

REF: 01023/GA/DJ/L0009

21 November 2023

Sent by email to: section62a@planninginspectorate.gov.uk

Leanne Palmer
The Planning Inspectorate
3rd Floor, Temple Quay House
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Temple Quay
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Dear Ms Palmer

S62A/2023/0021 Moors Field, Station Road, Little Dunmow, Essex

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

Further to our letter of 15 November 2023, we are pleased to submit revised proposals for the above application on behalf of Dandara Eastern Limited.

A full list of the plans and documents that now make up the application is contained on the enclosed Schedule of Documentation.

As set out in our previous letter, we have made revisions to the scheme in response to comments from four consultees: Active Travel England; Essex County Council Highways; Uttlesford District Council; and a local resident on Ainsworth Drive. We summarise the changes made in response to each in turn below. We will provide a more detailed assessment of the matters raised in the consultation responses in our opening statement to the hearing.

Active Travel England

As set out previously, we are pleased to see that Active Travel England (ATE) are now recommending conditional approval of the application following the submission of revised proposals in response to their initial comments. In response to the two proposed changes to the layout that they suggest can be conditioned, we have the following comments:

a) **Northern footway/cycleway:** A footway/cycleway is now shown on the landscaping plans instead of the footway previously shown to the north of the site connecting the western footway/cycleway, with the

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allotments, play area and with the residential area in 3 places. This revision removes the need for any condition to secure this change.

b) **Bridge over SUDs:** As set out previously, our client does not consider that this change is necessary or appropriate. The connection to Flitch Way in this location was added in response to comments from the Uttlesford District Council to ensure that the proposal accords with the approved Development Framework Plan attached to the outline permission, Condition 25 of the outline permission, and with the approved Design Code. The approved plans show this link to the south-east of the site and to move it to a position between the two SUDS features would not serve the clear desire line for people wishing to head east on Flitch Way. The only objection appears to be regarding maintenance, provisions for which are secured by the S106 agreement. We do not therefore propose to make this requested change, but if the Inspector considers that it is necessary, our client would have no objection to a condition on this point.

Essex County Council Highways

As set out previously, we are pleased to see that the previous revised submission dealt with a number of the issues previously raised. Our client met with Rachel McKeown from Essex Highways on 16 November 2023 to discuss the remaining concerns raised. A draft revised layout was shared ahead of this meeting and it was agreed that, subject to formal review, the changes proposed would satisfy Essex Highways' remaining concerns. The proposed changes presented to Essex Highways are shown on the revised layout now submitted. In summary:

- A 2m wide footway is now shown on both sides of the road serving plots 132-147;
- 2. Plot/garage locations have been re-arranged to ensure that the off-street parking spaces do not encourage indiscriminate parking across the carriageway and the parking strategy plan has been updated to clarify the number and extent of parking spaces in each location.
- 3. The proposed tree opposite plot 19 has been removed from the planting plan.
- 4. Visitor parking spaces are now shown along the main spine road for a more even distribution within the scheme.

In addition, the Adoptable Highways Plan has been revised to confirm that the roads within the site will remain private. The tracking plans have also been updated to demonstrate that refuse vehicles can safely access the site.

Uttlesford District Council

As set out previously, we are pleased to see that UDC have reduced their objections and that they now state that they only object to the proposals in so far as ATE and Essex Highways' comments are not addressed. As set out above, the revised plans respond positively to the only outstanding concerns raised by ATE and Essex Highways and as such we anticipate that UDC will also be able to remove their objection.

Our client has the following response to UDC's specific comments:

• Nodal Buildings: We are pleased to submit a new Nodal Buildings Plan that highlights the position and design of nodal buildings. We have followed the Design Code requirement for full height chimneys on prominent gable elevations and also incorporated bay windows to others as requested by UDC. These buildings are located at key vistas along the spine road to form wayfinding points as well as emphasising junctions throughout the layout. As set out previously, four additional house-type variations were submitted with the previous revised submission and include the "Penshurst" and "Gosford" housetypes which are

provided in brick/render with chimneys or as boarded/clad variations with bay windows. We have also provided a variation of the "Frogmore" and "Woburn" for key vistas and these are provided as fully boarded/clad variations. We trust that our approach to nodal buildings is now clearer and illustrates the high quality of the design of the scheme.

