

## **Notes for Planning committee APP/C1570/W/22/3296426**

Good morning all – my name is Adrian Knowles and I am here representing SEPC and SWTC in asking you to refuse this planning appeal.

As a parish councillor of the small village most affected by this application, we welcome the help and support of the SWTC - together with the R6 party we have the strong support of the community in opposing this development. The petition, signed by almost 600 residents justifies this statement. More on this later.

SE is a village of approx. one hundred and ninety houses and is a thriving and lovely village to the east of SW, which has a tremendous community feel and has been my home for the last 20 years.

Our objection to this planning proposal is based not only on this development contravening local and national planning policy, but also the desire to maintain the beauty and charm of Saffron Walden and Swards End.

As the R6 party representing the residents of SW and SE we believe that a number of assessments have been less than robust and that the “mitigation plans” for this development are too high a price to pay for this development to go ahead. The less than robust traffic capacity mitigation plan for the town centre has also been designed without proper review of associated traffic and notable Heritage impacts on listed buildings and the Saffron Walden Conservation Area

We have provided much more detailed feedback in our formal statement of case to the planning inspector, but some of our key objections are based on the following material planning considerations:

- The site is outside of the designated development limits (as per local plan S1.) The development limit is there for very good long-recognised social and environmental reasons, which are not out of date. It recognises the location of Saffron Walden in a valley bowl and provides a very clear distinction and green space between the town of Saffron Walden and the village of Swards End, reflecting the separate identity of these two very different individual settlements. The appellant suggests that this development is merely an “extension of Saffron Walden”. Not only is this factually incorrect as the development is in the parish of Swards End, but the Framework paragraph 79 requires housing in rural villages to be located where it will enhance or maintain the vitality of local communities. It will take from the parish of Swards End, but turn its back on it. The approach also indicates lack of community engagement and even disdain to the residents of Swards End who

are overwhelmingly against this proposal and will be for ever negatively impacted by this proposed large-scale development. We would ask the inspector to recognise and acknowledge that the location of the site would in essence join Swards End to Saffron Walden. This development significant changes the identity of Swards End for its residents. The village would immediately “double in size” with the inherent social issues that would cause. We believe planning policy on sustainable development is designed to stop this encroachment on rural communities.

- The proposed development site is part of the countryside - Local plan S7 is very clear on this matter – “In the countryside, which will be protected for its own sake, planning permission will only be given for development that needs to take place there, or is appropriate to a rural area..... There will be strict control on new building. 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”. This is reflected in Framework policy 174b which requires planning decisions to recognise the intrinsic character and beauty of the countryside and of the economic and other benefits of the best and most versatile agricultural land. This is highest quality land and countryside and therefore policy S7 is supported by the Framework which urges a sequential approach towards its protection.
- It is our contention that the proposed development site does not need to be there, **nor are there any special reasons for it to be there** – not only is it in the worst possible place for all the reasons we will come on to – but in the creation of the new local plan the council has already advised that many more sites have been identified within the Uttlesford district which would more than satisfy the land / housing requirement for future development. We would ask that this application/appeal is rejected and then be part of the overall new local plan considerations. It can then be established if the development NEEDS to be where it is or are there better sites for development.

Through our statement of case we have provided more details why we believe that the proposed site is unsuitable for this specific development, and that a number of key assessments and proposals relied on are not robust. They include sustainability and safety issues, Transport, Access, Landscape, Ecology and countryside impact and most importantly Heritage.

In this opening statement we focus on a few key areas that would be the major impact of this development on the daily lives of the residents of Swards End and Saffron Walden – we hope to show through this Inquiry that we are already at crisis point in many areas and this development will cause significant harm to the community.

Some of the major issues impacting residents are:

- Lack of capacity in the town's road networks, resulting in significant vehicle congestion in the town and the resulting AQMA issues.
- The desire to protect the conservation area of the High Street and its characteristics – no more traffic lights please.
- Lack of secondary education places to satisfy the long-established catchment area
- Lack of capacity in the town's primary schools

Although not directly affecting existing residents, we ask the Inspector to closely consider the safety issues relating to this site, amongst which is flooding, the fuel store and fuel pipework, and the much-reduced visibility splay based on a speed survey in February 2021, the half term holiday and last week of the covid shutdown

### **Lack of capacity in the town's road networks:**

As residents of SW and SE we all face the challenge of the congestion in the town centre at different times of the day. Our congestion reality is visible in the numbers provided as part of this planning review.

