



## UTTLESFORD DISTRICT COUNCIL

Council Offices, London Road, Saffron Walden, Essex CB11 4ER  
Telephone (01799) 510510, Fax (01799) 510550  
Textphone Users 18001  
Email [uconnect@uttlesford.gov.uk](mailto:uconnect@uttlesford.gov.uk) Website [www.uttlesford.gov.uk](http://www.uttlesford.gov.uk)

Mr S Brown  
Woolf Bond Planning  
The Mitfords  
Basingstoke Road  
Three Mile Cross  
Reading  
RG7 1AT

20<sup>th</sup> November 2023

Your ref:

Our ref: UTT/23/2567/PA

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

Dear Mr Brown,

**PROPOSAL: DEVELOPMENT OF THE SITE FOR UP TO 75 DWELLINGS,  
ASSOCIATED LANDSCAPING AND OPEN SPACE, WITH ACCESS FROM  
KNIGHT PARK, THAXTED ROAD OR POPPY VIEW.**

**SITE: LAND NORTH OF KNIGHT PARK, THAXTED ROAD, SAFFRON WALDEN.**

I refer to your preliminary enquiry submitted to Uttlesford District Council on the 13<sup>th</sup> October 2023 and our subsequent meetings on the 10<sup>th</sup> November 2023. I have examined your submitted documents, including all indicative drawings which inform the submitted proposal.

It was advised within our meeting that you have undertaken pre-application discussions with the Essex County Council who are the lead local highway authority seeking advice regarding matters surrounding highway and transportation and in particular vehicle access to the site.

As a result of pre-application advice received from the highway authority, it was advised during the meeting with officers of Uttlesford District Council that revisions would be required to be made to the initial layout of the scheme that has been submitted and presented to the Council.

Initially the application site comprised of two land parcels. The main revision as advised from the Applicant was the deletion of the northwestern parcel of land (smaller plot) leaving the larger southeastern parcel (larger plot) forming the application site. It was advised that the number of units would as a result be reduced from 75 dwellings to approximately 55 dwellings.

The advice provided below is based on the conversations within the meeting whereby the main discussions related to the principle of the proposals for the construction of up to 55 dwellings on the single plot of land.

### **Site Description**

The proposed application site is located to the northeast of Thaxted Road, Saffron Walden. The site is approximately 2 hectares in size and its topography consists of a modest slope falling from the southeastern corner to the northwestern corner.

The site is formed by a single distinct field currently in arable production and free of any established built form. Mature vegetation in the form of established hedgerows and medium size trees are located along the boundaries of the site.

Immediately adjacent to the southern boundary is Knights Park Retail Park which includes a several commercial units, a supermarket, a café, hotel, and a recycling centre. To the north, operation works are currently ongoing for a residential development for the construction of 150 dwellings being undertaken by Bellway. Modest size arable fields used for agriculture are located to the east.

In terms of local designations, the site is defined as being outside of the settlement boundary of the Town of Saffron Walden and thereby located in the countryside. The Environmental Agency Flood Risk Maps identifies the site lying within 'Flood 1'. The site does not fall within or abuts a conservation area, and there are no other heritage assets near the site. There are no local landscape designations within or abutting the site.

### **The Proposal**

The proposals forming this pre-application submission seeks advice in respect to the construction of 55 dwellings alongside associated works including open space & landscaping and a new vehicle and pedestrian access off Thaxted Road through the existing retail park.

### **Planning History**

A search of Council's records indicates that there is no relevant recorded planning history for the application site:

### **Development Plan Documents**

Uttlesford Local Plan (2005) – Provides the basis for all planning decisions within the district. It contains policies relating to the location of development and protection of environmental features.

Below is a list of the most relevant Development Management Policies in relation to this proposal the subject of this pre-application.

