

**LAND SOUTH OF
RADWINTER ROAD
(EAST OF GRIFFIN
PLACE),
SAFFRON WALDEN
PLANNING STATEMENT
INCORPORATING A
STATEMENT OF
COMMUNITY
ENGAGEMENT**

Quality Assurance



Site name:	Land south of Radwinter Road (East of Griffin Place), Saffron Walden
Applicant name:	Rosconn Strategic Land and the Executors of Mr E C Baker and Mrs J Baker
Type of report:	Planning Statement
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Signed	
Date	23 July 2021
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Signed	
Date	23 July 2021



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1.0 Introduction

- 1.1 This Planning Statement has been prepared on behalf of Rosconn Strategic Land and the Executors of Mr E C Baker and Mrs J Baker (hereby referred to as “the Applicant”) in support of an Outline Planning Application for the residential development of land south of Radwinter Road (East of Griffin Place), Saffron Walden (hereafter referred to as the “Application Site” or the “Site”).
- 1.2 The proposed development is in outline form with all matters reserved except access for up to 233 residential dwellings. The full description of development is set out in Chapter 4 of this Planning Statement.
- 1.3 This planning application follows pre-application discussions with Uttlesford District Council (“UDC”), Essex County Council (“ECC”) Highways Authority, other relevant consultees and the local community. The application is submitted to help UDC meet its five-year housing land supply requirements, as required by the National Planning Policy Framework (“NPPF”).
- 1.4 A full list of the submitted documents and plans prepared to support this application is set out in the accompanying covering letter.
- 1.5 This Planning Statement addresses the following issues:
- The Site’s location and physical context;
 - The proposed development;
 - The national and local planning policies that form the context for the proposal;
 - The process of engagement that has been undertaken;
 - An assessment of the application proposals in light of those policies; and
 - The planning balance.
- 1.6 This Statement also contains a Statement of Community Engagement at Chapter 6 which explains the process of engagement that has been undertaken in the lead up to the submission of this application, in accordance with UDC’s validation requirements.
- 1.7 This outline planning application is also accompanied by an Environmental Statement, which is submitted in support of the application on a voluntary basis. The Applicant does not consider that the proposed development constitutes EIA development.

About the Applicant

- 1.8 The Site is within the landownership of the Executors of Mr E C Baker and Mrs J Baker, and Rosconn Strategic Land has a controlling interest. No land is controlled by any other party, other than highway land forming part of the public highway at the access which is included within the extent of the red line shown on the accompanying Site Location Plan.

- 1.9 Rosconn Strategic Land is an experienced land promoter with expertise in major development schemes and a substantial track record in delivering land for residential led developments and achieving rapid onward sale to housebuilders.
- 1.10 As is demonstrated in this Statement and the supporting technical evidence, the lack of constraints mean that the Site is capable of coming forward quickly to meet housing need in the district.

2.0 The Site and its Surroundings

- 2.1 The Site is 18.3 hectares in size (including land within the public highway) and is located to the south of Radwinter Road, directly adjacent to a consolidated area of residential development approved under UTT/13/3467/OP & UTT/16/1856/DFO, which is being implemented by Linden Homes and now forms the eastern built edge of Saffron Walden. This scheme is described in more detail later in this Chapter.
- 2.2 The land rises to the south and east, away from Radwinter Road, and is in arable agricultural use. It is formed of two physically distinct fields which are separated by hedgerow; the northern field is a thin strip that runs parallel to Radwinter Road along its western part; and the remainder occupies the rest of the Site. The Site is served by an existing agricultural access at a mid-point along the frontage to Radwinter Road which leads to a single agricultural building.
- 2.3 Whilst being located adjacent to the existing built edge of Saffron Walden, the parish boundary line runs along the Site's western boundary and it is located wholly within Swards End Parish. As of 2011 the population of Swards End village was 511 and its western edge is approximately 250 metres from the far eastern edge of the Site.



Figure 1: Extract from OpenStreetMap showing the Site in the Saffron Walden context.

- 2.4 Radwinter Road, a bus route, is set within a cutting and a pedestrian footpath runs along its side. To the north is the Saffron Walden fuel depot. Part of the northern area of the Site is subject to the relevant Health & Safety Executive consultation zone and details of this are included on the constraints plans shown in the accompanying Design and Access Statement.

- 2.5 To the east and south of the Site is open farmland. To the south-west is land at Shire Hill Farm which is subject to an outline planning permission for up to 100 dwellings, granted under local planning authority reference 17/2832/OP. This scheme is described in more detail later in this Chapter.
- 2.6 There are no public rights of way within or directly adjacent to the Site. There are several within close proximity of the Site, the closest of which is Footpath 315_21 which runs along the northern edge of Radwinter Road approximately 30m to the north of the Site.
- 2.7 In the wider context, the Site is located on the eastern edge of Saffron Walden approximately 1.5 kilometres from the town centre. This is shown in Figure 1 above. Saffron Walden is the largest town in Uttlesford and is the administrative and commercial centre. This is exemplified on the Land Use Context Map which accompanied Uttlesford District Council's recent Call for Sites consultation in April 2021 as shown in Figure 2 below. It has the largest population and is situated within relatively short commuting distance of the major employment areas to the north-west and Stansted Airport to the south. Saffron Walden is also accessible to the mainline railway network via direct public transport routes to Audley End station which provides onward connections to Cambridge, Harlow and London, among other destinations.

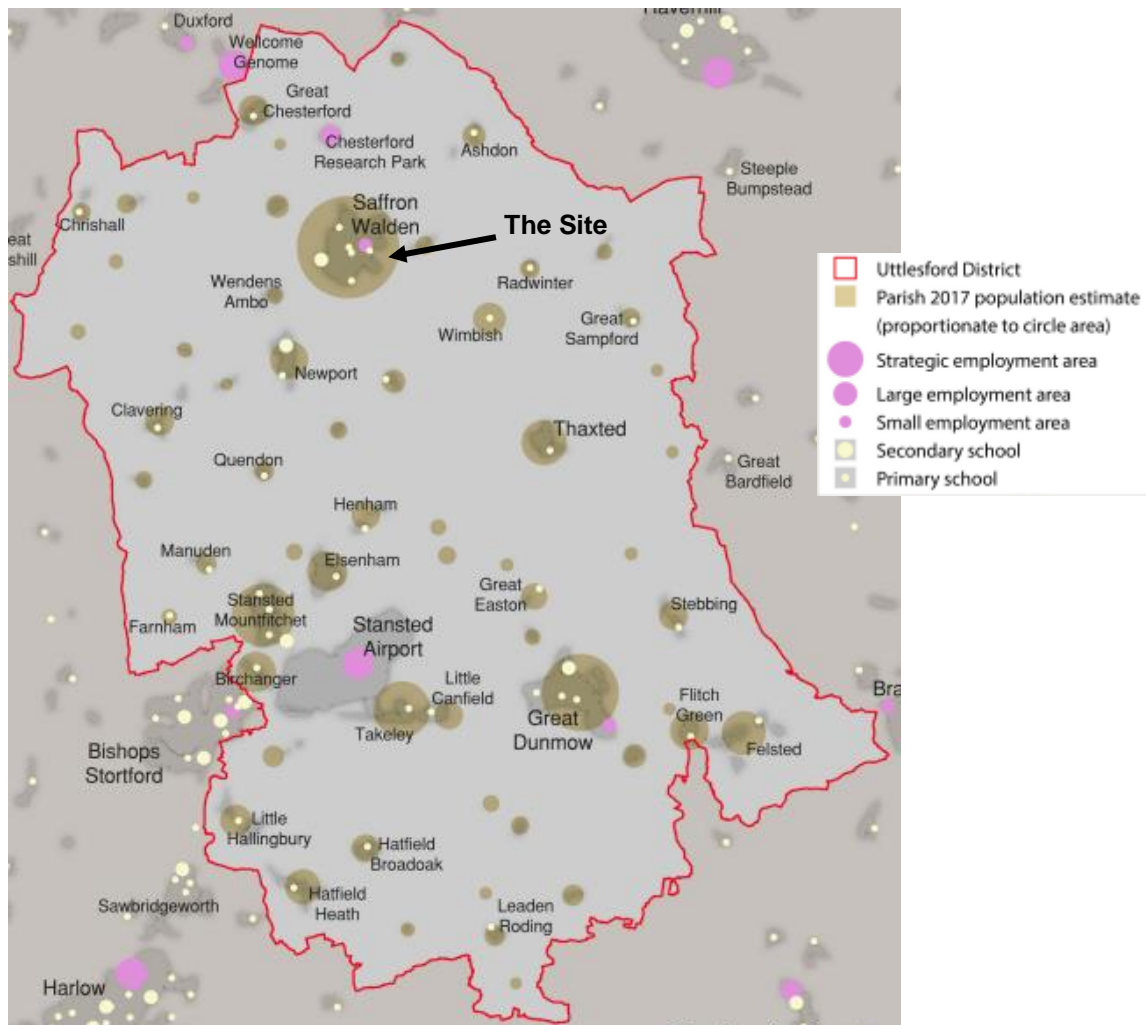


Figure 2: UDC's Land Use Context Map taken from the CfS consultation in 2021

Relevant Planning Context

- 2.8 There are recent planning applications for development on adjacent/nearby Sites which are relevant because they provide context to this proposed scheme.

Linden Homes “Saffron View” Land South of Radwinter Road

- 2.9 Saffron View is located directly to the west of the application Site. It is currently being built out by Linden Homes and comprises 200 dwellings along with provision of land for a one form entry primary school. Outline consent was originally granted in 2015 to Manor Oak Homes under UTT/13/3467/OP and the Reserved Matters were approved in 2017 under UTT/16/1856/DFO. An extract from the approved Site layout submitted by Linden is shown at Figure 3 below.



Figure 3: approved layout for the Linden Homes reserved matters scheme.

- 2.10 Through the section 106 legal agreement attached to that scheme, Essex County Council (ECC) as the local education authority has an option over the education land within the site. Based on Linden Homes' progress to date it appears that ECC has approximately 3 years left to exercise this option.
- 2.11 Condition 9 of the Outline planning permission reads as follows:

Before the commencement of development details of the link road and timing for its completion, that shall be constructed to adoptable standards and to a minimum width of 6.75 meters up to and including the boundary of the site to allow for future extension, shall be submitted to and approved in writing by the Local Planning Authority, in

consultation with ECC Highways Authority. The Link Road shall thereafter be completed in accordance with the approved details.

- 2.12 On 13th February 2017 Uttlesford District Council confirmed the discharge of Condition 9 under local planning authority reference UTT/16/2516/DOC by virtue of the grant of Reserved Matters Approval (RMA). The grant of RMA is subject to compliance with the approved drawings. Drawing No. LIND150913 CSL.01 shows the site layout and is listed on the Decision Notice as an approved drawing. The layout incorporates a Link Road according to the broad alignment set out in the outline planning permission and associated legal agreement.
- 2.13 The Section 106 agreement completed pursuant to outline planning permission UTT/13/3467/OP stipulates at Paragraph 9 of Schedule 6 that prior to the occupation of 50% of the Residential Dwellings to be constructed in accordance with the Permission, the Link Road shall be constructed and completed to adoptable standards to the satisfaction of the local highway authority.
- 2.14 The development approved under planning authority reference UTT/13/3467/OP and UTT/16/1856/DFO has now commenced. As such, the above-mentioned conditions and obligations requiring delivery of the relevant portion of the Link Road are engaged. The purchase of the site by a major national housebuilder that has now commenced development makes it very likely that this scheme will come forward.

Land north of Shire Hill Farm (south west of the Site)

- 2.15 This scheme is located to the south-west of the application Site and is subject to an outline planning permission for up to 100 dwellings, in addition to the provision of land to facilitate an extension to the primary school to 2 form entry. The outline planning permission, sought by Dianthus Land, was approved on 14 July 2020 under reference 17/2832/OP. At the time of writing this Planning Statement, no application(s) for reserved matters have been submitted.



Figure 4: illustrative masterplan submitted with the Dianthus outline planning application

- 2.16 The legal agreement attached to 17/2832/OP requires the developer to have constructed and completed to adoptable standards prior to the 50th occupation a spine road between point A and B shown on the plan shown at Figure 5 below. The spine road is defined as a 6.75m wide section of carriageway with a minimum 2m wide footway on one side and a minimum 3m wide footway/cycleway on the other along its full length, with a minimum of two bus stops.



Figure 5: extract from the Dianthus s106 showing a requirement to deliver the spine road between points A and B.

- 2.17 The area of land identified in yellow in Figure 5 above is set aside as an extension to the education site consented as part of the Saffron View scheme. If, in association with the Saffron View s106, ECC does not wish to use the education site, then the land would be offered to transfer to Saffron Walden Town Council for use as recreation open space or community use.
- 2.18 Condition 1 of the approved outline planning permission requires submission of a strategic highway masterplan for the spine road (i.e. the part of the Link Road that runs through that site) with any future application for RMA.
- 2.19 The Section 106 agreement associated with the outline planning permission references the Spine Road and sets out the required dimensions.
- 2.20 Paragraph 13 of Part 3, Schedule 2 states that prior to the 50th occupation, the developer must have constructed the Spine Road between Point A and Point B shown on the plan appended with the S106, securing construction of the Spine Road on a north/south axis through the westerly portion of the site.

- 2.21 Whilst no applications for RMA have been submitted to date, this site has been recently marketed and sold to a housebuilder. Any housebuilder bringing forward development on the site will need to conform to the relevant planning conditions and S106 obligations regarding delivery of the Link/Spine Road. To add further weight, the outline planning permission is subject to a 3-year time limit for RMA to be submitted and a further 2 years for commencement of development from the date of approval of the last RMA. It would not be in the interest of the housebuilder to allow the outline planning permission to expire in this respect.

Bellway Homes “Poppy View” – land east of Thaxted Road

- 2.22 This scheme benefits from outline planning permission for up to 150 dwellings and access from Thaxted Road (ref. UTT/18/0824/OP and UTT/19/2355/DFO). Of relevance to the application proposed by Rosconn Strategic Land is that full planning permission was granted for a spine road between Thaxted Road and the site’s northern boundary in July 2020 under reference UTT/20/0865/FUL. An extract of the approved spine road is shown at Figure 6 below:

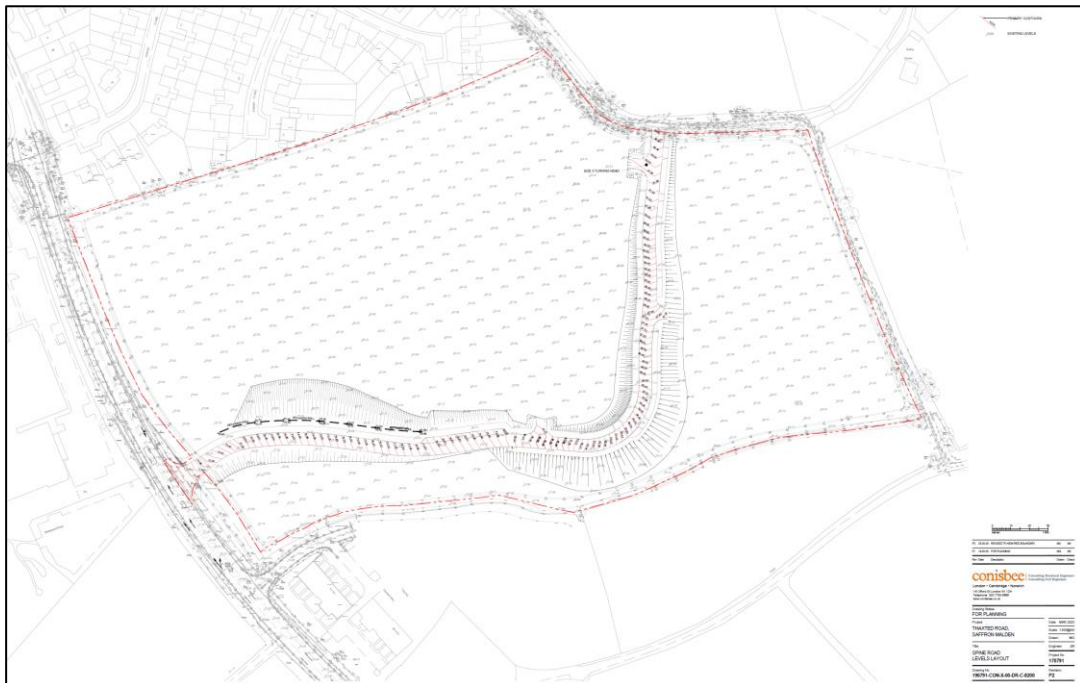


Figure 6: extract of the approved spine road layout for the Bellway Poppy View scheme.

- 2.23 Given the site has detailed planning permission and is in the control of a major national housebuilder, it is very likely the site will come forward and once it does, it will need to observe both the conditions subject to which planning permission was granted and the relevant legal agreement.

Summary

- 2.24 All three schemes (Linden, Dianthus and Bellway) secure a Link/Spine Road running through the respective land parcels and this will have a minimum width of 6.75m, 2m footways and 3m shared footway/cycleway secured through both approved detailed layouts (where applicable) and legal agreements. Furthermore, the associated legal agreements specify that the respective

portions of the Link/Spine Road will be delivered prior to more than 50 occupations in the case of the Bellway and Dianthus sites and prior to 100 occupations in the case of the Linden Homes site.

- 2.25 Based on the above, full delivery of the link road has been secured through three committed schemes, all of which have been granted planning permission subject to delivery of their respective parts of the spine/link road through both planning conditions and legal obligations.
- 2.26 Two out of three of the sites have secured detailed planning permission and the third has been sold to a housebuilder that will seek to do the same. Nonetheless, all the sites are committed with implementable planning permissions and substantial provisions to secure the delivery of the Link Road, making it very likely to come forward within, at most, the next five years in the view of the Applicant.
- 2.27 These schemes are therefore relevant to the consideration of the development proposed by this outline planning application, due to the potential implications on the extent and scope of technical assessments and planning obligations that may be required as part of the proposed development.

3.0 Planning History

- 3.1 The very northern field within the Site was subject to a planning application in 1958 under reference SWB/0046/58 for the use of the land for housing, which was refused. The application is not publicly available online nor are the reasons for refusal.
- 3.2 In March 2021 a request for an EIA Scoping Opinion under Regulation 15 of the EIA Regulations 2017 for residential development of up to 240 dwellings, new access and associated landscaping and infrastructure was submitted by Rosconn Strategic Land under reference UTT/21/1138/SO. At the time of writing this Statement Uttlesford District Council is yet to issue its decision on the Scoping Opinion request. Under the EIA Regulations, the proposal does not qualify as a Schedule 1 development and is not located within or close to a Sensitive Area. It is, however, of a type and scale that falls within Schedule 2(10) 'Infrastructure Projects' – specifically 10(b) 'Urban Development Projects'. In accordance with the EIA Regulations, given the size, scale and nature of the scheme, likely significant environmental effects at this stage could not be ruled out in the absence of measures to reduce these effects. Accordingly, the Applicant has volunteered to conduct an EIA to fully assess the likely significant environmental effects of the scheme upon the receiving environment.
- 3.3 There are no other publicly available planning records for the Site.
- 3.4 Details on the planning histories of adjacent developments which are relevant to this Site are set out in Chapter 2 above.
- 3.5 As part of the emerging proposals for the development of the application Site, the Applicant engaged in pre-application discussions with Uttlesford District Council, the local Highways Authority, the local community, Saffron Walden Town Council and Swards End Parish Council, amongst other consultees.
- 3.6 Pre-application discussions with UDC revealed a desire to ensure that future fringe developments around the town of Saffron Walden would come forward in an appropriate manner. UDC expressed a desire to ensure that the Application Site would "fit in" with a wider scheme coming forward without stopping any potential wider sustainable urban extension from being delivered and addressing local issues, notably highway and air quality aspects. Accordingly, the scheme takes account of this aspiration and includes within the proposed development land reserved for a potential future relief road. The proposed development does not, however, rely on the delivery of any wider potential future scheme nor should it be considered by reference to it; such a scheme has no formal planning status at the time of submitting this outline planning application.

