TOWN AND COUNTRY PLANNING ACT 1990, SECTION 78 TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND) RULES 2000





Rule 6 Party: Saffron Walden Town Council & Sewards End Parish Council

Landscape and Visual Issues EVIDENCE

Document A:

Main Text (CDF5)

Richard Morrish CMLI

On behalf of Saffron Walden Town Council and Sewards End Parish Council in respect of planning application called in by the Secretary of State for Communities & Local Government

Section 78 Appeal by Rosconn Strategic Land and Thomas Eric Baker and Sally Rose Hall, the Executors of Mr E C Baker and Mrs J Baker Appeal against refusal of Planning Permission for 233 homes at Land south of (east of Griffin Place) Radwinter Road, Saffron Walden

Inspectorate Reference: APP/C1570/W/22/3296426

Local Planning Authority Reference: UTT/21/2509/OP

Date: August 2022

Landscape Evidence

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Methodology for Landscape and Visual Impact Assessment.

1.0 Qualifications and Experience

- 1.1 I hold a Special Honours Bachelor of Science in Landscape Design and Plant Science, along with a postgraduate Diploma in Landscape Design and Master of Arts degree in Landscape Architecture from the University of Sheffield. I hold a Master of Arts in Ecologically Sustainable Development from Murdoch University, Western Australia. I have been a Chartered Landscape Architect (or equivalent) since 1989 and in that time I have worked for multidisciplinary and landscape design consultants WS Atkins and Chris Blandford Associates in the UK, Earthasia (now EADG) in Hong Kong and Hames Sharley in Perth, Western Australia. In those firms I have undertaken a range of planning and design-led projects including residential masterplanning and visual impact assessment for major urban expansion, roads, quarries, landfill sites, water and energy projects.
- 1.2 Since 2000 I have been in private practice as Director of Richard Morrish Associates, a registered practice of the Landscape Institute based in East Anglia. In this time I have prepared around 100 landscape and visual impact assessments for many different development projects including urban expansion, oil exploration, renewable energy, industrial, residential and leisure sector projects. I have undertaken landscape capacity studies to assist Local Plan development for several local authorities and provided expert evidence for public and private clients for hearings and public inquiries. I have previously prepared LVA studies for development in and around Saffron Walden and have considered the landscape setting of the town. I am also a Technician Member of the Arboricultural Association and undertake arboricultural surveys for a range of clients.

2.0 Background to this Appeal

2.1 I have been appointed by Saffron Walden Town Council and Sewards End Parish Council to provide landscape evidence to support their objection to the scheme promoted by Rosconn Strategic Land. In the refusal notice issued by Uttlesford District Council dated 18th March 2022, no specific objection was cited in relation to landscape impact. Nevertheless, it is demonstrable that the scheme would have a substantial and adverse impact on the rural character and setting of Saffron Walden, the village of Sewards End and the land upon which the scheme is proposed, and this is concluded in assessments by the appellant's own team. It would therefore appear to be contrary to key aspects of the National Planning Policy Framework (2021) and Uttlesford Local Plan (2005).

2.2 I understand the outline application is for up to 233 dwellings including affordable housing, public open space, sustainable drainage and associated works, with access off Radwinter Road. The site is presently arable land and approximately 18.3 hectares in size. The site lies within the parish of Sewards End and in 'countryside'.

3.0 Site Context

- 3.1 The appeal site is mainly one large arable field situated on rising land at the eastern edge of Saffron Walden, with an additional long thin paddock, located south of the Radwinter Road.
- 3.2 The first edition OS maps show that for many years the Saffron Walden to Haverhill railway line defined the eastern edge of the town with only a few scattered farmsteads (*Turnip Hall, Shirehill* and *Pounce Hall*) lying in the landscape between Saffron Walden and the village of Sewards End. Development of the nearby Saffron Walden fuel store began in the second world war. The railway line was closed in the 1960s. Employment sector development and the Tesco superstore appear to have extended urban settlement over the former rail corridor during the 1980s and 1990s. In the last decade, several infill housing schemes have subsequently introduced a residential element to this settlement expansion, most notably the site for 200 dwellings currently under construction by Linden Homes and adjoining the appeal site to the west.
- 3.3 Saffron Walden and the appeal site lie within the *South Suffolk and North Essex Clayland* character area. It is generally well wooded, undulating countryside incised by small river valleys, sometimes defining flat plateau areas between. Much of the area was made wealthy by the wool trade and cloth making in medieval times and towns including Saffron Walden retain a rich heritage of historic buildings. The landscape also has ancient attributes including woodlands, lanes, farmsteads and field patterns. Although some field agglomeration has occurred due to modern