- Policy S7 (Countryside)
- Policy GEN1 (Access)
- Policy GEN2 (Design)
- Policy GEN3 (Flood Risk)
- Policy GEN4 (Good Neighbourliness)
- Policy GEN5 (Light Pollution)
- Policy GEN6 (Infrastructure Provision)
- Policy GEN7 (Nature Conservation)
- Policy GEN8 (Parking)
- Policy ENV5 (Protection of Agricultural Land)
- Policy ENV7 (The Protection of the Natural Environment Designated Sites)
- Policy ENV8 (Other Landscape Elements of Importance for Nature Conservation)
- Policy ENV10 (Noise Sensitive Development and Disturbance from Aircraft)
- Policy ENV11 (Noise Generators)
- Policy ENV12 (Groundwater Protection)
- Policy ENV13 (Exposure to Poor Air Quality)

- Policy ENV14 (Contaminated Land)
- Policy H9 (Housing Mix)
- Policy H10 (Affordable Housing)
- Policy E2 (Safeguarding Employment Land)
- Policy SW5 (Thaxted Road Employment Site)
- Policy SW6 (Safeguarding of Existing Employment Areas)

### **Emerging Local Plan**

The Council is currently out to consultation of the new Local Plan for Uttlesford (regulation 18) in which the consultation response for representations closes on the 15<sup>th</sup> December 2023. The draft plan contains the vision, objectives, spatial strategy, and planning policy framework for the period 2021 to 2041. It is anticipated that the new local plan will be adopted in Spring of 2026. Once adopted the new local plan for the district will replace the existing Adopted Local Plan 2005.

### **Supplementary Planning Documents**

- Accessible Homes and Play Space (November 2005)
- Urban Place Supplement to the Essex Design Guide (March 2007)
- Uttlesford Adopted Parking Standards
- Essex County Council Parking Standards (September 2006)
- Interim Climate Change Planning Policy (February 2021)
- Building for a Healthy Lifestyle (November 2021)
- First Homes Planning Advice Note (March 2022)

### **Saffron Walden Neighbourhood Plan**

The Saffron Walden Neighbourhood Plan was formally made by Council on 11 October 2022. The most relevant policies to consider include:

- SW5 – Affordable Housing
- SW7 – Design
- SW8 – Parking on new developments
- SW19 – Ecological Requirements for all New Domestic and Commercial Development
- SW20 – Promoting Walking and Cycling
- SW21 – Travel Planning
- SW23 – Vehicular Transport
- SW27 – Opens Space for Informal Recreation
- SW29 – Land Value to the Natural Environment

### **National Planning Policy Framework**

The National Planning Policy Framework (hereafter “the NPPF”) was first published in 2012 and was revised in September 2023. It sets out the Government’s national planning policies for England. It identifies the Government’s vision, objectives and goals for the planning system and provides a series of aids in the determination of planning applications.

### **Councils 5 Year Land Supply**

Our housing trajectory and 5-year housing land supply calculation has now been reviewed and updated. It represents the housing land supply position as of 1 April 2023 and demonstrates that the district has **5.14** years of housing supply for the period covering 2023/24 to 2027/28.

## **Planning Assessment**

### **Principle of Development**

Referring to the existing adopted development plan, the northern part of the site is located within the 2005 Local Plan boundary for policy SW5 “Thaxted Road Employment Site” which is a 3.76 hectare site proposed for employment uses. It is noted that the northern part is no longer being considered for development in the latest illustrative masterplan for the site. The rest of the site is in open countryside.

The 2005 Local Plan safeguards existing employment land and allocates land for future employment development immediately to the south and west of the site under policies SW6 and SW5 respectively. Despite being in open countryside the proposed site access is through the existing and proposed employment sites. Since the 2005 plan was adopted a household waste recycling centre has opened immediately to the south of the site (consented in 2007 under reference UTT/0710/05/CC).

The recently published Uttlesford Employment Needs Update (2023) identifies a need for “up to 5ha” of industrial land in Saffron Walden. As outlined in the Employment Site Selection Topic Paper (2023) the recently published draft Housing and Economic Land Availability Assessment (2023) only identifies one site at Saffron Walden that is suitable, available and achievable for employment use – the site that is subject to this pre-app – albeit it is acknowledged that the site was promoted for both employment and residential in the Council’s Call for Sites.

