing 'Parking Strategy' ref: P23-0555_DE_013 A.

Previously, the siting of the visitor parking across the site included the provision of three separate strips total 240m in length which were to provide a total of 40 visitor parking spaces.



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In the revised parking strategy these strips have been separated with visitor parking distributed around the perimeter of the built form of the site. The parking strategy for the visitor parking is an improvement, however, it does not address the concerns raised by the Council. The provision of visitor parking should be evenly spread across the site and no parking has been provided centrally within the site for ease of access for all users and occupants. The location of the visitor parking does not comply with the relevant standards.

Community Orchard / Allotment Parking:

The Applicant confirms in their supporting letter that 5 additional parking spaces have been provided for the orchard/allotment area. However, referring to the Parking Strategy' ref: P23-0555_DE_013 A, no indication of separate parking has been provided for this area. It is acknowledged that visitor parking for the residential units is located nearby, however, this does not constitute appropriate parking provision for the proposed orchard/allotment area for those visiting outside of the site. A lack of parking provision for this area will thereby result in on-street parking on surrounding highways resulting in traffic congestion and car dominated frontages.

It is acknowledged that the approved 'Design Code' in which the final layout and design of the scheme should be constructed in accordance with as required by Condition 6 of the outline application refers under paragraph 6.3.7 that further amenity value is afforded through a semi-enclosed area for allotments and a community orchard.

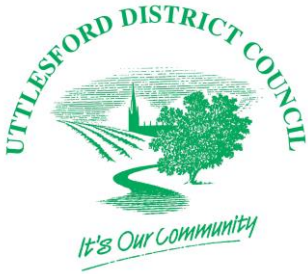
Refuse vehicles:

There are some instances where visitor parking has been provided at the end of cul-de-sacs such as adjacent to plots 11-13, and 96-101. The revised Refused Vehicle Tracking' drawing ref: 0026 PO3 demonstrates that for large vehicles to enter and exit this cul-de-sac's successfully, they would require space that extends into these visitor bays. If these bays are filled with vehicles, then refuse vehicles would not be able to successfully navigate and turn within the cul-de-sac and as such would not be able to undertake their main function to collect refuse.

It is also acknowledged that within all cul-de-sacs throughout the scheme the 'Refused Vehicle Tracking' drawing indicates that vehicle will need to overhang footpaths and thus result in potential safety issues for pedestrians and cyclists.

Boundary Treatments:

The Council accepts that the submission of the revised 'boundary treatments plan' ref: P23-0555_DE_007 B satisfies the previous concerns. The revised boundary treatments confirms



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that the 8m landscape buffer between the existing housing along Ainsworth Drive and the proposed housing will now be fenced off so that it is not publicly accessible.

Residential Amenity:

Although not raised as a particular concern, the Council wishes to point out that the Inspector assessing the scheme should ensure that appropriate back-to-back distances between the rear facades of the proposed residential units comply with the guidance set out in the Essex Design Guide. There should be a minimum of 25m between the rear facades of dwellings that back onto one another to avoid unnecessary visual blight or result in an overbearing impact, and to minimise the risk of a loss of privacy and light.

Play Space:

Although it would have been preferable to have the details of the formal and informal play areas throughout the scheme up front, the Council are satisfied that this could be dealt with by imposing a satisfactory well-worded condition on the decision notice if permission is approved.

Summary

Based on the above, although there have been some improvements made to address the previous concerns raised by the Council in their letter 14th September 2023, there still appears to be areas that require further clarification and improvement, particular with respect to issues regarding highways and parking.

The Council request that the Inspector ensures that all areas of concern raised by the Council, the Highway Authority, Active Travel England, and other consultees are appropriately addressed and considered in the assessment of the scheme to ensure a high-quality design is achievable in accordance with both Local and National standards.

Yours Sincerely

Mr Dean Hermitage
Director of Planning &
Building Control
Uttlesford District Council.