4.0 The Proposed Development

- 4.1 The scheme is proposed under Section 92 of the Town and Country Planning Act 1990. The development as described on the application forms is:

Outline planning application for the erection of up to 233 residential dwellings including affordable housing, with public open space, landscaping, sustainable drainage system (SuDS) and associated works, with vehicular access point from Radwinter Road. All matters reserved except for means of access.

- 4.2 As will be seen from the above, the application is in outline form with all matters reserved with the exception of access. However, the application is supported by Parameter Plans covering the following topic areas to help set specific design expectations at the Reserved Matters stage.

- **Land Use**
- **Building Heights**
- **Access & Movement**
- **Green Infrastructure**

- 4.3 The scheme is also accompanied by an **Illustrative Masterplan** to help demonstrate how the residential development could be delivered.

- 4.4 The scheme would deliver the following:

- 40% affordable dwellings, in line with adopted policy;
- Approximately 10 hectares of new publicly accessible open space, including play areas, parkland on higher ground;
- A network of cycle and pedestrian routes;
- Corridor for future link road to the south;
- Reasonable and proportionate planning obligations, as necessary.

- 4.5 The indicative housing mix is set out below.

SIZE	MARKET NO.	MARKET %	AFFORD NO.	AFFORD %	OVERALL	OVERALL %
1 bed	18	8	13	6	31	13
2 bed	62	27	41	18	103	44
3 bed	48	21	30	13	78	33
4 bed	12	5	9	4	21	9
Sub Total	140	60%	93	40%	233	100%
		OVERALL		OVERALL	HOMES	

- 4.6 The Affordable Housing mix would be split between affordable rent and shared ownership (70%:30% split) in accordance with the Local Plan policy requirements and in response to feedback provided by Uttlesford Affordable Housing Officer.
- 4.7 Full details of the scheme's proposed access are provided in the accompanying Transport Assessment. Access is proposed from Radwinter Road via a ghost island priority junction and new bus stops are proposed on Radwinter Road to the east of the development access together with a pedestrian refuge island to facilitate pedestrian access to the eastbound bus stop and the existing footway on the north side of Radwinter Road. A new 2.0m wide footway is also proposed on the south side of Radwinter Road between the proposed development access and the Linden Homes access to the west.

Environmental Statement

- 4.8 This outline planning application is also supported by an Environmental Statement, which is submitted in support of the application on a voluntary basis. The Applicant does not consider that the proposed development constitutes EIA development.

Reserved land for a potential future relief road

- 4.9 It may be seen that the proposed development accommodates a corridor of reserved land for a potential future link road to the south of the Site. Figure 7 below is an extract from the accompanying Access & Movement Parameter Plan which shows the corridor's western alignment through the Site.

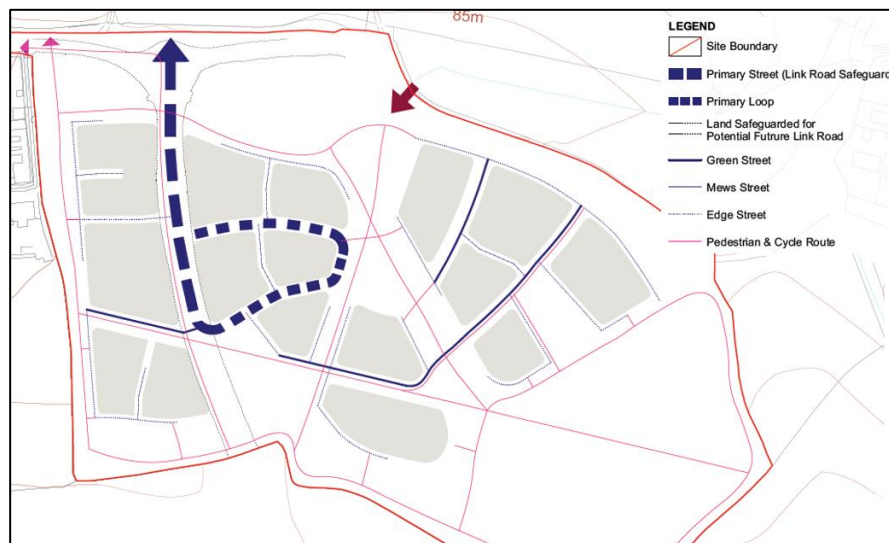


Figure 7: Extract from enclosed Access & Movement Parameter Plan showing "western alignment" of land safeguarded for potential future link road.

- 4.10 The purpose of this reserved corridor is to ensure that the scheme would enable the potential future delivery of a wider sustainable urban extension to Saffron Walden, if required. Such wider proposals do not form part of this scheme, nor are they required to make the proposed development acceptable. At the time of submission of this application, the wider scheme has no formal planning status.

Proposed Access

- 4.11 Details of the scheme's access proposals are proposed with this outline application. The access, which would be gained via a new junction on Radwinter Road, is shown on the Proposed Means of Access Framework Plan – Right Turn Ghost Island Junction SK01C, which is contained at Appendix H of the accompanying Transport Assessment.

Anticipated delivery trajectory

- 4.12 Rosconn Strategic Land has a strong track record securing deliverable outline planning permissions and achieving rapid onward sale to housebuilders. The lack of constraints identified within this Planning Statement and within the supporting technical evidence means that the Site is capable of coming forward quickly to meet housing need in the district.
- 4.13 It is anticipated that the scheme could be delivered in its entirety by the year 2028/29, with approximately 120 of the 233 new homes delivered within the five-year period 2021/22 to 2025/26. This works out at a rate of approximately 40 dwellings per year. These timescales are informed by standard lead-in times for a Site of this size and the completion rates extrapolated from the adjacent Linden Homes site that is currently being built out and has averaged about 40 completions per year.

5.0 Planning Policy Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 In this case, Uttlesford District Council cannot demonstrate an up to date supply of housing land because the Development Plan policies of relevance to the supply of housing are out of date, which means that other material considerations are engaged.

Adopted Development Plan

- 5.3 In accordance with Section 38(6), consideration is given below to the relevant policies of the adopted Development Plan for the Site, which comprises:
- Uttlesford Local Plan (2005) saved policies (2007); and
 - Essex Minerals Local Plan (2014)

Uttlesford Local Plan (2005) saved policies (2007)

- 5.4 The Uttlesford Local Plan was adopted in 2005 and covered the time period up to 2011. Uttlesford District Council undertook an independent review of the extent to which the saved policies of the Uttlesford Local Plan are considered to be consistent with the National Planning Policy Framework (“NPPF”) – the Uttlesford Local Plan 2005 – National Planning Policy Framework Compatibility Assessment in July 2012. The compatibility of adopted Local Plan policies in relation to the NPPF is also set out in the Assessment Chapter of this Statement where relevant.
- 5.5 The spatial strategy for the District proposed to direct the highest levels of growth to the urban areas of Great Dunmow, Saffron Walden and Stansted Mountfitchet. The Plan defined development limits for these locations which allow for identified growth (policies S1-S3).
- 5.6 Policy S7 states that *“In the countryside, which will be protected for its own sake, planning permission will only be given for development that needs to take place there, or is appropriate to a rural area”* and that *“Development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set or there are special reasons why the development in the form proposed needs to be there.”*
- 5.7 As recognised on the Local Plan Policies Map shown at Figure 8 below, the Site falls outside of the defined settlement boundary for Saffron Walden to the west and Swards End to the east. It is not subject to any other designations.

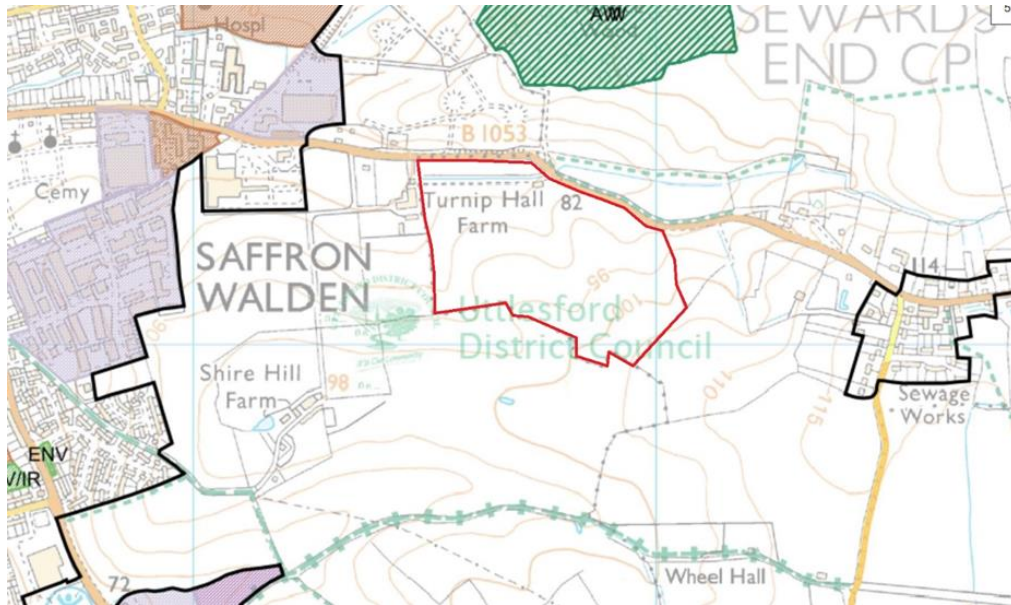


Figure 8: Extract from the adopted Local Plan Proposals Map¹ with the application Site outlined in red. The black lines represent the Development Limits for each identified settlement.

5.8 In addition to Policy S7, the following key policies are of relevance:

- **Policy H9 – Affordable Housing:** The Council will seek to negotiate on a Site to Site basis an element of affordable housing of 40% of the total provision of housing on appropriate allocated and windfall Sites, having regard to the up to date Housing Needs Survey, market and Site considerations.
- **Policy H10 – Housing Mix:** All developments on Sites of 0.1 hectares and above or of 3 or more dwellings will be required to include a significant proportion of market housing comprising small properties. Details of the housing mix are also addressed through the neighbourhood plan Policy SW4 – Housing mix on new developments.
- **Policy GEN1 – Access:** Development will only be permitted if it meets all of the following criteria:
 - a) Access to the main road network must be capable of carrying the traffic generated by the development safely.
 - b) The traffic generated by the development must be capable of being accommodated on the surrounding transport network.
 - c) The design of the site must not compromise road safety and must take account of the needs of cyclists, pedestrians, public transport users, horse riders and people whose mobility is impaired.
 - d) It must be designed to meet the needs of people with disabilities if it is development to which the general public expect to have access.

¹ <http://www.planvu.co.uk/udc/>

- e) The development encourages movement by means other than driving a car.
- **Policy GEN2 – Design:** Development will not be permitted unless its design meets specific criteria.
- **Policy GEN4 – Good neighbourliness:** development uses will not be permitted where noise, vibrations, smells, dust, light, fumes electro magnetic radiation or exposure to other pollutants would cause material disturbance or nuisance to occupiers of surrounding properties.
- **Policy GEN6 – Infrastructure Provision to Support Development:** Development will not be permitted unless it makes provision at the appropriate time for community facilities, school capacity, public services, transport provision, drainage and other infrastructure that are made necessary by the proposed development. In localities where the cumulative impact of developments necessitates such provision, developers may be required to contribute to the costs of such provision by the relevant statutory authority.
- **Policy GEN7 – Nature Conservation:** Development that would have a harmful effect on wildlife or geological features will not be permitted unless the need for the development outweighs the importance of the feature to nature conservation. Where the Site includes protected species or habitats suitable for protected species, a nature conservation survey will be required. Measures to mitigate and/or compensate for the potential impacts of development, secured by planning obligation or condition, will be required. The enhancement of biodiversity through the creation of appropriate new habitats will be sought.
- **Policy GEN8 – Vehicle Parking Standards:** 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 Supplementary Planning Guidance “Vehicle Parking Standards”.
- **Policy ENV4 – Ancient Monuments and Sites of Archaeological Importance:** notes a ‘presumption in favour of preservation in situ’ for nationally important remains, echoing PPG16: Archaeology and Planning, which preceded the NPPF. If less important remains would be affected, the policy notes that development might be permitted, if its benefits outweigh the harm to archaeology. The policy also confirms that fieldwork might be required pre-determination to confirm the archaeological interest of a site and that further investigation to mitigate harm might be required where development is permitted.
- **Policy ENV5 – Protection of Agricultural Land:** Development of the best and most versatile agricultural land will only be permitted where opportunities have been assessed for accommodating development on previously developed Sites or within existing development limits. Where development of agricultural land is required, developers should seek to use areas of poorer quality except where other sustainability considerations suggest otherwise.

5.9 The adopted Local Plan is supported by a range of Supplementary Planning Documents (SPDs) to help guide development proposals.

- Interim Climate Change Planning Policies (approved in February 2021).
- Essex County Council's Parking Standards (September 2009).
- Essex Design Guide (published in 2018).

Essex Minerals Local Plan (adopted 2014)

- 5.10 'Policy S8 - Safeguarding mineral resources and mineral reserves' of the adopted Essex Minerals Local Plan seeks to safeguard areas designated as Mineral Safeguarding Areas (MSA). Mineral Safeguarding Areas as designated for mineral deposits of sand and gravel, silica sand, chalk, brickearth and brick clay considered to be of national and local importance, as defined on the Proposals Map.
- 5.11 The policy requires that the Mineral Planning Authority is consulted on all planning applications for development on a Site located within an MSA that is 3ha or more for chalk. Non-minerals proposals which exceed 3 ha must be supported by a Minerals Resource Assessment to establish the existence or otherwise of a mineral resource of economic importance. If, in the opinion of the Local Planning Authority, surface development should be permitted, consideration shall be given to the prior extraction of existing minerals.

Material Considerations

The National Planning Policy Framework (NPPF), July 2021

- 5.12 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied.
- 5.13 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a) an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 5.14 Paragraph 9 states that these objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework.
- 5.15 At the heart of the NPPF lies the presumption in favour of sustainable development, Paragraph 11 of the NPPF states that for decision taking, this means:

- *Approving development proposals that accord with an up-to-date Development Plan without delay; or*
- *Where there are no relevant Development Plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - *The application of policies within the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

- 5.16 NPPF paragraph 48 states, inter alia, that local planning authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given).
- 5.17 The provision of housing to meet needs contributes to the social dimension of sustainable development (paragraph 8). Widening the choice of high-quality homes is recognised as a positive improvement (paragraph 8). To do so, Local Planning Authorities are required to plan for a mix of house sizes, types and tenures to meet local needs (paragraph 60).
- 5.18 Paragraph 74 of the NPPF states that Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:
- 5% to ensure choice and competition in the market for land; or
 - 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
 - 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.
- 5.19 The NPPF states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. The aim should be to involve all sections of the community in the development of Local Plans and in planning decisions. Safe and accessible developments, which contain attractive, well-designed, clear and legible pedestrian and cycle routes and high-quality public space, should be promoted (paragraph 92).
- 5.20 The NPPF supports a pattern of development that facilitates the use of sustainable modes of transport and reduces greenhouse gas emissions and congestion (paragraph 104). It aims for a balance of land uses within an area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities (paragraph 106).
- 5.21 Paragraph 110 states that in assessing specific applications for development, it should be ensured that:

- Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- Safe and suitable access to the site can be achieved for all users;
- The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and
- Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

- 5.22 Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (paragraph 111).
- 5.23 Paragraph 132 identifies that design quality should be considered throughout the evolution and assessment of individual proposals, and should be informed by early discussions between applicants, the Local Planning Authority, and the local community. Paragraph 130 states that permission should be refused for developments of poor design which fail to make opportunities for improving the character and quality of an area and the way it functions.
- 5.24 Paragraph 130 provides guidance on what constitutes good design, stating that local planning policies and decisions should aim to ensure that new developments:
- Will function well and add to the overall quality of the area;
 - Are visually attractive as a result of good architecture and appropriate landscaping;
 - Respond to local character and history whilst not preventing or discouraging innovation;
 - Establish a strong sense of place;
 - Optimise the potential of the Site to accommodate development, creating and sustaining an appropriate mix of uses (including the incorporation of public space); and
 - Create safe and accessible environments.
- 5.25 Leading on from this, paragraph 124 sets out the approach for achieving appropriate densities of development. In particular, decisions should support development that makes efficient use of land, taking into account: the identified need for different types of housing and other forms of development; local market conditions and viability; the availability and capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting; and, the importance of securing well-designed, attractive, and healthy places. Paragraph 123 recognises that where there is an existing shortage of land for meeting an identified housing need, it is important that planning decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each Site.
- 5.26 Paragraph 130 states that planning decisions should, inter alia:
- Ensure that developments will function well and add to the overall quality of the area;

- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- Optimise the potential of the Site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

- 5.27 Paragraph 134 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:
- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
 - b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 5.28 The NPPF expects development to contribute to and enhance the natural and local environment within Paragraph 174, inter alia, by:
- Protecting and enhancing valued landscapes, geological conservation interests and soils;
 - 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;
 - Minimising impacts on biodiversity and providing net gains in biodiversity where possible, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - Protecting new and existing development from different forms of pollution or land instability; and
 - Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 5.29 Paragraph 183 sets out how proposals should also ensure that: Sites are suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation; after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and adequate Site investigation information, prepared by a competent person, is presented.

- 5.30 In determining applications which cause harm to heritage assets directly, or indirectly, through affecting a complementary setting, the NPPF recommends that 'great weight' should be given to their conservation when reaching a planning decision (Paragraph 199).
- 5.31 The more important the asset, the greater the weight that should be ascribed. As heritage assets are irreplaceable, it is noted that any harm or loss should require clear and convincing justification. It notes that 'substantial harm' to or loss of designated heritage assets of the highest significance should be wholly exceptional and exceptional for Grade II listed buildings and conservation areas (Paragraph 200).
- 5.32 Paragraph 202 clarifies that, where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing an optimal viable use.
- 5.33 Paragraph 203 notes that effects on the significance of non-designated heritage assets require a balanced judgement weighing the scale of impact on the significance of the heritage asset against the benefits of the proposed development. Where heritage assets are to be lost, Paragraph 199 confirms that an appropriate record of the elements to be lost should be provided and both disseminated and archived by the developer.

Planning Practice Guidance

- 5.34 The National Planning Practice Guidance (referred to hereafter as Planning Practice Guidance or PPG) replaced previous planning guidance documents in March 2014. The PPG is intended to reflect and support the NPPF and the core policy principles of the presumption in favour of sustainable development.