The Council published a draft Local Plan for Regulation 18 consultation on 3rd November 2023. The plan allocates this site for employment development (industrial use) under Core Policy 4 and Core Policy 6 for a total of 3ha at “Land north of Thaxted Road (Rear of Knights Park)”.

As the Site Selection Topic Paper explains; given the need for industrial floorspace at Saffron employment, the lack of alternative sites and furthermore the identified noise and amenity constraints created by the household waste recycling centre and commercial development immediately to the south the site, the site has been allocated for employment use in the emerging Local Plan. The area allocated is only 3ha (i.e. excluding the land to the north) due to advice received from the local highway authority about the impact of crossing the byway at Tiptofts Lane. Even with the proposed allocation in the Regulation 18 Local Plan there is still a technical shortfall against the “up to 5ha” need.

There is an objection in principle to residential development on this site due to the conflict with the employment policies in the 2005 Local Plan, the emerging Regulation 18 Local Plan and the proposed employment allocation on the site, and material considerations in the form of up-to-date evidence on employment need and suitable, available and achievable HELAA sites for employment land at Saffron Walden.

### **Character and Design**

In terms of design policy, good design is central to the objectives of both National and Local planning policies. The NPPF requires policies to plan positively for the achievement of high quality and inclusive design for the wider area and development schemes. These criteria are reflected in Policy GEN2 of the Uttlesford District Local Plan 2005 (as adopted) and Policy SW7 of the Neighbourhood Plan which also requires that development is compatible with the scale, form, layout, appearance, and materials of surrounding buildings.

### **Layout:**

It is advised that the overall final indicative layout should evolved through good design practice taking into account the design principles of the scheme and that the architect makes the best and most efficient use of the site whilst respecting the character of the surrounding locality and the amenities of surrounding dwellings.

The layout should take into consideration the constraints of the site, namely the neighbouring commercial retail park to the south, the sites topography as well as the required parking/access standards, amenity space, the inclusion of landscaping and sustainable drainage requirements.

The layout of the development should provide an efficient layout and ensure its arrangement enhances the character of the surrounding area and establishes a clear, legible, and permeable layout.

The siting of the dwellings within the development should be arranged to follow the curve of the highways within the site which allows more harmonious street scene appearance. The frontage of the buildings along the internal highway should be sited at the back edge of the public footways allowing for car parking to be sited between houses reducing the visual impact of on-site parked cars and also allows as much private rear gardens as possible to the rear of the dwellings.

The street layout should generally encourage walking and cycling in that internal paths and existing highways are well connected allowing pedestrians and cyclists a choice of direct routes and to move freely between all parts of the site and to wider destinations including that of the town.

#### Appearance:

It is acknowledged that the challenge for applicants is to design new characterful buildings which reconcile the requirements of a modern lifestyle with the need for integration into their context. Successful and appropriate new development often has simple proportions and details, based on those of their traditional rural equivalent.

Getting the architectural details right is critical to ensuring new developments are appropriate to the setting and context. The traditional buildings of Essex are typically made up of rectangular rather than square plan forms, with pitched roofs spanning the narrower plan dimension. Chimney stacks are commonly found on buildings and help to punctuate rooflines and provide visual interest. Openings should be arranged so as to emphasise the visual strength of the wall by allowing as wide as s solid pier as possible between openings. Furthermore, external facing and roof materials should be selected from the range of regional materials characteristic of Essex, or similar to that of its surroundings.

Each of the residential units should provide their own sense of individuality because of their own interperion of design using different proportions, roof forms and footprints which helps to break up any strict plain forms in the street scene.

However, it is considered that the final design of the units should incorporate mare traditional detail influence by the Essex Design Guide and the local context to allow for the buildings to appear more in keeping with their rural setting.

Traditionally, buildings in countryside locations are integrated into the landscape by their siting and form, and by a blend of countryside elements producing a harmonious composition.

