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**UTT/21/2509/OP Land South Of (East of Griffin Place), Radwinter Road, Swards End, Essex**

Outline 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.

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In light of additional documents being submitted by the Applicant Saffron Walden Town Council (SWTC) and Seward's End Parish Council (SEPC) wish to raise the following concerns in relation to the Additional Documents

The additional documents received are as follows:

- Travel Plan Note ("Cotswold Transport Planning Technical Note – Response to ECC Highways Comments December 2021")
- Transport Assessment Updates Note ("Cotswold Transport Planning Technical Note – Transport Assessment Updates December 2021") (the Technical Note)
- Air Quality Note ("Kairus Ltd Air Quality Technical Note – Version 1. 1 December 2021")

In addition, the UDC website includes responses from Statutory Consultees submitted since the SWTC and SEPC response. These raise relevant points and are also considered below.

**TRAVEL PLAN NOTE**

The Travel Plan Note claims to rebut the ECC Highways objections dated 24 November 2021, but these objections and reasons for refusal given by ECC Highways still apply. The ECC Highways objections are supported by the previous objections on highways and sustainability grounds by SWTC / SEPC and Urban Design. The ECC Highways objections are summarised in italics as follows:

*The majority of trips would be undertaken in the car and the planning authority should take this into account when considering sustainability.*  
This cause for objection still applies.

1. The Technical Note bases access to facilities on a walking distance up to 2KM. This confirms that the site is relatively remote as it is well beyond the quoted typical 10-minute walking (0.4-0.8KM) distances from the town centre. It therefore does not comply with the recommended distances within the relevant guidance, including *Manual for Streets*, *Building for a Healthy Life* and *Essex Design Guide*.
2. The list of facilities cited within 2KM in paragraph 2.1 are outside the centre of the town. The shopping facilities provided by the Tesco supermarket would not improve the *vitality* of the town centre. The site is an edge of centre/out of centre proposal and therefore it should

trigger policies using a sequential approach when considering the location of development under NPPF paragraphs 78-88:

87. Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
88. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.

Sites like this which are less well connected to the town centre are not a priority.

3. Manual for Streets 4.4.1 confirms walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to about 800m) and that the perception of safety and comfort is also relevant:

4.4 The walkable neighbourhood	4.5 Layout considerations
<p>4.4.1 Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking <b>distance</b> of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS13<sup>4</sup> states that walking offers the greatest potential to replace short car trips, particularly those under 2 km. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking <b>distance</b> of most residents.</p>	<p>4.5.1 Streets are the focus of movement in a neighbourhood. Pedestrians and cyclists should generally share streets with motor vehicles. There will be situations where it is appropriate to include routes for pedestrians and cyclists segregated from motor traffic, but they should be short, well overlooked and relatively wide to avoid any sense of confinement. It is difficult to design an underpass or alleyway which satisfies the requirement that pedestrians or cyclists will feel safe using them at all times.</p>

4. The proposal is not a typical *walkable neighbourhood* –

The emphasis in Manual for Streets 4.4.1 is on providing a neighbourhood where daily needs are met within 10 minutes' walking and comfortable access.

The proposal is based on the daily needs being met at a baseline of nearly 2KM away from the site edge. 4.4.1 does not rule this distance out as a contribution towards potential car reduction but walking is proportionately less comfortable, viable or sustainable.

5. We note that the Technical Note refers only to the distance from the very nearest point of the site and not to the actual walking distance to any of the proposed housing. Housing could potentially be located in any part of the site as all matters except access are reserved. Houses within the eastern edge would be potentially 2.36KM from the Town Centre, up the steepest part of the hill, and the very nearest part of the site is some 2KM from the Town Centre. It would not be walkable for any resident within 10 minutes, but in reality, is 20 to 30 minutes' walk away.

The Response to Highways only considers one primary school, which assumes all children would get placed there – which is unlikely. Higher education is not considered at all – Saffron Walden County High School is roughly 40 minutes' walk from the nearest point of the site.



Walking into the town centre from the site would greatly exceed 10 minutes and therefore it is probable these journeys would be carried out by car. This would breach NPPF Paragraph 124.C, where it says developments should limit future car use.

6. The proposal is still to have a single access and footway along the busy Radwinter Road to the Linden Road site entrance. This is not the typical *comfortable* walking environment described in Manual for Streets 4.4.1:
  1. The route is an indirect route from much of the site. It is convoluted and does not follow the desire line (see Urban Design Objection);
  2. The access is at a narrow-confined position on a busy road and is not well overlooked so users will not feel safe (paragraph 4.5);
  3. It involves involving uphill walking to all the houses; and
  4. It requires walking along (and typically crossing) a busy street.

The poor sustainable transport links proposed breaches NPPF paragraphs 92 which says planning decisions should “*support healthy lifestyles – for example through the provision of... layouts that encourage walking and cycling*”. The proposed layouts would NOT encourage sustainable transport methods because it involves walking along a busy road, journeys would greatly exceed the comfortable 10-minute walking duration, more so due to being up hills and users would not feel safe. The importance of safe and suitable access is reiterated in NPPF paragraph 110 – “*safe and suitable access can be achieved by all users*”.

Also, NPPF Paragraph 112 states that “*applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport*”. The unsafe provisions do not show a priority to pedestrian and cyclists.

7. The Technical Note concludes by claiming that it would be inconsistent to treat the application site differently to the Linden Homes development. This is not the case. The majority of potential houses on the application site are significantly further from the Town Centre, connections and facilities for day-to-day needs, and the specifics of the site make walking less attractive. The site is over 0.5KM long, the slopes are steeper and the walking environment along this part of Radwinter Road is significantly less *comfortable*. As a result, there is likely to be greater use of the car to access the facilities.

*The permeability of the site for active travel is also of concern.*

This cause for objection in principle on sustainability grounds still applies:

8. There is still no proposal for a walkable link or permeable scheme through adjacent sites to provide safe access and interconnectivity and encourage walking (Manual for Streets paragraph 4.4.1) -
  1. The Highway record provided by Katharine Wilkinson (ECC Highways Response 3742954) shows there are linkages potentially available crossing the Linden Homes site and SuDs area that should be considered (to Griffin Place, Fairfax Drive and Pearson Road).
  2. If achievable, these interconnected routes would potentially partially mitigate some identified problems in principle with the application site. Potentially they provide

more practical and *comfortable* access to existing facilities, potentially being wider, safer and on similar contours to existing housing. They also potentially provide an escape route (albeit only for pedestrians and cyclists) should there be safety issues at the aviation fuel store.

3. These linkages are likely to be reliant on ransom strips and for development to be carried out in advance outside the site boundary to extend existing access routes and also to overcome problems of lack of lighting and supervision. The linkages across the application Site itself are also not certain due to the presence of buffer zones and statutory services. The linkages are therefore within the least viable categories of *Building for a Healthy Life* (see UD response of 22/10/2021).
4. As part of consideration of the ransom strips, the Town Council's management of the public space should be taken into account (paragraph 2.5 Cotswold Planning). However, it does not excuse the developer failing to provide proper consideration of all relevant potential connections that better comply with policy than the Radwinter Road route.

Paragraph 2.5 of the developer's response to Highways says that a link to the adjacent Linden Homes site has not been pursued as it is not supported by SWTC – which is not the case. The proposed link went across the uneven SUDS at the Linden Homes site and therefore is unsuitable for cyclists and pedestrians to cross. SWTC therefore told the applicant that this was not a suitable access and explained other options need to be considered. The applicant did not suggest any alternatives. SWTC would welcome a link, although even that would not address the inherently unsustainable location of the applicant site.

Therefore, Highways' comment regarding the limited sustainable travel links is still valid as alternatives should be considered to link the two sites.

5. The proposals for extending pavements and any further interconnectivity involves works outside the designated site area, but there are no Heads of Terms provided for comment. The proposals therefore lack certainty about the extent and deliverability of the connectivity and mitigation in principle.

There is a lack of clarity and certainty regarding the proposed relief road. *The potential route is through the residential area which may not be acceptable in the long term.* This cause for objection in principle on sustainability grounds still applies:

9. Paragraph 2.7 states that the Masterplan has reserved land around the site access and avoided development within the vicinity of the junction including drainage features. However, as we noted previously, the Masterplan is one of numerous inconsistent layouts and these include potential conflicts in the proposed layout of the boundary junctions, drainage swales, and treatment of the proposed relief road route.
10. There are numerous constraints on the form and location of the proposed relief road which require it to be part of a holistic proposal for the site rather than an afterthought. The route of the relief road needs to be within the western side of the site in order to access the only straight section of Radwinter Road without substantial changes of level, and it has to avoid the buffer zones of the underground services. It requires accesses to be provided and

changes to be made beyond the Site area, so the appropriate stage to establish its route and design principles is at Outline stage secured by S106.

11. Any proposed relief road must link in with other potential sites if it is to have any effect, and must be clearly distinct from any residential development. As has now been seen with the proposed link road through Linden Homes to Thaxted Rd, which was originally claimed to be a relief road, an estate road through a residential area cannot possibly perform the function of a relief road.

*Access: the submitted application has not demonstrated safe and suitable access for all users.*

This cause for objection in principle on safety grounds still applies:

12. A Safety Audit is awaited (paragraph 3.1). We believe that the application should be rejected in the absence of this Safety Audit.
13. Visibility splays to establish safety of the proposals go to the heart of the matter, and so would not be appropriate at details stage (paragraphs 3.3 and 3.5).
14. Conflicts have been identified where the footway and visibility are likely to involve loss of the longstanding embankment and mature (Protected) hedge. The extent of disruption and loss has not been assessed and mitigated within the application.
15. The footpath is heavily used for recreation. The application has failed to take into account the potential increased use for recreation from the proposed housing.

*Capacity. The cumulative impact is still not demonstrated and mitigated.*

This cause for objection in principle on environmental and safety grounds still applies:

16. Historic traffic data and other assessments should be submitted as requested. A decision based on Pre-Application and private discussions outside the planning process would not be robust.

*Mitigation. The application has not demonstrated that the proposed mitigation is deliverable.*

This cause for objection in principle on environmental and safety grounds still applies:

17. The Note does not respond to Mitigation item 4b, which is that *it is not clear that the deliverability and cost of the schemes have been considered adequately.*
18. A Safety Audit is awaited (paragraph 6.2).
19. Our response identified significant issues with the proposals which would affect the safety and deliverable level of mitigation in principle.
20. The extracts from the Highways responses for the changes at the 3 junctions also describe likely adverse effects on traffic, pedestrians and safety and effects at the junctions and within the AQMA and wider road network which need to be mitigated and balanced against the improvements. The 3 junctions are outside the Site Area so go beyond a planning application. The proposed process to deal with the proposals under condition is not robust



as they are likely to need a certain and deliverable scheme to be consulted on, provided and secured within a S106 Agreement on the Outline application with Heads of Terms agreed before the decision is made on the principle of the application.

