UTT/19/2355/DFO (SAFFRON WALDEN)

(Major)

PROPOSAL:	**Approval of Reserved Matters following outline application UTT/18/0824/OP details of layout, scale, landscaping and appearance relating to the development of the site to provide 150 residential dwellings (Use Class C3) and associated infrastructure works.**
LOCATION:	**Land East of Thaxted Road Saffron Walden**
APPLICANT:	**Bellway Homes (Essex)**
AGENT:	**Savills**
EXPIRY DATE:	**30.12.2019 (extension of time)**
CASE OFFICER:	**Maria Shoesmith**

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1. NOTATION

1.1 Outside Development Limits (small section within Developments Limits Policy SW5), Airport Safeguard Zone, Public Rights of Way

2. DESCRIPTION OF SITE

2.1 The application site is located east of Thaxted Road on the south eastern edge of the market town.

2.2 The site is of arable fields and lies within the rolling landscape of the River Cam/Granta. The M11 is to the west of the town and 5km from Audley End Station. It is adjacent to residential dwellings to the north and northwest, Lord Butler Leisure Centre and the skate park is located to the west, Shire Hill Farm northeast and the Kilns and Granite site, also Brick Kiln Lee Farm is located to the southeast of the site.

2.3 The character of the area surrounding the application site changes from one which is of an urban nature, to countryside, to one that is commercial/industrial.

2.4 The application site comprises an area of 7.9ha (19.6acres).

2.5 The northern parcel of land's highest ground level runs along the northern and eastern boundary (93.7m AOD) with the land sloping towards Thaxted Road to the south (reducing to 74.2m AOD). There is a water course that runs east to west across the site.

2.6 There are footpaths, bridleway and byway that either run along the perimeter of the site or through the site.

3. PROPOSAL

3.1 The application is for reserved matters following the granting of outline planning permission for the development of up to 150 dwellings (Use Class C3) with all

matters reserved except access (UTT/18/0824/OP). The report for this is attached to **Appendix A**.

3.2 This application provides details of layout, scale, landscaping and appearance, with associated infrastructure works.

3.3 Details relating to the housing types and tenure mix, details of new areas of public recreational and open space, LEAP, including network of public footpaths, cycle routes linking to the existing network and surrounding countryside.

3.4 The scheme would provide 40% affordable housing with a mixture of tenure, both rent and shared equity. 5% bungalows will be provided across all tenures.

3.5 A breakdown of the housing units in terms of tenure, parking and private amenity space provision is attached to the end of the report in **Appendix C**.

The application includes the discharge of conditions relating to materials (condition 5 of UTT/18/0824/OP.

4. ENVIRONMENTAL IMPACT ASSESSMENT

4.1 Town and Country Planning (Environmental Assessment): The proposal is not a Schedule 1 development, exceeds the threshold criteria of Schedule 2, however the application has been screened and an Environmental Assessment is not required.

4.2 Human Rights Act considerations: There may be implications under Article 1 and Article 8 of the First Protocol regarding the right of respect for a person's private and family life and home, and to the peaceful enjoyment of possessions; however, these issues have been taken into account in the determination of this application.

5. APPLICANT'S CASE

5.1 The following documents have been submitted in support of the application;

- Design And Access Statement
- Ecological Appraisal
- Planning Statement
- Transport Assessment Addendum

Drawing;

- BW216 PL01 Location Plan
- PR162-01 G - Revised Landscape Framework Plan
- 192311-006 A - Site Layout Swept Paths
- 192311-007 A - Site Layout Visibility Plan
- BW216 PL-02 B - Revised Development Layout
- BW216 PL-03 C - Revised Boundary Treatment Plan
- BW216 PL-03a Rev 00 – Additional Boundary Treatments
- BW216 PL-04 B - Revised Private Amenity Space Plan
- BW216 PL-05 B - Revised Parking Plan
- BW216 PL-06 B - Revised Colour Of Materials Layout
- BW216 PL-07 C - Revised Refuse Strategy
- BW216 PL-08 B - Revised Affordable Housing Location Plan
- BW216 PL-EN-01 A - Revised Proposed Development Entrance

- BW216 ST-01 B - Revised Street Elevations A,B And C
- BW216 ST-02 B - Revised Street Elevations D,E And F
- BW216-HT-JE-02 A - Revised Plots 1,28,32,58,60,63,78,86,94 &99 Elevations
- BW216-HT-JE-04 A - Revised Plots 29,46,82,108 Elevations
- PR162-02 B - Revised Lap/Leap Children's Play Area
- 192311-001 - Finished Floor Level Strategy
- 192311-002 - Retaining Walls Plan
- BW203-HA-050-01 - Plots 118,119,120,121 - Ha 50
- BW203-HT-BM-01 - Plots 4,15,21,26,38,41,51,54,89,132,140 & 150
- BW203-HT-BU-01 - Plots 109 - 112 Bungalow
- BW203-HT-CN-01 - Plots 33,34,36,37,55,56,87,88 Coiner
- BW203-HT-CN-02 - Plots 136, 137 Coiner
- BW203-HT-CS-01 - Plots 3,124, 131 Coppersmith
- BW203-HT-CT-01 - Plots 105,128 Cartographer
- BW203-HT-HI-01 - Plots 2, 14,18,20,52,53,92,93,133,134,135 & 138 Hillard
- BW203-HT-JE-01 - Plots 1,28,32,58,60,63,78,86,94,99 Floor Plans Jeweller SP1 M4(2)
- BW203-HT-JE-03 - Plots 29,46,82,108 Floor Plans Jeweller
- BW203-HT-PL-01 - Plot 22 Ploughwright (Country Brick)
- BW203-HT-QU1-01 - Plots 106,107,139,141, 142 Quilter Sp1(Country Brick)
- BW203-HT-RE-01 - Plots 30,39,45,62,84,91 Reedmaker (Country Brick)
- BW203-HT-RE-02 - Plots 5,16,17,31,35, 39 Reedmaker (Country Weatherboarding)
- BW216-GR-01 - Garage SG1& SG2
- BW216-GR-02 - Garage SG3 &SG4
- BW216-GR-03 - Sales Garage SG5
- BW216-HA-BA-01 Rev A - Plots 12,64,65,68,69,72,73,75,100,101,115-117, 122, 125, 126, 129, 130, 143, 144, 147-149 Baker
- BW216-HA-BA-02 Rev A - Plots 70,71,114,145,146 Baker (Ba A) (Country Weatherboarding)
- BW216-HA-BA-03 Rev A - Plots 13 And 74 Baker (Ba B) (Country Brick)
- BW216-HT-TI-01 Rev A - Plots 6-11, 23-25, 66,67,102,103,123 & 127 Tillman (Tib) (Country Brick)
- BW216-HA-TI-02 Rev A - Plots 76,77 And 113 Tillman (Tia) (Country Weatherboarding)
- BW216-HA-TI-03 Rev A - Plot 104 Tillman (Tib) (Country Brick)
- BW216-HT-LU-01 Rev A - Plots 19,40, 43,44,47,48,50,57,80, 81, 83, 85, & 96 Luthier (Brick)
- BW216-HT-LU-02 Rev A - Plots 27,42,59,61,79,90,95,97,98 Luthier (Country Boarding)
- BW216-PL-SE-01 - Section A-A
- BW216-PL-SE-02 - Section B-B
- BW216-PL-SE-03 - Section C-C
- BW216-SUB-01 - Electric Sub Station
- PR162 - Planting Palette
- PR162-03 A Precedent Images 1 (concrete wall surface, timber knee rail and metal railings)
- PR162-04 - Tree Pit Details And Service Trench Root Barrier Details