agricultural practice, (e.g. south of the appeal site), in general much of the local historic landscape pattern remains. Older maps indicate that the field shapes at and around the appeal site are well preserved and appear not to have altered significantly for at least 200 years (refer also to the Heritage Statement).

- 3.4 The South Suffolk and North Essex Clayland character area is undergoing an unprecedented period of change due to urban expansion and associated infrastructure. This is not only around Saffron Walden and in Uttlesford district but also at Chelmsford, Bishops Stortford, Braintree, Great Dunmow and in the countryside surrounding these centres. This trend has followed other significant impacts to the area which include extensive hedgerow removal and field agglomeration due to industrial mechanisation from the 1940s onwards, and the loss of mature tree cover due to dutch elm disease (1960s and 1970s) and more recently from ash dieback. Therefore, it is not too strong to say it is a threatened landscape requiring a sensitive approach to future land management and considerable care in the location and design of urban expansion if the essential characteristics of the landscape and its historic settlements are to be safeguarded.
- 3.5 The National Character Area Profile (No 86) identifies these concerns and under 'Additional Opportunities' outlines *measures that lead to the enhancement of existing historic settlements and sites of archaeological interest and the design and location of new developments and infrastructure. Provide wider associated social and cultural benefits through the provision and management of high-quality green infrastructure networks.* Some key bullet points include:
 - Ensuring that local development frameworks <u>recognise the importance of conserving and</u> <u>enhancing the landscape to help to reduce the likelihood of negative impacts from new</u> <u>developments</u>¹.
 - Supporting the use of historic and landscape characterisations to inform change, and encouraging their use in community-based planning to help to identify locally valued townscapes, rural landscapes and heritage assets.
 - Conserving and interpreting historic features in the landscape, including traditional farmsteads and buildings, and geological and archaeological interest features such as

¹ My underlining for emphasis of items particularly relevant to the appeal site.

<u>ancient wood banks and earthworks</u>, while recognising the potential for undiscovered remains.

- 3.6 In the Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessment (CBA, 2006), Saffron Walden and its setting to the north, south and west is located within the A1 Cam River Valley landscape type, whilst the appeal site straddles a transitional landscape area with farmland plateau landscapes. It lies partly within the B7 Debden Farmland Plateau and close to the Ashdon, Hempstead and Thaxted Farmland Plateau areas.
- 3.7 The significance of the appeal site straddling this transitional landscape is that it occupies rising land on the eastern valley side that adjoins the more open and rolling plateau landscape. This means that for the first time the settlement of Saffron Walden will be extending out of its historic valley setting into more open countryside and in so doing will initiate the near merger with the outlying village of Sewards End.
- 3.8 At page 276, the CBA Assessment concludes that the Cam River Valley landscape type has an open skyline of the valley slopes (and) 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 valley sides 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.
- 3.9 At page 301, the CBA Assessment concludes that the Debden Farmland Plateau landscape type has sensitive key characteristics and landscape elements ... includ(ing) dense woodland patches and copses, which provide structure within the landscape and are sensitive to changes in land management. The open nature of the skyline of areas of the plateau (where panoramic views, often towards settlements can be gained) is visually sensitive to new development, which may interrupt such views. There is also a sense of historic integrity, resulting from dispersed historic settlement pattern (with isolated farms, moated sites and small hamlets strung out along linear greens), which is sensitive to potential large-scale development.
- 3.10 As part of the work for their new Local Plan, Uttlesford have commissioned LUC to produce a Landscape Sensitivity Assessment (Phase 1, Towns and Key Villages,

