

UTTLESFORD DISTRICT COUNCIL

Council Offices, London Road, Saffron Walden, Essex CB11 4ER
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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

15th December 2023

Your ref: S62A/2023/0021

Our ref: UTT/23/1848/PINS

Please ask for Mr Lindsay Trevillian on [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

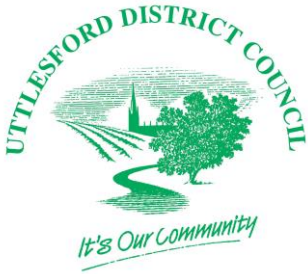
Thank you for your letter of 27^h November 2023 confirming that the Planning Inspectorate have accepted additional documentation for consideration from the Applicant relating to the above application.

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 comments and observations should be read in conjunction with the original comments sent by the Council to the Inspectorate on 14^h September 2023 and on 30th October 2023.

However, prior to the Council providing additional comments and as the Council confirmed within their previous correspondence, the Council respectfully requests that all representations from statutory and non-statutory consultees are taking into full consideration in the assessment of the scheme to ensure that the further revised documentation addresses all concerns previously raised.

The Applicant has once again made further changes to the original scheme from the revisions that were submitted to the Inspectorate on 6th October 2023, making this the second set of revisions submitted.

This second set of revisions as with the first set of revisions have been submitted in response to comments from Active Travel England, Essex County Council Highways and Uttlesford District Council.



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The Applicant has provided a letter 21st November 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.

As previously stated, 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.

Design:

Nodal buildings:

The Council acknowledge that a new drawing has been submitted with the proposals ref: P23-0555_DE_014 (Nodal Buildings Plan) following the previous comments made by the Council with respect to the lack of such feature buildings to improve the overall quality and place making of the development.

The Council recognises that the proposed Nodal Buildings will be made up of different house types consisting of Penhurst (PEN), Woburn (WOB), Gosford Versions 3 & 4 (GOS) and Frogmore (FRO). These house types have been externally finished with black UPVC horizontal cladding sitting on a red brick plinth with an assortment of different coloured roof tiles as indicated in the house type drawing pack ref: P23-0555 DE-HT-Pack-REV A.

However, there appears to be some discrepancies between which house types are proposed for some of the plots between the new plan P23-0555_DE_014 (Nodal Buildings Plan) and that of drawing ref: P23-0555 DE 003T (Technical Layout) as highlighted in the table below:

Plot Number	Details shown on Technical Layout - P23-0555 DE 003T	Details shown on Nodal Building Plan P23-0555 DE 014
Plot 3	House Type GOS V2	House Type GOS V4
Plot 52	House Type GOS V2	House Type GOS V3
Plot 99	House Type GOS V2	House Type GOS V3

The Council requests that further clarification is required, or revisions submitted to address these discrepancies.

Corner Buildings:

A well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of the principal elevations of buildings. Flank elevations on buildings set on a corner location should be given the same appreciation to the detailed design as with the principal elevation and should not be regarded as an afterthought. Flank elevations as



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with the principal elevation should have a dual aspect and have an animated and active frontage.

The house types known as 'Penhurst' and 'Gosford V1 & V2' are commonly found throughout the site on corner locations as referred to in drawings ref: P23-0555_DE_014 (Nodal Buildings Plan) and P23-0555 DE 009B (Street Scenes). Although the principal elevations of these dwellings are appropriate, the Council consider that their flank elevations consisting of chimney stacks, don't negotiate the corner location or have the same presence as the principal elevations.

The appearance of the flank elevation of a building makes a visual impression within the street scene the space around it. The existing detailing by way of chimney stacks and lack of bay windows affects the appearance of these house types and how they are experienced in the public realm. Although, provided with window openings, for some natural surveillance and to break up any featureless flank walls, it could be perceived that the flank elevations appear to be the rear of the buildings.

The flank elevations of these house types should be designed as dual frontage to reflect the series of front facades of adjoining properties to create a vertical rhythm along the street. This can be reinforced by the composition and proportions of openings including bay windows rather than chimney stacks.

Dormers:

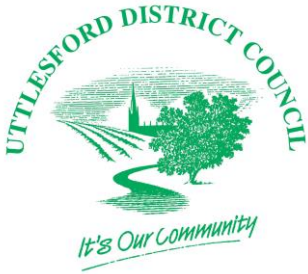
The Council acknowledges that the house type known as 'Bletchley' has now been incorporated with a gable roof form in accordance with the approved 'Design Code'. The Council are satisfied that this point has now been addressed.

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.

Moors Wood:

In addition to those comments provided by the Council in their representation 30th October 2023, it is acknowledged that the Applicant within their supporting covering letter that they are willing to accept the imposition of conditions to provide an updated Arboricultural Impact Assessment, including Tree Survey and Tree Protection Plans (TPPs). The Council are



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satisfied that subject to such conditions being imposed, then this shall remove any concerns that the proposal may or may not have upon Moors Wood and/or other existing vegetation.

Highways and Parking:

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. Prior to the latest set of revised drawings, the provision of 399 off street parking spaces where proposed.

The Council acknowledged that the Applicant as per their revised covering letter and as confirmed in drawing ref: P23-0555 DE 013C (Parking Strategy) that the proposals will now contain 371 off street parking spaces for the proposed 160 residential units along with an additional 40 visitor spaces. This is 7% more than the stated minimum requirement of 348 off street spaces.