6. RELEVANT SITE HISTORY

6.1 The application site has a long planning history; the most relevant planning applications are listed below;

UTT/13/2060/OP - Outline application with all matters reserved except access for residential development of up to 300 dwellings, pavilion building, extension to skate park and provision of land for open space/recreation use, including an option for a new primary school on a 2.4 ha site – Refused 02 May 2014, dismissed at appeal

6.2 UTT/18/0824/OP - Outline planning application for the development of up to 150 dwellings (Use Class C3) with all matters reserved except access – Granted Planning permission April 2019

7. POLICIES

Uttlesford Local Plan (2005)

- GEN1 Access
- GEN2 Design
- GEN3 Flood Risk
- GEN4 Good Neighbourliness
- GEN5 Light Pollution
- GEN7 Nature Conservation
- GEN8 Vehicle Parking Standards
- ENV15 Renewable Energy
- H9 Affordable Housing
- H10 Housing Mix

Supplementary Planning Documents/Guidance

Essex Parking Standards (2009)

National Policies

- National Planning Policy Framework

8. SAFFRON WALDEN TOWN COUNCIL COMMENTS

8.1 Please see **Appendix B**

9. CONSULTATIONS

Cadent Gas

9.1 Your proposal as currently specified is in proximity to Cadent and/or National Grid apparatus, which may impact, and possibly prevent, your proposed activities for safety and/or legal reasons.

Anglian Water

9.2 The reserved matters application is not foul drainage related, therefore this is outside our jurisdiction for comment.

UK Power Networks

9.3 Should your excavation affect our Extra High Voltage equipment (6.6 KV, 22 KV, 33 KV or 132 KV), please contact us to obtain a copy of the primary route drawings and associated cross sections.

UDC Housing Officer

9.4

The delivery of affordable housing is one of the Councils' corporate priorities and will be negotiated on all sites for housing. The Councils policy requires 40% on all schemes over 0.5 ha or 15 or more units.

The affordable housing provision on this site will attract the 40% policy requirement as the site is for 150 (net) units. This amounts to 60 affordable housing units and it is expected that these properties will be delivered by one of the Council's preferred Registered Providers.

It is also the Councils' policy to require 5% of the whole scheme to be delivered as fully wheelchair accessible (building regulations, Part M, Category 3 homes) as well as 5% of all units to be bungalows delivered as 1 and 2 bedroom units. This would amount to 4 bungalows delivered as affordable units.

The scheme presented by the developer is given below. This mix and the locations are acceptable. 30% of these homes should be for shared ownership. Further information is welcomed.

1 Bed Maisonettes	2 Bed House	2 Bed Bungalows	3 Bed House	4 Bed House
4	30	4	20	2

Homes should meet the following standards; 1 bed property house 2 people, 2 bed properties house 4 persons, 3 bed properties house 5 persons and 4 bed properties house 6 persons.

ECC SUDS

9.5 Having reviewed the documents which accompanied the planning application, we do not object to the granting of the planning permission ref UTT/19/2355/DFO. The reserve matter application does not directly relate to drainage and therefore the application should be subject to the same conditions applied to the outline application (UTT/18/0824/OP).

The proposed development will only meet the requirements of the National Planning Policy Framework if the measures as detailed in the Drainage strategies and the documents submitted with this application are implemented as approved.

Any questions raised within this response should be directed to the applicant and the response should be provided to the LLFA for further consideration. If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us.

ECC Archaeology

9.6 No objection subject to Archaeological Programme of Trial Trenching followed by Open Area Excavation condition.

Aerodrome Safeguarding

9.7 No objection

Crime Prevention Officer

9.8 We note that the boundaries between the gardens consist of 1.2m chain link fence, it should be noted that should entry be gained to one property within a block

then all of these properties will have a greater risk of crime. We also note that the play area has a number of trees surrounding it, care should be taken choosing the species and the maintenance plan to ensure that these do not restrict the natural surveillance it. NB the landscape advice within Secured by Design Homes 2019 has been edited by the RHS. To comment further we would require the finer detail such as the proposed lighting, boundary treatments and physical security measures. We would welcome the opportunity to consult on this development to assist the developer with their obligation under this policy and to assist with compliance of Approved Document "Q" at the same time as achieving a Secured by Design award.

From experience pre-planning consultation is always preferable in order that security, landscaping and lighting considerations for the benefit of the intended residents and those neighbouring the development are agreed prior to a planning application.

Further comments dated 21.11.2019

With reference to our earlier comment, unfortunately the viewing of the revised documents does not provide clarity of detail of any of the changes. It would appear that some boundary fences have been changed but some of the plots still retain a 1.2m chain link fences between them. Landscape species detail is not clear and as such our comments remain for consideration, and we would still like the developer to consult with us with a view to obtaining a Secured by Design award in respect of this development.

Environment Agency

9.9 Whilst we have no objection to this application, we do wish to advise the applicant on permitting. Please note that we are not commenting on this application with regards to flood risk as the proposal falls under our Local Flood Risk Stranding Advice.

Essex Highways

9.10 From a highway and transportation perspective the impact of the proposal is acceptable to the Highway Authority subject to condition.

ECC Ecology

9.11 No objection subject to securing biodiversity mitigation and enhancement measures

Environmental Health

9.12 Condition 13 of UTT/18/0824/OP requires 20% of parking bays to be provided with electric vehicle charge points, a further 40% to have capacity for conversion. I am unable to identify the points on the submitted plans, however provision is confirmed by the Planning Statement submitted with UTT/19/2355/DFO. The shared 3m foot/cycle path along Thaxted Road at the point of the proposed access appears to be continued alongside the spine road, but on estate roads the width is reduced. In this respect, the provision of paths for pedestrians and cyclists within the development is insufficient to encourage non car travel. A dedicated cycle path would encourage more use, and would provide a safer route through the development by avoiding cyclists combining with powered vehicles.

The LEAP is shown positioned adjacent the spine road to the south. Emissions from road traffic will impact on users of the facility, many of whom will be young and more prone to the harmful effects. National objective levels for air pollutants are unlikely to be breached at the facility, but the proposed location does not meet best practice in minimizing exposure to emissions.

UDC Landscaping

9.13 The submitted landscape framework plan (Dwg. No. PR162-01 Rev F) makes provision for the planting of nearly 200 trees of predominantly native species, and a kilometre of mixed native species hedgerows consisting of some 5,000 hedging plants, together with a broadly similar length of native hornbeam hedges.

The tree planting associated with the proposed swales is characterised by a mixture of traditional osiers, goat willow, and alder. This proposed wetland plantation planting would provide a level of visual separation and screening between the proposed development and the existing 'Kilns' residential development immediately south of the proposal site. Native hedge and tree planting adjacent to the north edge of the site will provide a level of screening and softening of the built forms from existing residential properties to the north of the site.

A circular site perimeter footpath is proposed through a linear open space to be seeded with native wild flower and grass mixture. The footpath links to the equipped play area (LEAP) situated in the south of the site.

Recommend that a fully detailed landscaping scheme is submitted for approval.

