

Our Ref: PJF/fa/PF/10680  
(Please reply to Banbury office)

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8<sup>th</sup> April 2022

The Planning Inspectorate  
The Square  
Temple Quay  
Temple Quay House 2  
Bristol  
BS1 6PN

Dear Sirs

**TOWN AND COUNTRY PLANNING ACT 1990**

**APPEAL BY ROSCONN STRATEGIC LAND AND THOMAS ERIC BAKER AND SALLY ROSE HALL, THE EXECUTORS OF MR E C BAKER AND MRS J BAKER AGAINST THE DECISION OF UTTLESFORD DISTRICT COUNCIL TO REFUSE AN OUTLINE PLANNING APPLICATION ON LAND SOUTH OF (EAST OF GRIFFIN PLACE) RADWINTER ROAD, SEWARDS END, SAFFRON WALDEN**

On behalf of the Appellants, I submit an appeal against the refusal of Uttlesford District Council to grant planning permission 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'.*

This application has generated substantial local interest in opposition to the granting of planning permission. The reasons for refusal allege deficiencies in the information provided with the application, and technical issues in respect of the deliverability of off-site highway mitigation. Furthermore, it may be necessary to call evidence to demonstrate the genuine extent of the deficiency in the supply of new homes.

For these reasons a Public Inquiry is requested to address the issues raised by this development. The LPA was notified of the intention to submit an appeal (against non-determination) by letter dated 9<sup>th</sup> March 2022 (attached). The Council subsequently reported the application to the Planning Committee on the 18<sup>th</sup> March 2022 and refused planning permission. The Appellant intends to call witnesses relating to:

- Planning Policy/Planning Balance
- Housing Land Supply (potentially)

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- Transportation
- Biodiversity
- Affordable Housing

With the amount of local interest, it is considered that this inquiry may have a duration of 6 days. The appeal submission is accompanied by:

- The Appellants' Statement of Case
- The Draft Statement of Common Ground

Yours sincerely



Peter J Frampton

Enc: Appeal Form  
10680 List Of Documents Submitted To LPA with Original Application UTT-21-2509-OP  
10680 List Of Documents Submitted To LPA as Amended Submission to UTT-21-2509-OP  
10680 Note regarding Planning Obligation  
Statement of Case  
Draft Statement of Common Ground