21. We do not believe that the schemes proposed at the 3 junctions are feasible – in particular:

1. there have been a number of proposals to reconfigure the Thaxted Road / Radwinter Rd junction to allow a turning lane, and as ECC Highways say, the junction is not big enough to accommodate such a proposal. Detailed plans approved by ECC Highways should be provided by the applicant before this junction proposal can be entertained;
2. We do not believe that installing traffic lights at the Church St / High St junction is feasible or desirable – again, detailed plans approved by ECC Highways together with a clear analysis of the effects of the lights should be provided by the applicant before this junction proposal can be entertained

*Travel Plan. It has not been demonstrated that the Travel Plan will be effective in promoting sustainable modes of transport and reducing car trips.*

This cause for objection in principle on sustainability grounds still applies:

22. The Highways response confirms that the current Travel Plan is not robust and lacks relevant targets, costings, key actions and demonstration that the proposals are deliverable. Deliverable sustainable travel is critical to the assessment whether this is a sustainable development and how much sustainable development should be balanced against the harm of development of the site and location in principle.

23. Heads of Terms have not been provided to secure relevant commitments under S106.

#### **Summary of response to Travel Plan Note**

24. Whilst ECC is the main Statutory Consultee on the Travel Plan, the decision and planning balance lies with the LPA. Agreements between the applicant and ECC should be transparent and subject to robust decision-making as part of the democratic planning process.

25. The applicant provides insufficient clarity to demonstrate that the site (outside the settlement boundary) is a *sustainable location* and that the effects on Saffron Walden and on Seward's End, the AQMA and wider area are sustainable, mitigated and justified in the planning balance.

26. Whilst opportunities for travel by non-car modes are provided, the potential for sustainable connection to the existing town is limited. Cars are likely to be more attractive than walking because of the distance, lack of alternative routes, steep slopes, and lack of comfort of the proposed walking route using Radwinter Road.

27. Significant safety issues have been identified, including substandard and unclear visibility splays and the use of a single access for vehicles and pedestrians serving the entire housing development. The location of this entrance within the zone of influence of the fuel store

adds to the risk which has not been addressed. The risks should be mitigated and included within the outstanding Safety Audit.

28. The relief road proposals in the application are unresolved and the location and spread of the proposed development would limit options for a relief road to be constructed in future to deal with congestion and traffic from this part of the town.
29. The highway data is not up to date and not provided as part of this application. Previous Pre-App discussions with ECC are not binding on the LPA as decision makers and are subject to public scrutiny.
30. The relevant Highways letter, Safety Audit, highways data and Heads of Terms are awaited in order to comment further.

## **TRANSPORT ASSESSMENT UPDATES NOTE**

The Note provides information on:

1. Electric Vehicle Charge Points and
2. Base Traffic Data.

### **Electric Vehicle Charge Points**

31. The proposal is still for passive standard electric charging points rather than the active charging points required by the Highways consultee and Environmental Health.

### **Base Traffic Data**

32. The base traffic data is incomplete. It is extrapolated from reports of other sites in 2018 and is generally not up-to-date. 8 sites were reassessed in a week in October 2021 and this concluded there had been an overall reduction in traffic at 7 of these junctions and a slight increase at the other (Ashdon Road east of Common Hill). This was a period where Covid levels in secondary schools had substantially increased, which would potentially have distorted the results. No allowance was made for temporary work patterns from home which is also likely to have had some effect.
33. The update concludes that there was an overall reduction of traffic. It reports a very large drop of traffic at Bridge Street north of Castle Street of 21.65%, but does not assess why. The conclusion is that peak hour traffic flows have fallen or remained constant since 2018 and therefore there has been little evidence to suggest there has been significant traffic growth since 2017/2018. The results indicate that the numbers using the junctions during October 2021 are relatively low, and would therefore be significantly increased by the number of vehicles added from the application site.
34. The data still does not include the traffic and speed of vehicles at the access of the application site, which is outside the built-up town and within the national speed limit area.
35. The base traffic data only considers junctions in Saffron Walden west of the application site, not on the traffic route eastwards towards Seward's End. The character of the rural road system along the site frontage and towards Seward's End is sensitive and substantially different. It cannot be extrapolated from the 2018 and 2021 Saffron Walden town junctions' data used in the Note.

## AIR QUALITY NOTE

### Introduction

36. The note provides results of modelling to compare air quality with and without the proposed link road. A significant allowance is made to reduce the annual Mean NO<sub>2</sub> concentrations from that in 2019 to take into account expected improvements in vehicle emissions. There is little difference between the concentrations with and without the link road.
37. This result is accepted by Environmental Health whose response is provided shortly after the report. On this basis the EH objection is lifted, provided specified conditions are imposed. These conditions are to reduce impact on the AQMA and are generally measures already required under policy (such as secure cycle stores) or already put forward as conditions to make an unacceptable development acceptable (such as a bus stop on Radwinter Road). The Travel Plan offered as a possibility to the Highways consultee is required under condition.
38. Two conditions differ from the current application proposals and would potentially justify refusal of the application:
1. The car charging points are required to be active rather than passive, as also required by the Highways consultee. The proposals should be changed to provide this.
  2. Walking and cycling routes are required through the existing development, as also required by Urban Design and the Highways consultee. This is a material change to the current application proposals. The application description and block plan should cover the additional accesses; owners and occupants of the ransom strips should be notified and consulted; the proposals should be amended to show the linkages and demonstrate that they are deliverable; and control of the linkages should be provided through a S106.
39. Environmental Health differentiate between the measures required to make an unacceptable proposal acceptable (above), and measures to mitigate harm (which could be considered in the planning balance). EH suggest the measures to mitigate harm could include ground/air source heat pumps and solar panels and photovoltaics. These are not applicant proposals and there is no clarity about them.

There are outstanding objections from the EH letter of 7 October 2021 –

40. Highways have not confirmed that the proposed alternative travel routes, cycle network and highways improvements will be acceptable and definitely undertaken at this stage.
41. The alternative Air Quality Assessment does not include the scenario should all proposed mitigation proposals not occur. It only considers failure to provide the link road.



## OTHER RESPONSES ON THE COUNCIL WEBSITE SINCE SWTC/SEPC LAST COMMENTED:

### URBAN DESIGN

42. The UD response of 22 October 2021 confirms that the scheme does not comply with Building for a Healthy Life -  
What 'red' looks like (from Building for a Healthy Life)

Single or limited points of access for pedestrians and cyclists.
Extensive use of private drives.
Pedestrian or cycle routes that are not well overlooked and lit after dark.
Failing to respond to existing (or anticipate future) pedestrian and cycle desire lines.
No opportunities to connect or extend streets and paths if required by later development.
Internal streets and paths that are not well connected or are indirect.
Retaining existing hedgerows between the back gardens of individual homes.
Ransom strips

Walking distances to town centre and schools are over recommended distance, walking and cycling connections to these places are along fast and unpleasant roads. Would suggest that bus timetables are not regular enough to encourage modal shift. Needs to connect to Linden Homes development to west and onwards to Shire Hill employment. Points highlighted in planning statement noted however issue still stands. Route of pedestrian connection via Radwinter road again is convoluted and doesn't follow the desire line, Highways/transport officer to comment further.

### ENVIRONMENTAL HEALTH - NOISE

44. There are 2 recent documents:

The Response dated February 2021 only refers to the Scoping, not to the OL application.

- Agrees scoping out the principle of development on the basis the developer confirms there is no noise other than from Radwinter Road.
- Agreed scoping in
  - Construction Noise and Vibration
  - Off-site road traffic needs Traffic Data to assess.
- There has been no comment in response to the October 2021 Traffic Data.
- It does not include traffic going through the narrow lane's eastwards.  
An undated response titled ENVIRONMENTAL\_HEALTH\_RESPONSE-3743020 is heavily redacted (uploaded to Uttlesford's portal on 20 November 2021) confirms
- The findings in the (unnamed) acoustic report are satisfactory and recommends conditions. However, the proposed Conditions refer to the Resound Acoustics Report Reference: RA00693 – Rep 1. This is not listed on the website and it appears to be key to understanding why the proposals are considered satisfactory, therefore it should be provided so it can be understood by all parties.

## ENVIRONMENTAL HEALTH

45. It seems environmental health have not considered the proximity of the aviation fuel store within the development – where the fuel and gas mains pipes run below the site, this has been brought to their attention. The application does not promote public safety and does not ensure that operational sites are not affected adversely by the impact of other development proposed in the area and therefore does not comply with NPPF 97.

## ANGLIAN WATER

46. The response is in the form of a Questionnaire
1. Pumping Station currently has capacity available.
  2. Pipework currently has capacity available.
  3. FW public sewer is currently on site. Needs 3M easement.
  4. Prefers SuDS.
  5. No information is provided showing connection to AW surface water, so AW cannot comment.
47. There are no comments on the viability of the SuDS scheme as a result of poor porosity in the frontage field which is designated for the SuDS area.
48. Potentially the overflow and final discharge from the SuDS scheme could be into the existing ditch subject to agreement from AW/ Environment Agency but it has been reported that this ditch has been filled in at Linden Homes. If it has been filled in, the developments do not comply with policy requirements to protect against flooding and UDC enforcement have been notified to investigate.

## LANDSCAPE

49. There are 2 responses:
1. This response is redacted and refers only to a different site.
  2. This response comprises an undated paragraph which appears to be an extract, which does not assess the impact robustly and does not provide an overall conclusion. The paragraph indicates that the Consultee would like to advise on landscaping detail rather than on landscape, after the principle of development is already agreed.

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The proposed development would clearly have a significant impact of the existing rural character the site, however, the visual impact on the wider landscape could be mitigated by an appropriate scheme of landscaping. There is an opportunity for seeking the provision of significant new woodland on the elevated south eastern part of the site as part of any detailed landscaping scheme.

Ben Smeeden  
Landscape officer.

50. *Development would clearly have a significant impact on the existing rural character – he does not state whether the impact is positive / negative, nor how much ‘significant impact’ is involved. If there is significant impact on the rural character of a rural landscape, it follows that it is likely that this is significant harm and contrary to policy in principle.*
51. *The visual impact on the wider landscape could be mitigated by an appropriate scheme of landscaping. He must have reached a conclusion of harm if it needs mitigating. It is likely*

this mitigation advocates landscape screening, and if it needs screening, it is unlikely it is appropriate in principle.

52. The response remit is limited (*wider landscape*) and does not consider visual impact on the rest of the landscape.
53. *There is an opportunity for seeking the provision of significant (sic) new woodland on the elevated south eastern part of the site.* There is no assessment why this would be desirable, other than to screen and lessen the harm of new development on the rural skyline. In which case, this is seeking to mitigate harm arising from the development in principle, rather than to provide an appropriate location for development and benefit to the landscape.
54. There is also no certainty or condition to provide strategic woodland, so it is not a benefit to be balanced against harm to the landscape.
55. Therefore, the consultee response here is very limited, particularly when it relates to a major development site application; whilst it does conclude that there would be a significant impact in the existing rural character, there is no assessment on what is significant about that rural character and there is much more to consider other than the wider landscape.

#### **ECC HISTORIC BUILDINGS BUILT HERITAGE**

56. There are 2 responses:

4/11/2021 Initial response to the OL was an objection -

1. Potential for harm.
2. Insufficient information about built heritage assets.
3. Heritage Statement fails to meet NPPF (2021) para 194.