10. REPRESENTATIONS

10.1 The application has been advertised on site and within the local press. Neighbouring residential occupiers have also been consulted of the application. As a result the following points have been raised:

1. Loss of light and privacy in garden/home;
2. Safety risk to family, children, pets and neighbours using public footpath;
3. Noise and disruption;
4. Significant increase in traffic and pollution along Thaxted road;
5. flooding and drainage;
6. link road seems to have been left off plan;
7. reduced quality of life;
8. Cumulative development impact upon infrastructure;
9. Kier development included 25m open space between public footpath and the edge of the new development;
10. No provision of a community hub that would service the development therefore no social cohesion;
11. Loss of hedges and habitat;
12. Link road would have impact on wildlife;
13. Extension of 24 Eastby Close not shown;
14. Loss of privacy and overlooking of garden;
15. Securing affordable housing;
16. Wellbeing;
17. Loss of agricultural field;
18. Advised 22 years ago the field would not be built on;
19. parking of plots 58 & 59 impact on garden;

20. development should be at Friends School on a Brownfield site not here;
21. less open space;
22. less drainage and landscaping;
23. overshadowing;
24. overlooking created by plot 42-44;

Privacy: 3 of the new houses front elevation being built opposite our side elevation. Our side elevation has 4 main windows facing the field (the proposed development site). Their windows looking into our windows.
Privacy: Windows of house numbers 42 - 44 overlooking our garden. As they face our property and look down into our rear garden plot, not letting us enjoy our privacy. We are lower than the proposed houses.
Privacy: Windows of Plot 42 looking into our front bedroom windows (the children's bedrooms)

25. Adequacy of parking/loading/turning areas including access - the cars parking and turning in the proposed road / drive area that will run parallel to our rear garden will be emitting pollution into my rear garden.
26. odour;
27. more traffic from future development marked as 'future' on the plans
28. impact of development upon dog walkers using Public footpath;
29. No affordable housing for locals

11. APPRAISAL

The issues to consider in the determination of the application are:

A Design
B Mix of Housing and Affordable Housing
C Road Design and Car parking
D Landscape Impact and Biodiversity
E Flood Risk and Drainage
F Other Considerations

A Design

11.1 A number of the points raised by third parties in Section 10 have been discussed and approved at outline stage. The principle of the development has been approved and this application relates to purely the details of the proposed development in so far that they relate to layout, scale, landscaping and appearance.

11.2 With regards to the proposed design of the scheme the NPPF; also Local Plan Policy GEN2 seeks for quality design, ensuring that development is compatible in scale, form, layout, appearance and materials. The policies aim to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole seeking high quality design.

11.3 As to whether the scheme would be compatible with the character of the settlement area and countryside, the scheme would see the development of countryside, an open area of field, which has been principally agreed. A scheme has been designed providing of various open spaces. It maintains and creates footpaths and a landscaping buffer which in turn provides a low density

development. The density of the proposed development would be well below of that reflected in national policy and the Essex Design Guide at 19 dph across the whole site and 30.6dph across the developable site area of 4.9ha, which is compatible with the surrounding area.

11.4 A mixture of 1, 2, 3 and 4 bedroom dwellings have been proposed in the form of bungalows, houses and maisonettes. The dwellings would be solely 2 storeys with focal buildings provided within certain areas. The buildings would vary in height from 7.7m-9m, and the bungalows would be 5.4m in height. The heights of the proposed dwellings would respect the changing ground levels of the site and be similar to the estate to the north. The design of the dwellings would be in keeping with other developments in the local area.

11.5 The design of the houses take account of surrounding area vernacular and the choice of materials proposed in terms of brick and weatherboarding which is considered to be acceptable.

11.6 The main spine road through the site would be to Outline Planning Permission standards of 6.75m in width with the provision of 3m wide shared footway and cycle path and 2m footpath to the other side of the road.

11.7 There is a retaining wall to the entrance of the site which would be up to 3m in height and constructed from texturised concrete, used elsewhere in Saffron Walden, which would be fronted by a hedge.

11.8 The Locally Equipped Area of Play would be to the south of the site where the site is at its flattest as highlighted within the Illustrative Master Plan. The Essex Design Guide (2005) recommends 50 square metres for up to 2 bedroom units and 100 square metres of garden space for 3 plus bedroom dwellings. All the dwellings meet or exceed this in accordance with EDG. This is highlighted in **Appendix C**.

11.9 Natural surveillance through the design of the scheme is proposed together with public and private areas clearly demarcated. These minimise opportunities for anti-social behaviour. Comments from the Crime Prevention Officer have been taken on board and the plans have been amended regarding boundary treatments. This is in therefore accordance with designing out crime principles and Policy GEN2 of the Uttlesford Local Plan.

11.10 There would be no overlooking as the dwellings have been sited respecting the required back to back distances of 25m as recommended within the Essex Design Guide, with only two dwellings falling marginally below this at 22m (Plots 104 to 97) however, due to the angled relationship of the two properties is considered acceptable.

11.11 The boundary to the north is considered the most sensitive in terms of residential dwellings being adjacent to the shared boundary. The developments layout relationship with the dwellings located on Linton Close, Eastby Close and Rylstone Way is acceptable. Objections have been raised with regards to loss of privacy, and overlooking, this is not consider to cause an unacceptable loss of residential amenity.

11.12 The existing public footpath has been retained along the perimeter of the proposed development and with the planting of trees would interrupt any form of direct views.

11.13 The proposed boundary treatments would be a mixture of 1.8m high brick wall, close boarded fence, hit and miss timber fence, Larch lap fence, Larch privacy panel. Due to changing ground levels retaining walls are proposed in certain parts of the site at 0.9m, mostly forming the rear garden boundaries of properties. The frontage boundary treatments are complimented with soft landscaping treatment.

11.14 In terms of noise and disturbance during the course of construction this aspect falls under the Environmental Health Act and covered in the Environmental Code of Development Practice.

11.15 The location of the LEAP has been raised by the Town Council and Environmental Health, however, this has been specifically located at the most suitable location level in terms of levels and safe access, which is also integrated within the wider landscaping scheme. Environmental Health have stated that the objective levels for air pollutants is unlikely to be breached. There are no policy grounds to refuse the application on this basis particularly as air pollution was assessed as part of the Outline application.

11.16 The dwellings are stated would be designed to sustainable standards, in accordance with current Building Regulation Standards and therefore would be energy efficient, in accordance with Local Plan Policy GEN2.

11.17 The development has been designed to be in accordance with Part M of the Building Regulations in terms of accessibility. This includes consideration for the design of the overall sloping site in term of gradients. An informal path for dog walkers is to be created around the perimeter of the site. This perimeter route will be just over one kilometre in length and will include the existing public footpath on the northern boundary that will be improved. This route will enable residents to gain access to the footpath network within the wider countryside. The designed gradients of the circular route will ensure that this path is accessible, with no gradient greater than 1 in 20.

11.18 Overall the application is in accordance with Local Policy GEN1, and GEN2, the Essex Design Guide and the NPPF.

B Mix of Housing and Affordable Housing

11.19 Local Plan Policy H10 seeks that residential schemes provide a mixture of house sizes. The scheme provides a balanced good mix of dwellings which responds to both the market and the needs of the Housing Register as the table below indicates;

Type	Private	Affordable
1 bedroom house	0	4
2 bedroom house	15	34
3 bedroom house	27	20
4 bedroom house	48	2
Totals	**90**	**60**

11.20 8 bungalows are provided on site in accordance with Council requirements of 5% provision of wheelchair accessible units. The scheme is therefore considered to be in accordance with Local Plan Policy H10 in this respect.

11.21 Policy H9 requires that 40% affordable housing is provided on sites having regard to market and site conditions. A total of 60 affordable dwellings are proposed

meeting the 40% requirement in accordance with Council policy and the terms of the S106 Agreement, in the following format;

Type	Affordable Rent	Shared Ownership
1 bedroom apartment	4	0
2 bedroom house	22	8
2 bedroom bungalow	4	0
3 bedroom house	11	9
4 bedroom house	1	1
Totals	**42**	**18**

11.22 As agreed with the S106 Agreement, attached the outline planning permission, there is a 70/ 30% split between affordable rent and shared ownership. In line with Schedule 2, Part 1 (3) the affordable housing has been integrated into the site layout so that no more than 15 affordable housing units are in a group.