Emerging Uttlesford Local Plan

- 5.35 The emerging new Local Plan for Uttlesford was recently subject to an Issues and Options level consultation, which closed in April 2021. The Local Development Scheme (approved in October 2020) identifies that the Plan will be submitted for Examination in around August 2023, with adoption in around July 2024. As the emerging new Local Plan is at such an early stage of its preparation and contains no proposed draft allocations, it is considered that it cannot be afforded any weight in the decision-making process at the present time.

Saffron Walden Neighbourhood Plan

- 5.36 A Neighbourhood Plan for Saffron Walden is currently in preparation and a Submission Draft version of the emerging plan was subject to public consultation in 2020. It was submitted for Examination on 20 May 2021, after which a Referendum will take place to determine whether it should be formally made and therefore become part of the development plan for the area.
- 5.37 Whilst the Plan relates to the administrative area of Saffron Walden, it does not cover the extent of the Site, as shown on Figure 9 below. Regard is however given to its contents where relevant to these proposals, including local needs identified through public consultation with the local community.

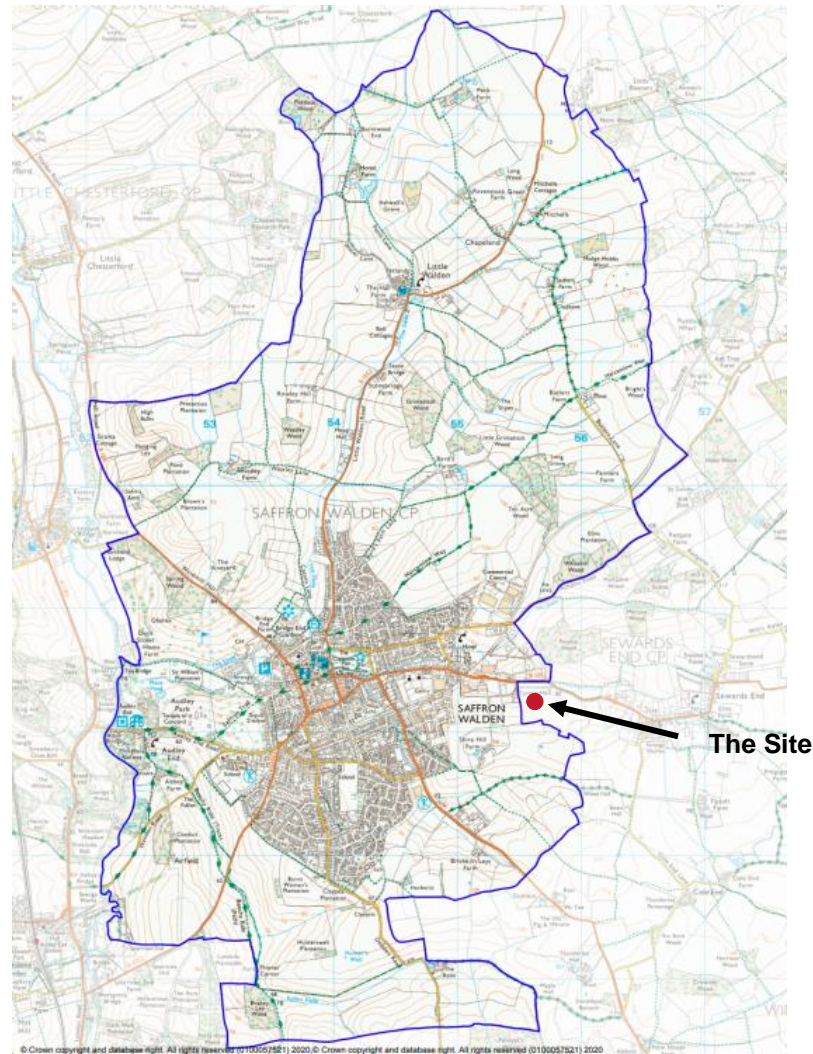


Figure 9: Saffron Walden Neighbourhood Plan Area

- 5.38 Whilst the Site falls within Seward's End Parish, a Neighbourhood Plan Area has not been designated and as such, no Neighbourhood Plan is currently being progressed.

Supplementary Planning Documents

- 5.39 UDC has a range of Supplementary Planning Documents (SPDs) in place to help guide development proposals, the most relevant of which to this application are:
- Interim Climate Change Planning Policies (approved in February 2021) – *note that the development proposed by this planning application is in outline form. It is anticipated that further details in respect of some of the Guidance's detailed technical matters may be considered at the Reserved Matters stage;*
 - Essex County Council's Parking Standards (September 2009);
 - Essex Design Guide (published in 2018).

6.0 Statement of Community Engagement

- 6.1 This chapter sets out the consultation that has been conducted in advance of the planning application for the proposed development and explains the process of involvement that has been undertaken. This chapter also explains how the consultation and engagement has contributed to the evolution of the proposals.

Policy framework

- 6.2 The Applicant has engaged in accordance with national and local planning policy guidance.

National Planning Policy Framework (2021)

- 6.3 Paragraph 126 of the NPPF states:

The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

- 6.4 Paragraph 132 of the NPPF states:

Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

Uttlesford Statement of Community Involvement (March 2021)

- 6.5 UDC's Statement of Community Involvement ("SCI") details the engagement process expected of applicants in the preparation of planning applications. Its key recommendations are that:
- *All applicants are encouraged to discuss future development proposals with the Council prior to submitting a planning application.*
 - *Applicants are encouraged to involve the community, including the Town or Parish Council before a formal application has been submitted as this would help address issues and may help unnecessary objections being made at a later stage. At times of Government restrictions relating to Covid-19, applicants are encouraged to discuss the approach with the case officer.*

Engagement undertaken

- 6.6 An extensive programme of pre-application engagement with statutory consultees and other relevant bodies has been undertaken. This has included both Swards End Parish Council and Saffron Walden Town Council, which both involved a presentation and discussion sessions with their relevant members based on a draft iteration of the emerging masterplan shown at Figure 10 below.
- 6.7 The Site falls within the Swards End Parish but is situated directly adjacent to Saffron Walden. Therefore while not a strict requirement, in the interest of transparency consultation has been undertaken with both groups.



Figure 10: preliminary emerging scheme presented to Swards End Parish Council, Saffron Walden Town Council and Uttlesford District Council.

Swards End Parish Council

- 6.8 The Applicant and Bidwells attended the Parish Council's meeting on Tuesday 2 February 2021. A presentation on the site, its constraints, opportunities and emerging proposals was made to members. Various matters were discussed which in summary included the following:
- Coalescence between Saffron Walden and Swards End
 - Provision of adequate infrastructure

- Capacity of existing schools, in particular secondary
- Low water pressure
- Highways impact and traffic
- Air quality management
- We would appreciate a gesture to improve the Radwinter Road footpath.

Saffron Walden Town Council

- 6.9 The Applicant and Bidwells attended the Town Council's virtual meeting on Thursday 11 February 2021. The same presentation as the one presented to Swards End Parish Council was given to the Town Council to ensure consistency to the scope of any comments received.
- 6.10 The Town Council recognises the current housing land supply position and the need for further housing development in Uttlesford. It also expressed a desire to want to be able to support the planning application, with dialogue between the parties key to ensuring this.
- 6.11 Key relevant matters raised by members in respect of the scheme included:
- Respect the local historic vernacular
 - Please ensure security of delivery of public open space. The proposed level of open spaces should be protected to ensure any future developer retains the same level proposed in the outline application. If possible authority / ownership should be given to the town/parish council.
 - Combine with other developers' schemes to the west to ensure adequate cycle and pedestrian access.
 - The impact of development on the Saffron Walden Air Quality Management Area should be managed.

Pre-application meeting with UDC Officers

- 6.12 On 11 March 2021 the Applicant and its core consultancy team held a virtual pre-application meeting with Planning, Urban Design and Environmental Health Officers from UDC, with the Highways Officer from Essex County Council highways authority also in attendance to provide advice.
- 6.13 An extract of the emerging iterative masterplan submitted with the pre-app is shown at Figure 11 below.



Figure 11: emerging iterative masterplan submitted with the pre-app.

6.14 The Applicant provided an update on the engagement undertaken to date, including attendance at the Town/Parish Council meetings and a formal pre-application meeting with the highways authority.

6.15 Principal matters discussed at the pre-app included the following:

- **Principle of development.** In terms of “fringe development of the town” it has been allowed previously and UDC has many examples of this. Each case must be judged on its own merits. Issues around Saffron Walden are to do with matters of detail, principally highways and air quality. These are the large issues surrounding the adjacent sites to the west and they will continue to be the core issues around any future sites coming forward and these need to be addressed. UDC wants to ensure that fringe developments come forward in an appropriate manner.

UDC is trying to get ahead of further development and ensure that the Rosconn site would fit in with a wider scheme coming forward or at least allowing a mapping plan of how it could be achieved in the future without stopping any wider sustainable urban extension from coming forward and addressing highway and air quality aspects.

UDC officers are not suggesting that the application site cannot come forward ahead of other sites but it would need to be part of a comprehensive masterplan that it would fit into.

- **Landscape impact / coalescence with Swards End.** There needs to be consideration about how much the development would extend to the east of the site which in turn would reduce the gap. Viewpoints would need to be agreed with the landscape officer.

- **Highways – reserved road corridor through the site.** ECC advised that it is concerned about a road going straight through a residential development and that it would become a barrier between the site. ECC would be looking for something that would go more to the east and form an edge to Saffron Walden without cutting the residential development in half.

ECC also stated that it needed a better understanding of the level of traffic flow it would expect through the site, but this is not yet known because the local plan is at an early stage – input is required from the local plan and strategic transport teams.

UDC advised that if the area is to come forward there would need to be a wider masterplan, to ensure that the site would not preclude a possible future transport strategy for Saffron Walden. There is more work to be done with strategic transport and local plan team, but it is also appreciated that the emerging local plan and masterplanning process is going to take some time. If an application is to be brought forward in advance of this, there would need to be some extra work behind that application to demonstrate the constraints and possibilities of where the link road corridor could be – test the road at different parts of the site and evidence this in the Design and Access Statement.

- **Design approach.** Walking and cycling links to the west are important. There would need to be further engagement with ECC's SuDS team and the HSE. A contemporary approach to house design could be supported, particularly with climate change issues on the agenda. The scheme needs a stronger network of green spaces within the built-up area.
- **Environmental Impact.** UDC strongly urged the applicant to submit a screening opinion request to rule the need for EIA in or out. Additionally, the constraints of the town itself and the level of cumulative development over a period of time mean that UDC's case officer considers that an EIA would be required. Other issues/constraints would need to be looked at in tandem with cumulative impact.

- 6.16 The scheme design has taken account of pre-application feedback received from UDC. As part of the Landscape and Visual Assessment, the viewpoint locations were agreed with UDC's Landscape Officer. This served to identify the most sensitive locations from which the proposed development could be viewed, and respond with appropriate mitigation accordingly, through the provision of appropriate green infrastructure. Feedback from UDC's Housing Officer has also directly informed the indicative mix of housing proposed as part of the scheme.
- 6.17 The design of green spaces within the scheme has been refined in response to the Urban Design Officer's comments. The scheme has been updated to strengthen its network of green spaces within the built-up area along the east-west alignment, making effective use of the topography to encourage walking and cycling and improve legibility, bringing nature closer to the development.
- 6.18 Significantly, the Applicant has taken account of UDC advice that it would be necessary to screen the potential environmental impacts of the proposed development, in accordance with the advice of Environmental Health and Planning Officers. Whilst the Applicant is of the view that the proposed development does not constitute EIA development, a Scoping Opinion request was submitted and subsequent voluntary Environmental Statement has been undertaken as part of this outline planning application, with the range of development impacts, cumulative impacts and mitigation proposed as part of this application. The submitted Environmental Statement also conclusively demonstrates that the scheme has considered realistic alternative designs and layouts for the Proposed Development, and taking into account proposed mitigation measures, it has been demonstrated that where possible, through the design evolution of the proposals, the

potential environmental effects have been avoided, or where this is not possible, the potential environmental effects have been reduced through mitigation. This has resulted in delivering an overall scheme which has had regard to minimising its environmental effects and delivering a sustainable form of development which achieves this.

- 6.19 So as not to prejudice the delivery of a wider potential future development scheme and relief road, the Applicant has tested the potential locations of the relief road corridor as raised by UDC at the pre-application meeting. This testing process is evidenced clearly in the Design and Access Statement and summarised within the Transport sub-heading in the Assessment section below. In brief, the suggested eastern alignment would require substantial earthworks, vegetation clearance, watercourse diversion, necessitate a non-standard gradient, third party utilities provider permissions, substantial ecological impacts and a change to the rural character with a new junction and visibility requirements, and it would have an urbanising effect on the rural community. It would effectively introduce a bypass solution which would be exaggerated by the cutting necessary to facilitate its delivery and would be noticeably segregated from the remainder of the Site and would sever the Site. The eastern alignment is therefore discounted. The western alignment, as proposed in the scheme, would be substantially less impactful and is the most suitable.
- 6.20 Following the above, the rationale of taking the western alignment through the development is to make it part of the scheme rather than having something to the east that it turns its back on. In response to this, advice received from UDC's Urban Design Officer confirmed that, if the Applicant were to propose the western alignment as integral street within the development, that it would be beneficial to show other successful examples of this approach as part of the planning submission. Details of such examples have indeed been included within the Design and Access Statement and demonstrate how this approach has been created elsewhere to create a "busy street" in accordance with urban design principles.
- 6.21 The work undertaken by the Applicant following pre-application engagement with UDC demonstrates that the proposed scheme delivers a sustainable form of development without the need for reliance upon or reference to any wider potential future scheme.

Pre-application engagement with statutory consultees

- 6.22 The Applicant engaged with the following statutory consultees during the pre-application process, principally:
- **Health and Safety Executive (HSE).** Due to the presence of the fuel depot to the north of Radwinter Road, it was necessary to consult the HSE to ensure development proposed adequate setback distances from its infrastructure. Relevant measures are incorporated into the scheme design and may be cross referenced on the Constraints Plan.
 - **Essex County Council, Highways Authority.** ECC was consulted in order to confirm the scope and extent of assessment for the transport evidence that needed to be gathered in support of the proposed development.
 - **Essex County Council, Lead Local Flood Authority.**
- 6.23 In addition to the above, the project team members consulted relevant consultees to appropriately scope the content of the Environmental Statement.

- 6.24 As part of this process of engagement, ECC Highways Authority advised that the provision of pedestrian/cycle link through to the west of the Site would be important to the sustainability of the development. The feasibility of providing a direct pedestrian / cycle link to the adjacent Linden site was being investigated by the Applicant. However, this is not feasible because it is not supported by Saffron Walden Town Council which currently manages the area of public open space over which the link would pass. In any event, the proposal for a new footway on the south side of Radwinter Road between the proposed development access and the Linden access is considered to provide an acceptable level of pedestrian connectivity.
- 6.25 It was also requested by ECC Highways Authority, following discussions, that the scheme provides two bus stops along Radwinter Road. These are indeed provided as part of the outline planning application and further enhances the scheme's sustainability credentials.

Public consultation

- 6.26 Following the above meetings, a website was constructed to display the emerging illustrative masterplan, summarise the constraints and opportunities, and demonstrate how the scheme proposes to address the key issues.
- 6.27 Due to COVID restrictions in place at the time the application was being prepared, it was not possible to undertake a full in-person public exhibition as the Applicant would normally do in relation to a development of this scale. However, it was deemed appropriate to deviate when and where necessary from aspects of UDC's Statement of Community Involvement where public gatherings are concerned. The scope of the Applicant's public consultation to include digital engagement was therefore considered appropriate in the circumstances and in line with current practices.
- 6.28 The virtual platform went live on 7 June 2021² for a period of 2 weeks. Leaflets were distributed to approximately 3,000 households in the vicinity of the Site to inform them of the website, how they could view the proposals and how they could leave comments.
- 6.29 Extracts from a selection of the virtual exhibition boards are shown at Figure 12 below. Further details on the content of the exhibition material is set out in the accompanying Design & Access Statement.

² <https://rosconnstrategicland.com/saffron-walden/>

**Land south of Radwinter Road (East of Griffin Place), Saffron Walden
Rosconn Strategic Land and the Executors of Mr E C Baker and Mrs J Baker
Planning Statement incorporating a Statement of Community Engagement**

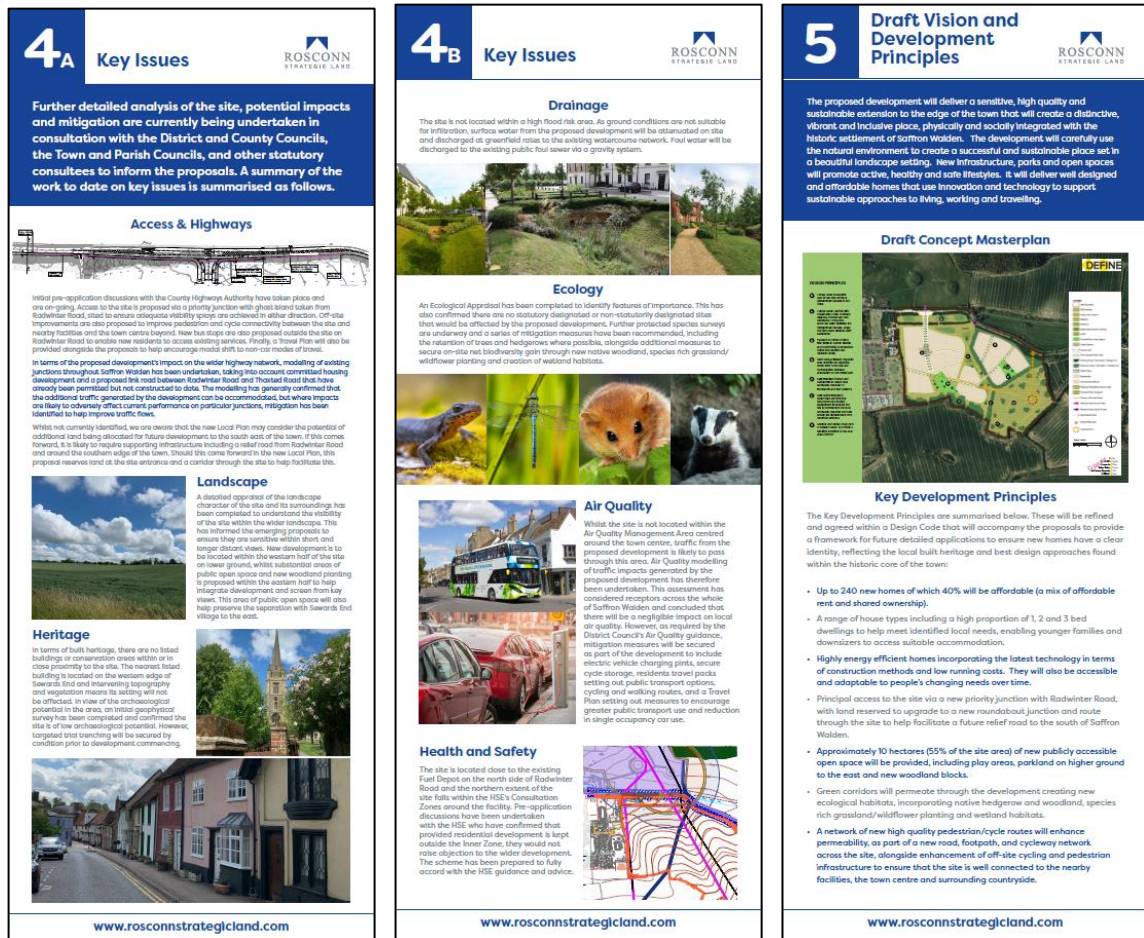


Figure 12: extracts from the public exhibition material

- 6.30 The questionnaire accompanying the online exhibition asked for feedback on a range of questions including:
- Whether there are any constraints and opportunities related to the proposed development that the Applicant has missed
 - Whether there are any key issues the Applicant needs to address as part of the proposed development
 - Whether the key development principles proposed as part of the scheme are appropriate and, if not, how they should be amended or expanded
 - Whether respondents had any other thoughts or suggestions.