7/12/2021 – The Objection is lifted. The response refers to a meeting and discussions, but there is no information giving the content of these and the reasoning behind lifting the objection, as no documents are provided to deal with the missing information and failure to meet NPPF paragraph 194 which requires assessment of the significance of heritage assets.

57. There is a map of 5 October entitled *Site and Identified Heritage and Archaeology*, but this predates the objection and does not provide assessment of significance.
58. The response confirms the development will coalesce settlements and the masterplan potentially should be more sympathetic, but states no Built Heritage significance of the designated heritage assets is harmed.
59. It concludes that details can overcome issues of design, materials and landscaping and “*this will sympathetically respond to local character and distinctiveness*”.
60. The remit of this response is no longer in accordance with the statutory requirement, the NPPF and Local Plan policy:
- The Applicant’s assessment remains inadequate (NPPF and Local Plan policy).
  - The assessments do not cover the settings of the heritage assets (Statutory requirement in 1990 Act).
  - The assessments do not cover undesignated heritage assets (NPPF).
  - The assessments do not cover Historic landscape (NPPF).



- Without the missing assessment and the actual details cited, it is premature to conclude that they would “*sympathetically respond to local character and distinctiveness*”.

## ECC ARCHAEOLOGY

62. The ECC response confirms that the Heritage Environment Record and geophysical survey indicates there is potential for archaeology and multi-period remains/deposits within the development area. Inc Bronze Age, Iron Age, Roman finds and post-medieval field boundaries.

63. Survey and Recording conditions are proposed.

NPPF 205 states that “*the ability to record evidence of our past should not be a factor in deciding whether such loss to be permitted*”. NPPF Footnote 68 says that non-designated archaeology of equivalent significance to scheduled monuments should be considered as if they were scheduled. The initial survey has found some remains on site that potentially may meet the criteria.

## HOUSING MIX

64. Bidwell’s latest submission since previous consultation now proposes:

TYPE	MARKET	AFFORDABLE RENT (AH)	SHARED OWNERSHIP (AH)	TOTAL
1 bed flat	2	11	2	15
2 bed flat	0	8	4	12
2 bed house	10	19	9	38
3 bed house	62	20	11	93
4 bed house	45	7	2	54
5 bed house	21	0	0	21
<b>TOTAL</b>	<b>140</b>	<b>65</b>	<b>28</b>	<b>233</b>

UDC housing Strategy 2021 shows that over a third of the Uttlesford need 1, 2 or 3-bedroom homes; with 1 bed general needs homes or 1 bed older persons accommodation being needed the most and 4-bedroom homes being needed the least. However, this development is only building 65 1- or 2-bedroom homes and a further 168 3-, 4- or 5-bedroom homes – which are the least in demand.

Secondly, further to the latest Housing Strategy Document - there are currently 207 applicants registered with the Home-buy Agent seeking a shared ownership property specifically within Uttlesford. 56 of which need 3- or 4- bedroom homes and this development is only building 13 shared ownership homes which is very few compared to the 107 market homes of the same bedroom size.

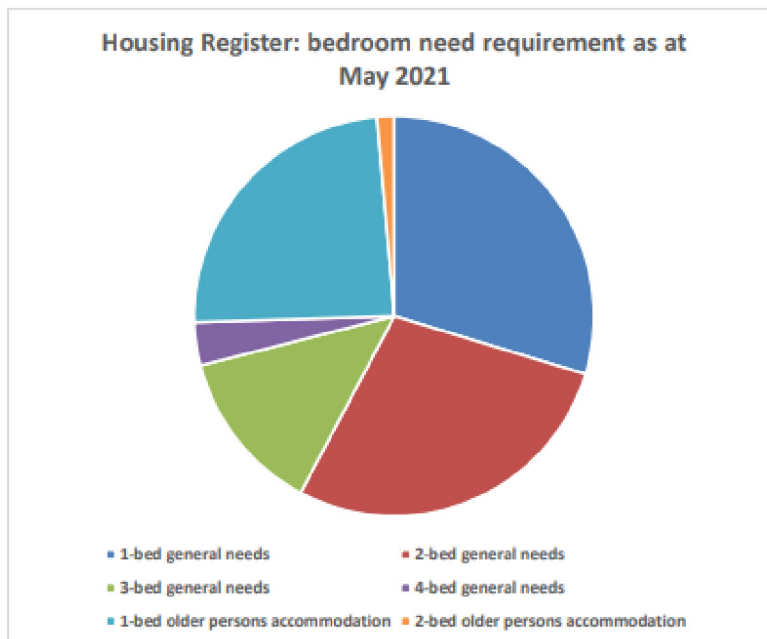


Figure 8: Housing need by bedroom number requirement (Data from Locata Home Options)

There are currently 207 applicants registered with the Homebuy Agent seeking a shared ownership property specifically within Uttlesford.

Shared ownership demand	Number of applicants
One bedroom	41
Two Bedroom	110
Three Bedroom	48
Four bedroom	8

## ECC INFRASTRUCTURE

65. Demand is assessed by ECC as (up to):
  - 18.18 places Early School years and Childcare,
  - 60.60 places Primary School
  - 40.40 places Secondary School
66. Contributions are proposed for
  - Early School years and Childcare,
  - Primary Schooling and
  - Libraries
67. This level is to make an unacceptable development acceptable. It is not a benefit arising from the development.
68. If the Council refuses the application, a failure to provide this would be an additional reason for refusal.

## **CONCLUSION**

Therefore, the objections raised by Saffron Walden Town Council and Seward's End Parish Council have not been specifically addressed in the three updated documents.

Per our initial response uploaded on 30 September the following are our specific objections to the application:

- Planning Statement
- Site Location outside the defined settlement boundary
- Loss of agricultural land
- Landscape
- Access
- Traffic and AQMA
- Flooding
- Safety – Fuel Store and pipework
- Safety – Conflict with farm operation
- Noise and vibration
- Ecology
- Heritage
- Scale of development
- Further Infrastructure
- Planning basis used

Our points raised previously and those within this response are still valid and need to be considered when a decision is made. A copy of our initial response is attached for information under appendix one.



## **APPENDIX 1.1**

### **Saffron Walden Town Council and Seward's End Parish Council initial response to Outline Plan**

#### **UTT/21/2509/OP Land South Of (East of Griffin Place), Radwinter Road, Seward's End, Essex**

Outline 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.

#### **Objection**

In principle, the change of this site from open field, meadow and green buffer, to built-up site for up to 233 houses is likely to have significant environmental effects:

- Specific objections to the application are raised due to:
- Planning Statement
- Site Location outside the defined settlement boundary
- Loss of agricultural land
- Landscape
- Access
- Traffic and AQMA
- Flooding
- Safety – Fuel Store and pipework
- Safety – Conflict with farm operation
- Noise and vibration
- Ecology
- Heritage
- Scale of development
- Further Infrastructure
- Planning basis used

#### **Planning Statement:**

The basis of the Planning case does not take material planning considerations proportionately into account.

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The material considerations include housing supply, but appropriate and up to date weight is still also required in the first instance for the Local Plan policies and the emerging policies within the Local Plan and Neighbourhood Plan.

NPPF 11 applies a presumption in favor of sustainable development, but in order to be sustainable, it needs to fulfil the 3 interdependent objectives in NPPF8, and in this case there is material evidence that it does not fulfil (at least) the environmental objective:

*11c) 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.*

NPPF 11 is also subject to relevant conditions and footnotes that restrict the presumption of approval. Footnote 7 provides for the *protection of areas and assets of particular importance by restricting the overall scale, type or distribution of development in the plan area*. NPPF 11 therefore requires that where Footnote 7 applies, approval should not be given if decision to *protect areas or assets of particular importance provides a clear reason for refusing the development proposed*.

The list includes *areas at risk of flooding*. The Environment Agency surface water map clearly shows this site is at multiple risk of flooding. Footnote 7 also includes ecological and heritage designations.

Further relevant elements of the natural environment to be protected under NPPF174 include valued landscapes, sites of biodiversity value or geological value and designated environmental areas such as the AQMA.

### **Site Location**

The Site falls outside the defined settlement boundary for Saffron Walden (to the west) and Seward's End (to the east), so in principle is unacceptable development.

It does not comply with Policy S7 which requires the protection of the countryside for its own sake.

It is not allocated within the Neighbourhood Plan.

The development does not fit the criteria for planning permission to be given under Policy S7 as it is not necessary in this place, nor appropriate in the countryside and its appearance is substantially urban rather than rural. The grain of the development is led by the constraints of underground services and changes of level along the frontage, and therefore contrasts poorly with the character of the countryside and locality. It would not protect or enhance the character of the countryside and there are no special reasons under S7 why it should specifically be there and take the form proposed.

Whilst the Applicant has commented on the relative weight to be given to Policy S7, the Appeal decision at Bran End (APP/C1570/W/20/3263440) is clear, recent and relevant. Paragraph 72 confirms the aim (to protect or enhance the character of the countryside from development that does not need to be there) is still relevant and aligns with the NPPF, which also aims to recognise the intrinsic character and beauty of the countryside.

The site is prominent and extensive, and comprises 2 fields in the open countryside, comprising a large open arable field and a smaller roadside meadow paddock. Its farm use, open rural character and appearance clearly forms part of the countryside.

The settlement boundaries for Saffron Walden and Seward's End follow the boundary of existing housing. The most recent housing comprised infill between Turnip Hall Farm and the town centre, and it rounded off the edge of the settlement. The Linden Homes element of this infill is still under construction. The current site contrasts with this character and definition, as it is outside Turnip Hall Farm projecting into open countryside, and is therefore a departure.

The proposed development would not comply with the development plan policy and NPPF in respect of the harm to the countryside, both in principle and in terms of its effect:

### Land Use

The site is amongst the best and most versatile agricultural land and the proposal would preclude that use and disrupt the ongoing use of the adjoining fields. Opportunities have not been assessed within the application for accommodating development on previously developed sites or within existing development limits. The proposal therefore does not comply with Policy ENV5 and with Policies 174, 175 and 124(d) of the NPPF.

The location of the development and access conflict with the farm use of the retained fields. This does not comply with NPPF 97(b) as it does not recognise, support and protect the operation of the farm and does not ensure it is protected from the impact of the housing.

The Agricultural Quality Report is not robust. It failed to carry out tests on the front meadow and instead assesses this as if it were the same as part of the large field, despite its greater sensitivity and rarity, and despite there being significant soil, environmental, visual and use differences.

It only looks at the application site. Planning Statement para 7.130 puts forward the view that policy ENV5 is inconsistent with NPPF because ENV5 requires other sites to be considered. However, the Framework is to be read as a whole, and the concurrent policies 174 and 175 should certainly be read together. Policy 174 requires the *intrinsic character and beauty of the countryside* to be recognised, including *the economic and other benefits of the best and most versatile agricultural land*. Policy 175 follows and explains this should involve hierarchical planning, where plans should *allocate land with the least environmental or amenity value* and a *strategic approach* should be taken. The hierarchical approach within NPPF and Local Plan are therefore generally consistent and a site proposed outside the normal plan process still requires sufficient information to be provided to assess whether it has the *least environmental or amenity value*.