Individual units should have a simple dominant form which may be based on a rectangular plan and have a pitched roof with a central ridge. This basic form may be extended and

added-to. Carefully placed 'additions' can enhance the overall composition. Simple forms are the key to success.

Individual windows can, if badly designed, spoil the appearance of an elevation and unbalance the whole building. Harmony and balance can be achieved in a number of ways. The simplest solution to window design is to choose windows that are symmetrical about both axes. Setting the glazing into the structure by at least a half brick width creates a shadow and gives articulation to the elevation. Please keep this in mind when finalising the design and appearance of the units.

Buildings in the open countryside may be seen from great distances and this is why form and setting are so important. The simple outline and modest form of a traditional countryside building has a dignity of its own. Over elaborate details can be of an unsuitable scale and also spoil a pleasantly-proportioned building. It is suggested that the design of the proposals need to be of a more simplified design that reflect their setting.

It is not unacceptable for dwellings to have garages or undercover parking, however these should not dominate the landscape or the proposed new residential units.

There are a number of traditional building forms that are seen as models for garages or car ports. Cart sheds are a readily acceptable form that are of timber structures with plain tiled roofs help to complement a more traditional form. This design would be more preferable and if possible, for the garages/ cart lodges to be to the side of dwellings. Where garages must be attached, they may take the form of a subsidiary element to the main house or as a lean-to extension.

The new buildings should blend with the landscape, its form, planting, and boundaries. The proposals should retain existing trees and hedgerows and where possible allow for sufficient space around and between buildings with sufficient distance away from boundaries for planting of new trees and vegetation to help soften the new built form.

#### Scale:

It is suggested to look at simple building forms in combination with its landscape setting. Aim to minimise their visual impact by keeping building masses small, with large buildings broken down into components of a satisfactory scale. Roof forms are all-important. It would be beneficial to use lower eaves lines and extended roofs to help to relate the building to the landscape. The use of bungalows in the scheme would help to minimise bulk and massing thereby providing some mitigations in respect to the visual impact upon the openness of this part of the countryside.

When working up the final design, consideration should be given to the harmony of design in that the new buildings should relate to distant views as well as close-to. Repeated patterns should generally be avoided in favour of organic forms and traditional countryside buildings such as small cottages.

#### Quality of accommodation:

Homes should be arranged to make an 'efficient' layout and have regard to solar orientation and passive design. The proposals should be supported by meaningful references to any passive design measures, renewable energy, building fabric specifications, or any other measures that would meaningfully reduce carbon emissions, in accordance with the Interim Climate Change policy. Reference should also be thought of in respect to how energy use can be reduced by designs and specifications considering the energy hierarchy, embodied carbon, or new construction techniques.

The proposals should comply and meet internal space standards and have acceptable levels of daylight and privacy so that the home will function, be adaptable and cater to changing lifestyles that meet the needs of its occupiers.

Proposed new build footprints must not result in unacceptably small rear gardens for proposed properties. Although garden sizes will to an extent be determined by the back-to-back separation distance between new development (25m, which may need to be increased due to topography/a significant levels difference), developments will be expected to meet the minimum garden standards in accordance with the Essex Design Guide. Dwellings consisting of one and two bedrooms require 50sqm whilst three or more bedrooms would need at least 100sq.m of private garden space to meet the needs of its occupiers. These areas should be usable, provide natural light and patio areas and ensure that they are not overlooked. Outdoor amenity space should provide outlook from habitable rooms and be directly accessible from the individual dwellings.

All waste management should be integrated into the design of developments from the outset and be achieved with minimal impact upon the quality of the public realm and the amenity of neighbouring and future residents. Where possible, waste storage should be at the rear of the dwellings. Where waste is stored at the front of properties, it must be carefully integrated into the frontage and appropriately screened from the public realm.

### Design Codes

Within our meeting we discussed the benefits of a detailed design code being submitted in support of the outline application to ensure that a high-quality design come forward during the submission of reserved matters applications if outline permission is approved.