The current local plan states "Saffron Walden is one of the finest examples of a market town in the East of England. It is of the highest environmental quality with pleasant shopping streets, open spaces and numerous historic buildings, which attract many tourists. Traffic in Saffron Walden is a significant problem with its historic street pattern, restricted carriageway widths and junction geometry posing particular problems for heavy goods vehicles. At various times during the day the existing road system is unable to cope with the number of trips being made. This can result in delays, disturbance to the occupants of buildings close to the affected roads and a reduction in the quality of the environment for pedestrians. Further traffic management measures are envisaged during the plan period, to be identified"

These specific benefits and challenges of planning for the historic town and its medieval road layout are considered in all local plans back to 1983. The road network within Saffron Walden has not changed significantly since that time – however the number of new residents and car journeys has increased significantly even since the latest plan of 2005. As residents we face the daily challenge of congested streets, with cars and HGVs bringing supplies to the town and this will get worse with the additional 480 houses approved and under construction in the adjacent sites.

The appellant suggests in their Technical Note: Outstanding Highways Matters Project No: CTP-20-1142 Date: January 2022 Para 4.1 that “The historic traffic data used within the assessment was taken from the approved planning application for the Kier / Bellway and Dianthus Land sites and this approach was agreed with ECC as part of pre-application discussions in view of the ongoing COVID-19 restrictions at the time that prevented the collection of traffic flow data. In addition, the data collected as part of these planning applications is considered to remain valid for use”

However, the historic traffic data provided as part of the previous planning applications (Report by Peter Brett Associates Project Ref: 41317 | Rev: - | Date: March 2018) Para 7.4.6 stated: “The results in Table 7.1 show the junctions operating within theoretical capacity in the 2017 base scenario. However, the following junctions operate marginally above practical capacity and are therefore beginning to experience delays and congestion”:

1. Newport Road / Audley End Road / London Road junction.
2. Debden Road / London Road junction; and
3. Hill Street / Common Hill / Cates Corner junction.

So even the baseline capacity analysis in 2017 shows the SW town road network suffering delays and congestion.

The situation gets worse as the future traffic growth is added. The report goes on to conclude in Para 7.4.12 that: “The modelling indicates one or more arms of the following junctions already operating over practical capacity in the future baseline scenario and where levels of queuing and delay worsen as a result of the addition of the development traffic”:

- Thaxted Road / Peaslands Road mini roundabout
- Debden Road / Mount Pleasant Road / Borough Lane signalised junction
- Borough Lane / London Road Junction mini roundabout
- High Street / Audley Road priority junction
- George Street / High Street / Abbey Lane signalised junction

- Hill Street / Common Hill / Cates Corner mini roundabout
- Thaxted Road / Radwinter Road signalised junction (240s cycle)

Please remember these models do not include any of the increased traffic associated with new proposed developments since 2018. These additional 233 houses further increase the problem.

We would therefore suggest that the submitted traffic data points to a very challenging traffic capacity issue.

The suggested mitigation issues are suggestions which in our opinion have not been robustly tested and in particular their negative impact on the heritage issues.

We are not able to question the effectiveness of the mitigation efforts suggested by ECC to the road capacity issue and we do not wish to. We do however share the concerns of ECC highways that these mitigation efforts may be undeliverable due to the nature of the Saffron Walden road network. This, combined with the lack of robust Heritage impact assessment in implementing the mitigation plans, makes the residents very worried and concerned for the future of the town if this planning appeal is upheld and then subsequently the traffic issues cannot be solved. (as we all expect)

As a matter of coincidence or interesting timing two events last week demonstrated quite significantly the traffic issue that we face which caused traffic chaos in the town and surrounding villages. Whilst we accept that Highways cannot plan for major road closures – it does highlight the fragility of the town road network.

On Thursday, the M11 southbound was shut pretty much all of the day resulting in traffic being diverted off the motorway north of Saffron Walden at Duxford. Whilst the official diversion routed traffic to the west of the motorway...sat navs would take the shortest route ie through Newport / SW. The resulting diverted traffic ended up trying to get through saffron Walden and the neighbouring village of Newport resulting in massive queues and locked roads. I was locked up in traffic trying to get to the north of the town. Not sure what would have happened if it was a school day.

We also this past weekend hosted Gardeners World Fair at Audley End House. Again, the area roads are not designed to handle influx of traffic as a tourist area. Again we had a gridlocked town / parking for most of the weekend. Residents see a constant erosion of the ability to get around Saffron Walden by car – we see this planning application only making matters worse.

Several of the official responses from ECC (sustainability and infrastructure assessments) rely on mitigation provisions that rely on cycle transport into the SW town and make this a clear requirement.