2021). The study provides an assessment of relative landscape sensitivities to different types of development around selected settlements, including Saffron Walden. The study does not consider 'capacity', which would include a consideration of cumulative impact. The assessment has considered that the appeal site and area south-east of the town is located in an area of 'moderate' landscape sensitivity, whereas the more intimate valley landscape to the north of the town has moderate-high sensitivity and the areas adjacent the Audley End estate west of the town are considered highly sensitive.

3.11 Saffron Walden is therefore highly constrained in landscape terms and any growth needs to be carefully considered in terms of siting, design, construction and future operational impacts. It also needs to be considered that continued and unmeasured growth is unlikely to be commensurate with sustainable landscape planning. If new housing is required in the district, it may be necessary to look at options other than continued expansion of housing estates at the edge of historic settlements.

4.0 Planning Policy Context

4.1 In relation to sustainable development, the environmental objective of the NPPF, paragraph 8 states:

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 4.2 Section 12 of the NPPF promotes design standards. Paragraph 127 states that plans should be developed with local communities to reflect local aspirations. Paragraph 129 suggests design guides should engage and include local communities and should refer to other national guidance. Paragraph 130 requires that development can function well, is visually attractive and that it is sympathetic to local character and history.
- 4.3 Although Saffron Walden and the appeal site are not within the Uttlesford area of Green Belt, it is worth considering the five purposes of Green Belt in relation to considered planning around an historic town. An appropriate strategy for any expansion might ideally include similar goals:

- check the unrestricted sprawl of large built-up areas;
- prevent neighbouring towns merging into one another;
- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns;
- assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.4 Section 15 of the NPPF promotes conservation of the natural environment. Paragraph 174 states that *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.*
- 4.5 Of relevance to the application is the NPPF section on open space and recreation where the Saffron Walden Neighbourhood Plan identifies significant shortfalls in both active and passive recreational facilities and green infrastructure. New development needs to comply with NPPF paragraphs 98 and 100–103.
- 4.5 The Uttlesford District Local Plan (2005) remains the current adopted plan. Policy S7, The Countryside, states that *Development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set or there are special reasons why the development in the form proposed needs to be there. Policies GEN 1 Access, GEN 2 Design, GEN 3 Flood Protection and other general policies are generic about design standards. There are a number of generic environmental protection policies including ENV 8 Elements of Importance for Nature Conservation. <i>Development that may adversely affect (the following) landscape elements will only be permitted if the following criteria apply: a) The need for the development outweighs the need to retain the elements for their importance to wild fauna and flora; Hedgerows; Plantations; Linear tree belts; Larger semi natural or ancient woodlands; Seminatural grasslands; Green lanes and special verges; Orchards; Ponds and reservoirs; River corridors; Linear wetland features; Networks or patterns of other locally important habitats.*