The loss of 17-18 hectares of good agricultural land of grades 2 and 3(a) is a substantial loss. The site specific constraints, location of substantial buffers and allocation of much of the eastern, southern and northern sides of the site to open space shows that this substantial loss is for limited gain. Areas which could be used for agriculture cannot be used for housing because it is a more vulnerable use. It is not an efficient use of land under NPPF 124(d).

The plans show that the loss is also likely to be greater than the site itself. The proposed plans show the existing road entrance would be kept open and sections of hedgeline would be kept with gaps for adjoining fields. The Concept Site Masterplan shows a route is retained dotted as 'agricultural track' along the north-eastern edge of the Site, through the housing development to the existing field on the south-east of the development. The arable farm use and residential use are incompatible and this proposal is likely to result in conflict, nuisance and issues of safety where the two uses meet, especially at harvest time.

It also indicates that the viability of the best and most versatile agricultural inner fields is also put at risk by the proposed change of use of the front fields for residential use. The additional conflict of



the use of the other fields is not taken into account in the submission but is material and substantially increases the harm.

It is likely that, if housing were acceptable in principle on this site, the eastern part of the field and its field entrance should be excluded and retained for agricultural use, in order to provide safe separate access to the inner fields that remain in agricultural use. This land is also the highest land, the most prominent part of the environmental buffer and the most sensitive in terms of landscape.

### **Landscape**

The appearance and extent of the proposed development would not protect or enhance the rural farmland character of the countryside in which it is set. The development would be an extensive and prominent intrusion within the rolling hillside and on the skyline.

The development would detract from the positive characteristics of the Cam River Valley character area in which it is located.

It would cause coalescence of the settlements of Saffron Walden and Seward's End, intrude into the sensitive river valley and detract from valued landscape.

The loss of the mature hedged frontage of the Site in order to create the proposed access and visibility splays will cause substantial landscape and ecological harm.

As a result, it does not comply with Local Plan Policies S7 and GEN2, and NPPF 130, 174 and 185.

The site is located within the character area A1 Cam River Valley. Characteristics identified of importance include:

- *The eastern slopes are dominated by the historic settlement of Saffron Walden, with its imposing church.* The site contributes to the backdrop of the church and settlement.
- *This side of the river valley is characterised by large farms and small villages connected by small lanes.* The last visible connection between the last of the large farms and village on the eastern side of Saffron Walden is still distinct. The length and rural character of this narrow roadway between the Town and Seward's End is still distinct.
- *Field pattern is regular, bounded by gappy hedgerows, drainage ditches and occasional trees.* The gappy hedgerows on the frontage and along the site field boundaries are remains of the early recorded field hedges and are fronted by the last open drainage ditches on the east of the Town.
- *Views from the higher ground are often framed by distant patches of woodland and scattered copses.* The site forms a distinct open area of high ground and skyline between the patches of woodland and copses.
- *The narrow course of the River Cam meanders within its floodplain between Great Chesterford and Shortgrove Bridge.* The character of the Cam valley continues, in smaller scale, along its tributaries, of which the

site is part.

- *The river corridor is fringed by trees which delineate its shape within the patchwork of pasture and plantation woodlands that line the valley floor.* The frontage of the site is part of this distinct river corridor and valley floor, delineated by trees.
- *In the upper reaches, arable farmland covers steep slopes descending almost to the river's edge.* From the upper reaches, the site is a good example of this characteristic.

The site is a good example of the identified Visual characteristics, providing:

- Attractive panoramic views from the eastern slopes to western valley slopes framed by distant blocks of trees.
- Views of towns and villages from higher ground.
- Valley sides descend quite steeply from rolling arable fields to the river and its tributaries and dramatic views are possible from the ridges.
- Large ancient town of Saffron Walden, and its distinctive church spire can be seen from many directions due to its position on the higher slopes.
- Intimate views on the lower slopes of wooded river valley floor.
- (Allows separation to better appreciate the) intimate scale of villages and towns contrasts with large-scale modern agriculture.
- The site has positive characteristics which lessen the visual impact of the negatives which were identified:
  - Its hedgerows are of good quality, continuity and completeness, which are very visible in the landscape.
  - The site softens the impact of the recent urban fringe settlement on the eastern edge of Saffron Walden which is not well integrated into the landscape.
  - The Site is a good example of the historic land use and field type which is identified as rare.
  - It follows the main historic features of the River Cam and valley slopes and this part of Radwinter Road is the most visible remnant of the winding lane between the Town and the historic eastern settlements.

The proposed development would exacerbate key landscape management issues identified in the assessment:

- Potential pressure for increased use of narrow and minor lanes
- Potential pressure from urban expansions on the edges of ...Saffron Walden.
- Visual intrusion of potential road expansion linked to pressure of traffic on minor roads.

It would damage sensitive key characteristics and landscape elements identified within this character area, which include:

- the patchwork pattern of pasture and plantation woodlands, which would be sensitive to changes in land management.
- The open skyline of the valley slopes is visually sensitive, with new development potentially being highly visible



within panoramic inter and cross-valley views.

- Intimate views from lower slopes to the wooded river valley floor and views to the valleysides from adjacent Landscape Character Areas are also sensitive.
- Historic integrity is relatively strong with a dispersed historic settlement pattern and several winding lanes, greens and ancient woodlands.

Potentially (as it is not adequately assessed), it would also harm the watercourse and meadow, likely to be habitats for wildlife and biodiversity.

It does not follow the Landscape Planning guidance. It would not:

- Conserve and enhance the landscape setting of settlements.
- Maintain cross-valley views.
- Consider the landscape pattern .. and the role that they have in the composition of views to and from the area.
- Ensure that new woodland planting is designed to enhance landscape character and that species composition reflects local character.
- Ensure any new development on valley sides is small-scale and that it responds to historic settlement pattern, form and building materials.

The Site is elevated above the existing town of Saffron Walden, on undulating agricultural land that rises to 105 meters above sea level. The historic town centre and its central green is some 25 meters lower, at about the 80-metre contour and the surrounding later development and tree line is at up to 85-90 metre contour. The most recent development (Linden Homes) is currently the highest and most prominent, with the highest houses just intruding above the tree line. The specific prominent location, cumulative encroachment, elevation and topography of the proposed development ensures its impact on the countryside would be notably more harmful.

In building up the slopes of the chalk hill and breaching the tree-line, development of this elevated field is contrary to the character of Saffron Walden town and surroundings including Seward's End, which are based on historic settlements nestling in the river valley.

The Site is located in the gap between Saffron Walden and the village of Seward's End. This field comprises more than 50% of the gap, so has a significant environmental role in providing separation between the two settlements. This gap has been substantially and incrementally reduced over the last 5 years, giving the last part of this 'green lung' and natural buffer greater sensitivity. The construction of a development of this scale is likely to involve permanent loss of the largest and most prominent part of this sensitive gap.



The distinctive shapes of the boundaries of the large field and the frontage Long Meadow field are shown on the earliest field record for the locality. The Long Meadow is a rare survival in its original strip field form, which has been substantially lost elsewhere. It therefore has high landscape value within the countryside.

Viewpoint VP7 shows the rolling farmland character of the high ground around Saffron Walden and Seward's End. The landscape south of Radwinter Road is a good example of the type, with few above ground intrusions.

The Long Meadow along the frontage should have been included within the Viewpoints, as it has a different character to this rolling high ground, being within the sensitive river valley landscape.

Pounce Wood, the ancient woodland, and the river valley field on the north side of Radwinter Road are significant and substantially original according to the historic field map. These features are key characteristics of the A1 Cam River Valley Character Area and have high landscape value.



In response to Paragraph 7.40 of the Planning Statement, VP7 shows there are a number of discrepancies with the assessment of landscape impact.

The yellow crop shows the spread and elevation of the main field and how its openness contrasts with the smaller wooded enclosures that form the rest of the gap.

The photograph VP7 and plans show that the spread of the proposed development forms a finger

reaching into the open countryside which would also result in greater light pollution (see below). This spread results in a greater impact on the landscape than the infill housing along Radwinter Road.

The highest part of the Site is just over 105M, some 15M higher than the highest houses on the adjacent Linden Homes infill Site to its right. Because of the slopes, proposed planted edges do not provide much screening to the development. The houses would extend across the majority of the yellow field and slope, and further down the hillside to the road. Although the plan layout shows the highest corner (left) is proposed as public open space, its inclusion in the development ensures it would differ in character from the farmland and countryside around it.

The Viewpoints and landscape comments we made at Scoping stage have not been dealt with. We had concerns about the omission of views close to the site and within the river valley, and about the selection of photographic positions behind hedges and other barriers. Our comments and additional key views SWTC SEPC 1-5 are within Appendix 1 at the end of this document.

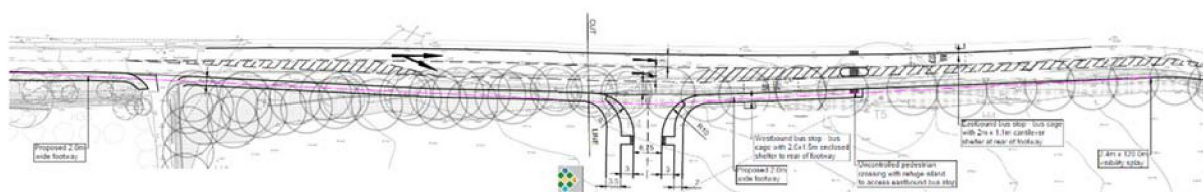
The summary of key views are as follows:

- SWTC SEPC 1 - Radwinter Road roadside frontage has high landscape and ecological value and would be substantially removed as shown by the Access and visibility splay drawings in TA Appendix H.
- SWTC SEPC 2 – The Long Meadow Pasture along the site frontage has high landscape and ecological value and would be substantially removed as shown by the Access and visibility splay drawings in TA Appendix H.
- SWTC SEPC 3 - Existing Entrance and main field has medium landscape value and would be built over.
- SWTC SEPC 4 - Slade River Valley has high landscape and ecological value and the adjacent development would add significantly to the existing recent level of intrusion on the skyline and boundary.
- SWTC SEPC 5 - Linden Homes View has high/medium landscape value due to the important historic boundaries, distinctive undulating glacial form of the landscape and lack of detractors. This would be built over.





*SWTC SEPC 1 - Radwinter Road roadside frontage (see Appendix 1 for assessment)*



*Extract from TA Appendix H Access and Visibility splays*

The assessment of landscape impact in the application understates the impact and crucially does not consider the impact of the access proposal drawings. The Planning Statement paragraph 7.27 considers the “loss of a very small amount of hedgerow is required to facilitate the access in a position that facilitates the necessary visibility splays”. It is clear from TA Appendix H that this is not the case as there is insufficient visibility because the road curves and additional hedgerow would be lost to widen the road for the bus stops proposed to overcome transport issues. As a result, the drawing shows that removal of high-quality landscape and ecological features along the frontage would be extensive and a material consideration when assessing the impact of this number of houses in principle in this location.

The Parameter green layout plan shows the use of the highest ground as public open space and a viewing position to the church tower. The view is of the tower alone, fronted by new development and the Linden Homes development, and there is no public view in reverse from the church and existing settlement. The various parameter plans provided in the application are inconsistent regarding whether the new view is intended to be taken forward into reserved matters or not.

Those plans with greatest definition show that houses would block views to the church and existing settlement, so this element is indicative.