- 6.31 Feedback from 48 participants was received, from both local business owners and local residents. All comments have been reviewed and participants responses are summarised below.

Key issues Raised:

- Road capacity / congestion
- School availability

- Overdevelopment of the area
- Loss of agricultural land
- The development may increase the local flood risk
- Lack of biodiversity
- Air quality
- Insufficient local amenities
- Climate change mitigation methods
- Coalescence

Amendments sought to the scheme's draft vision:

- Make improvements to the impact of local traffic
- Contribute to education provision
- Reduce the amount of development proposed
- Increase the amount of affordable housing
- Increase the level of open space
- Make further improvements to zero carbon impact
- Improve drainage to reduce the threat of surface water flooding on Radwinter Road
- Cycle links needed between Saffron Walden and Swards End

Additional suggestions

- Highways access requires a further change to the speed limit. *Note that a reduction in speed limit to 40mph in the immediate vicinity of the Site is proposed as part of the scheme. This would improve conditions for people on bicycles on Radwinter Road.*
- Improvements are needed to the footpath north of Radwinter Road. *Note that as part of the mitigation package in support of the development an uncontrolled crossing of Radwinter Road is proposed. This would facilitate access to the PRow network to the north of Radwinter Road as well as to the existing footway and proposed new bus stops.*

6.32 It is evident that the principal source of local concern raised through the consultation process related to the impact of development upon infrastructure capacity in the local area. These are matters that would typically be addressed through the technical assessment work accompanying a planning application, and/or as part of any planning obligations attached to a planning permission and are dependent upon the responses from statutory consultees, including the local highways authority, education authority and NHS. We seek to respond to the themes in turn below.

PUBLIC COMMENTS	APPLICANT'S RESPONSE
Over-development of the area.	Every local authority in England is expected to make sufficient housing development land

	<p>available to meet need over a rolling five year period. This planning application is prepared in the context of a substantial housing land supply shortfall in Uttlesford. The new Local Plan is at an early stage in its preparation and will not come forward quickly enough to resolve the immediate need to deliver more housing in the short-term. We believe the Site's location, on the edge of Uttlesford district's largest town, is a suitable place for growth at the scale proposed in the short-term, as future residents would be able to easily access the services, facilities and amenities within Saffron Walden.</p> <p>National planning policy requires development schemes to optimise the potential of the site to accommodate and sustain an appropriate amount of development.</p> <p>The net developable area comprises approximately 36% of the total Site area. Public open space would comprise approximately 55% of the Site area, with primary road infrastructure comprising the remaining 9%. The scheme's public open space provision would comfortably exceed UDC's policy requirements and at a density of approximately 35 dwellings per hectare within the development area, the scheme would make effective and efficient use of land.</p>
Coalescence / landscape impact	<p>Due to the localised topography patterns and patterns of vegetation on and around the Site, the Site is identified as having a very constrained visual envelope. Typically, the local undulations in topography restrict views of the Site and of the Proposed Development. Key views identified through the Landscape and Visual Impact Assessment show that the most significant views of the development would be from longer range, against a backdrop of existing adjacent development within Saffron Walden. The proposed public open spaces on higher ground in the south east of the Site would create a sensitive transition between the residential development and the wider rural landscape. These range of impacts are identified as ranging from minor to moderate adverse, not</p>

	<p>significant, and would have no material impact on valued landscapes.</p> <p>The Landscape and Visual Impact Assessment has recommended mitigation that should and has been designed into the scheme to ensure that the proposed built form would not be a prominent feature of views from Radwinter Road, including the retention of the small most northerly field as green infrastructure and the creation of a new tree belt along the eastern boundary of the Site.</p> <p>Sewards End is located just under 1 kilometre to the east of the existing settlement edge of Saffron Walden. Saffron Walden is not a feature of views from within the settlement. As part of the proposed development a 0.25km separation distance would be retained between the eastern edge of Sewards End and the closest area of proposed construction activity on the Site. This degree of separation with retained agricultural fields would be visible and would help to define Sewards End as separate to and distinct from Saffron Walden.</p> <p>The public open space would be maintained, managed and secured for that use in perpetuity by legal agreement securing the open nature over the long term.</p>
Traffic generation / highways impact	<p>The accompanying Transport Assessment models the effects of the development <u>without</u> the committed link road in the adjacent schemes to the west of the site coming forward. This is for robustness of assessment.</p> <p>Junction modelling has been undertaken and improvements are proposed at three offsite junctions:</p> <ul style="list-style-type: none"> ▪ Radwinter Road / Thaxted Road / East Street / Chaters Hill – short right turn lane on Radwinter Road.

- **Thaxted Road / Peaslands Road** – replace mini roundabout with traffic signals.
- **High Street / Church Street** – replace priority junction with traffic signals.

All three junctions, in their current form, are predicted to be operating well above capacity in 2026 even without the proposed development and in both the ‘with’ and ‘without’ link road scenarios.

The junction modelling of the proposed layouts indicates that the Thaxted Road / Peaslands Road and High Street / Church Street junctions would be operating within capacity in 2026 with the proposed development. Therefore, *the proposed junction improvements would not only fully mitigate the impact of the proposed development but would also address an existing capacity problem* that will continue to deteriorate as more of the committed development comes forward.

The junction modelling of the proposed improvement at the Radwinter Road / Thaxted Road / East Street / Chaters Hill junction indicates that the performance of this junction would improve. The capacity on the Radwinter Road arm would be restored. It would also result in slight improvements to the Thaxted Road and East Street arms with small reductions in the queue length in all but Thaxted Road during the AM peak which would remain unchanged. It can therefore be concluded that the *improvements proposed at this junction would fully mitigate the impact of the development.*

Other junctions that were tested for capacity were either shown to be operating within capacity in 2026 with development and therefore no further action is required, or the impact of the development on the critical performance indicators is considered not to

	<p>be material, and, on this basis, mitigation has not been proposed.</p> <p>Taking account of the above, the Transport Assessment confirms that the impact of development would not be cumulatively severe, in accordance with NPPF paragraph 111.</p> <p>New bus stops are proposed on Radwinter Road just to the east of the proposed access and the Applicant is prepared to provide a proportionate financial contribution towards bus service provision, including improvements to secure a half hourly service to the town centre and an hourly service to Audley End train station. This would both benefit the development and would contribute more widely to improvements to bus services throughout the town, thereby improving access to modes of travel other than the private vehicle.</p>
Flooding / drainage	<p>In accordance with national planning policy, the application proposal is supported by a drainage strategy based on sustainable drainage principles. Testing has indicated that infiltration would not be an appropriate solution for the Site due to the underlying geology. Therefore, surface water runoff generated by the proposal would be stored within the development comprising four attenuation basins located within the northern field, and SuDS corridors, before discharging into the existing watercourse.</p> <p>This solution would ensure that the amount of surface water run-off would not be greater than the existing greenfield rate and thus the proposed development would not increase flood risk elsewhere, thereby complying with national planning policy in this regard.</p> <p>As such, development of the Site would not result in any adverse impacts in terms of flooding or drainage. We consider that a</p>

	<p>detailed drainage strategy can be secured by way of a suitably worded planning condition.</p>
<p>Impact on local infrastructure</p>	<p>Assuming the school site on the adjacent scheme is delivered, this would mean that no significant cumulative impacts would occur in respect of education. Similarly, with the inclusion of financial contributions towards healthcare, no significant cumulative effects are predicted.</p> <p>Rosconn Strategic Land as Applicant would enter into a section 106 agreement, conditional upon the grant and implementation of planning permission for the proposed development, to make appropriate contributions to the provision of education and healthcare facilities amongst other items as necessary, in accordance with the Community Infrastructure Regulations.</p>
<p>Net zero carbon impact</p>	<p>The scheme acknowledges the national policy aspiration to transition to a low carbon future, in addition to UDC's Interim Climate Change Planning Policy for development proposals to achieve net-zero carbon by 2030.</p> <p>The scheme would actively manage patterns of growth by focusing new development on a location that is sustainable, adjacent to the edge of Saffron Walden, the district's largest town and commercial centre, close to key facilities and services, and within walking distance of the local Tesco supermarket. This reduces the need to travel. The scheme's package of transport mitigation measures would make the location more sustainable, in accordance with policy.</p> <p>The extensive green infrastructure network embedded within the scheme design would ensure biodiversity net-gain and carbon storage.</p> <p>it is proposed that further details of climate change mitigation, for instance including the scheme's detailed energy and water efficient design, adaptation and EV charging details</p>

	<p>may be reserved for consideration at the reserved matters stage. This would ensure that the scheme complies with the relevant adopted Local Plan policy requirements and Interim Climate Change Planning Policy guidance applicable to the detailed scheme at the reserved matters stage.</p>
Ecological impact	<p>The assessment work undertaken in support of the application identifies no significant ecology issues to indicate that the proposed development cannot be achieved.</p> <p>The majority of the Site consists of an arable field dominated by bare ground, which is considered to be species poor. The proposed development would create an attenuation area and semi-natural green space which, with the embedded mitigation as shown on the Indicative Masterplan, is anticipated to enhance the biodiversity of the grassland within the Site. The proposed development is also considered likely to result in a direct positive and permanent enhancement of standing water habitat because the proposed attenuation ponds in the northern field would be designed to maximise ecological benefit.</p> <p>The principles set out within the proposed Parameter Plans to deliver measurable ecological enhancement would be implemented through a detailed landscape strategy and Landscape & Ecological Management Plan at the reserved matters stage.</p> <p>The creation of approximately 10 hectares of green open space within the Site would provide for several functions, including the preservation and enhancement of ecological habitats. Public open space as shown on the Land Use Parameter Plan account for approximately 55% of the total Site area, specifically including retained green corridors and enhancement of habitats through the creation of new hedgerows, tree planting, attenuation features and grasslands. Taking account of the Site's existing poor-quality</p>

	existing habitat, the scheme would deliver substantive biodiversity net gain.
Design, connectivity, open space provision	<p>The scheme's design framework is explained in the Design & Access Statement and summarised in the design section below and responds to the Site's constraints and opportunities. It would ensure compliance with UDC's design policies, Interim Climate Change Planning Policy and the NPPF.</p> <p>The scheme's access and movement framework incorporates an extensive network of footpaths/cycle paths and the proposals include provision of new bus stops to the east of the Site entrance on Radwinter Road to further enhance its accessibility by non-car modes of travel.</p> <p>Open space provision onsite equates to 55% of the overall Site area and is in excess of UDC's minimum requirements.</p>
Air quality	<p>We acknowledge the potential impact of development upon air quality because the eastern edge of the Saffron Walden Air Quality Management Area is approximately 800 metres to the west of the Site. Air quality has been assessed in the accompanying Environmental Statement, the scope of which has been agreed with UDC's Environmental Health Officer.</p> <p>The Assessment identifies that during the construction phase, the implementation of appropriate mitigation measures in the form of a Construction Environmental Management Plan, would reduce air quality impacts to an insignificant level.</p> <p>The assessment identifies a negligible impact on local air quality as a result of the development's operational traffic. However, recognising that the proposed development would result in additional car-bound journeys, measures would be implemented in mitigation at the development to further reduce</p>

	<p>emissions, including passive provision for electric charging points for all on-plot car parking spaces, a Travel Plan which proposes to implement measures to encourage the use of alternative more sustainable modes of transport and reduce the use of single occupancy car journeys, provision of a large public open space area for recreational purposes, reducing the need for residents to travel further afield for recreational needs; and provision of extensive walking and cycling routes through the Site connecting with Radwinter Road.</p> <p>The Applicant also intends to fund improvements to secure a half hourly bus service to the town centre and an hourly service to Audley End train station. This would both benefit the development and would contribute more widely to improvements to bus services throughout the town, thereby improving air quality in the town by enabling travel other than the private vehicle.</p> <p>The scheme would not contribute to, or put the local environment at unacceptable risk from, unacceptable levels of air pollution. The accompanying Environmental Statement considers that there are no significant cumulative air quality effects that are attributable to the development.</p>
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- 6.33 The Applicant has shown that it has worked closely with those affected by the proposed development to evolve the scheme to take account of the views of the community and consultees. The most notable of these being:
- The scope and extent of evidence undertaken to help justify the proposals, including the voluntary submission of an Environmental Statement as part of the scheme.
 - The extent of work undertaken to identify the most appropriate future relief road corridor through the Site; and the urban design approach that goes hand in hand with that.
 - The scheme's landscape strategy, which seeks to minimise the sense of coalescence.
- 6.34 The scheme has evolved to take full account of advice received from UDC and its statutory consultees in the lead up to the submission of this application. The process of community engagement therefore accords with UDC and NPPF policy.

7.0 Planning Assessment

Principle of Development

- 7.1 The starting point for assessing the principle of this scheme are the saved policies of the Uttlesford Local Plan (adopted in 2005). Saved Policies H1 (Housing Development), H3 (New Houses within Development limits) and S7 (the Countryside) form the basis for the development strategy.
- 7.2 UDC acknowledges (through recent committee reports³) that the Local Plan is out of date insofar as it relates to housing numbers up to the year 2011. As the Site is adjacent to the urban edge of but outside Saffron Walden, the development would technically conflict with part of saved Policy S7, the first part of which states that:

“in the Countryside, which will be protected for its own sake, planning permission will only be given for development that needs to take place there, or is appropriate to a rural area.”

The second part of which states that:

“Development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set or there are special reasons why the development in the form proposed needs to be there.”

- 7.3 The first part of saved Policy S7 has been recently acknowledged in a December 2020 appeal decision to be inconsistent with the National Planning Policy Framework (NPPF) inasmuch as the NPPF takes a much less protectionist stance, instead requiring that the intrinsic character and beauty of the countryside be recognised⁴. Correspondingly, the Inspector in that case found that the second part of saved Policy S7 quoted above, relating to character and appearance, was in broad accordance with the NPPF. Nonetheless, it was recognised by the Inspector that:

“The Council accept that the settlement boundaries must be flexible and that saved policy S7 must be breached in order for a sufficient supply of houses to be provided.”

- 7.4 A further recent appeal decision relating to Land east of Elsenham⁵ (the “Elsenham” decision) revealed a recent trend of less weight being given to saved Policy S7 as the Council's housing land supply position worsened. In that case, which was determined in November 2020, it was identified that the current housing land supply position was 2.68 years and that accordingly policy S7 should be attributed moderate weight. UDC published an updated Housing Delivery Test and 5-Year Land Supply Statement in January 2021 which confirms an updated supply of 3.11 years

³ For example UTT/19/1789/FUL – Land at Pound Hill, Little Dunmow

⁴ APP/C1570/W/20/3256109, Land off Isabel Drive and Land off Stansted Road, Elsenham

⁵ APP/C1570/W/19/3243744, Land east of Elsenham

(including a 5% buffer). Whilst it shows an improved supply position, it is in still some way off the necessary requirement specified by NPPF paragraph 73, being **1,402 dwellings short**. This remains a substantial shortfall which urgently needs to be addressed and, in this context, saved Policy S7 should therefore still be attributed only moderate weight insofar as it is consistent with the NPPF.

- 7.5 The extent of annual housing need UDC will need to plan for as part of its emerging new Local Plan is now even greater than it was under the adopted Local Plan and withdrawn emerging Local Plan. Since the withdrawal of the then emerging new Uttlesford Local Plan in 2020, UDC's district-wide housing requirement increased some 18% to approximately 715 dwellings per year under Local Housing Need, the methodology applicable under the updated 2021 NPPF.
- 7.6 It should also be noted that the emerging new Local Plan for Uttlesford was recently subject to an Issues and Options level consultation. The Local Development Scheme (approved in October 2020) identifies that the Plan will be submitted for Examination in around August 2023, with adoption in around July 2024, some three years from the date of the submission of this planning application. In order for UDC's housing land supply position to improve in the interim, the Council will need to continue to approve development proposals on sustainably located, unconstrained and deliverable Sites such as this.
- 7.7 Given the absence of a five-year housing land supply and the corresponding weight to be attached saved Policy S7, the proposal should be considered in the context of the presumption in favour of sustainable development as set out in the NPPF. Paragraph 11d of the NPPF sets out the presumption in favour of sustainable development, which is relevant in instances where the policies which are most important for determining the application are out-of-date, such as this. Under the tilted balance, permission should be granted unless "*any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies*" in the NPPF taken as a whole.
- 7.8 In this context, we consider that any adverse impacts of approving development contrary to Policy S7, which is to be attributed moderate weight insofar as it generally accords with the NPPF, would not significantly and demonstrably outweigh the benefits of delivering development in this sustainable location and would therefore accord with the NPPF.
- 7.9 The planning benefits of this development are set out in Chapter 8 of this Statement below. As demonstrated within this Chapter of the Statement, there are no policies in the Framework that provide a clear reason for refusing the proposed development and there are no adverse impacts that significantly and demonstrably outweigh the benefits of the scheme.

Sustainable Location

- 7.10 Saffron Walden is a main town and key service centre within Uttlesford District, with a wide range of services and facilities. These include primary, secondary and sixth form schools, GP surgeries, dentists, supermarkets, restaurants, post office, library, leisure centre, along with various employment opportunities. Saffron Walden is the largest town in Uttlesford and is the administrative and commercial centre. It has the largest population and is situated within relatively short commuting distance of the major employment areas to the north-west and Stansted Airport to the south. Saffron Walden is also accessible to the mainline railway network

via direct public transport routes to Audley End station which provides onward connections to Cambridge, Harlow and London, among other destinations.

- 7.11 The Site is located directly adjacent to the existing built edge of Saffron Walden, approximately 1.5 kilometres from the town centre. Key services and facilities are within walking and cycling distance and public transport. The Application Site has a Tesco superstore within a 10-minute walk / less than 5-minute cycle. The Site would also be located within walking/cycling distance of the new primary school which forms part of the consented and implemented development on the adjacent site to the west.
- 7.12 Development of the Application Site would focus a significant number of new homes in a location which is sustainable, limiting the need to travel and offering a genuine choice of transport modes, in accordance with NPPF paragraph 105.

Provision of housing

The delivery of much needed new homes

- 7.13 The proposed development is for up to 233 dwellings. This is a significant benefit of the proposed development, considering the scale of UDC's housing supply deficit. It is well established that correspondingly more weight can be attached to the benefits of new housing, depending on the extent of such deficits⁶.
- 7.14 The Inspectors within the recent appeal decisions gave significant weight to the provision of new housing, for example this from the Elsenham decision:
- "it currently has no short or medium-term strategy to address this significant shortfall from the required 5 year supply. In these circumstances I consider that the provision of new homes through this scheme should carry significant weight"* (paragraph 191).
- 7.15 It should be noted that UDC's Housing Trajectory & 5 Year Housing Land Supply Statement 1 April 2020 (published in January 2021) shows how quickly the sources of housing land supply fall away during the current 5-year period 2020/21 to 2024/25 from 2022/23 onwards. An extract from Diagram 1 of that document shown at Figure 13 below.