- 4.6 Uttlesford have a number of Supplementary Planning Documents that are relevant to the appeal site. *Building for a Healthy Life* (June 2020) (the latest edition of the Homes England *Building for Life* code) employs a 'traffic light' system to promote best practice in residential design and the development of 'integrated neighbourhoods'. Pages 14-85 are particularly relevant to the design of new residential areas such as proposed at the appeal site. Another SPD promoted by Uttlesford is the *Urban Place Supplement* (Essex County Council, 2007). Pages 14-26 are particularly useful, defining a town the size of Saffron Walden as a 'Small Urban Centre' where local centres should ideally have a walkable catchment radius of 400m (5 minutes). Other relevant sections consider street and public realm design, cycle paths and SuDS design.
- 4.7 Saffron Walden Town Council have prepared a Neighbourhood Plan which is due to go to referendum in September. Paragraph 2.9 identifies views into and out of the town and surrounding countryside as key assets of the parish (as identified in public consultation, page 14). Key concerns of the community (pages 14-19) are the scale and quality of new development and related issues about traffic, air quality and lack of infrastructure provision (roads, paths, green space, services).
- 4.8 Neighbourhood Plan policy SW3, Design, refers to a proposed forthcoming Saffron Walden Design Guide which is still at preparation. Item 4 requires a positive response to the landscape, views and the natural /historic environment. It requires integrated neighbourhood and sustainable connectivity. Item 7 requests a *building for life* assessment and item 8 requires a design code to be submitted at outline application stage. Policy SW6 requires that new development must not have adverse impacts on Market Hill and Church Street. Policy SW11 sets out biodiversity requirements for new development including the design of SuDS infrastructure. Policy SW12 requests that new development delivers adequate pedestrian and cycling infrastructure and, if appropriate, a travel plan. SW14 requests that developers provide adequate public transport infrastructure.
- 4.9 Pages 72–78 outline the shortfall of active recreation and public open space facilities in the town and Policy SW16 identifies requirements. Pages 79–81 outlines the substantial shortfall of informal recreation space and Policy SW17 identifies some requirements. Policy SW18 seeks to mitigate adverse impacts to local public rights of way. Policy SW19 promotes the development of new public access woodland.

5.0 Landscape and Visual Impact Assessment

- 5.1 I have reviewed the elements of the appellant's landscape and visual impact assessment that appear on the planning portal. I have undertaken fieldwork to review local viewpoints. I have not prepared a full LVA, but have considered the appellant's conclusions using my own methodology that I have developed over a number of years using the published *Guidelines for Landscape and Visual Impact Assessment* (GLVIA) produced by the Landscape Institute in conjunction with the Institute for Environmental Management and Assessment (now in the third edition, published 2013). My methodology is provided as my Appendix iii.
- 5.2 The proposed outline scheme for 233 dwellings can be described as being divided into five distinct areas. The small rectangular paddock adjacent the B1053 is indicated for use as the site access and for drainage attenuation basins (which may restrict opportunities to use as public open space). The main area of housing is shown in the western portion of the site on ground sloping from around 78 to 94m AOD. This appears to be slightly higher and steeper than the neighbouring Linden Homes site and will presumably require ground modelling to create flat building platforms. Two other 'blocks' of housing are indicated toward the east, separated by 'green corridors' that are understood to relate to service easements. These are also set on higher ground, apparently extending up to the 98m contour, and are likely to require significant earthworks to establish access and building platforms. The final portion of the highest ground in the south-east corner of the site is proposed for public open space, but will also presumably require some earthworks to facilitate equitable access.

Landscape Sensitivity

5.3 I have reviewed the appellant's LVA documents as found on the planning portal. The 'Landscape schedule' document appears to summarise a fuller analysis that I assume is summarised as 10.72 –10.77 of the main ES text, although delineation of identified landscape receptors is not very clear. I feel that sweeping the entire context of the site (which will include four separate landscape types and a variety of public access locations) into two categories – 'Local Landscape' and 'Settlement of

Sewards End' has almost certainly led to the under-valuation of effect on certain aspects of the setting – notably the B1053 road corridor.