Existing view SWTC SEPC 4 of Slade River Valley and the church which would be affected by the development has greater significance and visual quality (see below).

Aerial maps and photographs along road edges prior to the developments show that a significant amount of farmland and hedgerow has been incrementally lost due to the recent completed and partially completed developments, along with much of the green lung and previously generous separation gap between Seward’s End and Saffron Walden. In the case of at least the Linden Homes site, significant elements of the landscape and biodiversity due to be retained and enhanced, such as the frontage hedge and central hedge, field margin and drainage ditches have been lost and the impact of these losses should be included in any assessment. The losses elsewhere have resulted in the application Site being more sensitive as the key site providing the hedged frontage and rural setting on this approach to the Town.

## **Transport and Access**

The development would not comply with Policy GEN1, NPPF111 and emerging NP Policy SW23 as:

Without substantial alteration to the character and appearance of the site and frontage, the access to the main road network is unable to achieve the necessary visibility splays for the scale of development and to carry the traffic generated by the development safely.

The traffic generated will add significantly to the congestion in the town centre and to the pollution in the AQMA.

The location of the bus shelters and pedestrian crossing close to a hidden bend is likely to compromise road safety. The increased flood risk is also likely to affect the choice of transport and to affect road safety.

The inclines of the site, buffer zones, distance from the entrance and town centre and limited choice of route is likely to compromise movement by means other than a car.

The access and alterations to the Radwinter Road frontage are likely to cause an increased risk and unacceptable impact on highway safety:

1. There are significantly increased number of vehicles using a single entrance on a busy narrow B road, close to a blind bend and a narrow subterranean section of road.
2. The evidence shows previous collisions along the frontage of the site which should have been taken into account.
3. The road regularly floods and opening up the new site access is likely to increase the risk of identified surface water flooding from the field onto the road.
4. Visibility is limited by the need to preserve as much as possible of the protected hedge. It is also limited by the change of level from verge and site at least 1M higher than the road.
5. There is no mitigation for the (94) vehicles going east into Seward's End, the countryside and narrowest section of road.
6. The location and grouping of bus stops and crossing close to a blind corner would create a hazard.

Appendix H of the Transport Assessment shows that in order to get a 2.4M x 120M visibility splay eastwards, the entire verge would be lost, including the embankment, the watercourse and much of the frontage hedge. This visibility splay is below that required for 60mph, subject to acceptance of the speed tests and a proposal to reduce the design speed to 70kmph. The diagrams also show that the hedge, verge and watercourse would be removed between the proposed access and the existing

footpath at the Linden estate, in order to widen the road at the access and provide a 2M footpath west of the new access.

This would have a substantial and damaging impact on the protected hedge and the appearance, rural character, landscape, flood protection and ecology of the site. As Radwinter Road already suffers regularly from flooding, the added risk of flooding from breaching the embankment in order to provide the spine road and access from the site is material.

All the proposed junction improvements, including the site access, are subject to a Stage 1 Safety Audit which has not yet been provided and it is proposed would only be provided to ECC alongside a Designers' Response once complete.

The proposed bus stops are required in order to provide access to local facilities not available near the Site. However, as designed, they involve a stationary vehicle stopped on the busy Radwinter Road, only 60 meters from a hidden bend, an uncontrolled pedestrian crossing only 80 meters from the bend, and a further potential stationary bus only 100 meters from the bend. There is very little space to maneuver between them and the speed limit is 60MPH at this point, which is likely to result in a significant risk to highway safety.

The collision statistics and a response to this application confirm that there was a recent serious collision on this section of the road which arose from a vehicle slowed down in order to maneuver into an access approximately 200 meters from this bend.

The TA summary and conclusion states that analysis of the latest five-year collision data took place and it can be concluded that there are no specific safety patterns or concerns that need to be addressed as part of this assessment. This is not the case.

TA Appendix F and Crash map show that there were 3 serious crashes in the last 5 years on the site frontage. The reasons for these three serious crashes were given as

- the road layout;
- exceeding the speed limit (or not looking properly) at a vehicle slowed down to enter an entrance from the road; and
- losing control of a vehicle on a bend (frosty/icy conditions).

The TA analysis is therefore not robust. These crashes are relevant to the proposal as these scenarios show the road contains potential hazards that should have been taken into account in selecting the site, designing the access and locating potential obstructions such as crossings and busstops. They show there is material risk to safety on this part of Radwinter Road and that is likely to be exacerbated by additional traffic and further disruption to the traffic flow along this stretch of road.

To mitigate the additional vehicles from the Site, three road improvements are proposed. It is proposed that the improvements *fully mitigate* the harm resulting from the additional traffic. This is unlikely to be the case:



1. None address the impact of vehicles leaving eastwards from the Site, through Seward's End.
2. Those going westwards through Saffron Walden would add to queues, including within the AQMA. The predictions have not taken into account the specific effects on the AQMA and the need to reduce traffic and emissions in this area.

The following improvements are proposed, but it is difficult to test as the drawings do not include the existing for comparison:

1. Junction 4. Radwinter Road / Thaxted Road / East Street / Chaters Hill – short right turn lane on Radwinter Road.  
This is fully within the AQMA. The predictions in Tables 8.4 and 8.5 indicate the peak period queue on the Radwinter Road side would more than double from 24 to 60 cars due to the proposed development on this site.

The proposed short right turn lane on Radwinter Road is predicted to fully reverse the increase on Radwinter Road, but it is unclear how that is done if it would do nothing for the traffic turning left or going straight ahead. Oddly, it is also predicted to reduce queues on East Street to less than they were before, despite the lane not being on East Street.

2. Junction 6. Thaxted Road / Peaslands Road – replace mini roundabout with traffic signals.

The junction is outside the AQMA but the queues from the north extend into the AQMA. The predictions in Tables 8.7 and 8.8 indicate that these queues would increase due to the development, and would increase further with the proposed traffic lights which potentially improve the southern side queues at the expense of the north.

3. Junction 13. High Street / Church Street – replace priority junction with traffic signals.

The prediction tables 8.11 show that Junction 13 – High Street / Church Street (Priority Junction) would be subject to an increase of queue lengths of 25% or more at peak time within the AQMA. Table 8.12 indicating the effect from the proposed traffic lights is predicted to lengthen queues in the afternoon peak in return for improvements in the morning. It prevents direct comparison and needs clarification as it duplicates one of the streams (High Street North) rather than giving figures for High Street South. As High Street South is in the direction of the site, this discrepancy is significant.

The prediction tables indicate that junctions 8 and 9 (London Road / Borough Lane & London Road / Audley End Road / Newport Road), Junction 12 (High Street / George Street / Abbey Lane), Junction 15 (Church Street / Castle Hill / Ashdon Road / Common Hill), and Junction 17 (Ashdon Road / Chaters Hill) would all be subject to increased queueing within the AQMA. Junction 15 sees an increase of more than 30% queueing on Ashdon Road due to this proposed development (Table 8.14). The increase in queue from 25 to 39 cars is described as small and non-material, which does not take into account

that this is within the AQMA, which is an environmentally sensitive location where reductions not increase are being sought.

The terrain and gradients have not been taken into account in calculating distances such as to the buses on Radwinter Road and the site is treated as if it is flat. The discrepancy is likely to mean the routes designed as alternatives to car transport would be less attractive and less viable than predicted.

The road layout and network of routes within the site are dependent on a series of safety non-development buffer zones which preclude development including roadways. Road and emergency vehicle access to the eastern section of the site is likely not to be viable, due to the presence of the high-pressure gas main and the aviation fuel line.

These safety buffer zones, and the buffer zone along the front of the site due to the aviation fuel store, significantly affect the safety and scale of development on the site, and the principle where development would avoid these should have been established prior to the planning submission.

Likewise, the scheme for the link road should have been established prior to submission, as the information provided regarding this is inconsistent and premature, and does not seem to accord with the Highways request.

## **Flooding**

### **Flood risk**

The application does not comply with Policies GEN3 – Flood Protection and NPPF 163 which *should ensure that flood risk is not increased elsewhere*.

The evidence including photographs and EA mapping show that this site is at risk of flooding under NPPF Footnote 7 and is unsuitable for this type of development.

The water storage proposal would substantially reduce the flood capacity of the meadow and increase the risk of flooding, surge and contamination. It does not comply with Local Plan paragraph 5.1 and NPPF 174 which requires that decisions prevent *unacceptable levels of soil, air, water or noise pollution* and where possible *help to improve local environmental conditions such as air and water quality*.

It does not comply because:

1. The development is likely increase the risk of flooding through surface water run-off.
2. The development will be exposed to or may lead to an increase in the risk of flooding. The submitted FRA is not full and does not robustly set out the level of risk associated with the proposed development.
3. The FRA is required under NPPF because of the extent of the development and its vulnerable proposed uses within an area of surface water flooding and critical drainage problems.

It does not show that the proposed development can be provided with the appropriate minimum standard of protection throughout its lifetime and does not

demonstrate the effectiveness of flood mitigation measures proposed.

The assessment does not comply with good practice and does not appropriately take into account relevant designation, implications for flood risk elsewhere (para 3.12), and is not up to date (para 3.12). The relevant authorities note their records are incomplete and that further study will be required (e.g. letter from CCC LLFA of 30/04/2021 appended to the report).

The evidence including photographs and EA mapping show that this site is unsuitable for this type of development, including:

1. Housing is a more vulnerable use than the existing. The evidence shows that there is significant flooding of the site and a high risk of flooding at the entrance, frontage and Radwinter Road. The series of failed porosity tests indicate there is a significant risk to any infiltration scheme and a significant need for the existing natural flood relief of the meadow and field to be preserved.
2. The proposals for the loss of farmland and meadow, extent of development, and the extent and location of the entrance and SuDS basins are highly likely to exacerbate the risk of flooding on Radwinter Road, on the site and elsewhere.

The photographs submitted with this application and the Scoping show that the site has *critical drainage problems*.

There is significant standing water on the grass surface, including within the paddock which is the location of the proposed access and drainage for the entire site. The Scoping archaeological report describes the land as being waterlogged throughout and the map describes additional areas of alluvial mud deposits on high and low ground that it attributes to areas of historic flooding. Trial Pit INF01 results describe this impermeable type of soil. The photographs in the Scoping all show standing water in the main field and paddock, and the flood warning signs from the last occurrence are still on the road verge (27 April 2021). In addition, there are springs on the plateau above the site.

The EA surface water map shows that there are numerous surface water flood sources on and adjacent the site, and that the existing entrance and proposed entrance onto Radwinter Road is within an area subject to a 'high' level of surface water (and likely fluvial) flooding.

There are significant omissions in the assessment of the actual levels and the risk of flooding:

The constraints map does not show the surface water flood routes shown on the EA map. It only considers the river tributary.

The EA surface water flood map shows the entire length of Radwinter Road along the frontage is subject to a 'high' risk of flooding and it is likely that this site would be inaccessible on a regular basis. Paragraph 6.7 of the report only considers that there "could be" a pluvial risk but "could be waded through if required". There is no consideration of the effect of additional flooding on Radwinter Road and the road traffic on this busy road. The new access would breach the raised verge and bank of the road, and the steeply sloping roadway and development along the spine road is likely to cause further runoff onto the road.