- **Dormers:** The Bletchley is now shown with a gable dormer window.
- Moors Wood: A detailed Arboricultural Impact Assessment, including Tree Survey and Tree Protection
 Plans (TPPs) was submitted with the outline. Our client is confident that their proposals comply with this
 report, but we note that there is no condition on the outline requiring compliance. We therefore agree that
 it would be appropriate for a condition to be added requiring the submission and approval of an updated
 AIA.
- **Parking:** As above, changes have been made to on-plot and visitor parking in response to comments from Essex Highways. The revised Parking Strategy Plan now submitted clarifies the precise number of parking spaces proposed. In response to the issues raised by UDC:

Off-Street Parking Provision:

UDC raised a concern that the provision of 399 off-street parking spaces on the previous layout against a minimum requirement for 348 spaces could result in an overprovision resulting in unwanted car dominated frontages. In response to this concern, the applicant has reduced the number of off-street spaces to 371 which is just 7% more than the stated minimum requirement of 348 spaces. This has been achieved through a review of the length of driveways and the addition of new single and twin garage designs that do not meet the Councils standards to be counted as parking spaces.

In response to this concern, it is also necessary to clarify what the parking standards are in Uttlesford. UDC states in its consultation responses that the proposal would be contrary to Policy GEN8 – Vehicle Parking Standards, but they don't actually apply the standards set by this policy as they are clearly out-of-date.

Policy GEN8 states that parking is to be provided in accordance with Supplementary Planning Guidance "Vehicle Parking Standards". A summary of this document is provided at Appendix 1 of the Local Plan which sets "maximum" parking standards for residential development. In applying maximum parking standards this policy is not in accordance with NPPF paragraph 108 which states that maximum standards should only be used where there is compelling justification (e.g. where they are necessary to optimise the density of development in town centre locations). No such justification exists in rural Uttlesford and in accordance with NPPF paragraph 219 the policy must be considered out-of-date.

The inconsistency between Policy GEN8 and national policy is clearly recognised by UDC as they now apply the standards set out in Essex County Council's "Parking Standards Design and Good Practice" (September 2009) except where they are augmented by UDCs own standards for 4+ bedroom dwellings (see https://www.uttlesford.gov.uk/localparkingstandards). These standards set a clear "minimum" requirement for 1 bedroom dwellings to have 1 car parking space, 2-3 bedroom dwellings to have 2 spaces and 4+ bedroom dwellings to have 3 spaces (excluding any garages less than 7m x 3m internal dimension). The use of these standards is reflected in UDC's consultation responses which refer to a minimum requirement. In the context of the clear description of these standards as a minimum, a 7% increase is evidently in general accordance with the standard.

Triple Tandem:

In response to the Council's concern regarding triple tandem parking, it is first necessary to highlight that there is no policy restriction on triple tandem parking provision in either Essex County Council's parking standards or Uttlesford's standards set out on the website link above. Neither of these standards refer to tandem parking at all, but Uttlesford's standards does include important guidance on design:

"Parking courts are not generally considered to be appropriate for the rural nature of Uttlesford and "on plot" parking should be the normal approach.

Space for car parking can be provided "on plot", within the curtilage of the dwelling, such as in the form of a garage, car port, cart lodge, parking bay or private drive. Ideally dwellings should be accessed from the front, although side and rear access can be appropriate in some circumstances. Quality urban design dictates that care should be taken that this does not result in streets dominated by parking spaces in front of dwellings, or by building facades with large expanses of garage doors."

The above makes clear that parking courts are not supported in Uttlesford and that parking should therefore be on plot, but that care should be taken to avoid streets dominated parking spaces in front of dwellings or large expanses of garage doors. In this policy context, tandem parking is one of the few solutions available in Uttlesford that provides parking on plot, but avoids frontage parking and large gaps for garages between dwellings.

Tandem parking and in particular triple tandem parking is also a common feature of new developments that have been approved elsewhere in the local area. For example, we have enclosed the approved layouts for the recent development at Ainsworth Drive to the east of the site (Ref: UTT/14/3675/DFO) and one of the latter phases of Flitch Green (Ref: UTT/15/2089/DFO).

In summary, there no policy restriction on the provision of triple tandem parking and its provision is often necessary to ensure compliance with UDC's parking design standards with respect to avoiding parking courts and limiting frontage parking and large expanses of garage doors. This said, we appreciate that there is a balance to be struck to ensure that parking does not overspill onto local roads. In this context, the triple tandem provision across the site is now 59 units, but many of these units do not require 3 spaces (i.e. they have 3 or fewer bedrooms) and as such the provision of an additional space should actually help prevent on-street parking. Of the dwellings that do require 3 spaces (i.e. 4+ bedroom dwellings), 37 units have triple tandem parking. These plots are primarily located on private drives to the edge of the development and in locations well served by additional visitor parking bays. We consider that the number of plots served by triple tandem parking is appropriate and accords with the Council's parking design standards.

- Visitor Parking: Visitor parking spaces are now shown along the main spine road for a more even distribution within the scheme.
- Community Orchard / Allotment Parking: As set out previously, our client's discussions with Little Dunmow Parish Council have confirmed this will be more of a community growing area than an allotment space (n.b. there is no specific requirement for allotment provision in the outline planning permission). As such the area is seen as a more informal offering with no additional parking requirements over and above normal public open space. Visitor spaces are located near to this space and we can confirm that the Parish Council are happy with this approach. As the Inspector will note, the Parish Council have submitted a letter of support to the application.