- 5.4 However, I do not disagree with an evaluation of 'medium' overall sensitivity for the landscape types, and this is obviously similar to the conclusions of the LUC 'Landscape Sensitivity' study. LUC have qualified their assessment of 'moderate' landscape sensitivity for this landscape setting by saying they have not factored in cumulative impact. I feel the appellant's conclusions on cumulative impact analysis (10.121–10.124 of the main ES text) are weak. Extending the effects of the already prominent and not yet complete Linden Homes residential estate is clearly going to have a cumulative impact on identified landscape and visual receptors. The likelihood of perceived settlement coalescence with Sewards End is also relevant.
- 5.5 The appellant's scheme retains a narrow gap between the site and Sewards End. It is actually only 150m between the site boundary and nearest garden land off Cole End Lane. The 250m 'physical separation' distance is therefore questionable and appears to be the distance between the site boundary and the first dwelling off Cole End Lane. I think there needs to be some consideration as to whether this narrow buffer of farmland is actually viable to maintain in future. In fact, the smaller paddocks nearest Radwinter Road already appear to be unused (although this maybe a conservation management scheme). Signage in fields adjacent the nearby public footpath PROW 315 already indicate friction between farmers and nearby residents (refer to photographs of Local Site Context in my Appendix ii). I would argue that such a narrow landscape buffer between the appeal site and Sewards End will in time prove to be unviable for agriculture and that there will either be pressure for settlement expansion, or it will be subsumed for public open space. In either case there is a great likelihood of local landscape character becoming urbanised in future, leading to actual or perceived total settlement coalescence.
- 5.6 I feel that the extent to which landscape mitigation can/will reduce landscape effects has also been overstated. Even before factoring in the operational impacts of a substantial new residential enclave on a green-field setting that presently still retains considerable historic integrity, this will be a prominent settlement extension on rising ground. It will not be easily integrated into the landscape.

Landscape Effects

- 5.7 <u>Construction landscape character/features</u>: I concur with the appellant's list of likely construction phase changes to the site (10.82 of the main ES text). The nature of the proposed scheme can be expected to require considerable ground modelling and level changes. This will create a prominent building site, which is likely to be phased over several years. Changes of level and temporary soil storage / drainage works are likely to have impacts on features to be retained including boundary hedges/trees. (See comments on the Arboricultural report below.) This is an outline application and there are still considerable unknowns to be confirmed in relation to required highway, drainage and servicing works. A single access from Radwinter Road seems questionable, especially when the easternmost parcel of development appears to be linked by a very narrow internal road corridor. 18 hectares of farmland will be permanently removed from agricultural use. The road frontage will be 'urbanised'. I think the appellant's conclusion of major adverse effects at the site and moderate effects to the setting are fair but I am doubtful that these can be reduced to minor effects after 15 years.
- 5.8 <u>Operation Landscape character/features</u>: The appellant's assessment seems to concentrate on impacts to landscape features and not so much the imposition of a large urban extension on landscape character including new site activity. Clearly there will be considerable new traffic activity generated from an edge-of-town estate as proposed, where dependence on vehicular transport is likely to be much greater than for a town centre scheme. There will be a permanent perception of settlement coalescence with Sewards End that will influence the character and setting of Saffron Walden. The extent to which the proposed public open space and other soft landscape works can mitigate this is questionable and will very much depend on the detailed design, success of establishment and ongoing management and maintenance.

Views Analysis

5.9 <u>Visible Structures:</u> The principle new structures will be the buildings, the tallest of which are proposed to be 3 storeys tall, therefore perhaps 9–12 metres tall at roof

ridge height. I would assume the lowest 1.5m storey buildings to be 5-7m tall to roof ridge. The finished floor levels will clearly vary across the site but are likely to mainly be within the 85-95m AOD range – so that most rooftops will probably be 95-100m AOD. The access road will be notable from the B1053 and also from the existing dwellings opposite. Works to create the public open space will also be evident from outside the site. The appellant has also noted the introduction of street lighting and new path connections.

- 5.10 <u>Zone of Visual Influence</u>: I have reviewed the likely zone of visual influence and concur broadly with the findings of the appellant's LVIA. (Refer to 'Views of Site' photographs at my Appendix i.) I found an additional viewpoint at the Ashdon Road / Bloor Homes development, where the site will be notable in long views from a new amenity area and surrounding dwellings at Miller Street / Hawkins Place.
- 5.11 I agree with the appellant's conclusion² that the views from Harcamlow Way, although 1300 –1800m from the appeal site, will be moderate/major adverse and significant. The extent of the proposed estate on a north-west facing slope will be very notable. It is also clear that, especially from the south-west end of the Harcamlow track, existing dwellings at Sewards End, including the listed Pounce Hall, can be seen in the same view and that, despite tree cover, it is likely to be perceived that there will be no meaningful break between the two settlements in the view. It can be expected that any residential properties in Saffron Walden with this south-easterly outlook will also be able to see this substantial urban extension.
- 5.12 The appellant's LVA view 3 doesn't appear to be on the planning portal. I do not agree with the appellant's conclusion that the visual effect from their viewpoint 3a will be negligible. I have walked the footpath (PROW 315) and photographed three illustrative views (refer to views 5, 6 and 7 in my Appendix i). In my opinion the proposed development will be 'prominent' in my View 5 (extending the observable rooftops of the Linden Homes development up the hill towards the viewer), 'very prominent' in View 6 (with the new buildings fundamentally altering the view and