Paragraph 8.8 of the Scoping stage report had already identified that the porosity tests had failed and the site is unsuitable for infiltration. Paragraph 2.11 of the application report describes 2 porosity test pits of January 2021. It states the results are in Appendix D and that testing was undertaken in accordance with BRE 365 'Soakaway Design' methodology guidance.

Appendix D shows the study does not comply with BRE 365, as for instance, only 2 soakaways are reported on (INFO1 and Groundwater Pit) and neither location is plotted. The results also indicate that both porosity tests failed and both were deep excavations with no zone found suitable for infiltration. The guidance requires the assessment to continue until there is a set of results that are all successful. However, instead the results demonstrate again that there is no full successful test group and no robust evidence that the soils are capable of dealing with the proposed development.

Groundwater Pit trial hole was located somewhere undefined on the site where no groundwater was found, so is inconclusive. The application therefore provides no data to establish where groundwater is relative to the base of the basins and soakaways. This runs counter to paragraph 2.15 of the report which states that, "Where infiltration-based SuDS are proposed to manage surface water from a development, then direct discharge into groundwater would not be permissible. *Therefore, the elevation of the groundwater table with respect to the base of the soakaway is critical*, and there must be an unsaturated zone in the aquifer unit." Paragraph 5.26 concludes that the risk is low "despite the chalk bedrock present", on the basis there is no flood history. That is not robust.

The sections through the test pits show that a substantial amount of the test was taken below 1M, into deep excavations and the chalk bedrock of the aquifer which provides water supply to the local area. The failure to establish conclusively where the groundwater is poses a significant risk to the groundwater Source Protection Zone (SPZ) and of pollution generally, especially in a high risk context where deep excavations are proposed.

The report relies heavily on the designation of the site as river flood Zone 1. It is material that the watercourses on site do not fit the criteria of main river, in which case the fluvial flooding is indistinguishable from pluvial surface water flooding. The surface water map is provided, but again the report relies on 'low' flood risk for the areas of flooding marked on the map, omitting the classification of 'high' for Radwinter Road and the area around the existing site entrance and its culvert. It also fails to take into account the site-specific nature of the flooding and the limitations of the record, such as being in open countryside, where EA and LLFA records are incomplete. The LLFA response in Appendix E warns the applicant of the shortfalls of relying on the maps and urges further site-specific investigation. As paragraph 5.26 shows, this typically has not been done.

The section on topography omits the land forms within the site (paras 2.6 and 2.7). These are distinctively contoured and concentrate the surface water flood routes. The EA surface water map shows that there is flooding down all three of the glacial valleys of the main field and that the majority of the long paddock is also subject to flooding. The land forms are material, because they identify the routes of the surface water flooding, and therefore where there is greater risk of flooding, which is essential to have assessed in order to consider risk, design an effective scheme and assess impact. As a result of its omission, the report is not robust. The report proposes that the design of the development would provide landscaping to allow the existing water flows to be preserved. Comparison between the EA map and indicative plans show the two are incompatible.

The application does not take into account existing urban expansion elsewhere (LP para 3.12) and is out of date. There is no cumulative assessment and the report has not mentioned the diverted

runoff along the boundary with the Linden Site changes the route and increases the flow of existing surface water flooding.

The substantial area of surface water flooding down the south-west glacial valley no longer follows the EA plotted route because substantial engineered embankments and SuDS detention basins have been built in the Linden Site along the site boundary. This diverted floodwater flowing down the western edge of the development should have been assessed and designed for fully within the application site.

Table 7.8 confirms that calculations are based on a greenfield runoff rate that is based on area without addition for the existing surface water flooding and Appendix H shows the drainage scheme is only designed to deal with the additional runoff. It does not take into account that the existing meadow paddock and field drainage needed for the existing run off would be lost and therefore there would be a substantial shortfall in the flood capacity of the site compared to the existing.

Paragraph 6.9 proposes that the flood risk of the new access is not considered under this application as a separate consent is required. However, it is material that the access would involve the culverting of two existing watercourses, one of which is proposed for discharge of the surface water from the site. The EA identifies that culverting creates a greater risk of flooding, which is demonstrated by the existing culvert on site, which floods to a high level.

Paragraph 4.18 confirms it is intended that surface water will be drained via a traditional gravity system and directed to 'SuDS features. These major final SuDS detention basin structures would be constructed in the paddock and lowest part of the site, which is the area identified as being of greatest risk of flooding. The standing groundwater also indicates that water levels are high within this area. In principle, SuDS should not be constructed in groundwater and areas subject to flooding, due to the risk of environmental harm.

Paragraph 5.2 states that the proposed development would not increase surface water risk to adjacent land because a surface water strategy has been agreed with ECC. The strategy described in sections 5 and 7 is one which is mostly outside ECC's remit. Whilst much of the document describes 'SuDS features', section 7 confirms these are 3 open ditches following the fuel pipes (i.e., within their safety buffer zones) and the rest of the proposed drainage is a storage, not a SuDS, scheme.

Paragraphs 5.21 and 7.12 propose 4 onsite storage basins each with a maximum water storage level of 1.2 meters. Paragraph 5.26 proposes (because of lack of infiltration) that these basins discharge the stored water into the existing watercourse via a hydro-brake system at 20.8 litres per second, despite the risk of bacteria and pollution from the road surfaces. This water storage facility and hydro-brake is not adoptable and is not a sound proposal for the long term. As a result, it is likely to increase the risk of flooding and contamination downstream.

The Scoping identifies that the development of the Site would reduce its permeability. If no viable drainage scheme can be found in principle at the outset, the scale of this development is likely to result in significant additional flood risk to the existing road, river valley and community.

As the flood map shows this part of Radwinter Road is at high risk of flooding, drainage networks within the road would also be at high risk of flooding; and at greatest risk at times when most



needed to drain the site. The steep slopes of this site are likely to exacerbate the flood risk and risk of discharge of pollutants from the roads into the surface water system. The steep slopes of this site are also likely to exceed the adoptable slopes for drainage. Technical drainage solutions for highways such as smart sponges have a high maintenance burden and are therefore also likely not to be adopted.

As a result, the proposals in principle would increase the likely risk of flooding elsewhere, including at the entrance, along the tributary to the river into Saffron Walden, and along Radwinter Road. The loss of the paddock, replacement with the engineered detention basins and hydrobrake prominently at the entrance to the site will increase the urban character of this proposed development within the landscape.

Through the Call for Sites process, many more suitable sites have been identified.

### **Safety**

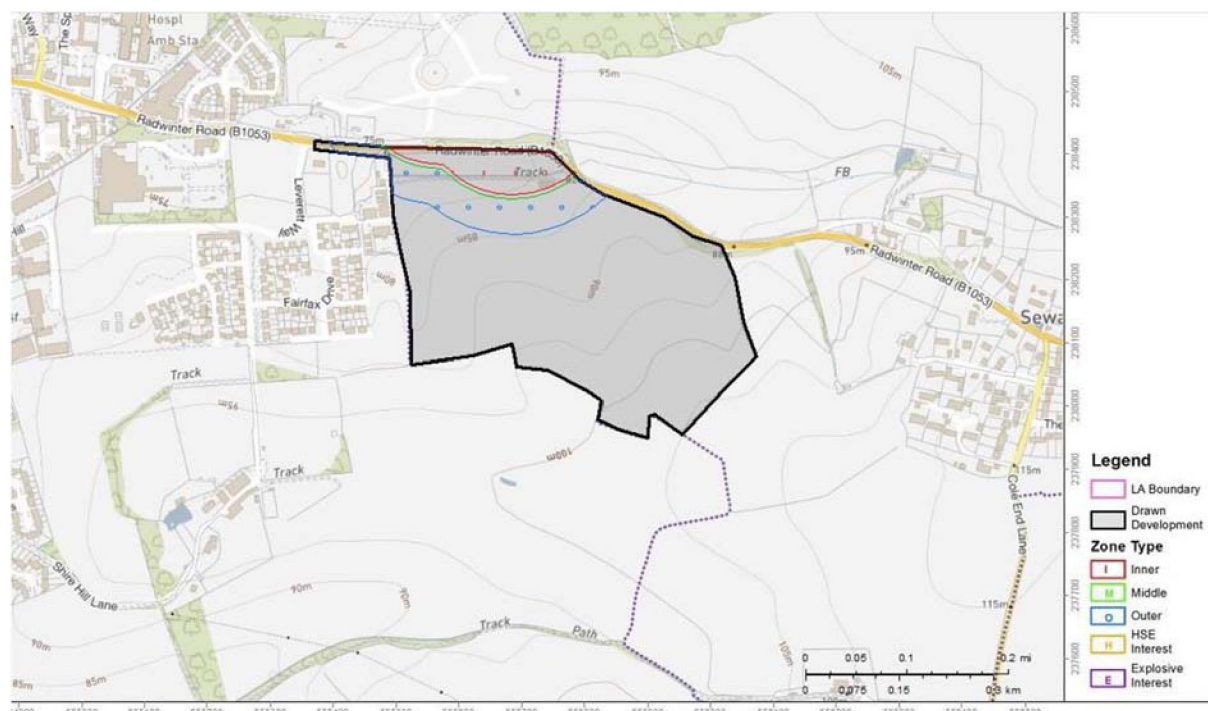
#### **Fuel Storage and Pipes**

The site is compromised for housing because housing is a vulnerable use, the proposed location is next to an aviation fuel store, and fuel and gas mains pipes run below the Site.

The Parameter plans propose development within exclusion buffer zones. The only means of vehicular and pedestrian access are within the aviation fuel store exclusion zone.

The proposed development will reduce the extent of access possible for maintenance and therefore affects the long-term operation of the fuel site.

The application does not promote public safety and does not ensure that operational sites are not affected adversely by the impact of other development proposed in the area and therefore does not comply with NPPF 97.





The exclusion zone of 250M from the tank wall (blue) results from an explosion at Buncefield where damage extended approximately 250M from an overfilled tank. Paragraph 38 of the relevant *HSE Safety and environmental standards for fuel storage sites* provides a proviso to this guidance, which is that *"the movement of the vapour cloud is heavily dependent on factors such as site topography, degree of congestion and weather conditions."*

Approximately half the application site is within 250 meters of the nearest fuel tank wall. 80% of the road frontage is also within this area and the remaining 20% has the highest embankments and the most winding section of road, making access to and from the site potentially more hazardous and congested. Any leakage of flammable fuel is likely to drain to the watercourse that then flows across the site frontage, bringing it within 250 meters of 60% of the development.

Site topography is significant on this site, where the fuel storage tanks face directly onto the slope of the Site, and the site takes the form of a concave bowl, where, should there be an explosion, the damage and effects are likely to be concentrated.

In addition, the Site only has one entrance for vehicles and pedestrians, and that is within the red inner zone and specific area of HSE interest. In the event of an explosion like Buncefield, the occupants of the 233 houses would be unable to escape.

The remit of the HSE is to protect the fuel storage site and it does not extend to the exclusion zones. As the HSE response confirms, HSE does not advise against the principle, on the basis the development can be located outside the mapped zones. However, the position of the access to the site is established in this application and that is within the red mapped zone.