⁶ See, for example, per Lindblom J in *Crane v SSCLG* [2015] EWHC 425 at [71].

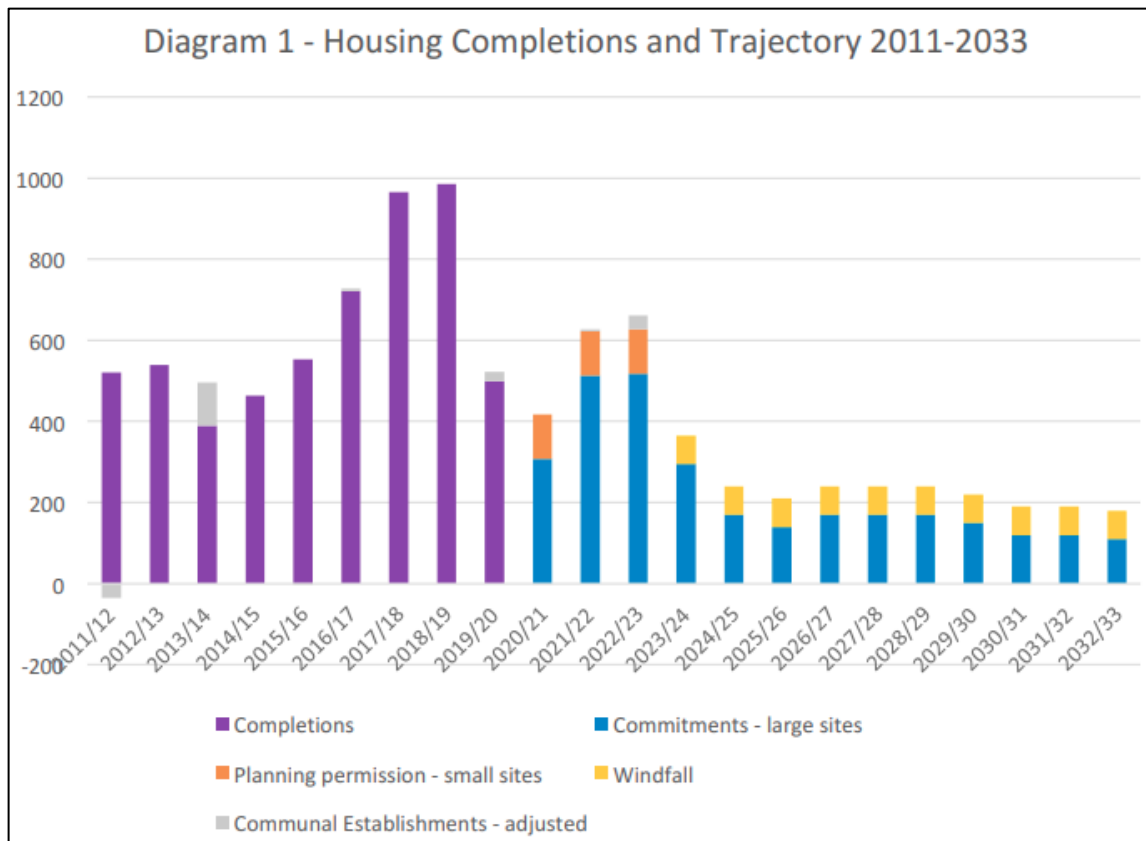


Figure 13: UDC's Housing Trajectory & 5yrHLS Statement April 2020 (Jan 2021)

- 7.16 The evidence accompanying this planning application, as summarised in the relevant sections below, demonstrates that there are no insurmountable constraints or impediments to the swift commencement and delivery of the proposed development, following the grant of outline planning permission and reserved matters approval. It is anticipated that approximately 120 of the 233 new homes would be delivered within the five-year period 2021/22 to 2025/26 at a rate of approximately 40 dwellings per year. These timescales are informed by standard lead-in times for a Site of this size and the completion rates extrapolated from the adjacent Linden Homes site that is currently being built out and has averaged about 40 completions per year.
- 7.17 The early delivery of this scheme would therefore make a worthwhile contribution to boosting the Council's poor housing supply over the next five years and beyond. This would achieve the NPPF's social objective – which seeks to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.
- 7.18 The application is in outline form and the details of the exact housing mix would be determined at the Reserved Matters stage. However, the scheme's indicative dwelling mix is set out in the table at paragraph 4.5 above in agreement with UDC's Housing Officer. The Illustrative Masterplan shows that the provision of a broad mix of dwelling types across both market and affordable tenures could be accommodated within the proposed development, in accordance with adopted Local Plan policy H10 and the NPPF.

Provision of much-needed affordable housing

- 7.19 It is proposed that 96 dwellings would be affordable which equates to 40% onsite provision, in accordance with Local Plan Policy H9. This would benefit the local community by making a meaningful contribution to affordable housing provision in Saffron Walden/Sewards End and the district, providing benefits in terms of social sustainability.
- 7.20 The importance placed on providing affordable housing is highlighted by the key priorities set out in UDC's Corporate Plan 2020-2024. These include an objective to '*Deliver more affordable homes and protect those in need in our district*'. It should also be noted that UDC's most recent affordability ratio is 13.54, which is extremely high⁷.
- 7.21 The Inspectors appointed to examine the now withdrawn Local Plan also highlighted the importance of affordable housing provision, noting in the Inspector's letter of January 2020 that:
- "The Council accepts that there is already an affordability issue in the district. The supporting text to Policy H6 states that there are, and will continue to be, many households in Uttlesford lacking their own housing or living in housing that is inadequate or unsuitable, who are unlikely to be able to meet their housing needs in the housing market without some assistance"* (paragraph 34).
- 7.22 It is plain that this is a pressing matter for the District, and without a firm short or medium-term strategy to address the need, all reasonably suitable opportunities to provide additional affordable units should be taken. Recent decision-making within Uttlesford District has also accorded "*significant weight*" to the provision of affordable housing⁸.
- 7.23 In all, the delivery of 233 new homes including affordable housing in a sustainable location fulfils the NPPF's economic and social objectives of sustainable development. It therefore fully accords with the NPPF.

Sustainable Design

- 7.24 Adopted Local Plan policy GEN2 seeks to ensure that all development meets set criteria (including the compatibility of scale, form layout, appearance safeguards environmental features, minimises environmental impact) and has regard to the Council's Supplementary Planning Documents, including UDC's Interim Climate Change Planning Policies. NPPF paragraphs 130 and 134 are also of particular relevance to design.
- 7.25 The accompanying Design and Access Statement, prepared by Define, communicates the design process and development principles associated with the proposed development, demonstrates

⁷ Page 5 of UDC Housing Trajectory and 5-Year Land Supply Statement

⁸ Paragraph 194 of the Elsenham decision (3243744), and paragraph 56 of the Isabel Drive Elsenham decision (ref 3256109)

how the scheme accords with adopted design policies and the NPPF, and the advice of UDC Officers.

- 7.26 It outlines the key design principles and a narrative for a sustainable development that respects local character and landscape assets whilst being focussed on the health and well-being of its future residents.
- 7.27 In the first instance, the technical assessments undertaken by the Applicant have identified the key constraints that have guided the layout, location and scale of development proposed. Principally these include:
- The presence of multiple utility and service infrastructure which criss-cross the Site. It is necessary for built development to leave appropriate easements in this respect, and so whilst this is technically straightforward, the areas of built development and green infrastructure corridors have been positioned around these constraints and this has, in turn, helped to inform the placemaking and green infrastructure strategies.
 - Proximity and arrangement of the Site to its existing neighbouring built form to the west. The development considers the scale of development on the adjacent Linden scheme. Additionally, the presence of existing residences is accounted for in the layout design and as part of the scheme's construction phase to minimise impacts from dust, noise etc;
 - The need to gain appropriate means of vehicular access into the Site via Radwinter Road. As existing hedgerow runs along the Site's northern boundary the loss of a very small amount of hedgerow is required to facilitate the access in a position that facilitates the necessary visibility splays. However, as part of the site-wide landscaping strategy, extensive new lengths of hedgerow would be planted in a manner that creates similar field patterns, offering new arboricultural and ecological benefits;
 - The landscape and visual impact of development, particularly to the north-east and north-west where the Site is more visible. Woodland blocks on or around to the Site's ridgelines to the south and south-east are provided and/or strengthened for screening and views. The positioning of the scheme's most substantive piece of public open space on higher ground to the south-east helps to reduce any perception of coalescence between Saffron Walden and Swards End and capitalises on expansive views to the town and countryside / view corridors towards local landmarks such as St Mary's Church and Pounce Wood, to add to the quality of the area and ensure the landscaping works effectively.
 - The eastern development parcel is well integrated into the landscape and comprises a lower density of development, to provide a sensitive transition to the rural areas; and
 - The layout makes effective use of part of the Site which falls within the HSE's consultation zone, associated with the Fuel Depot on the north side of Radwinter Road. The HSE confirms that residential development should be kept outside of the inner zone. As this part of the Site is effectively at its lowest point, it provides the opportunity to provide adequate drainage systems and water storage to deal with run-off. Surface water runoff generated by the proposed development is proposed to be stored on site using attenuation basins and SuDS corridors that will help to manage the quantity and quality of water, improve biodiversity, and help create an attractive and healthy landscape. It may be seen that the northern field, within the HSE consultation zone, is proposed to accommodate three drainage basins, with a fourth adjacent but to the south of the hedgerow. The benefit of this approach is that it also helps to aid the landscape transition between Swards End and the existing built development in the east of Saffron Walden.

- Substantive improvements to the ecology and amenity value of the Site to offset the loss of greenfield development.

7.28 The scheme design takes forward key masterplanning principles as part of the layout design to ensure it creates a quality place and maximises potential to mitigate climate change in accordance with the NPPF and UDC guidance, by incorporating the following:

- There is a strong relationship between movement corridors and landform, as well as development edges and landform, to ensure that the places are inclusive and accessible, promoting health and well-being.
- There is an extensive network of pedestrian and cycle connections, to maximise permeability and opportunities for active travel than vehicular use.
- Tertiary streets reflect character and create a place for people first, to establish a strong sense of place that is safe and inclusive.
- Built form would reflect local vernacular to ensure the development is sympathetic to local character and history, with tree-lined streets
- Green and blue infrastructure reinforces/enhances biodiversity and habitat creation, providing a high standard of amenity for existing and future occupiers.
- Urban grain and density reflect the local context and character. Particular care is taken to sensitive edges such as the eastern edge that needs to respond to the rural areas with wider setbacks, lower density and looser form.

7.29 The proximity/arrangement of the proposed development in relation to the potential need for a future relief road that serves other land to the south and south west of the Site is explored in greater detail below.

Reserving land for a potential future relief road

7.30 As part of the potential aspirations for a strategic expansion to the east of Saffron Walden, Essex County Council as the local highway authority indicated that this wider proposal, if pursued, would need to deliver a new relief road or bypass for the town that would run from Radwinter Road to Debden Road and potentially to Newport Road. In order not to prejudice such a proposal should it come to fruition, the Illustrative Masterplan and associated Parameter Plans allow for a reserved corridor running through the Site on a north/south axis as well as reserved land around the proposed Site access to enable its upgrade to a roundabout.

7.31 The amount of reserved land, including the size of the potential relief road corridor, has been informed by detailed discussions with ECC and would allow sufficient space to provide a road of the appropriate dimensions should this be required. However, ECC requested that the relief road corridor and associated access to Radwinter Road should be within the easternmost portion of the Site on the basis that this would provide a permanent and defensible boundary to any further eastward growth of Saffron Walden. Importantly, the relief road or the bypass in this location would not be fronted by development and this could potentially provide a freer flow of traffic. ECC's request was discussed at length during the pre-application meeting in February 2021. UDC planning officers advised that ECC's preferred alignment should be tested and compared to other options through the Design & Access Statement. Having followed this advice and tested the options from an urban design, landscape, ecology arboricultural, utilities and

highways/transport perspective (as illustrated at Figure 14 below), the alignment of the relief road corridor as shown on the accompanying drawings is the most appropriate solution and the reasons for this are explained in full in the Design & Access Statement.

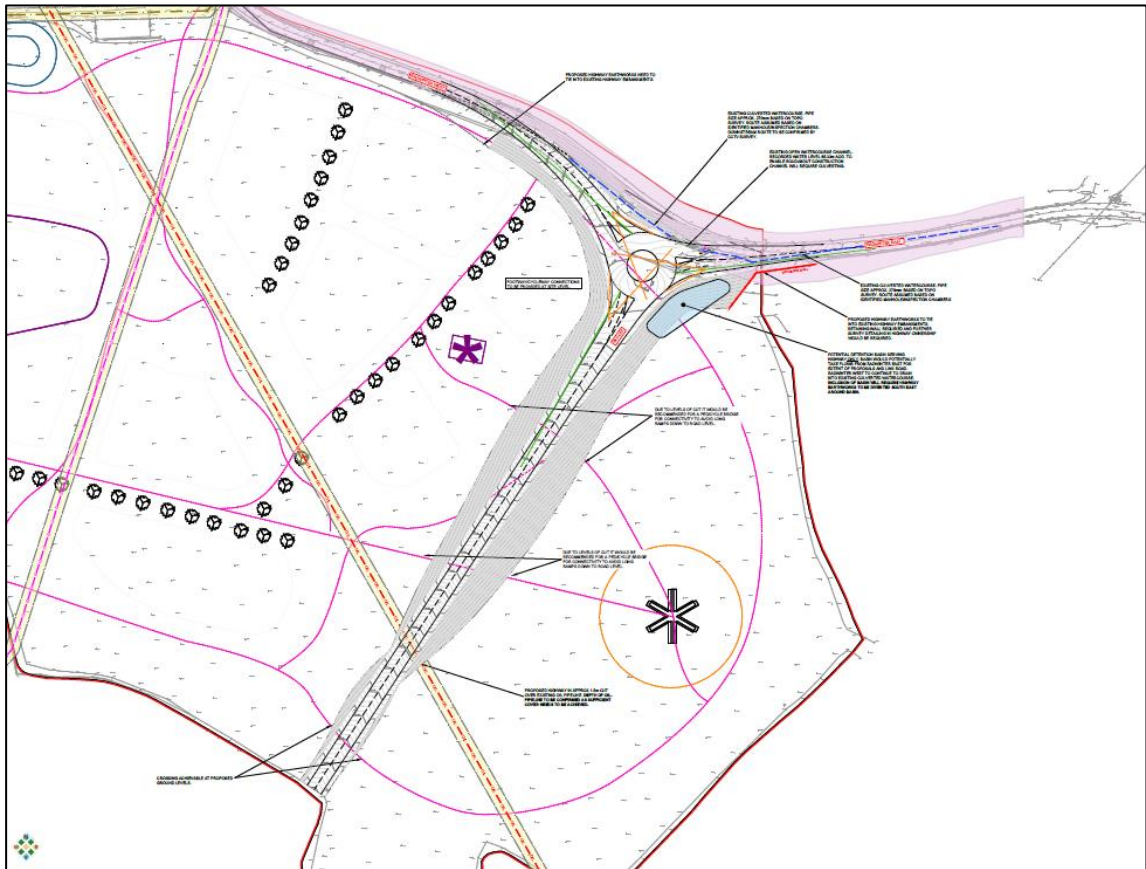


Figure 14: The tested and discounted eastern potential relief road alignment

7.32

In brief, these matters confirming why an eastern alignment has been discounted are summarised as follows:

- The eastern relief road alignment option would require substantial earthworks, vegetation clearance and watercourse diversion. The western relief road corridor proposed requires much less significant earthworks, modest vegetation removal and no watercourse diversions;
- The eastern relief road alignment option would necessitate a non-standard gradient and third-party utilities provider permissions to be achieved. The western relief road corridor proposed does not cross any utilities alignments or associated easements;
- The eastern relief road alignment option would result in substantial removal of vegetation to facilitate the necessary works. The western relief road corridor proposed would result in modest removal of vegetation that can be mitigated through the proposals;
- The eastern relief road alignment option would result in substantial ecological impacts as a result of the works required (which in turn remove substantial vegetation and result in a watercourse diversion) which it is unlikely could be mitigated on Site. The western relief road corridor proposed would result in modest ecological impacts that can be mitigated through the proposals;

- The eastern relief road alignment option would result in a substantial change to the rural character of Radwinter Road at the eastern end of the Site in order to create a new junction and its required visibility arrangements. The western relief road corridor proposed would retain the rural character of Radwinter Road at the eastern end of the Site;
- The eastern relief road alignment option would be very close to Swards End and would have an urbanising impact on this rural community, undermining the separation between it and Saffron Walden.
- The eastern relief road alignment option would effectively introduce a 'bypass' solution which, exaggerated by the cutting necessary to facilitate its delivery, would be noticeably segregated from the remainder of the Site and would in effect sever the Site. The western relief road corridor proposed passes through the development placing emphasis on creating a sense of place with active frontage on both sides of the road. The provision of at-grade pedestrian and cycle crossings would further reduce the severance effect of the road and help to promote an active street which is in line with current best practice and accords with the aspirations of the development.

7.33 Taking account of the above, the proposal demonstrates that it has considered and evidenced the alternative relief road alignment and that the proposed alignment is the most suitable.

Parameter Plans

7.34 The scheme's Parameter Plans provide a strong design framework that would need to be taken into account at the Reserved Matters stage. The proposals do not preclude alternative layouts as part of a subsequent Reserved Matters or detailed planning application, providing that the underlying principles established by the Outline Parameters are satisfied and that delivery of high-quality development can be achieved in accordance with the applicable planning policies and guidance.

- **Land Use.** The application proposes up to 233 residential dwellings. The net developable area comprises approximately 36% of the total Site area, of which the average density of development would be 35 dwellings per hectare. Public open space would comprise approximately 55% of the Site area, with primary road infrastructure comprising the remaining 9%. The scheme's public open space provision would comfortably exceed UDC's policy requirements. It is considered that this mix and percentage split of uses optimises the potential of the Site to efficiently accommodate an appropriate amount of development.
- **Building Heights.** The majority of the Site would be characterised by 2-2.5 storey family housing except for the area to the north forming the wetland edge which is a proposed feature linked to taller forms including terraced 3-storey townhouses and apartment buildings. The rural edge to the north east is proposed to be deliberately lower in form (1.5 storeys) which in conjunction with enhanced planting on the north east site boundary would mitigate against visual impacts of the development from long range views from the north east. This would ensure that the development is sympathetic to the local character and landscape setting.
- **Green infrastructure.** The scheme's landscape strategy has been driven by the Site's existing assets, key views in and out of the Site and the desire to enhance connections into the wider existing community. The most significant of these is a multifunctional open space on higher land at the south east of the Site which would have expansive views to Saffron Walden and the rural surrounds. Importantly, being the highest part of the site, this open

space would celebrate the view to the spire of the iconic Grade I Listed St. Mary's Church in the centre of Saffron Walden facilitated by a channelled view down the Church view corridor. The scheme's green corridors contain a mixture of functional open space areas as well as semi-natural areas that address the overall drainage, arboricultural and ecology requirements, while using the required utilities easements. This demonstrates that the scheme would be visually attractive as a result of good layout, effective landscaping and sympathetic to local history.