² Refer to the appellant's LVA – Group 5 photographs, View 7 and 7a and accompanying commentary.

extending up the hill and towards the skyline), and 'notable' in View 7, where, even before the likely loss of trees along the road frontage, I would expect filtered views through the intermediate vegetation to the site, especially in winter time. Rooftops may also extend above the tree cover. So, for ramblers using the path, the corridor of which presently has strong rural character with historic integrity, the perception will be that they are now very close to the town. Activity at the site, both during construction and operation, is likely to be audible and visible from these viewpoints. This therefore represents a substantial change to the setting for footpath users. I would conclude that the magnitude of change would be medium or high, the sensitivity of receptors would be medium high and therefore that the level of effect, certainly in my views 5 and 6, would be **moderate substantial** and **significant**.

- 5.13 It seems likely that any residents at Sewards End with westerly or south-westerly views from their properties will have a similar level of visual intrusion in their outlook.
- 5.14 I have summarised my conclusions on nine selected views to illustrate potential visual effects on identified visual receptors in the development setting. (Refer to Appendix i, Figures 1-5. View positions are illustrated in Figures 6 and 7.)

View / Receptor	Distance	Comments
View 1. Looking south-east	Approximately	The development will be seen as a prominent
from Harcamlow Way	1300 metres to	extension to the town. I agree with the
(PROW 44)	development.	appellant that the effect will be moderate
Path users including long-		major adverse.
distance walkers		
View 2. Looking south-east	Approximately	The development will be seen as a prominent
from further along Harcamlow	1200 metres to	extension to the town. I agree with the
Way (PROW 44)	development.	appellant that the effect will be moderate
Path users including long-		major adverse.
distance walkers		

Summary of Views Analysis

View 3. Looking south-east	Approximately	The development will be seen as a prominent
-	1300 metres to	extension to the town. I agree with the
(PROW 44) – before it	development.	appellant that the effect will be moderate
swings north.		major adverse.
Path users including long-		-
distance walkers		
View 4. Looking south-east	Approximately	The development will be seen as a prominent
°,	700 metres to	extension to the town. This was not a view
Place	development.	identified by the appellant, but on the basis of
Residents – including from		the conclusions above, I conclude the effect
new dwellings.		will be moderate major adverse.
	Approximately	The rooftops of the development will be seen
path near Sewards End	800 metres to	as a prominent extension to the town. I
(PROW 315)	development.	conclude the effect will be moderate adverse.
Path users.	-	
View 6. Looking west from	Approximately	The development will be seen as a prominent
path (PROW 315)	500 metres to	extension to the town. I conclude the effect
Path users.	development.	will be moderate major adverse.
View 7. Looking west from	Approximately	Partial or filtered views of rooftops and taller
path (PROW 315)	150 metres to	buildings seem probable. I conclude the
Path users.	development.	effect will be moderate adverse.
View 8. Looking west on	Approximately	Changes to sections of the road front will be
Radwinter Road (B1053)	20 metres to	substantial with hedge and tree loss and
Road and adjacent footpath	development.	creation of the new entrance. Filtered views
users.		into the site will be evident. I conclude the
		effect will be moderate major adverse.
View 9. Looking west from	Approximately	On the basis that rooftops at the Linden
Pounce Hall Farm.	340 metres to	Homes site are partially visible, it seems
Residents and pedestrians.	development.	likely that the proposed development will also
		be visible from this position. Views of the
		development from west-facing windows in
		Pounce Hall itself are likely to be prominent. I
		conclude the effect will be slight or moderate