• **Refuse tracking:** As above, revised tracking plans are now submitted.

Local Resident on Ainsworth Drive

The comments from the local resident raise a concern regarding the accuracy of the measurement for the proposed 8m buffer between the boundary of the proposed dwellings and the boundary of existing dwellings Ainsworth Drive. We can confirm that this has been checked and increased where required to ensure that the buffer is at least 8m wide. The proposed buffer is between 8 and 10.5m wide as shown on the submitted Rear Garden Compliance Plan. The 8m buffer was included in the outline application proposals to ensure an appropriate relationship with existing dwellings.

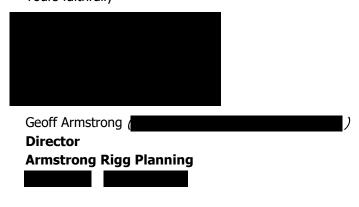
As set out previously, we can also confirm that the proposal would meet Essex Design Guide standards that require a separation distance of 25m between rear elevations. The separation distances between the proposed and existing dwellings are between 26.5m and 36.1m. All proposed dwellings comply with the Essex Design Guide in terms of interface distances and angle of separation, where relevant, between existing and proposed dwellings. We can also confirm that none of the proposed adjoining dwellings have living rooms on the first floor which would require a minimum back to back distance of 35m to comply with the Essex Design Guide. The rear elevation of all of the new dwellings is also a minimum of 15m away from the nearest existing boundary in accordance with the Essex Design Guide.

Conclusion

We trust that this letter provides a useful summary of the revised plans now submitted. We look forward to discussing further at the hearing.

If you require any further information at this stage please do not hesitate to contact me.

Yours faithfully



Encs.

- 1. Schedule of Documentation
- 2. Approved Layout for Ainsworth Drive development
- 3. Approved Layout for latter phase of Flitch Green development