- **Access & Movement.** Provision of a hierarchy of new primary, secondary, tertiary, pedestrian and cycle routes within the Site are integral to the proposed movement framework, allowing users of all ages and abilities to move safely and conveniently between various spaces and land uses within the development as well as to the adjacent countryside, the services and facilities of Saffron Walden.

Primary vehicular access would be provided from a new access on Radwinter Road which would access the Primary Route into and through the Site. The alignment of the Primary Route and the space made available for its junction arrangements are such that the route and its junction could, if required, be made available for further works to accommodate a future relief road to development to the south.

The Primary Route has also been designed to accommodate bus movements and allows the potential for bus services to enter the Site as required subject to discussion with key stakeholders (e.g. ECC, bus operators). The Site can also be served by existing bus services that run immediately adjacent to the Site on Radwinter Road stopping outside the Site at the proposed new bus stops.

The Access and Movement framework would ensure that the scheme establishes a strong sense of place through the use of an arrangement of streets and spaces to create attractive and welcoming places to live and visit.

- 7.35 The Design and Access Statement also sets out the expectations in respect of the proposed street and route hierarchies, building details and materials, landmark buildings and other key urban design principles that would need to be followed at the Reserved Matters stage. Additionally, as this scheme is currently proposed in outline form, with all matters reserved except means of access, it is proposed that further details of climate change mitigation including the scheme's energy and water efficient design, adaptation and EV charging details may be reserved for consideration at the reserved matters stage. This would ensure that the scheme complies with the relevant adopted Local Plan policy requirements and Interim Climate Change Planning Policy guidance that would be applicable at the reserved matters stage.

- 7.36 It is therefore demonstrated that the outline Parameter Plans, aided by the Illustrative Masterplan, represent a suitable design solution for the Site, demonstrating that good design is deliverable on the Site in accordance with adopted Local Plan policy GEN2, UDC's Interim Climate Change Planning Policy and the NPPF.

Landscape impact

- 7.37 Adopted Uttlesford Local Plan Policy S7 is relevant to landscape impact. Policy S7 only permits new development if its appearance protects or enhances the particular character of the part of the countryside within which it is set, or there are special reasons why the development in the form proposed needs to be there. In this respect, Policy S7 needs to be tempered against the

less protectionist requirements of the NPPF which, at paragraph 174, requires planning decisions to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, and by recognising the intrinsic character and beauty of the countryside. Additionally, as discussed in the Principle of Development section above and as demonstrated through successive recent appeal examples in Uttlesford district, Policy S7 may only be afforded moderate weight in light of UDC's current 5-year housing land supply shortfall which currently stands at only 3.11 years. In a nutshell there is simply not enough available land within development limits of the policy which was adopted in 2005 because all residential land allocations within the 2005 local plan with one or two exceptions are built-out.

- 7.38 Taking account of the above, a Landscape and Visual Impact Assessment has been prepared by Define and forms part of the accompanying Environmental Statement.
- 7.39 The Assessment identifies that there are no national or local landscape designations that relate to the Site. It is identified in the Uttlesford Landscape Character Assessment as forming a small component of the Cam River Valley landscape character area, and a small component of the Debden Farmland Plateau landscape character area at its most northern narrow tip. The Assessment identifies that very little of the valued historic/landscape and ecological designations present within these landscape character areas are located on or near the Site. The landscape of the Site and its immediate surroundings are mainly composed of a large and sloping intensively farmed fields structured by hedgerows of varied strength. The rural character of the landscape between Saffron Walden and Swards End has already been eroded by the expansion of both settlements, into the agricultural landscape. Frequent views to residential development (including the schemes under construction), in conjunction with other land uses typical of a peri-urban environment (e.g. the fuel depot, busy road networks, pylon routes) creates a peri-urban character. The local landscape character is therefore judged to have a "medium" sensitivity to the change proposed.
- 7.40 Due to the localised topography patterns and patterns of vegetation on and around the Site, the Site is identified as having a very constrained visual envelope. Typically, the local undulations in topography restrict views of the Site and of the Proposed Development. However, two locations have been identified where the elevated topography allows for panoramic views across to the Site. These are from the Public Right of Way network north of Radwinter Road (identified in the Assessment as Group 2 locations) and from Harcamlow Way, north-west of the Site (to the north-west of Ashdon Road – identified in the Assessment as Group 5 locations). Against the backdrop of the recent developments to the west of the Site, there is the potential for views of the Site from the Group 2 viewpoint locations on Harcamlow Way to be experienced, but these would be from a distance of around a kilometre, against a backdrop of existing adjacent development within Saffron Walden and would therefore have a negligible impact on the view. Similarly, from the Group 5 locations, development would be viewed as an extension of the Linden Homes development, but as a result of the mitigation designed into the proposed development, residential development would only be visible on the lower lying slopes; the proposed public open spaces on higher ground in the south east of the Site would create a sensitive transition between the residential development and the wider rural landscape. These range of impacts are identified as ranging from minor to moderate adverse and not significant.
- 7.41 The Assessment acknowledges that development would introduce several permanent changes to the landscape and visual amenity. The predicted impacts of the development during the operational phase would be of a permanent nature as agricultural fields would be lost. However,

as part of the Site's green infrastructure strategy, areas of meadow and wetland would be created which would share similar characteristics, by being undeveloped and open aspect so that views to other surrounding landscape elements are retained. This ensures that open, undeveloped space around prominent tree belts would be retained, so that the landscape pattern they create remains evident.

- 7.42 Whilst the new access road to the development would become a feature of views from Radwinter Road when travelling between Swards End and Saffron Walden, mitigation has been designed into the scheme to ensure that the proposed built form would not be a prominent feature of views from Radwinter Road. This includes retention of much of the tree belt along Radwinter Road, retention of the small most northerly field as green infrastructure and creation of a new tree belt along the eastern boundary of the Site. The proposed development would be viewed as new housing set within a network of public open spaces and green corridors, well integrated into landscape to provide a sensitive transition to the rural area. 55% of the Site would be retained as public open space, the most significant proportion of which would be on the eastern side of the proposed development.
- 7.43 Swards End is located just under 1 kilometre to the east of the existing settlement edge of Saffron Walden. It is a linear settlement centred on Radwinter Road, but with additional development off Redgates Lane and Cole End Lane. Although located approximately 800 metres from Saffron Walden currently, it is experienced as a separate settlement. When within the settlement itself, views out are limited and constrained by built form and vegetation cover. Saffron Walden is not a feature of views from within the settlement. As part of the proposed development 0.25km separation distance would be retained between the western edge of Swards End and the closest area of proposed construction activity on the Site. This degree of separation with retained agricultural fields would be visible and would help to define Swards End as separate to and distinct from Saffron Walden. It is judged that the settlement identity of Swards End would experience a Minor/Negligible Adverse effect which would be Not Significant.
- 7.44 Taking account of the above, following the inclusion of landscape mitigation measures embedded within the masterplan, the range of residual landscape and visual impacts identified range from negligible to moderate adverse, with only one of these effects (Group 5 viewpoint locations) falling within this category; the majority are either negligible or minor adverse. It is demonstrated that very little of the valued historic/landscape and ecological designations present within the local landscape character areas are present within or near to the Site. It is also considered that the rural character of the landscape between Saffron Walden and Swards End has already been eroded by the expansion of both settlements, into the agricultural landscape. Whilst the introduction of new development in this location would introduce permanent changes to the landscape and visual amenity, the impacts of this would be minimized by the well-designed green infrastructure which is embedded into the masterplan and Parameter Plans.
- 7.45 The development would therefore have no material impact on valued landscapes and it recognizes the intrinsic character and beauty of the countryside, in accordance with the NPPF. As is discussed elsewhere in this Statement, there is a pressing immediate need for new homes in Uttlesford district in sustainably located edge of settlement locations to be identified and brought forward. This Site is one such site. It is considered that the proposed development satisfies Policy S7 insofar as it accords with the NPPF.

Heritage and Archaeology

- 7.46 A combined Archaeology and Heritage Assessment prepared by BSA Heritage is included within the Environmental Statement in support of the application.

Archaeology

- 7.47 The Assessment identifies that there are no known archaeological assets recorded within the Site or significant features other than the ditched field boundary in the north which divides the Site's two fields. The Site is likely to have been part of a medieval open field system between Saffron Walden and Swards End, before enclosure in the later 18th century. Although the Historic Environment Record records several later pre-historic and Roman sites nearby, extensive trial trenching of the development site immediately west of the Site found very little. Settlement does not tend to be found on north facing slopes and there are better candidates for the site of Iron Age and Roman settlement to the north and south. Hence, given low archaeological potential, the Assessment undertook a Geophysical survey in consultation with the Essex archaeological advisor to UDC; only one area of features with potential to be significant archaeology was identified by this survey, a likely enclosure with internal divisions and a possible entrance route in the north west of the site. Other features were interpreted as possible quarries in the west and north and former field boundaries and land drains.
- 7.48 Given low archaeological potential, the Council's archaeological advisor has agreed that further work can be completed as a condition of planning permission. Trial trenching can be completed to confirm the nature of the features in the north east and the absence of significant remains suggested by the Geophysical survey. Significant remains could subsequently be dealt with through further investigation ahead of or during development, in accordance with adopted Local Plan Policy ENV4.

Heritage

- 7.49 The NPPF advises at paragraph 199 that great weight should be given to the conservation of designated heritage assets. Adopted Local Plan policy ENV2 states that development affecting a listed building should be in keeping with its scale, character and surroundings.
- 7.50 The Assessment identifies that the Site does not contain any designated heritage assets and none lie nearby. The closest assets are Grade II listed buildings and include older houses in Swards End and the former workhouse to the west. None of these would be affected by proposed change within the Site; it already has good screening on its boundaries and designated heritage assets are also screened by topography, vegetation and later structures. The proposals would retain and enhance all of the vegetation on the Site boundaries.
- 7.51 Even though Saffron Walden's 19th century church spire and upper tower can be seen from within the Site, this does not mean there would be heritage harm to the church. As set out in the latest Historic England Guidance, proposed development would not 'compete' with the church and is not part of a designated or associative view. Indeed, the proposed change would not be perceptible from the asset itself, or its environs. The Site could therefore be developed in accordance with all relevant heritage legislation, the NPPF and adopted UDC Policies ENV2 and ENV4.

Transport

- 7.52 Adopted Local Plan Policy GEN1 states that development will only be permitted if it meets all of the following criteria:
- a) *Access to the main road network must be capable of carrying the traffic generated by the development safely.*
 - b) *The traffic generated by the development must be capable of being accommodated on the surrounding transport network.*
 - c) *The design of the site must not compromise road safety and must take account of the needs of cyclists, pedestrians, public transport users, horse riders and people whose mobility is impaired.*
 - d) *It must be designed to meet the needs of people with disabilities if it is development to which the general public expect to have access.*
 - e) *The development encourages movement by means other than driving a car.*
- 7.53 The NPPF states at paragraph 105 that significant development should be focused on locations which are or could be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. At paragraph 110 it states that in assessing specific applications for development, it should be ensured that, inter alia, safe and suitable access to the site can be achieved for all users, and that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. Crucially, paragraph 111 states that “*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*”
- 7.54 Taking account of the above, a Transport Assessment has been prepared by CTP in support of the proposed development and forms part of the Environmental Statement.

Scope of the Assessment

- 7.55 There are three consented housing schemes to the west of the proposed development and all three schemes secure a link road running through the respective land parcels that will connect Radwinter Road with Thaxted Road. The delivery of the road is secured through both approved detailed layouts and legal agreements. The full details of these scheme and the link road are set out in Chapter 2 above, illustrated at Figure 15 below.

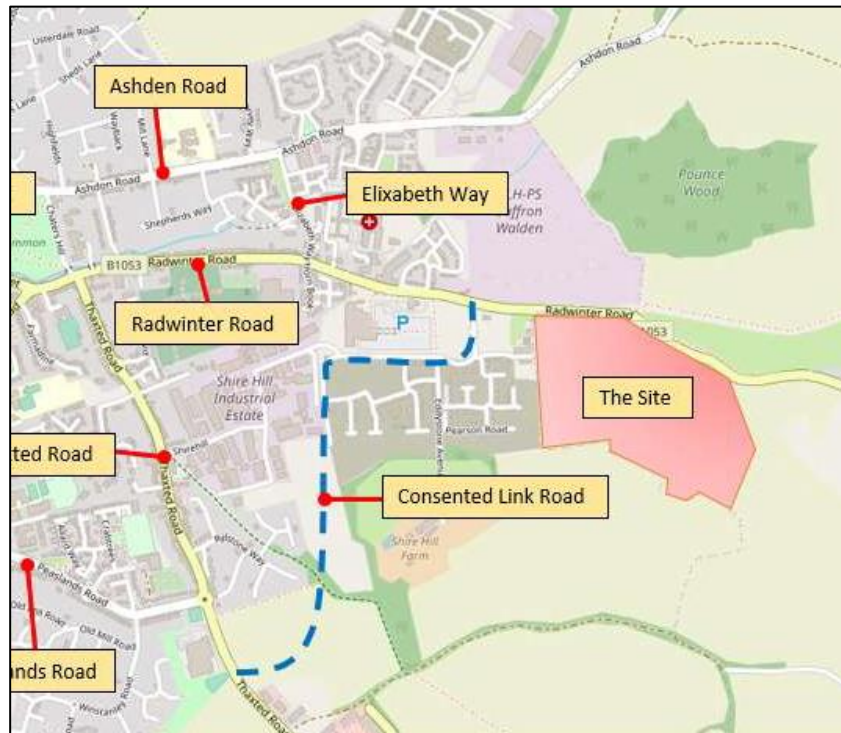


Figure 15: Extract from the accompanying Transport Assessment which illustrates the line of the consented link road through the schemes adjacent to the west of the Site.

- 7.56 Both the Applicant and its transport consultant are of the view that an assessment of traffic scenarios without the consented link road is not necessary on the basis that two of the three sites that will deliver the road have secured detailed planning permission and the third has recently been sold to a housebuilder making it very likely to come forward, within at most, the next five years because the delivery of the link road is secured by planning condition and legal agreement.
- 7.57 Despite these assurances, the Highway Authority is concerned that the Dianthus Land site could be delayed or might not come forward and have therefore requested an assessment without the link road. It was agreed that a 'Without Link Road' scenario would be presented in the Transport Assessment as a sensitivity test. It should be noted that, even with this applied, the Transport Assessment confirms that the impact of development would not be cumulatively severe, in accordance with NPPF paragraph 111.

Reserving land for a potential future relief road

- 7.58 The proposed development accommodates a corridor of reserved land for a potential future relief road to the south of the Site. Discussions have taken place with the Highway Authority regarding an aspirational long-term plan for this new relief road to the south of the town between Radwinter Road and Newport Road. The development proposed by the Applicant has been identified as a possible first phase of the relief road and the Highway Authority has requested that land should be reserved to allow it to be built in the future. Details of the proposed alignment of the relief road corridor are set out in The Proposed Development Chapter above.

- 7.59 It is understood that discussions are taking place between the various authorities at a strategic level and are at a very early stage. There is no fixed route or certainty that all the required land is available to deliver the road or the enabling development. The scheme has no formal planning status.
- 7.60 Notwithstanding this, the Applicant has indicated a willingness to seek to work with the authorities so as not to prejudice the future delivery of a relief road providing it satisfies all the necessary technical requirements and does not have a significant detrimental impact on the development layout within the scheme. To this end, a corridor has been reserved to allow the site access to be converted to a roundabout in the future and main spine road to be widened, if required, and a strip of land has been reserved at the southern end of the site to allow a future connection into the adjoining field.

Proposed access

- 7.61 The scheme's means of access is proposed in full at this stage. It is shown on the Proposed Means of Access Framework Plan – Right Turn Ghost Island Junction SK01C, which is contained at Appendix H of the accompanying Transport Assessment.
- 7.62 The design of the proposed development access has been informed by the results of a speed survey on Radwinter Road and has been tracked using a 10.25m refuse vehicle as requested by the Highway Authority. It has been demonstrated that the proposed access is designed in accordance with the recorded speeds and that the specified refuse vehicle could satisfactorily access and egress the proposed access.
- 7.63 The Highway Authority has indicated that it would support a reduction in speed limit between Saffron Walden and Swards End to 40mph and the results of a speed survey at four locations on Radwinter Road would appear to support this proposal.
- 7.64 The feasibility of providing a direct pedestrian / cycle link to the adjacent Linden site was being investigated by the Applicant. However, this is not feasible because it is not supported by Saffron Walden Town Council which currently manages the area of public open space over which the link would pass. In any event, the proposal for a new footway on the south side of Radwinter Road between the proposed development access and the Linden access is considered to provide an acceptable level of pedestrian connectivity.
- 7.65 A comprehensive network of pedestrian and cycle routes are being proposed within the site that internally would connect the residential plots to the area of public open space to the east, and externally would provide a connection to the proposed footway on the south side of Radwinter Road. The proposed uncontrolled crossing to the east of the site access on Radwinter Road would also form part of a continuous pedestrian route between the site and Swards End and provide a connection to the public rights of way to the north of Radwinter Road.

Public transport enhancements

- 7.66 The Applicant is prepared to provide a proportionate financial contribution towards bus service provision to help deliver an enhanced service that both benefits the development and contributes more widely to improvements to bus services throughout the town.
- 7.67 New bus stops are proposed on Radwinter Road just to the east of the proposed access and it has been demonstrated that between 61% and 74% of the dwellings would be within 400m of the bus stops. The furthest anyone would have to walk to access the eastbound bus stop would be 540m which is only an additional 1 minute and 40 seconds beyond the nominal 400m walk distance. The proposed bus stops are shown on the extract from Appendix H to the Transport Assessment at Figure 16 below.

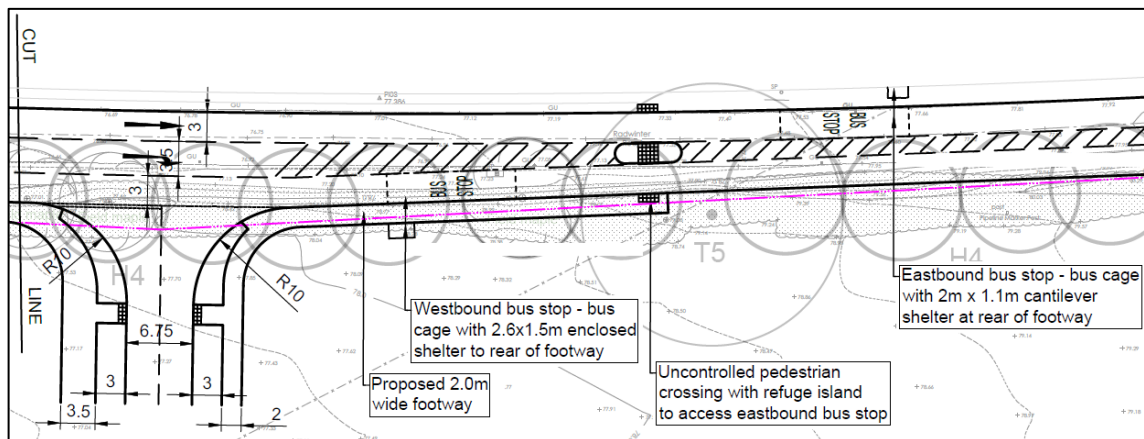


Figure 16: Proposed bus stops on Radwinter Road to the east of the proposed Site entrance. This plan also indicates the proposed vehicular, pedestrian and cycle access via Radwinter Road.