In terms of what could be included in the code, the Council would suggest the following:

- Overall, this document: [Uttlesford Building for a Healthy Life accessible.pdf](#) sets out some clear principles that should be captured in the code to give more certainty at reserved matters stage.
- Street type sections showing elements that must be provided for each street type including green corridor, orbital greenway, widths of pavements, types of boundary treatments and front garden depths, street trees, soft landscaping, rain gardens and linear swales where appropriate, also parking strategy e.g. on-street etc.
- Edge type sections showing active frontages forming outward facing development, height ranges, boundary treatment options e.g. estate rail, surface material options e.g. pavers rather than blacktop, timber bollards to avoid anti-social parking, visitor parking spots, edge landscaping, permeable edges i.e. pedestrian/cycle connectivity around all edges etc.
- Hedgerow sections showing how these will be treated i.e. not with blank timber garden fences.
- Junction and street active travel principles i.e. continuity of pedestrian routes with raised tables/blended crossings, 3m kerb radii as much as possible.
- A character study of quality local vernacular which could be well informed by this document: [Uttlesford Building for a Healthy Life accessible.pdf](#) the aim is to set down some high-quality local principles, materials, layouts etc that can inform reserved matters applications. An issue we have at reserved matters is mediocre quality developments being referenced to justify more of the same and agreeing a good initial character study would help mitigate against this. Looking at good examples of local 3-storey and apartment/mixed-use typologies would also be useful.
- We need to set some good principles for how higher density typologies like terraces and flats come forward, such as amenity space including balconies as per Essex design guide, ensuring parking does not dominate street scene, materials and

massing to avoid overbearing apartment blocks, on-street parking with soft landscaping, shared surfaces, and spatial enclosure rather than long runs of on-street parking, how to design well for buildings at risk of flooding etc.

- Location of LEAPS & LAPS, amenity greens and good layout principles as per Fields in Trust guidance, making sure max. distances from homes are complied with, safe access i.e. not over primary streets etc.
- SUDs detailing to avoid (such as deep fenced areas with poor planting) - SUDs in green streets - attenuation ponds also used as play areas/POS?
- Air source heat pumps, building fabric standards improvements as per Uttlesford Interim Climate Change Guidance, solar panels, other renewables, measures to avoid over-heating that fit with the Uttlesford vernacular e.g. light render, light brick on south facing facades, overhangs over windows, external shading, change window sizes according to orientation, orienting homes within 30 degrees of south where possible for passive principles.
- Important to understand road angle and detail through steep central section because will compromise open space potentially.
- There should be an overall plan which maps these key principles. It will show different things to a parameter plan i.e. design principles rather than uses and will need to be complied with rather than purely illustrative like a typical outline planning masterplan would be. However, it would be loose enough to allow the reserved matters design to come forward flexibly.

### Noise:

Whilst it is acknowledged that the acoustics note does not represent a full acoustic assessment the applicants have sought to use the data from the preliminary noise survey to model the noise (Figure 2) and inform an outline noise mitigation strategy for the site (Appendix 2). The noise assessment for the acoustics note was based upon unattended monitoring in three monitoring positions (L1 -3) and attended monitoring on Thursday 6th June 2023 from 1605 Hrs to 1655 hrs spread across 4 locations for a 5 or 10 minute period at each.

The National Planning Policy Framework (NPPF) Agent of change principle is relevant to this development. Section 187 of the NPPF states as follows;

***187. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.***

To ensure that all the existing businesses at the retail park (e.g. Pets at Home, Vets 4 Pets, B and M store and Garden Centre, Pure Gym, Beefeater, Costa Coffee, the Saffron Walden Household Recycling Centre, a depot, Premier Inn, Howdens and Aldi supermarket etc) would not have unreasonable restrictions placed upon them as a direct result of the proposed development it is necessary to undertake a robust noise assessment under BS4142 that includes all relevant noise sources and includes all the information to be reported as set out in BS4142 section 12 including a description of the main sources and the specific sound, hours of operation, mode of operation and so on. (see BS4142 for full list). The acoustic note has taken an Leq (average) noise level from unattended monitoring indicated by Cass Allen to be considered representative of all noise sources. Unfortunately, this approach does not provide sufficient information to assess the impacts of each of the businesses individually and cumulatively on future residents of the proposed development. It will be necessary for the acoustic consultants to speak to the businesses to establish what



the principle noise sources may be and their hours and times of operation and to include representative measurements of all the relevant sources in the noise impact assessment.