11.23 No objection has been raised by the Housing Officer in terms of the proposed housing mix or type. As such the application complies with Policies H9 and H10 of the Local Plan and the requirements of the NPPF.

C Road Design and Car parking

11.24 Local plan policy GEN1 states "*development will only be permitted if it meets all of the following criteria;*

a) Access to the main road network must be capable of carrying the traffic generated by the development safely.
b) The traffic generated by the development must be capable of being accommodated on the surrounding transport network.
c) The design of the site must not compromise road safety and must take account of the needs of cyclists, pedestrians, public transport users, horse riders and people whose mobility is impaired.
d) It must be designed to meet the needs of people with disabilities if it is development to which the general public expects to have access.
e) The development encourages movement by means other than driving a car."

11.25 Local Plan Policy GEN1 seeks sustainable modes of transport which is reflected within National Planning Policy Framework. A Transport Assessment Addendum has been submitted as part of this application.

11.26 Whilst a number of the third parties have raised highway safety issues, capacity and the location of the development, the principle of the development, including the level of vehicle movements, and access into the site from Thaxted Road has been accepted at outline stage and therefore does not form part of the consideration of this application.

11.27 This reserved matters application includes details of the internal road layout, internal road priorities and its connectivity. The main core road through the site has been provided up to the northern boundary to allow for future development should this come forward under planning application UTT/17/2832/OP Land North Of Shire Hill Farm (100 dwellings) which would also connect with planning permission UTT/13/3467/OP & UTT/16/1856/DFO Land South Of Radwinter Road Radwinter Road (200 dwellings currently under construction), as secured through the original Section 106 Agreement attached to the outline consent of all three sites.

11.28 The main road through the site has been designed to 6.75m in width. A cycle/ footpath has been designed within the street layout at 3m and 2m width footpath the other side of the road.

11.29 It has been stated within the Transport Assessment Addendum that "*The site layout has been designed with consideration given to the Essex Design Guide and Manual for Streets with emphasis on reducing car dominance and keeping traffic speeds within the target of 30mph on the spine road and 20mph on all other roads, with pedestrian and cycle movement prioritised where possible*." This addresses the concerns raised by Environmental Health.

11.30 The existing Public Right of Way Footpath 37 will remain and be improved as well as be integrated into the design of the development. This will provide a positive buffer between the development and the dwellings to the north.

11.31 The following off-site highway works are to be delivered in-line with requirements set out in the S.106 Agreement attached to the outline planning consent (ref. S.106 para 1.33):

• a traffic signal-controlled junction in Thaxted Road to provide access to the proposal site;
• a minimum 3m wide foot/cycleway along the site's Thaxted Road frontage;
• improvements to aid pedestrians to cross at the Thaxted Road/Peasland Road mini-roundabout;
• improvements to the Bridleway that runs along the northern boundary of the site;
• pedestrian and cycle signs at the key points along the appropriate routes between the town centre and railway station.

11.32 ECC Highways have raised no objections subject to a condition requiring both sides of the main road to have a 3m wide footpath both sides of the road which is contrary to the terms of the S106 Agreement, and thereby this is considered unreasonable. However, Highways have raised no objection to the road layouts, accesses or visibility splays.

11.33 In terms of car parking standards the Uttlesford Residential Parking Standards (2013) seeks for 1 car parking space for 1 bedroom units, 2 car parking spaces for 2-3 bedroom units and the Uttlesford Local Parking Standards (March 2013) seeks 3 car parking spaces for 4 plus bedroom dwellings, with a visitors parking provision of 0.25 spaces per dwelling. A breakdown of the proposed parking provision is highlighted in the table in **Appendix C**. Car parking spaces are 5.5m x 2.9m, increased to a 6m length for a space within a driveway in front of a garage. Garages have an internal size of 7m x 3m as per the ECC/EPOA standards and so count as a car parking space.

11.34 The proposed development is acceptable in terms of its road layout and design, and in accordance with the adopted Parking Standards above, also Policies GEN1, GEN2 and GEN8 of the Uttlesford Local Plan.

D Landscape Impact and Biodiversity

11.35 The visual impact of the proposed development in this location has been considered as part of the outline planning application. As part of the reserved matters the details of the landscaping scheme need to be considered as to whether it is acceptable.

11.36 The constraints of the site where considered as part of developing the landscaping scheme. The existing landscaping is fundamentally along the along the perimeters of the site would be retained except in connection in allowing for the proposed access into the site.

11.37 A single-line avenue of trees, set within a generous highway verge, will line one side of the proposed bus route that will pass through the site. This will create a positive new landscape feature that will aid movement through the site. A series of smaller "greens" are to be created throughout the development. These new landscape spaces will be planted with groups of new trees which will soften the development.

11.38 An informal path for dog walkers is to be created around the perimeter of the site. This perimeter route will be just over one kilometre in length and will include the existing public footpath on the northern boundary. This route will enable residents to gain access to the footpath network within the wider countryside. The designed gradients of the circular route will ensure that this path is accessible, with no gradient greater than 1 in 20.

11.39 A total of 190 new trees are proposed to be planted and together with under 1000 linear meters of new native species hedgerows are also to be planted as part of the new landscape and public realm proposals.

11.40 An area of local equipped area of play (LEAP) with various play equipment is proposed to the south of the site where the land levels are most even and safe access. This will be fenced off with child-friendly bow-top railings with two self-closing gates to keep out dogs. The play equipment will be constructed of hardwood timber to respect the site's location on the settlement edge.

11.41 The introduction of dry drainage ponds within the site which would be planted will read as part of the wider landscaping and open space provision. Due to the fact that the 'ponds' will be dry and shallow these will be useable.

11.42 The various areas such as mews, table tops and drives will be characterised by differing hardscaping materials. Various types of planting have been proposed for differing areas such as indigenous trees within the street. New native species hedgerows that are to be planted around the edge of the built part of the site, low flowering informal evergreen hedgerows will be planted in some parts of the development in order to define garden frontages and to reinforce sense of place.

11.43 Due to the change in ground levels a textured retaining concrete wall would be proposed to the front entrance of the site that will be planted up with a 3m high native hedge. A 3.8m high wall and railings to the north side of the entrance will signify the gateway to the site. Together with the landscaping proposed this will create a semi-rural feel.

11.44 The Landscape Officer has been consulted of the application together with proactively working with the applicant's Landscaping Consultant in order to develop and achieve a suitable scheme.

11.45 The Landscaping Officer has stated "*the submitted landscape framework plan (Dwg. No. PR162-01 Rev F) makes provision for the planting of nearly 200 trees of predominantly native species, and a kilometre of mixed native species*

hedgerows consisting of some 5,000 hedging plants, together with a broadly similar length of native hornbeam hedges.

11.46 *The tree planting associated with the proposed swales is characterised by a mixture of traditional osiers, goat willow, and alder. This proposed wetland plantation planting would provide a level of visual separation and screening between the proposed development and the existing 'Kilns' residential development immediately south of the proposal site. Native hedge and tree planting adjacent to the north edge of the site will provide a level of screening and softening of the built forms from existing residential properties to the north of the site.*

11.47 *A circular site perimeter footpath is proposed through a linear open space to be seeded with native wild flower and grass mixture. The footpath links to the equipped play area (LEAP) situated in the south of the site*." The Landscape Officer concluded no objection subject to a fully detailed landscaping scheme to be submitted for approval should the Reserved Matters application be approved.