SCHEDULE OF DOCUMENTATION – FURTHER REVISED SUBMISSION MOORS FIELDS, STATION ROAD, LITTLE DUNMOW, ESSEX

TITLE	AUTHOR	REFERENCE	SUBMISSION
			DATE
Forms lottors eshadules			
Forms, letters, schedules Covering Letter	Armstrong Rigg Planning	01023/GA/DJ/L0003	17/07
Application Form	Armstrong Rigg Planning	N/A	17/07
Schedule of Documentation – Revised	Armstrong Rigg Planning	N/A	21/11
Submission	Armsdong Rigg Flaming	19/0	21/11
(This Schedule)			
Revised Submission Covering Letter	Armstrong Rigg Planning	01023/GA/DJ/L0007	06/10
Update Letter on Further Proposed Revisions	Armstrong Rigg Planning	01023/GA/DJ/L0008	15/11
Further Revisions Cover Letter	Armstrong Rigg Planning	01023/GA/DJ/L0009	21/11
Documents	Transacing ragginarining	1 01013/ 3/ 4 23/ 10003	
Biodiversity Validation Checklist	Aspect Ecology	N/A	17/07
Design and Access Statement	Pegasus Group	P23-0555_DE G001C	06/10
Building for a Healthy Life Statement	Pegasus Group	P23-0555_DE	06/10
Drainage Strategy Statement	LDE	134390-DSS-(00)	17/07
Ecological Appraisal	Aspect Ecology	6047 EcoAp vf JM/JB	17/07
Flood Risk Assessment	LDE	890428-R1(1)-FRA	17/07
Hydraulic Modelling Results	LDE	134390 Rev C	21/11
Landscape Statement	MacFarlane + Associates	3261 MA RP001 Rev P02	06/10
Landscape Maintenance and Management Plan	MacFarlane + Associates	3261.MA.RP002	17/07
Planning Statement	Armstrong Rigg Planning	01023/S0001	17/07
Plans			
Site Location Plan	Pegasus Group	P23-0555_001 Rev B	17/07
Existing Site Layout	Pegasus Group	P23-0555_002 Rev B	17/07
Technical Layout	Pegasus Group	P23-0555_003 Rev T	21/11
Materials Plan	Pegasus Group	P23-0555_005 Rev D	21/11
Hard Landscaping Plan	Pegasus Group	P23-0555_006 Rev D	21/11
Boundary Treatment Plan	Pegasus Group	P23-0555_007 Rev D	21/11
Waste Management Plan	Pegasus Group	P23-0555_008 Rev D	21/11
Street Scenes	Pegasus Group	P23-0555_009 Rev B	21/11
Adoptable Highways Plan	Pegasus Group	P23-0555_010 Rev D	21/11
Storey Height Plan	Pegasus Group	P23-0555_011 Rev C	21/11
Rear Garden Compliance Plan	Pegasus Group	P23-0555_012 Rev D	21/11
Parking Strategy Plan	Pegasus Group	P23-0555_013 Rev C	21/11
Nodal Buildings Plan	Pegasus Group	P23-0555_014 Rev A	21/11
Housetype Pack	Pegasus Group	P23-0555_DE	21/11
Bin and Cycle Store Details	Pegasus Group	P23-0555_HT25	06/10
Single Detached Garage Details	Pegasus Group	P23-0555_HT26 Rev A	21/11
Twin Detached Garage Details	Pegasus Group	P23-0555_HT27 Rev A	21/11
Double Detached Garage Details	Pegasus Group	P23-0555_HT28	06/10
Housetype Roof Plans	Pegasus Group	P23-0555_HT30 Rev A	06/10
Illustrative Masterplan	MacFarlane + Associates	3261.MA.900	21/11
Landscape General Arrangements, Site Wide	MacFarlane + Associates	3261.MA.1000 Rev C	21/11
General Arrangement plan, Sheet 1 of 7	MacFarlane + Associates	3261.MA.1001 Rev C	21/11
General Arrangement plan, Sheet 2 of 7	MacFarlane + Associates	3261.MA.1002 Rev B	21/11
General Arrangement plan, Sheet 3 of 7	MacFarlane + Associates	3261.MA.1003 Rev B	21/11
General Arrangement plan, Sheet 4 of 7	MacFarlane + Associates	3261.MA.1004 Rev C	21/11
General Arrangement plan, Sheet 5 of 7	MacFarlane + Associates	3261 MA 1005 Rev B	21/11
General Arrangement plan, Sheet 6 of 7	MacFarlane + Associates	3261.MA.1006 Rev B	21/11
General Arrangement plan, Sheet 7 of 7	MacFarlane + Associates	3261.MA.1007 Rev B	21/11
Access and Circulation Plan	MacFarlane + Associates	3261 MA 2000 Rev B	21/11
Planting Plan, Site Wide	MacFarlane + Associates	3261 MA 3000 Rev B	21/11
Planting Plan, Sheet 1 of 7	MacFarlane + Associates	3261.MA.3001 Rev B	21/11
Planting Plan, Sheet 2 of 7	MacFarlane + Associates	3261.MA.3002 Rev B	21/11
Planting Plan, Sheet 3 of 7	MacFarlane + Associates	3261.MA_3003 Rev B	21/11
Planting Plan, Sheet 4 of 7	MacFarlane + Associates	3261.MA.3004 Rev B	21/11
Planting Plan, Sheet 5 of 7	MacFarlane + Associates	3261.MA.3005 Rev B	21/11
Planting Plan, Sheet 6 of 7	MacFarlane + Associates	3261.MA.3006 Rev B	21/11
Planting Plan, Sheet 7 of 7	MacFarlane + Associates	3261.MA.3007 Rev B	21/11
Detailed Plant Schedule	MacFarlane + Associates	3261.MA_3008 Rev B	21/11
Surface Water & SuDS Strategy	LDE	134390-RSK-ZZ-ZZ-DR-C-	21/11
		0005 P05	<u> </u>

Site Levels Sheet 1 of 3	LDE	134390-RSK-ZZ-ZZ-DR-C- 0006 P05	21/11
Site Levels Sheet 2 of 3	LDE	134390-RSK-ZZ-ZZ-DR-C- 0007 P05	21/11
Site Levels Sheet 3 of 3	LDE	134390-RSK-ZZ-ZZ-DR-C- 0008 P05	21/11
SuDS Features Plan	LDE	134390-RSK-ZZ-ZZ-DR-C- 0021 P04	21/11
Site Drainage Sheet 1 of 3	LDE	134390-RSK-ZZ-ZZ-DR-C- 0022 P05	21/11
Site Drainage Sheet 2 of 3	LDE	134390-RSK-ZZ-ZZ-DR-C- 0023 P05	21/11
Site Drainage Sheet 3 of 3	LDE	134390-RSK-ZZ-ZZ-DR-C- 0024 P05	21/11
Refuse Vehicle Tracking	LDE	134390-RSK-ZZ-ZZ-DR-C- 0026 P05	21/11
Visibility Splays Sheet 1 of 3	LDE	134390-RSK-ZZ-ZZ-DR-C- 0027 P04	21/11
Visibility Splays Sheet 2 of 3	LDE	134390-RSK-ZZ-ZZ-DR-C- 0028 P04	21/11
Visibility Splays Sheet 3 of 3	LDE	134390-RSK-ZZ-ZZ-DR-C- 0029 P04	21/11
General Arrangement	LDE	134390-RSK-ZZ-ZZ-DR-C- 0030 P02	21/11
Pedestrian Crossing Points	LDE	134390-RSK-XX-XX-DR-C- SK11 P02	21/11