There are almost no cycling facilities in Saffron Walden, and no dedicated cycle lanes or safe spaces for cyclists anywhere within the town (save for one small stretch of cycle path). The narrowness of the roads and the weight of motorised traffic on the roads means that there is almost no road space available for cyclists. In 1999, Uttlesford District Council and Essex County Council drew up a cycle strategy with a network of desired cycle paths; in the succeeding 23 years, not one of the paths identified within the town has been built or even confirmed as feasible. In 2015, Saffron Walden Town Council conducted a public consultation and drew up a list of desired segregated cycleways; every single one of those was rejected by Essex Highways as not being technically possible. In 2021 Essex Highways looked again at the requested cycle provision, and again repeated their advice that none of the requested routes was technically possible; they also stated that they could not think of any cycle scheme which was technically possible within Saffron Walden. Cycling in Saffron Walden is already difficult and dangerous, and every new development adds more cars to the road network and makes it harder to find any safe space for cycling. The proposed application will make the situation still worse.

There is no safe cycling infrastructure which would link the proposed development to any facility in Saffron Walden, whether the town center, any of the schools, junior or secondary, or otherwise, and nor is the applicant proposing anything beyond the limits of the development to assist cyclists.

Once a cyclist is on the Radwinter Road they would be entirely left to their own devices; it is a narrow road with heavy traffic flows and no space for cyclists - as anyone who has cycled it can confirm, it is an extremely unpleasant road to cycle down for an adult and would be far too dangerous for a child to use. We have witnessed regular accidents with the cars parked on the north sides being scraped or their wing mirrors broken because of the narrowness of the road and the width of vehicles. We would ask that the inspector walk from the applicant site to the County High School at the morning or afternoon peak times and view reality for a pupil to cycle from the proposed development.

To quote ECC in their sustainability response

“The location of the application site will clearly not encourage residents to walk into the town centre because of the distance and hilly nature of the route as well as the dangerous and unappealing nature of the Radwinter route itself.”

It goes on “There is some hope that cycling will become more popular in the future..... However the barrier to this remains the unappealing nature of the route itself as well as the complete lack of infrastructure in the town.”

ECC infrastructure response goes on to say

“ECC will not be seeking a school transport contribution, however the developer should ensure that safe direct walking and cycling routes to local schools are available”

We know that safe direct walking and cycling routes to schools are not available.

We would ask that this application be rejected until a more robust traffic management assessment and its impact on the Heritage issues can be robustly assessed.

### **Heritage impact on the High Street Conservation Area**

Corrie Newell will provide evidence on heritage and has included the traffic mitigation efforts in her study as three of the four junctions proposed for change are either wholly or partly in the Conservation Area.

The most concerning of these junctions is Junction 13, which is at the T junction of Church Street and the High Street. This is a very visible part of the oldest part of town where there are many listed buildings. All the buildings at the junction itself are listed and, when looking up the High Street, the historic buildings at this junction have the tower of the Grade I listed Church as a backdrop.

Corrie Newell’s comparisons show that the lights, crossings and service boxing would make a considerable (and negative) difference to the appearance of the historic group along both the High Street and along Church Street. They would also be very visible in the views along the High Street towards the Church.

Church Street is very narrow and is a one-way single lane. The pavements along Church Street and this part of the High Street are also very narrow. To install the traffic lights, crossing and services, the pavements are widened, the road is narrowed and three of the columns are installed only a foot away from the listed buildings. The gratings and list entries show the cellars exist very close (if not under) the positions where traffic light columns are being proposed.

The proposals would neither preserve nor enhance the character of this part of the Conservation Area and would not preserve the settings of the Listed buildings. It is very likely they would also damage the structure of the nearest listed buildings and/or their historic cellars.

There are other elements of the proposals that have impact on heritage that Corrie Newell will present. They include there are likely to be views of the proposed houses over the treeline from part of the Common (the old Castle Green) which is a very important open public space in the town and Conservation Area.

We very much welcome and encourage a site visit.

### **Lack of school places:**

One of the major issues facing families residing in **and around** Saffron Walden is will there be a secondary education place for their son/daughter. NPPF 95 states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. We strongly agree.

We are blessed that we have two great schools within a few miles of Saffron Walden town centre – however both are located to the west – 1 being in the town of Newport to the southwest (Joyce Frankland), serving the villages to the west of SW. SWCHS catchment area covers **the town and** villages to the north, east and south of SW. SWCHS (Saffron Walden County High School) and Newport are significantly oversubscribed and are full in all year groups, with waiting lists. This is before we see the impact of *current* developments which are already under construction and not yet occupied. It is reasonable to conclude that, in the coming years we will see that some children living in SWCHS's catchment area will not receive an offer of a place at the school. With no capacity at Joyce Frankland, these children will have to travel much further afield to go to school – either to Great Dunmow, or more likely to Stansted.