The initial HSE advice to the applicant was based on minimal information and a small number of residents potentially affected, which is unlikely to apply for 233 houses and does not cover the distinct topography of the Site. A second HSE response to the application has been provided.

The Parameter Plans and the TA plans also show that the development would extend into the mapped area. The principle of water storage structures and hydro brake is also likely to be established within this application and they are within the mapped area.

On that basis, the applicant has not provided sufficient information to satisfy NPPF 79 and the proposed access and parameters do not promote public safety.

Exolum has also objected on the basis that the development would prevent required access to the fuel infrastructure. This is likely to add significantly to the future maintenance, environmental and safety risk. The letter also warns against breaches of the requirements. This has already occurred, as the archaeology survey shows that the large shed at the entrance to the Site is built directly over at least one of the pipes. If such a breach can occur with a single ownership, the risk of future breaches is significantly greater with the multiple ownerships and occupancies involved in a residential development of 233 houses.

### **Noise and Vibration**

The Resound Acoustics survey is not robust and the proposed location of housing does not comply with NPPF 174 and Local Plan Policies ENV10 and ENV11 to ensure that this noise sensitive development is separated from the major source of noise from Radwinter Road.

The noise report did not consider the additional traffic and source of noise from the development of the existing field for housing and does not provide the cumulative assessment required under NPPF 174 and the Noise PPG. It does not identify and protect the adjacent tranquil river landscape area under NPPF 185 which is prized for its recreational and amenity value and is therefore likely to be harmed by the significant increase in additional vehicle and construction noise.

The main generator of noise has been confirmed as traffic noise on Radwinter Road. Only Position 1 was assessed from near Radwinter Road. Position 2 was near the Linden Homes SuDS drainage area, where noise was likely to be minimal.

Paragraphs 48 and 49 of the report confirm the survey reported is only based on 24 hours, from Wednesday 19 to Thursday 20 May 2021. The rest of the data was unreliable due to weather conditions.

Comparison between RA Appendix F Figure F1 and the indicative layout shows that the extent of the site subjected to EU unacceptable levels of 55dB or more includes the three areas of development within the north-eastern part of the site, alongside Radwinter Road. Figure F2 shows the area of the development subjected to excessive night-time noise is greater.

The existing topography, hollow road and valley reverberation are all likely to have a significant effect and the study should also have taken into account the likely increase in site noise due to opening up the new access onto Radwinter Road.

### **Trees**

The application does not demonstrate Policy ENV3 and ENV8 that the hedgerow and visually important groups of trees on the road frontage would be protected within the development proposals.

It appears there is no report to identify the impact on trees. The TA Access Plan indicates that mature trees on the frontage would be lost.

### **Ecology**

The application is likely to adversely affect the intrinsic character and beauty of the countryside and landscape elements including Hedgerows, River corridors and patterns of other locally important habitats, by removal, alteration and interrupting their continuity. The proposed replacement is not shown to reflect the value of the existing historic elements. It therefore does not comply with Policy ENV8 and NPPF 174.

The Ecology section recognises the hedges as being Important Protected hedges under the Hedgerow Act, but undervalues their significance. Important hedges are nationally (not locally) classified, and the coppiced hedges and those accompanied by ditches and embankments should be

appropriately recognised as having high value, according to the criteria used in the study. View *SWTC SEPC 1a* in Appendix 1 shows the roadside Important hedges with large mature coppiced trees, field ditch and embankment of high visual and ecological significance.

Viewpoint V7 shows the relationship of the wooded site frontage (just visible in front of the yellow) and Pounces Wood where it is likely the bats would travel from one mature tree habitat to the other, undisturbed by lighting.

The Ecological proposals are inconsistent with the TA proposals and paragraph 7.42 assumes only a small section of hedging would be removed. The loss through removal of all the hedge boundary, roadside ditch and embankment along this length of site frontage (other than the far end adjacent Turnip Hall Farm) in order to create the proposed access and visibility splays, would be substantial, and less destructive alternatives should have been sought.

The Long meadow has not been appropriately assessed according to the historic and photographic evidence. It is likely that it would be substantially lost. Green corridors are to be retained, but the Parameter plans show they are generally intermittent rather than continuous, so have less ecological value.

The application proposes mitigation by planting replacements and additional planting, and alternative wetlands and meadow. The upper parts of the chalk hill, where the open space is proposed, is not conducive to new uses for wetlands and meadow and would not be resilient in the long term. It would also not reproduce the ecological value of the historic coppiced hedging, habitats, old tree cracks and crevices and historic planting.

The application proposes SuDS, but in the form of holding tanks rather than a fully ecological scheme, so would not have a comparable level of biodiversity value, and would risk contamination.

### **Heritage**

Heritage considerations within the NPPF include historic landscapes. As noted above, the historic landscape of the site and river valley would not be preserved.

The proposed development does not preserve the archaeology and settings of heritage assets. NPPF does not consider the ability to record fully compensates for the loss.

Whilst the losses to heritage assets are 'less than substantial', the NPPF considers this level of loss to be significant in terms of planning balance.

The most significant archaeological find within the site is on the eastern edge, part of the site that would be difficult to develop due to farm access and buffer zones. The consideration of harm in excavating this area and relying on a survey should take into account NPPF 205 which notes that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

The National Monuments Record has a record for the *North West Essex Fieldwalking Project* which identified 2 Roman settlement areas within TL 56 38. The pits and rectangular boundary divisions plotted on the archaeological survey are potentially associated with these or another Roman settlement. Historic England guidance considers that a group of complementary assets have an enhanced significance, and the NMR entry indicates that this is such a group. The value and impact should therefore be assessed, including whether individually or as a group they qualify for designation, and the extent of permanent loss, which would be significant.

A further archaeological asset is listed in the Essex Heritage Environment Record. It is described as pre-1700 windmill at 560380 *'between Turnip Hall farm and Pounce Hall, approximately 300 yards south of the Radwinter Road.'* (Farries).

In addition, closely set parallel anomalies are shown on the archaeological map in positions around the main field and across the entire long paddock that indicate likely ridge and furrow.

The earliest map indicates likely ownership / functional connection between the site and Grade II listed Pounce Hall. The consideration of visual setting should include impacts on side views, including the identified sensitive views from the PROW north of Radwinter Road.

There are views of the Tesco's tower from Saffron Walden Conservation Area. As Tesco's is on lower ground in the same direction, it is likely that development on the application Site would intrude above the tree line and on the skyline of the CA.

### **Sustainability and Infrastructure**

The proposal is poorly related to the existing communities and fails to provide sustainable transport links.

As a result, it does not comply with Policies Gen1 and NPPF 112.

The proposal does not provide any assurance nor mechanism to secure the infrastructure requirements, nor the provision for community facilities, healthcare facilities, child care, primary and secondary education requirements, school transport, public services, transport provision, drainage and other infrastructure that arise from the proposed development. There is also no assurance about the required delivery of 40% affordable housing and the proposed open space and the subsequent maintenance of these areas.

As a result, it does not comply with Policies GEN6, H9 and ENV7.

The calculations assess the impact of 501 new residents in the context of the whole of Uttlesford, but the key impact is on local infrastructure which is not assessed. The proposal not to mitigate the effect of over 500 new residents in this rural town and village locality would therefore cause significant adverse impact.

The Site is poorly linked to existing facilities, infrastructure, cycle and walking routes and to the



adjoining sites.

Although the development is approximately 600 meters deep, there is only 1 route outside the site, which is on the busy Radwinter Road. It is not linked to the existing developments and their footpaths, and it is likely the substantial buffers arising from underground services will constrain movement across the site and movement across to neighboring sites in principle, making this an unsustainable site whatever the layout.

The existing entrance is allocated for use for farm vehicles, and is unsuitable for increased vehicular and pedestrian use due to very poor visibility. It would not contribute significantly to permeability.

The footpath route along Radwinter Road eastwards in the direction of Seward's End is of added concern as it lacks amenity and is very poor. It is very narrow, unlit and enclosed with poor visibility in close proximity to heavy traffic. The perception of hazard within the winding and tunneled sections of the footpath reflects the reports of serious crashes in TA Appendix F and Crash map (above).

Sustainable transport links are required to deal with the additional need arising from the development.

The development is therefore inconsistent with the Essex Design Guide to design permeable layouts that connect well with existing walking, cycling and passenger transport networks within and outside of the development.

The Open Spaces are not centrally located relative to the housing, and much involves climbing the hill which is likely to restrict its suitability for all age groups.

As the Site is steeply sloping and relatively remote from the town centre, it is likely to discourage sustainable alternative means of transport to the car. The nearest part of the Site is some 1.65KM from the town Centre and the furthest part is some 2.36KM up a steep hill. These are well beyond 0.4KM/0.8km sustainable walking distances.

This Site (along with others) was identified as an area of potential development which could be subject to an LDO. Linking Radwinter Road through to Newport Road would in principle significantly reduce the pressure and risk of pollution within the sensitive AQMA and historic town centre and the Radwinter Road site is key to the success of the measures being taken to deal with these. This link road has not been able to be achieved through the development that has been implemented to date and therefore the need has not been satisfied.

The proposed development will have a notable impact on the overall scale, design and access in this part of Saffron Walden and the wider area. To date the applicant has considered the site in isolation, whereas there is also a need to consider the effect on the wider area and cumulatively in conjunction with the other recent developments.

The potential environmental impact of this scale of development for the scale of new houses is likely to be significant, especially if considered cumulatively. Whilst the utility providers have a statutory duty, there are exceptions, including those where it is likely site levels are too steep for adoptable designs.

Water supply should be considered as the Site is in a Zone 3 Source Protection Zone and the bedrock aquifer and the water supply serves a substantial area. The site is adjacent the Linden Homes site where the condition of the chalk casing was variable. The chalk casing is exposed on some parts of the Site and the lower part of the main field and the long paddock are both likely to have minimal cover above groundwater. Some groundwater on the main field is identified by Envirocheck as being less than 3 meters below ground, which gives minimal protection. The Linden Homes SuDS is built-up above natural ground level but as a result has large manmade mounds, which are not appropriate for the natural undulating chalk landscape character south of Radwinter Road.

### **Cumulative Impact**

There are likely significant cumulative impacts including roads/transport, utilities, landscape, air quality, construction, biodiversity, lighting and flooding. These have not been appropriately assessed.

### **Lighting**

The intrusion of lighting within the open countryside would exacerbate the harm to its character and the quality of the landscape and environment. The impact is visible at distance and close up, and is increased by the elevation and topography of the site on the upper slopes of the hillside.

The impact is contrary to Local Plan Landscape Policies and Character Area.

It is proposed that lighting can be excluded as a matter of detail (e.g., to use downlighters), but it is clear from the less steep development at Linden Homes, that viewers would potentially be looking up at the lights and the effect would therefore be significant. The table only mentions roadways and pavements, and it is likely that lighting on individual homes is controlled. Linden Homes houses have at least 2 external lights per house frontage and these are not downlighters. Once the estate is complete, the effect of lighting compared to the previous open field is likely to be significant. The larger scale of the proposed development and its spread up the hill to the top of the plateau is likely to result in light pollution visible both sides of the chalk hill, in the open countryside where there is none previously. Light pollution should therefore be assessed as part of the principle of development, at least as part of the impact on the landscape.