Sections 4.11 and 4.12 of the acoustic note propose that industrial noise criteria for internal noise target levels for the development are based upon BS8233 internal targets with the addition of rating corrections (from BS4142) to account for additional annoyance caused by the noise character. It also proposes in section 4.13 that garden noise levels are assessed in accordance with BS8233. The acoustics note suggests that this methodology is supported by Appendix A6.1-3 of BS4142. I have considered the referenced section of BS8233 and was unable to find the methodology proposed by the acoustic note. I acknowledge that the BS8233 assessment examples do state that other guidance such as BS8233 might be applicable in this instance and there is a comparison made between the absolute noise level of the noise source and BS8233 internal noise standards in BS4142 Table A6 clause 11, and Table A8 clause 11 and the significance of noise character is also discussed. I agree that BS8233 internal noise standards may be referenced in addition to BS4142 as part of the assessment of the impacts and the context in which the sound occurs as noted in the quoted examples. However, I do not agree that a hybrid of the two standards, for which the noise consultants have provided no references of scientific peer reviewed papers to support, should be used to determine acceptable internal noise standards at the proposed development.

Section 6.5 of BS8233 clearly states that BS 4142 should be used to assess industrial noise and sources of an industrial nature in commercial premises. As advised at the meeting the noise standard Uttlesford require at new residential developments with respect to Industrial/commercial noise impacts is a noise rating level of -5dBA assessed in accordance with the methodology in BS4142. If there are music noise impacts from the Gym a low frequency band analysis (particularly 63 Hz and 125 Hz may be required to determine music noise impacts at the proposed development). Low frequency noise sources may additionally need to be assessed in accordance with NANR 45 Procedure for the assessment of low frequency noise disturbance.

Please note that Environmental Health may object to the proposed development if the noise impacts on future residents are significant and/or the development puts existing businesses and facilities at an unacceptable risk of restrictions being placed upon them as a result of the development.

In designing any proposed mitigation a good acoustic design process should be followed in accordance with the 'Professional Practice Guidance on Planning and Noise: New Residential Development' (May 2017 or later versions) to ensure that the noise criteria are achieved with windows open.

Any design measures that are used to control the ingress of noise must be consistent and compatible with the requirements of Approved Documents O and F. Overheating shall be assessed in accordance with the Association of Noise Consultants and Institute of Acoustics, Acoustics, Ventilation and Overheating Residential Design Guide, January 2020

#### Odour:

The Council would advise that potential odour impacts from the recycling centre and food businesses may need to be assessed in accordance with the Institute of Air Quality Management Guidance on the assessment of Odour for Planning and EMAQ/Defra Control of Noise and Odour from Commercial Kitchen Exhaust Systems, respectively.

#### Land Contamination:

In view of the residential end use and the proximity to commercial/industrial land uses any future application should be accompanied by appropriate assessment of land contamination. Further guidance is available in the Land Affected by Contamination Essex Technical Guidance for Applicants and Developers (copy attached for your reference) and The

Environment Agency Land Contamination Risk Management Guidance see Land contamination risk management (LCRM) - GOV.UK ([www.gov.uk](http://www.gov.uk))

#### Air Quality:

The proposed development is not in an Air Quality Management Area. However the applicant should have regard to the Uttlesford Air Quality Technical Guidance. (attached) An Air Quality Assessment may be required, the size of the development is likely to be relevant see section 4.1.1 of the guidance. Construction impacts during the development phase should also be considered.