The Council are satisfied with the provision of the off-street parking proposed across the scheme, however, not necessarily the amount of triple tandem parking across the site which is discussed further below.

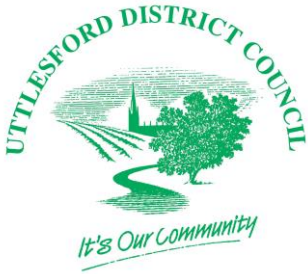
Garages:

The Council acknowledge that some of the single and twin garages as shown on revised drawings ref: P23-0555-HT26A (Single Detached Garage) and P23-0555HT27A (Twin Detached Garage) that some would not comply with the minimum dimensions to constitute or be regarded as an allocated off-street parking space. The Council notes that these garages would only be used for storage purposes which has reduced the amount of off street parking across the site as referred to above.

Tripple Tandem Parking:

The Applicant acknowledges that across the scheme there are 54 residential units that are provided with triple tandem parking. 17 consist of a garage with two spaces in front, 34 consist of 3 spaces on the drive and are positioned to the side of the residential unit. This amounts to approximately 34% of the number of units being provided with triple tandem parking.

The Applicant refers in their supporting letter that if one only counts those instances where a residential unit is required to have 3 parking spaces then there are only 37 instances where triple tandem parking has been provided.



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Based on these numbers, this means that 18 residential units that contain 3 or less bedrooms have been provided with triple tandem parking.

The Applicant stipulates that in their view, it is not correct to label a 3-bedroom house that has 3 linear parking spaces as having triple tandem parking as this house would only require 2 spaces. The Applicant points out that the reason for providing longer driveways in these instances is either that they share a garage with a 4-bedroom dwelling or that the driveway needs to be longer to avoid having detached garages.

The Council submits that it is not necessary for an additional 18 instances of whereby triple tandem parking has been provided across the scheme to accommodate those relevant residential units. The provision of 2 off street parking spaces would be sufficient to meet the needs of the future occupiers of these units.

If all residential units consisting of 3 bedrooms or less were provided with the minimum of 1 or 2 off street parking spaces, as the Applicant correctly points out, these would only leave the provision of 37 instances of whereby triple tandem parking occurs across the site.

This would amount to approximately 23% of the units across the site having triple tandem parking. Although the Council considers this figure to still be a high proportion of units having triple tandem parking, it is certainly significantly better than the existing proposals which amount to a total of 54 units or 34% consisting of triple tandem parking.

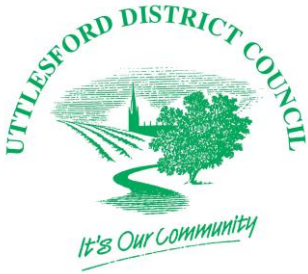
As a minimum, the Council submits that the scheme should be revised to remove all triple tandem parking for those units consisting of 3 or less bedrooms.

The Council confirm that there is no policy requirement or guidance that specifically states that no triple tandem parking should be provided.

However, this is a matter of good place making and providing a high-quality design as required by Section 16 of the National Planning Policy Framework and Policy GEN2 of the Uttlesford District Local Plan (as Adopted).

Paragraph 104 e) of the Framework requires all transport considerations including patterns of movement, streets and parking are an integral to the design of schemes and contribute to making high quality places.

The Council maintains their objection in this regard in that the proposals provides a high proportion of triple tandem parking across the scheme. Triple tandem parking tends to lead to an overspill of vehicles onto the highways which ends up resulting in unwanted traffic congestion and detrimental to the function of the highway which is main priority is form movement from point A to B and reduces the visual qualities of the street scene contrary to good place making.



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Refuse vehicles:

The Council were previously concerned that it appeared in some instances that refuse vehicles would not enter and exit some cul-de-sac's successfully without overhanging visitor bays or public footpaths. This concern was based on the initial drawing ref: 134390-RSK-ZZ-ZZ-DR-C-0026 P03 (Refuse Vehicle Tracking) submitted in support of the proposals. As per the notes attached to this drawing, the vehicle used for tracking was based on a vehicle length of 11.65m by a width of 2.5m.

It is acknowledged that following the comments made by the Council that the Applicant has submitted a revised drawing ref: 134390-RSK-ZZ-ZZ-DR-C-0026 P05 (Refuse Vehicle Tracking). The notes attached to this drawing does not provide an indication as to the size of the vehicle use for tracking of the site. It is presumed that the tracking is based on a smaller refuse vehicle to allow for appropriate refuse collection without resulting in potential safety issues to all highway users.

Further clarification is required in this respect.

Residential Amenity:

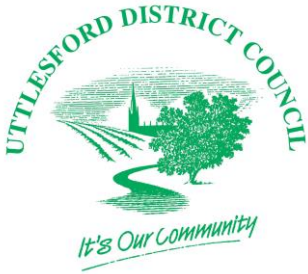
Although not raised as a particular concern, the Council wishes to point out that the Inspector assessing the scheme should ensure that appropriate back-to-back distances between the rear facades of the proposed residential units comply with the guidance set out in the Essex Design Guide. There should 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 30th October 2023, there still appears to be areas that require further clarification and improvement, particular with respect to issues regarding highways and parking.



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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.