NPPF 185c requires development to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

As a result of its spread into open countryside such as shown in Viewpoint V7 it would cause light pollution beyond the confines of the settlement. The elevation of the development also means that light design would not overcome the glare when viewing from lower ground. This would also impact further on the identified character of the landscape (above).



## **Building Heights**

The scale of development as described on the Parameter Plan is likely to be greater than that of the surrounding buildings and therefore not compliant with Policy GEN2.

The Parameter Plans describe the majority of the site as 2 to 2 ½ storey heights. There are larger 3 storey apartment buildings prominent at the approach to the site, which are likely to appear bulky and appear urban rather than rural in character.

## **APPENDIX 1.2**

### **Saffron Walden Town Council and Seward's End Parish Council response to Scoping**

#### **Viewpoints and LVIA**

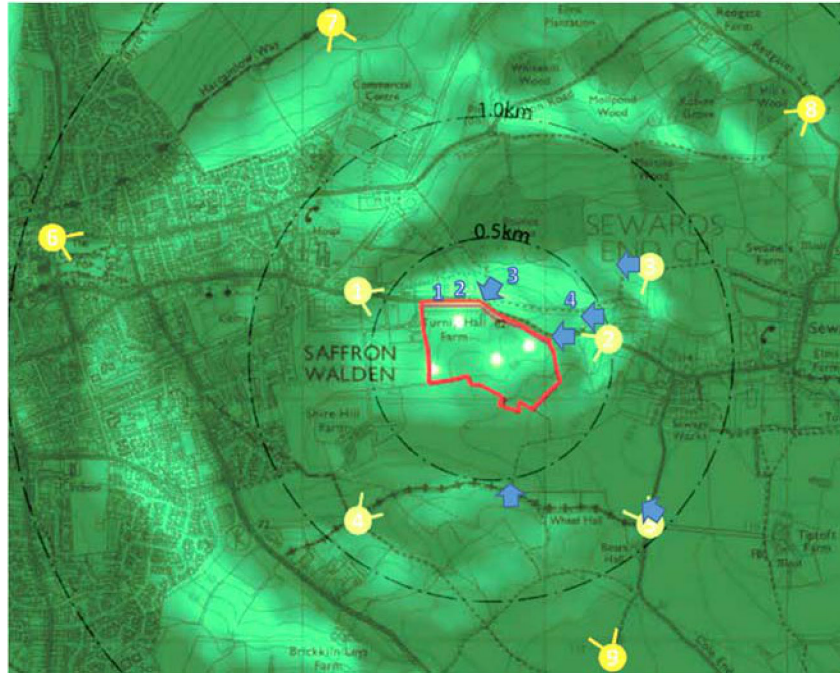
The Viewpoints do not address the joint Councils' response and Holding Objection at Scoping stage:

1. The selection does not show a representative group of views. It omits key views such as from the existing site entrance looking into the development.
2. The lighting positions used to establish the extent of visibility crucially do not include the highest part of the Site (which is likely to be the most prominent).
3. The views were plotted onto a map which indicated areas of intervisibility as lit areas. Some viewpoints (such as 4) appear to be taken from unlit locations, when there are lit locations close-by.
4. Some viewpoints have been taken from behind obstructions when it is likely that the view could be adjusted to show an adjacent more informative view.

There are no views from the high ground where light is shown south-west of the town.

The landscape at Audley End may have views that incorporate the Parish Church spire, with the site as a rural backdrop. As the spire is an important landmark in the landscape, the aim should be to include it.

The joint Councils proposed revised and additional viewpoints all identified at Scoping stage are included on the map below in blue. Those arrows close to the Scoping arrows are where it is considered that the LVIA should be extended to show an adjacent more informative view and/or to avoid obstructions in the foreground.



*LVIA viewpoints with blue arrows for the relevant additional / repositioned views*

*The numbering of the Map and views has been updated for consistency with the Application. The summaries have also been updated to assess the likely impact of the development on the views.*

*The Council's views are 1-4, which are now SWTC SE 1-4 below:*

**View SWTC SEPC 1 – Radwinter Road.**





*View SWTC SEPC 1a – Radwinter Road Looking west along Site frontage to Turnip Hall Farm.*

This view shows the narrow winding rural eastern approach to Saffron Walden.

The Site frontage (left) comprises Important hedges with large mature coppiced trees, field ditch and embankment of high visual and ecological significance. The path to the right is the footpath PROW.

The application proposes the removal of all the hedge boundary along this length of site frontage (other than the far end adjacent Turnip Hall Farm) in order to create the proposed access and visibility splays. The TA Access plans (TA Appendix H) show that the access would be located approximately where the embankment reduces in height and that the road would be widened and realigned into the field and the embankment, trees, hedges and field ditch would be removed.

Approximately where the photographer is standing, there would be a bus stop and another bus stop would be approximately where the sawdust shows a tree was cut. The photograph shows that there is a significant amount of realignment of ground levels in order to provide the access, roadway and the required visibility splays.

The landscape and ecological value of this view is high and the loss would be substantial.



*View SWTC SEPC 1b – Radwinter Road west of the existing Site entrance, looking west towards View1a above.*

This view shows the existing curve in the road, and looks along the Important hedge into the Long Pasture field on the Site frontage.

The application proposes the widening and straightening of the road, including removal of the hedge bank back to the tree trunks. From this point westwards, the trees and hedge bank would be lost. The application proposes the loss of the meadow in order to locate drainage storage tanks eachside of the proposed access road.



The landscape and ecological value of this view is high and the loss would be substantial.

**View SWTC SEPC 2 – Long Pasture Field.**



*View SWTC SEPC 2 – Long Pasture Field from Radwinter Road*

The pasture meadow is enclosed and bounded by mature hedges. Currently the access is private, but the open space is perceived from the public realm behind the roadside hedge (see Views 1a and 1b above).

It encloses what appears from the photograph to be a medieval ridge and furrow pasture landscape, which is consistent with the lines indicated on the archaeological survey plan and would be of high landscape importance. It provides a rural approach to Saffron Walden of some quality, as both fields are edged in Important hedges with large mature coppiced trees and complement the medieval character of the long pasture and feature as boundaries on the earliest maps.

Any openings, road accesses, visibility splays or residential development within this long pasture are likely in principle to result in harm to the sensitive landscape character and importance.

The proposed access and main estate road in approximately this position will open the pasture up to the road edge and the field of proposed houses beyond. The proposed drainage tank structures will replace the meadow.

The landscape and ecological value of this view is high and the loss would be substantial.

### View SWTC SEPC 3 – Existing Site Entrance.



*View SWTC SEPC 3 – Viewpoint from the existing entrance, near the PROW junction, looking up the steep slope of the large field to the plateau and skyline. The slope is considerably steeper than the Linden Site entrance (above). Only the roofs of Linden Homes are visible (circled), below the skyline, confirming the OS Map contours that show this site is higher.*

The view is open to Radwinter Road and the PROW and is contained by the hedge line boundaries which are on the skyline. The field is steeply sloping and characteristic of the local arable fields with a gently undulating profile characteristic of the local farmland landscape. The glacial valleys give some interest to the profile.

As such, it is a good example of its type with Important hedgerows at the field edges and apart from the farm building (right) has little above ground interruption.

The application involves construction of up to 233 houses up the hill across this view, apart from a linear buffer zone around the Gas pipe that runs up the site to the top boundary.

The single farm building on the right would be removed. The Concept Site Masterplan proposes that this entrance would be retained as a farm entrance, with a farm track running left along the development edge.

The landscape and ecological value of this view is medium and the loss of the view would be substantial.



**View SWTC SEPC 4 – Slade River Valley.**



*View SWTC SEPC 4 – Slade River Valley*

The Site is also visibly part of the long views of the Slade River valley.

This view is on the same PROW footpath as Viewpoint 3, but closer to the Site and Saffron Walden.

The Site is on the skyline in conjunction with the river valley and views of the Parish Church. It forms part of the wooded skyline and an opening shows the open farmland of the main field as part of the backdrop. The value of the open field in the Slade landscape is shown by contrasting it with the only part of the skyline where the recent Linden estate houses now intrude (below):



*View SWTC SEPC 4 – Slade River Valley showing detail*

*Looking west along the PROW and river valley, with the Parish Church tower (ahead right) and the tranquil modest river landscape. The hollow running centrally is the watercourse.*

*This view should be included in LVIA to include the gap where the application field can be seen, just to the left of this photograph (see LVIA section below).*

The river valley landscape incorporates a number of public footpaths, which are much used. The views are special – looking westwards, the valley provides an axis along the PROW looking towards the tall spire of the Grade I listed Parish Church (at 193 feet the tallest spire in Essex), and looking eastwards, the axis leads the eye to the distinctive C17 garden frontage of Grade II listed Pounce Hall. The history, appearance and character of the listed buildings adds to the interest of the view.

These characteristics give it a high value, sensitivity and significance and make it a valued landscape in its own right – it is a good example of the national landscape type, incorporating designed vistas of dominant key historic buildings on raised natural sites, complemented by the natural river valley and appreciated as a publicly accessible environment. The archaeological history of this part of the river valley is of added interest and complements its historic and visual character.

The recent Linden Homes roofs intruding on the skyline (left) are the main detractor, and provide a marked contrast with the wooded skyline and modest rural character elsewhere in the view.

The application will locate houses closer and higher than the Linden Homes houses. Individually and together the cumulative impact of these new houses is likely in principle to result in substantial harm to the landscape character of this small-scale intimate river valley.

#### **View SWTC SEPC 5 – From Linden Homes.**



*View SWTC SEPC 5 – From Linden Homes.*

Looking east to the application field from the Linden Homes site.

The view shows the undulating character of the Site leading up to the skyline, with Important hedge lines on the field edges. It is a good quality open farmland landscape uninterrupted by above ground obstructions.

This entire view beyond the boundary hedge would be built over.

The landscape and ecological value of this view is Medium and the loss of the view would be substantial.



## **Scoping Comments on LVIA Viewpoints:**

### **Scoping Viewpoint 2**

The Scoping Viewpoint 2 is positioned beyond a thick planted area. For a more representative view along the road looking west, see the typical roadside boundary photos below.

### **Scoping Viewpoint 4 and SW Proposed Viewpoint:**

Viewpoint 4 describes the site as being on a similar height landform as the Linden Homes site. The OS map contours and photographs at the site entrances show this is not the case, and as the Site is significantly higher, there is likely to be impact on the Linden Homes houses, as shown right:



Viewpoint 4 is taken at a significant distance, where the PROW is enclosed and there is no visibility of the fields. Had Viewpoint 4 been taken from the eastern rather than western corner of the field, the view is more open and the Site closer on the skyline:



### Scoping Viewpoint 5

Viewpoint 5 would be significantly more open if taken on Cole End Lane.

#### General notes:

The Viewpoint descriptions assume that the existing mature hedge boundaries will hide the development. As the Linden Homes development boundaries and SWTC SEPC 5 show, this is not the case, and there is significant topography and visual permeability that should be taken into account.

*Visibility of Linden Homes in the landscape despite a mature hedge and tree line along its eastern boundary.*



All photographs were taken by a Nikon 7500 at the equivalent of 50mm using 35mm film.