11.48 In terms of airport safeguarding BAA have raised no safeguarding objections to proposal.

11.49 In consideration of the above the landscaping scheme accords with Local Plan Policy GEN2, and GEN7.

11.50 Policy GEN7 of the Local Plan states that development that would have a harmful effect on wildlife will not be permitted unless the need for the development outweighs the importance of the feature of nature conservation. Where the site includes protected species, measures to mitigate and/or compensate for the potential impacts of development must be secured.

11.51 The ecological survey has been undertaken, submitted and assessed as part of the outline planning application. A number of recommendations have been made in order to mitigate and enhance biodiversity of which these have been conditioned as part of the outline application and would still need to be adhered to.

11.52 Condition 11 of the outline planning permission states "*All ecological mitigation & enhancement measures and/or works shall be carried out in accordance with the details contained in the Update Ecological Appraisal (Bioscan, May 2018) as already submitted with the planning application and agreed in principle with the local planning authority.*

REASON: To conserve and enhance Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species) and s17 Crime & Disorder Act 1998. This is also in accordance with Policy GEN7 of the Uttlesford Local Plan (adopted 2005) and the NPPF."

11.53 An updated ecological report has been submitted as part of this application. As a result no objections have been raised by ECC Ecology subject to securing biodiversity mitigation and enhancement measures. However, this is a condition that remains to be complied with on the Outline consent therefore no additional condition would be required should the reserved matters be approved. The scheme therefore is considered to accord with Local Plan Policy GEN7, and NPPF.

E Flood Risk and Drainage

11.54 Local Plan Policy GEN3 states that development would only be allowed if it does not increase the risk of flooding. Due to the scale of the proposed development a Flood Risk Assessment has been undertaken and submitted as part of the outline planning application, in accordance with Policy requirements.

11.55 The application site falls within Flood Risk Zone 1 where there is low probability of flooding from tidal or fluvial sources. The assessment had been undertaken to demonstrate that the proposed development would not increase the risk of flooding outside of the application site.

11.56 As part of the application landscaping masterplans have been submitted which indicate features such as dry swales which would form part of the development and any forthcoming drainage scheme.

11.57 ECC SUDs have been consulted and have stated "*Having reviewed the documents which accompanied the planning application, we do not object to the granting of the planning permission ref UTT/19/2355/DFO. The reserve matter application does not directly relate to drainage and therefore the application should be subject to the same conditions applied to the outline application (UTT/18/0824/OP). The proposed development will only meet the requirements of the National Planning Policy Framework if the measures as detailed in the Drainage strategies and the documents submitted with this application are implemented as approved*."

11.58 Whilst no drainage details have been submitted as part of this reserved matters application there are conditions which that remain to be complied with on the outline permission therefore no additional would be required should the reserved matters be approved.

11.59 The development is therefore considered to be in accordance with Policy GEN3 of the adopted Local Plan.

F Other Considerations

11.60 ECC Archaeology have commented regarding the application and have raised no objection subject to Archaeological Programme of Trial Trenching followed by Open Area Excavation condition. However, it should be noted that this condition has already been placed upon the Outline planning application. It is understood that some archaeological works have already commenced on site.

11.61 The Town Council have raised objections, which are included in **Appendix B**, regarding the level of weight applied to Emerging Draft Local Plan Policies. Due to the status of the draft local plan the weight applied to these policies are limited and therefore could not sustain refusing an application on this policy basis, also due to the fact that they are not formally adopted.

11.62 With regards to comments relating to the Green space and this being '*significantly diminished*' in relation to the outline planning application, the Outline permission purely relates to the principle of the development and the fact that 150 dwellings could be achieved on the subject site. Details relating to the level of greenspace was not approved as part of the outline planning application and only the access was approved. For information the description of the application was "*Outline planning application for the development of up to 150 dwellings (Use Class C3)*

with all matters reserved except access". There is no adopted policy for the provision of public open space which the application can be assessed against. It was made clear within the outline planning application report that "*The details relating to public open space land situated within the residential part of the development is a reserved matter however it is clear that such would be provided as part of the proposed development*."

11.63 Even with the ground level constraints on the site large buffers zones of greenspace have been provided surrounding the proposed development which will provide over 1km of footpath, together with pockets of greenspace within the scheme which softens the development, also a LEAP providing over 600m2 of play area. . Based on the Town Council's calculations the greenspace provision as part of the whole scheme of approximately 23,353m2 also exceeds the draft policy provision of 3,600m2 based on 10m2 per person. The SUD basins are shallow and dry and therefore usable.

11.64 The reserved matters details has to demonstrate that the sufficient back to back distances, off street parking provision, roads to standards, providing dwellings to national space standards on top of greenspace provision which is considered to have been balanced out within the development scheme and well achieved.

11.65 Cycle paths have been provide on the mains roads as discussed above whereby 3m wide pavements have been provided in accordance with the S106 Agreement requirements.

11.66 No objections have been raised by ECC Highways, Landscape Officer, or Ecology.

11.67 In terms of the housing mix this is considered above as acceptable. It meets the current SHMA and no objections have been raised by the Housing Officer.

11.68 With regards to the lack of consideration for climate change mitigation the dwellings will need to accord with current Building Regulation requirements regarding energy efficiency, which is stringent taking a fabric first approach. There is no adopted policy requirement and as far as Local Plan Policy GEN2 is considered the scheme accords. It is unreasonable and unable to sustain refusing the application based on the lack of solar panel and air source heat pump provision within the scheme.

11.69 The Town Council states that "*The reserved matters application show equipment made of wood, which will not be long-lasting and which will not provide good value for money, especially in the light of the short maintenance contribution (set in the Section 106 at 5 years not 10). Again, this is unsustainable*." The equipment is proposed to be made from treated wood which comes with a 25 year guarantee. The use of wood is considered more environmentally sustainable rather than the use of metal and aesthetically more sensitive to the rural nature of the site's surroundings and the design approach of the scheme. Nonetheless, this aspect could be conditioned should the reserved matters be approved.

11.70 The some of the following details have been provided as part of the application and by way of formally discharging conditions attached to the outline planning permission;

11.71 **Condition 5 - Materials and boundary treatment**

This has been discussed above and the details are considered to be acceptable. Therefore the condition can be formally discharged.

11.72 **Condition 7, (detailed lighting scheme) (UTT/19/2356/DOC)**
Condition 7 states "*No fixed lighting shall be installed until a detailed lighting scheme has been submitted to and approved in writing by the Local Planning Authority. The lighting scheme shall include details of the height of the lighting posts, intensity of the lights specified in Lux levels), spread of light including approximate spillage to the rear of the lighting posts or disturbance through glare. The development shall be carried out in accordance with the approved details.*

REASON: To protect the amenity of neighbouring residents, in accordance with Policy GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005) and the NPPF."

11.73 An Outdoor Lighting report and Lighting Impact Assessment has been submitted as part of the discharge of condition. It should be noted that the details do not form part of the reserved matters, however, the adopted roads would influence the lighting scheme due to lighting required to meet adoptable standards.

11.74 It should be noted that the more sensitive lighting should be to the outer parts of the development which have mews type roads and therefore less formal lighting sensitive to both neighbouring residential properties and local wildlife habitats, which has been identified by the Lighting Impact Assessment. The formal adopted lighting specification on the core roads of the scheme would be 6m in height.

11.75 The reports also have taken account of mitigating of the effects of the lighting installation during construction phase. The Lighting Impact Report for post construction states "*The detailed lighting design is designed to use current best practice and technology. The impacts of external lighting will be minimised by the installation of lighting to the minimum specification required to provide a safe night time environment for residents, therefore lighting will be designed to comply with the minimum illuminance levels given within the appropriate guidance. The detailed lighting design will be in keeping with the ecology report in order to maintain the integrity of habitats for wildlife within and around the site*."