This problem will not just affect those applying for places in Year 7, but also 'mid-year' applications to Years 7 -11 when families move into Saffron Walden with older, teenage children. Recently, a family moved to the town from abroad and required a place in Year 9 for their child. Neither SWCHS nor JFAN were able to accommodate them: Essex could only offer them a place at Forest Hall School in Stansted. Again a 12 mile / 30+ min drive



When SWCHS is oversubscribed then the admission criteria is enforced – one of the final criteria used is distance from the school. The addition of 480 houses (for existing planning permissions) is completely changing the admission / catchment area. This will (and already has) impacted Swards End and surrounding villages **so that residents cannot be confident of securing a place at SWCHS, their 'catchment' school**. The addition of another 233 houses will, effectively, further **shrink** the catchment area, requiring students in the villages to travel to schools significantly further away, such as Forest Hall in Stansted (12 miles) or Helena Romanas in Dunmow (15miles).

An unintended consequence of this development, if approved, is that families living in the villages surrounding SW, **which are in the school's published catchment area**, will no longer "make the cut" for SWCHS admission criteria. Please put yourself in the position of the many concerned parents living in the villages today who have no idea if their son or daughter will get a secondary school place in a nearby school. Through no fault of their own, families will be scrambling to secure a place in secondary schools that may be many miles away even into different Education authorities (eg Cambridgeshire). These are real problems which are not being acknowledged or reflected by the simulations being used for this development, and therefore the mitigation does not reflect the impact.

The town's primary schools are also at their absolute capacity. In recent years, Essex has asked them to take 'bulge' classes and they now have no physical capacity in their buildings to admit more. Again, this will result in young children having to attend schools at some distance from their home.

As residents and families – we all know the importance of getting our children into the local school and to not have to travel hours on public transport or by private car to get to school. We would suggest the additional journeys have a major effect on the sustainability of the site – and for sure this is not contained in the transport modelling provided.

## **Petition**

Almost 600 signatures were collected on a petition organised by Hazel Mack and Kathleen Hutchinson to show the strength of feeling amongst local residents regarding this proposed development. 80% of the households in Swards End were visited and signed the petition. In addition, they approached as many households in Saffron Walden that they could in the time available to them. Not a single person who was approached, either in the village or in town, was in favour of the development – the 'hit rate' when direct contact was made with households suggests

that an overwhelming majority (more than 90/95%) of residents in both Swards End and Saffron Walden are against this development.

In summary:

The Appellants suggest to:

- Completely remove Radwinter road roadside frontage, roadside ditch and at least 100 metres of hedgerow to this country lane which has high landscape and ecological value to be replaced by a large roundabout to access the site. It falls well short of the Framework's key objective of sustainable development to protect and enhance our natural environment. What was a winding country lane with protected hedgerow and veteran trees would become an urban roadway.
- Provide no solution to the need for sustainable cycle and or pedestrian links other than through accessing Radwinter road which the Sustainability Officer assesses as having a "dangerous and unappealing nature". No connections via the adjacent site are possible and this undermines the suitability / sustainability of the site. The current alternative suggestion is not tested and demonstrated to be deliverable.
- Provide no workable mitigation for the increased east / west traffic flowing through already congested town centre at peak times.
- Push ahead with a suggestion to install traffic lights and prominent paraphernalia in one of the most sensitive locations in the town, where preservation of heritage is given great weight under the Framework, and where it has already been questioned by ECC as undeliverable.
- Provide no pedestrian / cycle connection to existing Swards End village, which bears the brunt of demand for parish facilities from the development.
- Under-assess the Landscaping and Heritage quality and impacts.
- Under-assess the Ecology impacts including the protected status of the hedgerow, and the numbers and quality of habitats, ponds and watercourses on and adjacent the site.
- Under-assess the significant issue in flooding for the road connecting SE and SW, the existing surface water flooding of road and site shown on the Environment Agency map, and the slopes due to the 20 metre height

difference of the site. The loss of valuable agricultural land and replacing with hard surfacing and concrete will only exacerbate this problem.

- Build on prime agricultural land situated on a rising hill overlooking Saffron Walden and would be highly visible not only from SW but also from SE. The beautiful views that we currently enjoy would be destroyed and would change the character of SW and SE significantly. The constraints of safety buffer zones across the site and of suggested landscape mitigation zones means this development fails to make notably efficient use of the loss of that high quality land, contrary to Section 11 of the Framework.

We have provided very detailed feedback to the planning inspectorate why we believe this planning appeal should be rejected as it does not comply with National and local planning policies.

It fails on many other areas including the loss of a historic landscape, Ecology grounds and sustainability.

The application fails to address many of the challenges of building a significant development to the east of Saffron Walden.

We are very proud to live in this area – an area that attracts many tourists and visitors alike. You are deciding how Saffron Walden and Swards End will look and feel long into the future. We respectfully ask that you protect this beautiful living and tourist spot that is packed with heritage and history – we think it deserves it.

I ask you to reject this proposal.