- 5.15 Visual impact summary residential receptors: I have not undertaken a detailed analysis of the number of residential dwellings that may gain views of the development, but based on a general review of the setting, it seems likely that the development will be prominent from the north-west part of Saffron Walden which may include several hundred homes. It will obviously be prominent from the neighbouring Linden Homes site and also from parts of Sewards End.
- 5.16 Visual impact summary transient receptors: The contextual photographs provided and summarised above indicate principal views from Radwinter Road (B1053), the footpath from Sewards End (PROW 315) and from Harcamlow Way (PROW 44). The section of Radwinter Road opposite the site appears to be a historic sunken lane and is said to follow an ancient river course. The Harcamlow Way is a 141-mile long-distance route through Cambridgeshire, Essex and Hertfordshire. Prow 315 appears to be a well-used local path that provides an attractive walk within part of the upper Slade valley.
- 5.17 Visual impact summary heritage: It is considered likely that the development will be prominent from Pounce Hall, a grade II listed building. It has not been established whether views of the site will be possible from ground level areas around St Mary's Church in Saffron Walden, but much of the church is visible from the appeal site. It seems likely that the proposed development would be distantly visible from parts of the grounds at Audley End as these are partially visible from the appeal site. The Heritage Statement considers other heritage impacts.

6.0 Arboricultural assessment

6.1 I have reviewed the Arboricultural Report by BJ Unwin. There are some slightly surprising statements in the report such as at 4.1 where it is stated that the boundary vegetation along the B1053 *severely overhang the road cutting, and would benefiter from severe cutting back* (sic), which is not arboricultural terminology that I have come across before. I would think if the Highways Authority had any particular risk management concerns for the road corridor, they would address them, hopefully with appropriate selective pruning. In my view, the vegetation along this section of sunken lane has strong rural character and should be protected. Several trees certainly have veteran status (T5 – Oak is noted).

- 6.2 In my opinion, for an outline application, a Tree Protection Plan or Arboricultural Method Statement are probably premature. The site proposals are far from fixed and there may be a variety of additional constraints and requirements that could yet affect the existing vegetation during development. I note at Section 5.1.1 of the report it is stated that *tree retention on architect's plan is indicative*, and I would think this could be said of all the tree management proposals at this stage. It is stated that 100 metres of road-front hedge will need to be removed (which I would estimate is more than indicated on the TPP illustration as presented), but I note additional Highways comments regarding the need for roadside footpaths and visibility splays. Unfortunately, I would anticipate far greater impact to road-front vegetation, even before other matters are addressed including ground modelling to create an acceptable access gradient, creation of drainage attenuation ponds, and construction of housing platforms.
- 6.3 The report notes the presence of dutch elm disease and ash dieback, but only recommends to 'plant up gaps'. There are no specific recommendations about replacement planting or mitigation planting and no suggestions on what might be appropriate on this site in the face of climate change.

7.0 Summary and Conclusions

- 7.1 The appeal site lies in open countryside at the edge of Saffron Walden, a historic town that benefits from tourism. The landscape at the site has no conservation designation, but provides an attractive agricultural setting to the town and the outlying village of Sewards End. Field boundaries are historically intact and the boundary vegetation has landscape and ecological value. There are several distinctive features of heritage interest in the immediate setting including a sunken section of Radwinter Road, Pounce Hall, and Pounce Wood (an ancient woodland and county wildlife site).
- 7.2 Saffron Walden is situated in the South Suffolk and North Essex Clayland, in the Cam Valley landscape type. This area of attractive undulating countryside with a rich landscape heritage is under unprecedented development pressure and I have stated that it can be considered a 'threatened landscape'. In particular, the setting of historic

towns like Saffron Walden are under threat as urban expansion, much of it arguably not fulfilling the government's 'Build Beautiful' agenda, erases historic landscape features and introduces 'anywhere' residential estates that are typically highly car dependent and have few amenities.