11.76 Environmental Health have been consulted of the details and stated that "*Details prepared by MMA Lighting Consultancy show a proposal to install 25LED luminaires on 6m high columns in accordance with ECC specification and ILP guidance. The design and choice of luminaires minimise overspill onto development beyond the site boundary, and control sky glow and glare. Contours depicting the horizontal illuminance in Lux are provided, and show no spill onto neighbouring developments. The proposals are acceptable however, Condition 7 also requires the development to be carried out in accordance with the approved details, and in this respect it may not be appropriate to fully discharge the condition at this stage.*"

11.77 The details submitted in theory does not prevent the discharge of the condition as suggested by EHO, however no details have been provided regarding any lighting details for the mews. This nonetheless does not prevent the determination of the reserved matters application as the condition can be dealt with separately.

11.78 **Condition 16 (water pollution control), 21(surface water drainage), and 23 (maintenance plan) (UTT/19/2357/DOC)**

11.79 The above conditions state;
16 - Prior to the commencement of any development, a scheme for the provision and implementation of water pollution control shall be submitted and agreed in writing with the Local Authority. The development hereby permitted shall be constructed and completed in accordance with the approved plans/specifications. REASON: To ensure that the proposed development does not cause pollution of controlled waters and that the development complies with approved details in the interests of controlled waters, in accordance with Policy ENV12 and ENV14 of the Uttlesford Local Plan (adopted 2005).

11.80 21 - No works shall take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme should include but not be limited to:

o Limiting discharge via infiltration for all storm events up to an including the 1 in 100 year rate plus 40% allowance for climate change.
o Provide sufficient storage to ensure no off-site flooding as a result of the development during all storm events up to and including the 1 in 100 year plus 40% climate change event.
o Final modelling and calculations for all areas of the drainage system. The appropriate level of treatment for all runoff leaving the site, in line with the CIRIA SuDS Manual C753.
o Detailed engineering drawings of each component of the drainage scheme.
o A final drainage plan which details exceedance and conveyance routes, FFL and ground levels, and location and sizing of any drainage features.
o A written report summarising the final strategy and highlighting any minor changes to the approved strategy.
The scheme shall subsequently be implemented in line with dwelling occupations.

REASON: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site. To ensure the effective operation of SuDS features over the lifetime of the development. To provide mitigation of any environmental harm, which may be caused to the local water environment. Failure to provide the above required information before commencement of works may result in a system being installed that is not sufficient to deal with surface water occurring during rainfall events and may lead to increased flood risk and pollution hazard from the site. This is in accordance with Policy GEN3 of the Uttlesford Local Plan and the NPPF.

11.81 23 - No works shall take place until a Maintenance Plan detailing the proposed maintenance arrangements including who is responsible for different elements of the surface water drainage system and the maintenance activities/frequencies, has been submitted to and agreed, in writing, by the Local Planning Authority. Should any part be maintainable by a maintenance company, details of long term funding arrangements should be provided.

REASON: To ensure appropriate maintenance arrangements are put in place to enable the surface water drainage system to function as intended to ensure mitigation against flood risk. Failure to provide the above required information before commencement of works may result in the installation of a system that is not properly maintained and may increase flood risk or pollution hazard from the site. This is in accordance with Policy GEN3 of the Uttlesford Local Plan and the NPPF.

11.82 Details have been submitted in the form of Flood Risk And Drainage, Permeable Paving and construction details plan. ECC SUDs have been consulted and state "*Having reviewed the Flood Risk Assessment and the associated documents which accompanied the planning application, we recommend the discharge of Condition 21 to the outline planning permission reference UTT/18/0824/OP. The proposed development will only meet the requirements of the National Planning Policy Framework if the measures as detailed in the Drainage strategies and the documents submitted with this application are implemented as approved*."

11.83 Whilst the Environment Agency have yet to respond to the consultation regarding Condition 16 and no details appear to have been submitted regarding who is responsible for different elements of the surface water drainage system again this does not prevent the determination of the reserved matters application, as the condition can be dealt with separately.

11.84 **Condition 8 (Construction Environmental Management Plan)**

8 - Prior to the commencement of any individual building or individual phase hereby approved, including any ground works or demolition, a detailed construction environmental management plan shall be submitted to and approved in writing by the Local Planning Authority, and the plan shall include the following:
o The construction programme and phasing
o Hours of operation, delivery and storage of plant and materials used in constructing the development
o Parking of site operatives and visitors and loading arrangements of plant and materials
o Details of hoarding
o Management of traffic to reduce congestion
o Control of dust and dirt on the public highway
o Arrangements for monitoring levels of dust emitted during the construction phase
o Details of consultation and complaint management with local businesses and neighbours
o Waste management proposals
o Mechanisms to deal with environmental impacts such as noise, air quality, light and odour.
o wheel and underbody washing facilities

The development shall thereafter be implemented in accordance with the approved details.

REASON: In the interests of highway safety and the control of environmental impacts, in accordance with policy GEN2, GEN1, GEN8, ENV13, ENV14 and GEN4 of the Uttlesford Local Plan (adopted 2005) and the NPPF. Also, to ensure that on-street parking of these vehicles in the adjoining streets does not occur and to ensure that loose materials and spoil are not brought out onto the highway in the interests of highway safety and Policy DM1 of the Highway Authority's Development Management Policies February 2011.

11.85 Construction Management Plan has been submitted to address the above condition. It should be noted that this condition does not have a bearing on the assessment of this Reserved Matters application.

11.86 Nonetheless, ECC Highways have recommended amendments to the details submitted which are currently under process. Environmental Health have commented on the details which have been submitted of which they have stated "*Condition 8 requires a detailed construction management plan to be submitted to demonstrate safety and environmental impact controls which will be applied during the construction phase.*
A Construction Management Plan prepared by Bellway Homes has been submitted and is considered acceptable to allow discharge of the condition. The plan includes a requirement for further detailed risk assessments and site specific method statements to be prepared during development of various phases of construction to address noise and dust emissions." The condition is considered acceptable to discharge subject to the corrections suggested by Highways.

12. CONCLUSION

12.1 The following is a summary of the main reasons for the recommendation:

Policy	Proposals in accordance with policy?	Policy compliance with NPPF	Weight
GEN1	Proposal would comply with Policy GEN1 with appropriate mitigation	Generally consistent	Moderate
GEN2	Proposal complies with Policy GEN2	Generally consistent	Moderate
GEN3	Proposal comply with Policy GEN3 with appropriate mitigation	Partly consistent	Limited
GEN4	Proposal comply with Policy GEN4 with appropriate mitigation	Consistent	Moderate
GEN5	Proposal comply with Policy GEN5 with appropriate mitigation. Further information required as part of the outline conditions	Consistent	Moderate
GEN7	Proposal would comply with Policy GEN7 with appropriate mitigation	Partially consistent	Moderate
GEN8	Proposal complies with Policy GEN8	Consistent	Moderate
H9	Proposal complies with Policy H9 in accordance with s106 Legal Obligation	Consistent	Moderate
H10	Proposal complies with Policy H10	Consistent	Moderate
ENV15	Proposal will comply with Building Regulation requirements which are stringent	Partially consistent	Moderate

12.2 The design, appearance, layout and scale of the development is in accordance with Local Policy GEN1, and GEN2, the Essex Design Guide and the NPPF. The

amenity of the existing adjacent and future resident of the site would be persevered in accordance with Local Plan Policy GEN2, GEN4 and GEN5.