- 7.68 It should also be noted that if a bus terminus point is provided at the eastern end of the bus loop, then all dwellings would be comfortably within 400m of a bus stop. Based on the current strategy, this would potentially only benefit people using evening services, but in the future if more daytime services choose to divert into the site, there would be an overall benefit of enhanced public transport accessibility for all residents.
- 7.69 Preliminary discussions with the Passenger Transport Team at ECC have identified that a half hourly service to the town centre and an hourly service to Audley End railway station could be appropriate. A facility to allow some services to layover within the development would also be provided through the provision of a bus loop within the central part of the development.
- 7.70 Based on the above, it is considered that the public transport strategy is robust and would provide all residents with a realistic opportunity to travel by bus and play their part in reducing the number of single occupancy car journeys.

Parking

Vehicles

- 7.71 Based on the proposed accommodation schedule and using the Essex Parking Standards, a total of 451 allocated spaces and 58 unallocated spaces are proposed as part of the development. It should however be noted that these are minimum parking standards and therefore provide some flexibility at reserved matters should additional spaces be considered necessary.

Cycles

- 7.72 The minimum standard for cycle parking is 1 secure covered space per dwelling unless a garage or secure area is provided within the curtilage of the dwelling. For visitors, 1 space per 8 dwellings is required. To encourage the ownership and use of bicycles, the intention is to provide all houses with a garage or a separate secure storage area within the curtilage of each dwelling. Where this is not practicable, 1 secure covered space per dwelling would be provided in easily accessible locations throughout the development.

Charging points

- 7.73 In accordance with the Essex Design Guide passive provision for electric charging points would be provided for all on-plot parking spaces. For unallocated parking, the infrastructure would be put in place to allow for connection to an electric charging point in the future.

Local junction improvements

- 7.74 Junction improvements are proposed at three offsite junctions:
- Radwinter Road / Thaxted Road / East Street / Chaters Hill – short right turn lane on Radwinter Road.
 - Thaxted Road / Peaslands Road – replace mini roundabout with traffic signals.
 - High Street / Church Street – replace priority junction with traffic signals.
- 7.75 All three junctions, in their current form, are predicted to be operating well above capacity in 2026 even without the proposed development and in both the 'with' and 'without' link road scenarios.
- 7.76 The junction modelling of the proposed layouts indicates that the Thaxted Road / Peaslands Road and High Street / Church Street junctions would be operating within capacity in 2026 with the proposed development. Therefore, these schemes would not only fully mitigate the impact of the proposed development but would also address an existing capacity problem that will continue to deteriorate as more of the committed development comes forward.
- 7.77 The junction modelling of the proposed improvement at the Radwinter Road / Thaxted Road / East Street / Chaters Hill junction indicates that the performance of this junction would improve. The capacity on the Radwinter Road arm would be restored. It would also result in slight improvements to the Thaxted Road and East Street arms with small reductions in the queue length in all but Thaxted Road during the AM peak which would remain unchanged. It can

therefore be concluded that the improvements proposed at this junction would fully mitigate the impact of the development.

- 7.78 Other junctions that were tested for capacity were either shown to be operating within capacity in 2026 with development and therefore no further action is required or the impact of the development on the critical performance indicators is considered not to be material, and, on this basis, mitigation has not been proposed.

Sustainable location

- 7.79 The Site's sustainability credentials are discussed under the relevant sub-heading above, within this Chapter. Its location on the edge of on the of the District's main towns and principal commercial centre means that the development of the Application Site would focus a significant number new homes in a location which is sustainable and with good access to local services and facilities. The package of mitigation and sustainable transport improvements proposed as part of the scheme would limit the need to travel and offer a genuine choice of transport modes, in accordance with NPPF paragraph 105.

Summary

- 7.80 It is considered that the proposed development is acceptable in transport and traffic terms and meets the policy requirements as set out in paragraphs 105, 106, 110 and 111 of the NPPF and adopted Local Plan policy GEN1 because:
- Appropriate opportunities to promote sustainable transport modes would be taken up;
 - Safe and suitable access to the Site can be achieved for all users;
 - There would be no significant impacts from the development on the transport network in terms of both capacity and congestion.
- 7.81 As such, the development would not result in an unacceptable impact on highway safety and the residual cumulative impact on the road network would not be severe such that there are no highways and transport reasons why the proposed development cannot be granted planning permission, in accordance with NPPF paragraph 111.
- 7.82 The accompanying Environmental Statement considers that there are no significant cumulative transport effects that are attributable to the development.

Air Quality

- 7.83 Air Quality has been assessed by Kairus Ltd as part of the accompanying Environmental Statement.
- 7.84 The scope of the assessment has been agreed with UDC's Environmental Health Officer due to the potential impact of development upon air quality within the Saffron Walden Air Quality Management Area (AQMA), the eastern edge of which is approximately 800 metres to the west of the Site. The Assessment aligns with the transport assessment work undertaken specifically in respect of other committed developments elsewhere in the town.

- 7.85 The Assessment anticipates that there would be no more than 25 HGV movements per day on any one road link during the construction phase. This would result in a negligible impact on local Nitrogen Oxide (NO₂) and particulate matter (PM).
- 7.86 Due to the proximity and number of nearby residential receptors the Site is considered to have a medium risk of impacts with regard to dust soiling and PM concentrations. Following the implementation of appropriate mitigation measures, impacts associated with the construction of the development would be reduced to insignificant.
- 7.87 The modelling assessment has predicted a negligible impact on local air quality as a result of the development's operational traffic. However, recognising that the proposed development would result in additional car-bound journeys, the following measures would be implemented in mitigation at the development to further reduce emissions:
- Secure cycle storage for residential units without covered parking or garages;
 - Passive provision for electric charging points for all on-plot car parking spaces;
 - A Travel Plan (TP) accompanies the development which proposes to implement measures to encourage the use of alternative more sustainable modes of transport and reduce the use of single occupancy car journeys;
 - A travel pack would be provided to all residents as part of the Travel Plan measures, setting out public transport options, promoting cycling and walking routes;
 - Provision of a large public open space area for recreational purposes, reducing the need for residents to travel further afield for recreational needs;
 - Provision of extensive walking and cycling routes through the Site connecting with Radwinter Road.
- 7.88 Taking account of the above, the scheme would not contribute to, or put the local environment at unacceptable risk from, unacceptable levels of air pollution, in accordance with NPPF paragraph 174 and UDC's Interim Climate Change Planning Policy 5.
- 7.89 The accompanying Environmental Statement considers that there are no significant cumulative air quality effects that are attributable to the development.

Health Impact

- 7.90 The health impacts arising from the proposed development are considered in the Socio-Economic & Health chapter of the accompanying Environmental Statement. The health impacts of development have also been considered and built into the site-wide masterplanning process.
- 7.91 The Health Impact Assessment Checklist appended to the Environmental Statement considers the potential health impacts as a result of the proposed development across eleven key topic areas. Across the eleven topics of focus, none of the relevant health considerations are expected to see a negative impact. A large number of the points considered do have minor positive or neutral benefits for existing and new residents in areas such as housing design and inclusivity and access to new open space.

- 7.92 Within the masterplan, the landscape strategy places a high amount of importance on focusing on the health and wellbeing of future residents and users of the key spaces. Distinct themes have been identified and addressed by interventions that can be interwoven into the landscape and public realm proposals. Several social civic opportunities have been created within the design for the key spaces that provide the means for community events or small pop-up social activities.
- 7.93 The Site's existing natural assets provide attractive landscape features that can be brought to life to inspire the landscape strategy and create an interesting backdrop for people to enjoy the new open spaces. A variety of different natural and semi-natural landscape character areas are proposed to enhance the existing environment and offer opportunities for habitat creation and biodiversity gain. The resulting landscape will be diverse and distinctive, with interest for all users.
- 7.94 Two formal Local Equipped Areas of Play (LEAPs) are proposed and each one would take a slightly different character in terms of equipment provided, the degree of enclosure and the landscape it overlooks in order to add variety and interest. It is important that these play areas are integrated into the wider landscape, forming part of a wider strategy, rather than being segregated and self-contained with no design reference to surrounding spaces.
- 7.95 The scheme's health impacts are considered to accord with UDC's Interim Climate Change Planning Policies.

Flood Risk & Drainage

- 7.96 As the Site is over 1 hectare in size, the application is accompanied by a Flood Risk Assessment (FRA) (prepared by CTP), which also includes a drainage strategy for the proposed scheme to ensure that it incorporates sustainable drainage systems (SuDS). These are also included within the accompanying Environmental Statement.
- 7.97 The Site falls within Flood Zone 1 which is shown to be at low risk of flooding associated with the River Cam and The Slade. The FRA considered the risks of all types of flooding and confirms that the Site is:
- at low risk of flooding from fluvial, pluvial, groundwater and sewer sources; and
 - at negligible risk of flooding from artificial sources (e.g. reservoirs, canals etc.).
- 7.98 In accordance with paragraph 168 of the NPPF, the application proposal is supported by a drainage strategy based on sustainable drainage principles. Testing has indicated that infiltration would not be an appropriate solution for the Site due to the underlying geology. Therefore, surface water runoff generated by the proposal would be stored within the development comprising four attenuation basins located within the northern field, and SuDS corridors, before discharging into the existing watercourse. This solution would ensure that the amount of surface water run-off would not be greater than the existing greenfield rate and thus the proposed development would not increase flood risk elsewhere, thereby complying with paragraph 163 of the NPPF in this regard. As such, development of the Site would not result in any adverse impacts in terms of flooding or drainage. A detailed drainage strategy can be secured by way of a

suitably worded planning condition. Foul drainage is proposed to connect into the existing public foul sewer on Radwinter Road and this has been confirmed by Anglian Water.

- 7.99 The final layout and design of the surface water drainage network would be determined at the detailed design stage as the development masterplan evolves.
- 7.100 Taking account of the above, in compliance with the requirements of the NPPF, and subject to the mitigation measures proposed, the development would proceed without being subject to significant flood risk. This would accord with UDC's Interim Climate Change Policy 4.

Ecology

- 7.101 NPPF paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Similarly, Policy 6 from UDC's Interim Climate Change Planning Policies requires developers to demonstrate how their proposals prioritise the natural environment and how, through the design, planning and delivery would result in a biodiversity net gain, enhancing multifunctionality and multiple benefits for people, wildlife and habitats.
- 7.102 A Preliminary Ecological Assessment (PEA) has been prepared by Harris Lamb, together with species-specific surveys which have informed the relevant chapter in the accompanying Environmental Statement. In the first instance the assessment work undertaken identifies no significant ecology issues to indicate that the proposed development cannot be achieved. There are no internationally or nationally designated sites for nature conservation within 10km or 2km of the Site respectively. Ten non-statutorily designated sites were identified within 2km of the Site, the closest of which is Pounce Wood Local Wildlife Site, located 180m to the north separated by Radwinter Road, but no direct loss is anticipated from the proposed development in this respect.
- 7.103 The majority of the Site consists of an arable field dominated by bare ground with areas of tall ruderal habitat in the field margin. This habitat is considered species poor and widespread both locally and nationally and is not considered to be of value to nature conservation at a greater than Site level. The smaller field, at the north of the Site, is dominated by grasses. This habitat is considered to be widespread both locally and nationally and not considered to be of value to nature conservation at a greater than Site level. The field boundaries are dominated by species-rich hedgerows with scattered and semi-mature trees.
- 7.104 Based on the habitats present onsite and within the immediate surrounding area, surveys for the following species/species groups have been undertaken:
- Amphibians
 - Badgers
 - Bat activity surveys, transects and static monitoring. At the time of writing this Statement, two further surveys are planned and will be presented as an addendum to the Environmental Statement, post submission of the planning application;

- Breeding birds. As with the bat activity surveys, at the time of writing this Statement, a breeding bird survey is commissioned by the Applicant and will be presented as an addendum to the Environmental Statement, post submission of the planning application; and
- Hazel dormice.

7.105 From the species-specific work undertaken to date there is nothing to suggest that impacts cannot be mitigated.

7.106 The proposed development would create an attenuation area and semi-natural green space which, with the embedded mitigation as shown on the Indicative Masterplan, is anticipated to enhance the biodiversity of the grassland within the Site. The proposed development is also considered likely to result in a direct positive and permanent enhancement of standing water habitat because the proposed attenuation ponds in the northern field would be designed to maximise ecological benefit.

7.107 The principles set out within the proposed Parameter Plans to deliver measurable ecological enhancement would be implemented through a detailed landscape strategy and Landscape & Ecological Management Plan (LEMP). These principles are:

- Creation of species-rich (seven or more native species) hedgerows of greater length than being lost to accommodate access;
- Creation of species-rich grassland under an appropriate management regime to maintain its value over the long-term, as set out in a detailed landscape strategy and LEMP;
- Planting native trees and shrubs and hedgerow to enhance habitat connectivity and diversity;
- Creation of SuDS features designed to enhance the biodiversity value of the Site; and
- Locations and nature of positive species-specific enhancements e.g. bat/bird boxes, reptile refugia and insect boxes.

7.108 The creation of approximately 10 hectares of green open space within the Site would provide for several functions, including the preservation and enhancement of these ecological habitats. Public open space as shown on the Land Use Parameter Plan account for approximately 55% of the total Site area. The proposed development specifically includes retention of green corridors and enhancement of habitats through the creation of new hedgerows, tree planting, attenuation features and grasslands. Taking account of the Site's existing poor-quality existing habitat, the scheme would deliver substantive biodiversity net gain, the details of which would be secured through the LEMP via condition / at the reserved matters stage.

7.109 Having regard to the above, it is considered that the scheme fully accords with the NPPF and UDC's Climate Change Planning Policies.

Trees

7.110 A Tree Constraints, Impacts and Protection Method Statement has been prepared by B.J Unwin Forestry Consultancy Ltd in support of the application and is included within the Environmental Statement.

- 7.111 The Statement identifies that the Site is characterised by perimeter hedges. Some trees on the roadside edge of Radwinter Road severely overhang the road cutting and would benefit from severe cutting back. Hedges along the eastern and southern edges of the Site are mature, gappy and trimmed; they could be restored by planting up gaps or planting a new belt of hedge plants on one or both sides.
- 7.112 The proposal requires removal of some hedging (identified as falling within retention categories B and C) to facilitate the access road, but extensive planting proposed as part of the masterplan development compensates for this. Planting in open spaces on the upper edges of the scheme would be visible from afar and would create a wooded skyline. Trees, shrubs and hedges could be protected by careful construction detailed within the report.
- 7.113 The scheme accords with BS5837:2012 guidance, NPPF paragraph 174 and UDC's Interim Climate Change Planning Policy 6.

Ground conditions

- 7.114 A Phase 1 Desk Study Report has been prepared by JPP in support of the application.
- 7.115 The Report identifies potential contamination sources onsite including the made ground containing anthropogenic material in the trackway and building in the north of the Site, together with the current agricultural usage where pesticides and herbicides have been used. There is also a potential gas risk associated with a backfilled chalk pit approximately 140 metres to the north west and a historic landfill site approximately 325 metres to the south. However, these ground conditions would not present a restriction to development.
- 7.116 The Report makes a series of recommendations for consideration as part of a Phase 2 Ground Investigation study which could help define the proposed construction methods and design approach. It is considered that such work could be reserved for pre-commencement planning conditions or undertaken at the detailed design stage.

Noise and Vibration

- 7.117 Adopted Local Plan Policy GEN4 states that development uses will not be permitted where noise, vibrations, or exposure to other pollutants would cause material disturbance or nuisance to occupiers of surrounding properties.
- 7.118 The accompanying Noise Assessment, prepared by Resound Acoustics, forms part of the accompanying Environmental Statement. The Noise Assessment uses direct measurement and calculation to assess the suitability of the Site for development against national and local noise guidelines.
- 7.119 Radwinter Road is identified as the key noise source at the Site. A survey was undertaken during a period when restrictions were in place as part of the Government's response to Covid-19. It is possible that the effect of these restrictions would be to reduce traffic movements on roads around the Site which in turn would reduce noise levels. Therefore, to check the reliability of the measurements they have been compared against road traffic flow data from the year 2019,

which was the most recent year prior to the start of the pandemic. There was a good degree of correlation between the noise flow parameters and to be robust, the higher of the measured or calculated values for each assessment period (i.e. daytime or night-time) have been used.

- 7.120 The Assessment identifies that the level of noise risk is low to medium risk, tending towards low risk. The majority of the Site is subject to noise levels below the Lowest Observed Adverse Effect Level (LOAEL), with only the northernmost proposed residential development zones subject to noise levels above the LOAEL but below the Significant Observed Adverse. On this basis, the Site is considered acceptable for residential use subject to the incorporation of suitable mitigation. This includes:
- Development layout – use of simple buffer distances from sources of noise (Radwinter Road) is considered good acoustic design and this is incorporated in the masterplan.
 - Implementation of sound reduction performance requirements to the whole external building fabric to ensure compliance with BS8233 guidelines. Standard double glazing should be sufficient so that noise levels meet the relevant internal guideline values.
 - Orientation of properties along the northern edge of the site so that they screen their gardens from the road. Where gardens are not screened from Radwinter Road by buildings, garden fences that act as noise barriers may be required.

Construction phase

- 7.121 Assessment of construction noise shows that a high magnitude of impact was predicted for one receptor, Turnip Hall Farm, when works are undertaken close to the Site boundary with that receptor. When combined with the high sensitivity of receptor, this would result in a major adverse effect, which is considered to be significant in an EIA context. Minor adverse impacts have also been identified for construction works undertaken at their closest to Pearson Road, Sativus Close and Fairfax Drive to the west of the Site. Similarly, vibration impacts were identified from construction in relation to these receptors, albeit less impactful than noise. It should also be noted that these are only likely to occur for a short duration. For the majority of the time, when works are undertaken at an average distance from receptors, no significant effects are likely.
- 7.122 Taking account of the above, it should be possible to minimise the impacts of construction noise and vibration, bringing them to acceptable levels, through a Construction Environmental Management Plan. This may be controlled via a planning condition.
- 7.123 On the basis of the Assessment's recommendations, noise should not pose a constraint to the proposed development and the scheme would accord with adopted Policy GEN4.

Utilities

- 7.124 The accompanying Utilities Appraisal prepared by Cotswold Transport Planning establishes the presence of key utility services within the vicinity of the Site boundary. Services recorded in the local area include mains water, foul sewerage, surface water sewerage, gas, electricity, telecommunications and oil/pipelines. These are illustrated at Figure 17 below.