- 7.3 Under 'Additional Opportunities', the NCA profile for the character area promotes measures that lead to the enhancement of existing historic settlements and ... (that) Provide wider associated social and cultural benefits through the provision and management of high-quality green infrastructure networks.
- 7.4 Although Saffron Walden is a valley town, situated in the Cam Valley landscape type, the appeal site occupies a transitional landscape space between the valley and the higher and more open plateau farmlands to the east. In this respect the proposed development would entirely change the setting of the town because it is extending the settlement into a new landscape type on higher, more open ground.
- 7.5 Another significant aspect of this development is that it will to a large extent lead to the coalescence of the town with the outlying village of Sewards End. This is an unprecedented growth plan that will be prominent in the setting and is clearly unpopular with residents. In my opinion, the 150 metres of land left between the settlements is unlikely to be sustainable for agricultural purpose in the longer term and the proposed public open space within the development, whilst a reasonable idea, is likely to further urbanise the overall landscape setting. I cannot see that the proposal therefore accords with NPPF paragraph 8 and clearly not paragraphs 127 130.
- 7.6 I have reviewed the zone of visual influence and found some additional positions from which the development will be prominent in local views. I have concurred with the appellant's landscape architect regarding the magnitude of impact and effect to receptors from Harcamlow Way, but I feel a similar level of intrusion should be concluded from at least two other viewpoints at Miller Street/Hawkins Place and from a section of PROW 315.

- 7.7 This is an outline application and there will be much detail to finalise before a reserved matters design can be submitted. Having reviewed some of the comments from stakeholders and noted some anomalies in the design to date, it is my view that the extent to which existing boundary vegetation can be sustainably retained and new landscape works can mitigate the impact of the building works, as stated by the appellant, is very optimistic. In my opinion, the impact of the scheme will be and will remain significant and detrimental to the setting of Saffron Walden.
- 7.8 I have visited other current building sites around the town and looked for them from local public rights of way and I am in no doubt that the proposed development at the appeal site will be the most prominent urban extension yet proposed in Saffron Walden. Even the extensive red roofscape of the neighbouring Linden Homes development and the considerable bulk of the Premier Inn on Thaxted Road are not as widely visible in the context of the town as the proposed scheme would be. To this extent, the proposal would be out of step with previous planning decisions, contrary to national and local planning policy and very discordant with the valley setting. If the scheme went ahead, it would in my opinion constitute urban sprawl, encroach upon attractive open countryside, cause coalescence with a neighbouring settlement and undermine the setting of an historic town.
- 7.9 Clearly there is strong demand for housing in Uttlesford and especially in Saffron Walden and this scheme would provide a significant number of new homes. However, I feel it is a premature application. The scale of recent growth in Saffron Walden is overwhelming the town. Detailed consideration is required before more residential expansion is brought forward. The Neighbourhood Plan indicates that residents are not resistant to the idea of new housing development per se. However, they are clearly resistant to the scale and context of the appellant's proposed scheme. My conclusion is that this is with good reason and that in landscape terms the scheme should be considered unsustainable development <u>and the appeal dismissed</u>.
- 7.10 Should it be decided that the continued growth of Saffron Walden is necessary and desirable in future, then I would think that any further plans at this or other sites need to be developed in close association with the Town Council and wider community

and, assuming it is adopted, within the auspices of the Neighbourhood Plan. Certainly, a clear vision for green infrastructure provision, multi-modal transport, recreation and other amenities must lead decision making. This would conform closely with NPPF paragraphs 127–130 and other current government guidance.

7.11 If the inspector is minded to uphold the appeal, then detailed and binding reserved matters conditions should be agreed to ensure that the outline plan as presented can be developed and implemented with optimal outcomes. In particular, I would think this must apply to high quality detailed design of buildings, roads and public realm areas; delivery of infrastructure to underpin a multi-modal transport hierarchy; detailed construction, landscape and ecological management planning including adequate monitoring, reporting and enforcement; and a clear plan for the future management of public realm areas including defining organisations and resources to maintain them.