12.3 40% affordable housing has been provided in accordance with the terms of the S106 Agreement. The housing mix is in acco9rdance with the SHMA. No objection has been raised by the Housing Officer in terms of the proposed housing mix or type. As such the application complies with Policies H9 and H10 of the Local Plan and the requirements of the NPPF.

12.4 The main core road through the site has been provided up to the northern boundary to allow for future development should this come forward under planning application UTT/17/2832/OP Land North Of Shire Hill Farm (100 dwellings) which would also connect with planning permission UTT/13/3467/OP & UTT/16/1856/DFO Land South Of Radwinter Road Radwinter Road (200 dwellings currently under construction), as secured through the original Section 106 Agreement attached to the outline consent of all three sites.

12.5 The roads have been designed to Highway Standards and in accordance with the size and layout required by the Section 106 Agreement.

12.6 The proposed development is acceptable and in accordance with the adopted Parking Standards above, also Policies GEN1, GEN2 and GEN8 of the Uttlesford Local Plan.

12.7 In consideration of the above the landscaping scheme accords with Local Plan Policy GEN2, and GEN7.

12.8 An updated ecological report has been submitted as part of this application. As a result no objections have been raised by ECC Ecology subject to securing biodiversity mitigation and enhancement measures. However, this is a condition that remains to be complied with on the Outline consent therefore no additional condition would be required should the reserved matters be approved. The scheme therefore is considered to accord with Local Plan Policy GEN7, and NPPF.

12.9 Whilst no drainage details have been submitted as part of this reserved matters application there are conditions which that remain to be complied with on the outline permission therefore no additional would be required should the reserved matters be approved. ECC SUDs have raised no objections subject to the conditions of the Outline permission being complied with. The development is therefore is in accordance with Policy GEN3 of the adopted Local Plan.

RECOMMENDATION – APPROVAL WITH CONDITIONS

Conditions

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this decision.

   REASON: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. Prior to the erection of the development hereby approved (not including footings and foundations) full details of soft landscape works shall be submitted to and approved in writing by the local planning authority and these works shall be carried out as approved.

   Soft landscape works shall include [planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; implementation programme].

   REASON: The landscaping of this site is required in order to protect and enhance the existing visual character of the area and to reduce the visual and environmental impacts of the development hereby permitted, in accordance with Policies GEN2, and GEN7 of the Uttlesford Local Plan (adopted 2005).

3. Notwithstanding the refuse strategy drawing submitted as part of the application (drawing BW216 PL-07 Revision C) details of bin storage locations which are located more reasonably closer to the dwellings that they relate shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be implemented in accordance with the approved scheme.

   REASON: In the interests of the appearance of the site and area, and protecting residential amenity in accordance with Policies GEN2 of the Uttlesford Local Plan (adopted 2005).

APPENDIX A

OUTLINE REPORT

APPENDIX B

TOWN COUNCIL'S COMMENTS

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SAFFRON WALDEN
TOWN COUNCIL

Saffron Walden Town Council OBJECTS to the planning application UTT/19/2355/DFO

UTT/19/2355/DFO | Approval of Reserved Matters following outline application UTT/18/0824/OP details of layout, scale, landscaping and appearance relating to the development of the site to provide 150 residential dwellings (Use Class C3) and associated infrastructure works. | Land East Of Thaxted Road Saffron Walden Essex

In objecting to the above planning application, the Town Council must also object to planning applications:

UTT/19/2357/DOC | Application to discharge Condition 16 (water pollution control) and 21(surface water drainage), 23 (maintenance plan) attached to UTT/18/0824/OP. | Land East Of Thaxted Road Saffron Walden Essex

UTT/19/2356/DOC | Application to Discharge Condition 7, (detailed lighting scheme), attached to UTT/18/0824/OP | Land East Of Thaxted Road Saffron Walden Essex

The reasons for objection stem from the differences of detail between the approved outline application and the current reserved matters application. The Town Council considers that the differences of detail are substantial enough to be material reasons for refusal of this application.

For clarity, SWTC believes that this planning application should be REFUSED for failing to meet:

- **2005 Local Plan Policies: GEN1** Access, **GEN2** Design, **GEN6** Infrastructure Provision to Support Development and **H10** Housing Mix

- **eLP Policies: SP12** Sustainable Development Principles, **D1** High Quality Design; **H2** Housing Mix; **TA2** Sustainable Transport, **INF1** Infrastructure Delivery, **INF2** Protection, Enhancement and Provision of Open Space, Sports Facilities and Playing Pitches; **D8** Sustainable Design and Construction **D9** Minimising Carbon Dioxide Emissions and **EN7** Protecting and Enhancing the Natural Environment

- **The NPPF**: Paragraph **122**; and the definition of **Open Space**

We note that eLP policy SP12 has been through the Local Plan Examination, and was approved as amended; we also believe that the other policies that we have referred to are consistent with the NPPF, and therefore all should be given significant weight in accordance with NPPF para 48.

1. Green space

Detail at approved outline application	Detail at reserved matters planning application
The Officer Report for the planning committee at outline application stage says: *3.1 "The submission is for Outline planning permission with all matters reserved except access.* • *Provision of up to 150 dwellings including affordable housing;* • *Mixed housing types and tenure* • *Substantial new areas of public recreation and open space providing for all ages, range of formal and informal spaces"*	The Town Council has had the outline application and the reserved matters maps professionally measured to assess the green space. The first observation is that the green space is significantly diminished; the outline application measured all the green space as being 27,382m², whereas the reserved matters application measures all the green space as being approximately 23,353m² – a reduction of 4,029m². We note below that UDC is about to adopt the February 2019 Open Spaces Standard as a material consideration, and that this sets down a standard of 7.81ha per 1,000 people, or 2.8ha for a development of the size now proposed. The outline application falls below this standard, although we recognise that it cannot be varied now, but the current application should conform to the new standard, or at the very least provide no less green space than the outline permission. The TC does not consider that the green space proposed by the reserved matters application meets the definition of "substantial", and in any case the significant reduction is unsustainable within the NPPF meaning – it involves a diminution in social and environmental sustainability compared with the existing permission with no corresponding benefits. The green space is almost all in the form of inaccessible and closed-to-the-public attenuation ponds, and busy roadside verges, none of which is usable. We note that the main spine road through the development is to be a significant main road, designed to divert through traffic away from the Thaxted Road / Radwinter Road junction; as with the green spaces at, for example, Beeches Close by the Newport Road, the proximity of a busy road by these proposed green spaces renders them useless for amenity value, and they cannot possibly be described as

	areas for "public recreation". The Outline Application referred to the provision of substantial new areas of open space providing for all ages; instead there is virtually no usable provision – almost nowhere quiet to sit and nowhere for informal play or ball games. The proposed development needs to be re-designed so that there are substantial areas of open space which are usable by all ages and which are well away from busy roads. The application is therefore contrary to INF6, and eLP INF1 and INF2, as well as NPPF paras 8 and 92 (in not providing open spaces which reflect needs)
The Officer Report for the planning committee at outline application stage says: *11.16 "Whilst design is a reserved matter, the illustrative Master Plan indicates a development that reflects the rural character of the location. Landscaping would be used to reduce the visual impacts and some landscaping elements would introduce additional facilities required for health, social and cultural well-being. These include proposed open spaces; children play spaces, recreation, new footpaths and cycle routes."*	The TC does not consider that the reserved matters application in any way reflects the illustrative Master Plan's reflection of the rural character of the location. Whereas there was supposed to be a broad "green" perimeter separating the new development from existing houses, now there is only a very thin strip of land. The great reduction of the green perimeter also impinges on the neighbouring houses on the edge of Saffron Walden as well as reducing its environmental value – both eLP EN7 and the NPPF require that development enhances biodiversity and the environmental value of sites, whereas the proposed application would diminish it when compared to the outline permission. The open space provision is too small to be considered as "facilities required for heath, social and cultural wellbeing". The footpaths have diminished and only run along the main roads. The needs of pedestrians are not properly considered There are no cycle paths, and the only cycle routes are along the main roads. There is only one "children play space" not several (unless the application tries to count two verges alongside the spine road as "play areas", when they clearly are not).