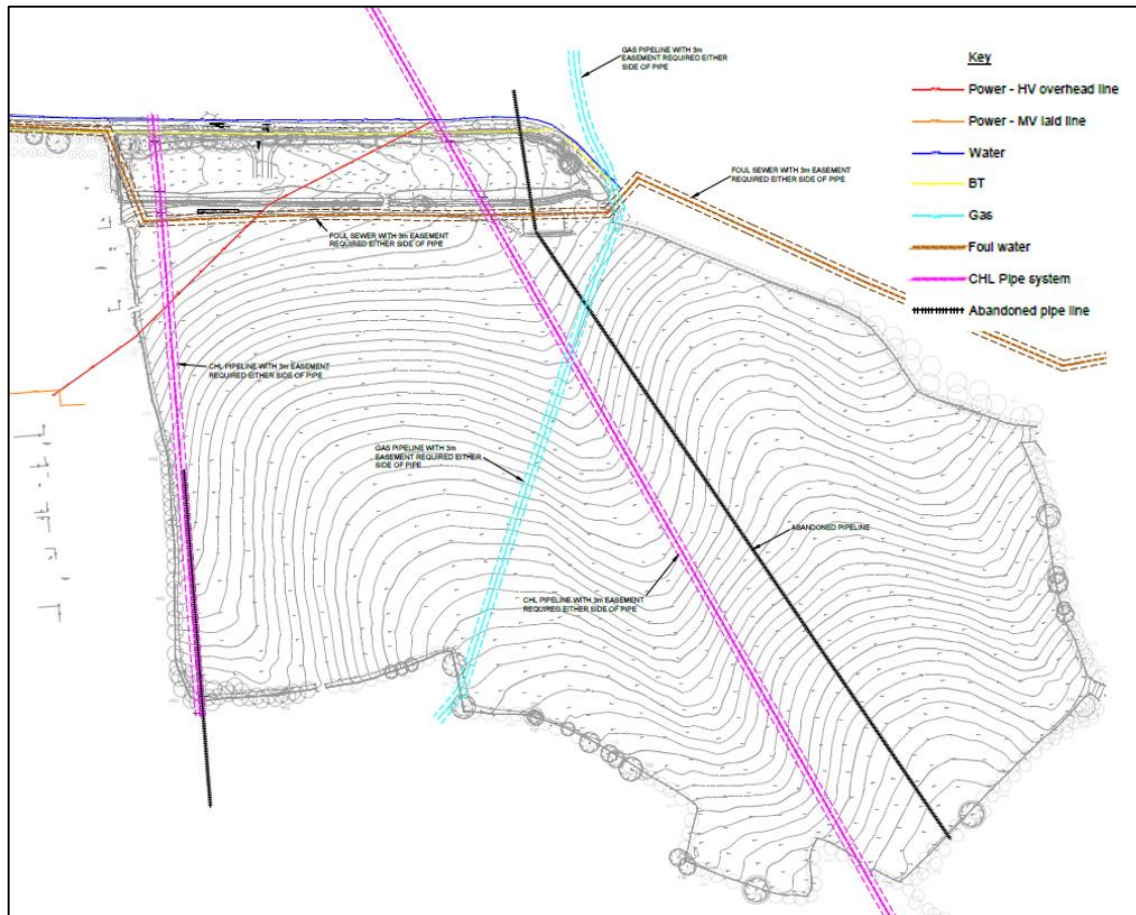


Figure 17: Extract from the Utilities Constraints Plan showing the locations of various utility easements across the Site.

- 7.125 The presence of utilities infrastructure within the Site presents a constraint to the scheme design, in the sense that it is necessary for built development to be designed around the necessary easements to each asset. It is technically straightforward to achieve this, the results of which have contributed to the scheme's placemaking and green infrastructure strategy through the placement, scale and size of the development areas.
- 7.126 Pre-development enquiries have been made for the gas, water, telecoms and electricity supplies to the proposed scheme and further consultation with individual utility providers is recommended as part of a detailed application.
- 7.127 Following review of the existing utility network and the responses received to date, it is considered unlikely that there would be any significant issues in providing the development with the required utility infrastructure. This means that there are no obstacles preventing delivery of the proposed development in respect of utilities infrastructure matters.

Loss of agricultural land

- 7.128 UDC adopted policy ENV5 states that “*development of the best and most versatile agricultural land will only be permitted where opportunities have been assessed for accommodating development on previously developed sites or within existing development limits. Where development of agricultural land is required, developers should seek to use areas of poorer quality except where other sustainability considerations suggest otherwise*”.
- 7.129 The NPPF at paragraph 170 states that planning decisions should, inter alia, *contribute to and enhance the natural environment by recognising the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land*.
- 7.130 In the recent Elsenham appeal decision, the Inspector noted that *Policy ENV5 is broadly consistent with the NPPF...however, the Framework does not require development proposals to have undertaken an assessment of alternative sites, as this policy implies, and in this regard the policy is not fully consistent with the Framework. I therefore give it reduced weight*. Our assessment of the loss of agricultural land is therefore undertaken in light of the above. Furthermore, successive recent appeal Inspectors have acknowledged the need for land to come forward outside of development boundaries to meet UDC’s housing need, as there is not enough available previously developed land.
- 7.131 An Agricultural Land Classification Report has been prepared by Land Research Associates in support of the accompanying Environmental Statement. The Report identifies that the Site is formed of 3.8ha of Grade 2 quality agricultural land and 13.1ha of Subgrade 3a land; with the Grade 2 land focused at the centre of the Site and a Subgrade of 3a for the majority of the remaining Site. These grades may be classed as best and most versatile agricultural land, which would be lost as a result of the proposed development. This is identified as causing a minor adverse effect. No mitigation possible for the loss of agricultural land to the proposed development; it is unavoidable.
- 7.132 The tenant farmer has a short time left on the lease (one year) and access to extensive wider holdings (owned and tenanted) that would not be affected by the proposed development. The effect of the scheme is likely to result in a reduction in net farm income for the tenant resulting in minor restructuring, but this is considered to be a minor negligible adverse effect. In mitigation, access may be maintained to parts of the Site not under construction in early stages of the development to allow agriculture to continue into later phases of the development – this may be outlined in a Construction Environmental Management Plan (CEMP) as part of a pre-commencement planning condition.
- 7.133 Following the adoption of mitigation including the CEMP and a Soils Management Plan, there are judged to be potential minor adverse effects on agricultural land resources and agricultural land users; and potential for negligible adverse effects on soil resources. Following adoption of these mitigation measures, the loss of agricultural land is not considered to constitute a significant economic or environmental loss. Furthermore, the proposed development with its ecological credentials including extensive areas of public open space such as natural and semi-natural areas, would contribute to biodiversity net-gain, thereby contributing to wider sustainability objectives and enhancements to the natural environment, in accordance with the NPPF.

- 7.134 The wider sustainability objectives, which also include delivery of much needed new housing in a sustainable location adjacent to the District's largest town and commercial centre, confirm that the development accords with adopted UDC Policy ENV5 and the NPPF.

Minerals

- 7.135 Consultation with the Essex County Minerals and Waste Planning Authority has revealed that a 13-hectare portion of the Site lies within a Minerals Safeguarding Area. This exceeds the 3-hectare threshold for the consideration for prior extraction under Essex Minerals Local Plan policy S8.
- 7.136 The accompanying Minerals Resource Assessment (MRA) provides an assessment of the most suitable and sustainable management of the identified resource at the Site, taking into account the economic viability of the resource and environmental constraints. The analysis in the MRA identifies that there is no identifiable demand for the full prior extraction of the underlying chalk resource at the Site. This is because the chalk quarry located at Newport Chalk Quarry to the south west of the Site is anticipated to be sufficient to meet the current and future demand for chalk throughout the remainder and beyond of the Minerals Local Plan period. Additionally, it is not considered that the chalk reserves that underlay the Site can be considered economically important.
- 7.137 Further factors that would constrain prior extraction include the presence of the existing oil, gas and sewer pipelines beneath the Site, existing nearby built development and the natural environment. These factors would effectively subdivide the workable area and complicate future extraction, with further buffer zones required to maintain the required acceptable amenity distances during extraction.
- 7.138 The identified constraints at the site would reduce the potential mineral yield and would make a prior extraction less practical and less appealing for a mineral operator. Therefore, prior extraction of the mineral resource at the Site before development is not necessary or justified and the requirements of Policy S8 of the Essex Minerals Local Plan have been met.

Planning Obligations

- 7.139 Analysis undertaken as part of the Socio-Economic Assessment within the Environmental Statement helps identify the necessity for and scope of planning obligations.

Education

- 7.140 The data indicates that there is some capacity in primary schools within Saffron Walden and the surrounding areas, but that the secondary school is over capacity. The next nearest secondary school is Joyce Frankland Academy in Newport, approximately 5.1km to the south-west, which has existing capacity. Both secondary schools have sixth form provision.
- 7.141 The Essex School Organisation Service's 10-year plan suggests that there would be capacity in primary schools within Saffron Walden over the next ten years (2021 - 2030), although it notes that the level of new housing planned in Saffron Walden would lead to a requirement for a new

primary school. The 10-year plan also suggests that there would be capacity in Joyce Frankland Academy over the next 10 years.

7.142 The proposed development would increase demand for educational facilities. Based on the Essex School Organisation Service's 10-year plan forecasting methodology, we anticipate that the proposed development would create the need for approximately:

- 10 additional early years and childcare provision;
- 56 additional primary school;
- 37 additional secondary school places; and
- 8 post 16 years old education.

7.143 The Essex School Organisation Service's 10-year plan suggests that there would be capacity in secondary schools and primary schools over the next ten years, although a new primary school may be required to meet the demand from new housing.

7.144 Taking account of this, the position in respect of the delivery of the school site associated with the Linden and Dianthus schemes adjacent to the west of the Application Site needs to be fully understood, as it is unclear from initial discussions with Essex County Council's Infrastructure Planning team whether the option will be exercised. With the delivery of the school site, no significant cumulative impacts of development are predicted.

7.145 Notwithstanding this, the Applicant is prepared to enter into any proportionate and reasonably related planning obligations in this respect, should it be deemed necessary.

Healthcare

7.146 There are two GP surgeries and two dental practices within 5km of the Site. There is a community hospital in Saffron Walden, however, the closest large hospital with accident and emergency is at Addenbrookes, Cambridge, approximately 19km away. Although both GP surgeries are accepting new patients, it's noted from a consultation response by West Essex CCG with regard to a nearby development, that based on their calculations, both surgeries do not have spare capacity (West Essex CCG, 2020).

7.147 The Proposed Development would result in approximately 501 new residents, which is an increase of approximately 0.2% of the population within the West Essex CCG and an increase of 2.1% of the registered patients at GP surgeries within 5km of the Site. It is acknowledged that this would result in additional pressure on the local health service provision.

7.148 With the inclusion of financial contributions towards healthcare, no significant cumulative effects are predicted.

Transport

7.149 It has been demonstrated that the proposed development is acceptable in transport and traffic terms and meets the policy requirements as set out in the NPPF and adopted Local Plan. As

such, the development would not result in an unacceptable impact on highway safety, the residual cumulative impact on the road network would not be severe and there are no significant cumulative transport effects that are attributable to the development.

- 7.150 This means that the scheme can mitigate its own impacts and does not need to be considered by reference to any potential wider future proposals. Such wider proposals do not form part of this scheme, nor are they required to make the proposed development acceptable. The scheme accommodates a corridor of reserved land for a potential future relief road to the south of the Site.

Public Open Space

- 7.151 As with transport above, the scheme proposes policy compliant open space provision. The scheme does not need to be considered by reference to any potential wider future proposals.

Proposed Section 106 Heads of Terms

- 7.152 Taking account of the above, it is proposed that Rosconn Strategic Land as Applicant would enter into a section 106 agreement with Uttlesford District Council, Essex County Council and the freehold owners of the Application Site. This agreement would be conditional upon the grant and implementation of planning permission for the proposed development.

Parties	<ul style="list-style-type: none"> ▪ Uttlesford District Council ▪ Essex County Council ▪ Rosconn Strategic Land ▪ Landowner
Public Open Space	<ul style="list-style-type: none"> ▪ To provide public open space ▪ To provide an appropriate maintenance regime including consideration of transfer to Parish Council or management company
Affordable Housing	<ul style="list-style-type: none"> ▪ 40% of all dwellings as affordable housing ▪ Affordable housing types, tenure and phasing to be agreed with UDC
Education	<ul style="list-style-type: none"> ▪ Contribution to primary education, if required

Health contribution	<ul style="list-style-type: none"> ▪ An appropriate contribution to the provision of healthcare facilities
Transport	<ul style="list-style-type: none"> ▪ Highways improvements at three junctions ▪ New footway link on Radwinter Road ▪ Provision of new bus stops ▪ Provision of financial contribution to bus service provision
Legal fees	<ul style="list-style-type: none"> ▪ Applicant to meet reasonable costs of UDC and ECC for s106 negotiation and preparation.

- 7.153 These Heads of Terms are subject to consultation feedback received during the lifetime of the planning application period, and subject to accordance with Regulation 122 of the Community Infrastructure Regulations 2010.

8.0 Planning Balance

- 8.1 With UDC unable to demonstrate a 5-year housing land supply, paragraph 11d of the NPPF is engaged. Paragraph 11 requires planning decisions to apply the presumption in favour of sustainable development. For decision taking, paragraph 11d states:

Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 8.2 There are no policies in the Framework under sub-section i) (as defined by footnote 6 in the NPPF) that are applicable to the Application Site. This is demonstrated by the adopted Local Plan policies map extract shown at Figure 7 above.

- 8.3 Under sub-paragraph ii), the benefits of the development proposed by this planning application are wide ranging.

- **Sustainable location to boost local market housing and affordable housing supply.** As explained in Section 7 of this Statement, the Application Site is situated on the edge of the district's main town and commercial centre. It is within walking distance of the extensive range of services and facilities on offer in Saffron Walden. It benefits from public transport links to other nearby urban and employment centres. The benefits of the sustainability of this location should be given significant weight in the planning balance.
- **The scheme would make a significant contribution towards addressing the housing needs in Uttlesford district,** helping to address UDC's substantial current deficit five-year housing land supply. In doing so the scheme would provide a wide choice of high-quality homes, including a mix of house types and affordable tenures that respond to the locally identified needs. This should be given substantial weight.
- **The scheme would provide a policy compliant quantum of onsite affordable housing.** This equates to 40% provision with a 70%:30% split between affordable rent and intermediate. In light of UDC's extremely high affordability ratio, the benefits of delivery of policy compliant affordable housing provision should be given substantial weight in the planning balance.
- **The provision of substantial new public open space.** This would help meet a significant identified shortfall in Saffron Walden of natural and semi-natural open greenspace and amenity greenspace. This benefit should be given significant weight in favour of the proposal.
- **The scheme would deliver biodiversity net gains.** The assessment work undertaken in support of the application confirms that the development would deliver biodiversity net gains.

The overall beneficial effect of these enhancements would be validated at the reserved matters stage in a transparent and quantitative manner through the application of the Defra biodiversity net gain metric. It is considered that significant weight should be given to this in favour of the proposal.

- **The provision of a corridor of reserved land for a potential future relief road to the south of the Site** to ensure that the scheme would enable the potential future delivery of a wider sustainable urban extension to Saffron Walden, if required. This would ensure that UDC's wider potential future sustainable developments would not be compromised by unplanned piecemeal development. This should be given significant weight in favour of the scheme.
- **The economic benefits of the development.** The economic benefits of housing delivery are well known. Paragraph 80 of the Framework advises that "significant weight" should be given to economic growth and productivity. Such a consideration is all the more important now, given the obvious national imperative of "re-starting" the economy once the Covid-19 pandemic relents to the point where this becomes possible. It should therefore be given significant weight in favour of the application.
- **Contributions to local education, healthcare, highways and public transport infrastructure**, subject to consultation responses received during the course of the application period, in accordance with Regulation 122 of the CIL Regulations. Infrastructure investments and enhancements should carry weight in favour of the application.

- 8.4 The accompanying voluntary Environmental Statement identifies that the scheme would give rise to no significant adverse impacts. This is summarised in the Non-Technical Summary which summarises the mitigation measures and residual effects identified in each of the technical assessments included within it. The development has been subject to an iterative design process. As this process progressed measures have been incorporated into the development parameters in order to avoid, reduce or offset significant environmental effects. Where this has not been possible, further mitigation measures have been proposed and the residual effects of the Development following mitigation have been determined. The combined impacts from the proposed development would give rise to no significant cumulative effects, in combination with all other identified local projects. As a result, the ES concludes that the development would not have a significant environmental effect.
- 8.5 The proposed development is considered to be of merit in its own rights, promoting the timely delivery of a policy compliant and highly sustainable proposal.
- 8.6 Against sub-section ii) of NPPF para 11d, there are therefore no adverse impacts of development that would outweigh the benefits, when assessed against the policies of the NPPF taken as a whole.

9.0 Conclusion

- 9.1 This Planning Statement has been prepared in support of an outline planning application with all matters reserved except access for the residential development of land to the south of Radwinter Road (East of Griffin Place), Saffron Walden.
- 9.2 The purpose of the Statement is to demonstrate that the scheme accords with relevant planning policy and guidance at local and national levels.
- 9.3 The Statement also includes within it a Statement of Community Engagement, as required under Uttlesford District Council's validation requirements, to explain the process of engagement that has been undertaken in the preparation of the proposed scheme.
- 9.4 The outline planning application is supported by Land Use, Building Heights, Access & Movement and Green Infrastructure Parameter Plans to help set specific design expectations at the Reserved Matters stage. The scheme is also accompanied by an Illustrative Masterplan to help demonstrate how the residential development could be delivered.
- 9.5 The need for the development is demonstrated by Uttlesford District Council's housing land supply shortfall which is currently 3.11 years, against a requirement to demonstrate a minimum of 5 years' worth of supply.
- 9.6 The scheme would deliver a wide mix of housing, including 40% affordable housing provision onsite in line with adopted policy. It would deliver generous public open space, including play areas and parkland on higher ground. It would provide a corridor for a potential future relief road to the south of Saffron Walden. The Applicant is also willing to enter into a s106 agreement to ensure delivery of reasonable and proportionate planning obligations, as necessary. These, along with the other identified benefits, are substantive.
- 9.7 The accompanying technical evidence demonstrates that the scheme is deliverable in the short term and would assist UDC in meeting its pressing housing need in the short term.
- 9.8 The proposed development does not need to be considered by reference to any potential wider future urban extension to Saffron Walden, because the scheme is deliverable and can mitigate its own impacts. Furthermore, the potential future wider scheme is at a very early stage and has no formal planning status.
- 9.9 The Non-Technical Summary of the voluntary Environmental Statement summarises the mitigation measures and residual effects identified in each of the technical assessments included within the Environmental Assessment. The development has been subject to an iterative design process, during which time measures have been incorporated into the development parameters to avoid or reduce significant environmental effects. Where this is not possible, the potential environmental effects have been reduced through mitigation. This has resulted in proposals for an overall scheme which has had regard to minimising its environmental effects and delivering a sustainable form of development which achieves this. The combined impacts from the proposed development would give rise to no significant cumulative effects, in combination with all other

identified local projects. As a result, the ES concludes that the development would not have a significant environmental effect.

- 9.10 The planning benefits of the scheme are substantive and weigh in favour of the proposals.
- 9.11 Taking account of the above, there are no adverse impacts that would significantly and demonstrably outweigh the benefits of the proposals.
- 9.12 The development promotes the timely delivery of a policy compliant and sustainable proposal. Planning permission should therefore be granted for the application scheme, in accordance with the presumption in favour of sustainable development.