#### Housing mix and Tenure:

In accordance with Policy H9 of the Local Plan, the Council has adopted a housing strategy which sets out Council's approach to housing provisions. The Council commissioned a Strategic Housing Market Assessment (SHMA) which identified the need for affordable housing market type and tenure across the district. Section 5 of the Framework requires that developments deliver a wide choice of high-quality homes, including affordable homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

One thing to note is that there will not be a requirement for First Homes as applications within Saffron Walden fall within the First Homes transitional arrangements as the Saffron Walden Neighbourhood Plan was at an advanced stage when the requirement for First Homes was first announced. If approved, the affordable housing tenure mix for the 40% Affordable Homes requirement will therefore be 70% for Affordable Rent and 30% Shared Ownership.

Policy H10 requires that developments of 3 or more dwellings should provide a significant proportion of small 2 and 3 bedroom market dwellings. However, since the policy was adopted, the Council in joint partnership with Braintree District Council have issued the 'Housing for New Communities in Uttlesford and Braintree (ARK Consultancy, June 2020)'. The study recommends appropriate housing options and delivery approaches for the district. Its identities that the market housing need for 1 bed units is 11%, 2-bedunits 50%, 3-bed units 35.6% and 4 or more bed units being 3.4%. Further to the above, the Council also requires that 5% of the market units also need to be M4(3) wheelchair adaptable standard.

It is acknowledged that at this stage that the scheme is likely to be submitted seeking outline permission and thereby details of the housing mix has not been defined to date. However, the final design should consider the Council's preferred housing mix.

#### Access and Parking:

Policy GEN1 of the Local Plan requires developments to be designed so that they do not have unacceptable impacts upon the existing road network, that they must compromise road safety and take account of cyclists, pedestrians, public transport users, horse riders and people whose mobility is impaired and encourage movement by means other than a vehicle.

It is understood that an outline application would be submitted seeking approval in principle of the development with all matters reserved apart from access.

The Council acknowledge that the highways authority has already provided some initial advice whereby the general feedback is positive. It is understood that the main access will be proposed from Knight Park, off Thaxted Road with a spine road circulating throughout the site. The Council have not been presented with the written comments provided by the highway authority; however, it is suggested that the advice provided by the authority is carefully considered and that any application is supported by a Transport Assessment in support of the proposals.

The maximum refuse bin drag distance should be no more than 25m. Adequate turning circles and passing points may be required dependent upon the size and length and width of the access road of the development.

Policy GEN8 of the Local Plan states that development will not be permitted unless the number, design and layout of vehicle parking places proposed is appropriate for the location as set out in the Supplementary Planning guidance 'Vehicle Parking Standards'. The adopted Council parking standards recommended for at a minimal of one space is provided for each one bedroom residential unit, two vehicle spaces for dwellings consisting of two or three bedroom dwellings, and three spaces for a four or more bedroom dwelling house. Also, the provision of one visitor space should be provided for every four residential dwellings. Adequate provision for cycle storage should also be provided for each unit.

Please ensure that adequate off-street parking is provided on the site in accordance with the standards to meet the needs of future occupiers. Car parking should be considered from the outset of the scheme and should be provided as visually recessively as possible. Heavily car dominated frontages and streetscapes should be avoided with the preference of parking to the side of dwelling houses.

Triple tandem parking should be avoided where possible as this provides risk of anti-social parking. Triple tandem parking (particularly with garage arrangements) is not generally supported because the logistics of using the spaces and low likelihood of garages being used for parking, resulting in overspill anti-social parking on the street. Furthermore, the use of parking courts should be limited, and large areas of hard standing should be broken up with sufficient soft landscaping.

#### Flooding:

The NPPF states that inappropriate development in areas of high-risk flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

The Environment Agency's (EA) indicative Fluvial and Tidal Flood Mapping demonstrates that the proposed development is located within Flood Zone 1. The design of the proposals should consider surface water and foul water discharge into consideration including appropriate SuD's measures and it would be expected that a detailed Flood Risk Assessment and Drainage Strategy be submitted in support of the application.

#### Landscaping, Open Space and Ecology:

All larger developments should be designed around a landscape structure. The landscape structure should encompass the public open space system but should also provide visual contrast to the built environment and constitute a legible network based, where appropriate, on existing trees and hedgerows. The layout and design of the development, including landscaping, should seek to reflect the vernacular of the locality. Native species should be provided for structural planting and linked to existing vegetation to be retained.

In good landscape design, both soft landscaping and hard landscaping are essential elements, and both need consideration. The principal aims of a good quality landscape plan are to secure a coordinated and high standard of landscape management for the landscape areas within the site, to ensure the successful integration of the residential development with the surrounding landscape and to protect and enhance nature conservation interests in accordance with the design objectives. It is suggested that a high-quality indicative landscape plan be supported in support of the proposals.

It is understood that the proposals would include where possible the retention of hedgerows and trees along the boundaries of the site and individual and groups of trees are proposed to be planted within the development to help define spaces and soften the building forms. This will help to provide natural screening of the development and enhance the public realm in order to enrich the open spaces to achieve a better sense of wellbeing and place making for future residents.

Open space areas should be suitably located and have appropriate proportions to their use and setting. Narrow or peripheral areas, which are difficult to access or maintain will not be considered appropriate. Open space provisions should form an integral part of the design and layout and meet the need generated by the development. This should be considered in respect to the final design of the layout. I don't foresee any concerns with the amount and location of the public open space provision as shown on the indicative plans.

Residential developments should normally be required to meet the need for play provision generated by the development on site, as an integral part of the design. A play area must be sited within an open space sufficient to accommodate the provision and its required buffer zone to ensure residential amenity is maintained. A development of this size would be expected to provide a Local Equip Area of Play (LEAP) in accordance with the details outline in the 'Fields in Trust' guidance.

Policy GEN2 of the Local Plan applies a general requirement that development safeguards important environmental features in its setting whilst Policy GEN7 seeks to protect wildlife, particularly protected species and requires the potential impacts of the development to be mitigated.

The application site itself is not subject of any statutory nature conservation designation being largely used as an overgrown arable field. It is not foreseen that the proposals would result in harm to protected or priority species or their habitation, however, appropriate Preliminary Ecology Assessment (PEA) and biodiversity checklists should be submitted in support of the scheme.

The landscape proposals associated with the development should support and enhance biodiversity on each individual site, ideally through the retention of existing trees and vegetation deemed to be of ecological importance, including mature back garden vegetation. The provision of quality new landscaping will also be expected. In addition to such landscape provision on the site itself, biodiversity off-setting may be required to achieve the overall net biodiversity gain required by the NPPF and any subsequent national and/or local requirements.

### Planning Obligations

Local Policy GEN6 requires that major development such as that proposed to make a positive contribution and provision for community facilities, school capacity, public services, transport provision etc to mitigate the impacts of a development proposal. This can be via a planning agreement entered into under section 106 of the Town and Country Planning Act 1990.

The full extent of what potential planning obligations will not be known until the application has been consulted to relevant statutory consultees, however, from experience I would expect at least a financial contribution would be required in relation to education, health, and libraries mitigation and to secure affordable housing and public open space provisions including maintenance. There may be also other obligations required in respect to transport and highway improvements.

The Council will seek to reach agreement with the applicant over an appropriate contribution that fairly reflects the level of demand the scheme would generate.

### **Summary and Conclusions**

In light of the above appraisal and for the reasons highlighted, there is an objection in principle to residential development on this site due to the conflict with the employment policies in the 2005 Local Plan, the emerging Regulation 18 Local Plan and the proposed employment allocation on the site, and material considerations in the form of up-to-date evidence on employment need and suitable, available and achievable HELAA sites for employment land at Saffron Walden.

You will appreciate that the views expressed in this letter are those of an officer which do not bind any Members of the Council's planning committee should an application come before them for formal consideration.

Yours sincerely

**Mr Lindsay Trevillian**  
**Principal Planning Officer**