	The only children's play area is on the opposite side of the main (spine) road from the houses. The spine road is being designed to take heavy goods vehicles and buses, and given its location and design intent, it will be a very busy road, perhaps becoming one of the busiest in the east of Saffron Walden. It is manifestly unsuitable to require children to cross such a road to access a play area, and situating a play area anywhere near to a main road is clearly extremely poor design, from an amenity, air pollution and general safety perspective. The positioning of the play area away from the houses substantially diminishes its amenity value – to be properly designed it should be as close as possible to the centre of the housing. For these reasons the proposed development is contrary to INF6, GEN1 and GEN2 and eLP D1, INF1 and TA2 as well as the equivalent NPPF provisions.
The Officer Report for the planning committee at outline application stage says: *11.18 "Whilst layout, scale, design and landscaping are to be reserved matters, there is significant detail within the illustrative Master Plan and the Design and Access Statement to demonstrate how landscaping and biodiversity would be enhanced and preserved."*	With the open green space so drastically reduced, it is not possible to agree that the landscaping and biodiversity would be "enhanced and preserved" by this reserved matters application.
The Officer Report for the planning committee at outline application stage says: *11.33 "The structure of the development is stated to take the form of setting a clear approach of having a hierarchy of streets and spaces based on a strong, irregular block structure. It is stated that the scheme would be designed so as to not be car dominated and encourage movement by foot and cycle. There would also be a range of public open*	The reserved matters application clearly shows that the scheme would be car dominated because there are no paved routes for pedestrians or cyclists other than the roads. Therefore, there are no measures which will "encourage movement by foot or cycle". The open spaces in the scheme only include one children's play space – a LEAP, and there are no LAPS in the design (unless as previously noted, these are the verges along the spine road, and therefore not in any way suitable as LAPS).

spaces through the scheme that would include children's play spaces, trim trail, and informal amenity spaces for walking and general recreational activities. This would also be provided through the use of Local Areas of Play (LAP) and a Locally Equipped Area of Play (LEAP) which has been highlighted within the illustrative plans submitted."	There are no "informal amenity spaces for walking and general recreational activities". The only footpaths are those which are mandatory because there is already a public right of way over the site. This is not an enhancement of the site because the public right of way exists now while the site is a field. There are no spaces large enough to be used for "general recreational activities". Further, the only open spaces are either adjacent to the spine road which will be busy or Thaxted Road which is very busy. This makes them abjectly unsuitable and undesirable as recreation spaces, even if they were big enough, because they will be noisy, dangerous and polluted. It would not be possible, for example, to allow children to play football on the spaces alongside the road, or to allow a dog to run off lead. Placing the play area on the far side of such a busy road fails UDC policies: GEN1 Access *"The design of the site must not compromise road safety and must take into account the needs of cyclists, pedestrians, public transport users, horse riders and people whose mobility is impaired"*; and eLP D1 High Quality Design *Development should* [...] *creating well connected, accessible and safe places."* Further, much of the proposed open spaces are in fact in the form of SuDS attenuation basins, (the development layout plan shows four in total). Attenuation basins are not accessible to the public as they contain dangerous structures. Non-accessible public open space is contrary to UDC planning policy. eLP Paragraph 8.13 *"Exceptionally open space can be provided within floodplains"*. Nothing has ever suggested that this application qualifies as such an exception. Therefore, the open space must not be provided on a floodplain. An attenuation basin is even more likely to contain water than a floodplain

<table>
<tr><td></td><td>(because it catches all surface rainwater and not just the surplus water once a river has burst banks). Therefore, an attenuation basin is “worse” than a floodplain in relation to its value to the public as amenity land. Therefore, if the development wouldn’t provide public open space on a floodplain then it definitely should not describe an attenuation basin as public open space.

The reserved matters application fails the NPPF Glossary definition of Open Space: “All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity”, because an attenuation basin, which is inaccessible to the public, does not “offer important opportunities for sport and recreation”</td></tr>
<tr><td>The Officer Report for the planning committee at outline application stage says: 11.156 "In terms of open space provision the draft plans outlines the following;

<table><tr><td colspan="4">Open Space Requirements</td></tr><tr><td>Type of Provision</td><td>Level of Provision (Square metres per person)</td><td>Threshold for On-Site Provision</td><td>Threshold for Off-Site Provision</td></tr><tr><td>Amenity Greenspace</td><td>10</td><td>All development of 10 dwellings or over</td><td>All developments under 10 dwellings and development of 10 dwellings or over where on-site provision is not possible</td></tr><tr><td>Provision for children and young people (LAPS, LEAP'S and NEAPS)</td><td>2</td><td>All development of 10 dwellings or over</td><td>All development under 10 dwellings and development of 10 dwellings or over where on-site provision is not possible</td></tr><tr><td>Allotments</td><td>2</td><td>All development of 10 dwellings of over</td><td>All development under 10 dwellings and where

on-site provision is not possible.</td></tr></table>
11.157 No doubt should planning permission be granted the reserved matters would</td><td>Contextual figures: The proposed development is for 150 dwellings and the most recent sports strategy calculates an average of 2.4 residents per dwelling, thus the development can be expected to accommodate 360 residents.

Therefore, according to the officer’s report the development should provide:
• Amenity greenspace 10m² x 360 = 3,600m²
• Provision for children/young people 2m² x 360 = 720m²
• Provision for allotments 2m² x 360 = 720m²

• Total = 5,080m²

The single play area in the reserved matters application is 553m², which is 167m² too small, i.e. 23% smaller than the officer report to the planning committee said it would be.

We also note that the UDC PPWG meeting convened for 5 November 2019 proposes to adopt the Open Space Study Standards Paper February 2019 as a material consideration and to apply the standards contained within it. According to these Standards, amenity space should be provided at 16m² or 5760 m² in total</td></tr>
</table>

identify land for open spaces, LEAPs and LAPs which would address the above draft policy. "	The table which the officer report reproduces is an extract from policy eLP INF2 Protection, Enhancement and Provision of Open Space, Sports Facilities and Playing Pitches. INF2 precedes the table with the following text: *"Unless specified in the relevant site allocation policy, publicly accessible open space ... will be in accordance with the following standards"*. This policy supports the fact that the SuDS cannot be considered as public open space.
	An additional note on the public open space – Essex Highways has commented (letter added to planning portal 28.10.19) that the spine road requires a 3m wide cycle path and a 3m wide verge at either side. This will further reduce the public open space by a width of 9m the entire length of the spine road, which will have a considerable impact on the development. Essex Highways has also asked for modifications to some parking spaces. The development layout will need to be amended. The Town Council will comment further on the revised layout when it is available.

2. Open Market Housing Mix

Detail at approved outline application	Detail at reserved matters planning application
The Officer Report for the planning committee at outline application stage says: 11.36 [...] *"Emerging Draft Local Plan Policy H2 states "New housing developments will provide for a mix of house types and sizes to meet the different needs of the local area and the District as a whole including a significant proportion of 3 and 4+ bedroom market*	The proposed open market housing mix is: 0 *x* 1-bedroom dwellings 15 *x* 2-bedroom dwellings 27 *x* 3-bedroom dwellings 48 *x* 4-bedroom dwellings --- 90 open market dwellings in total.

housing and 2 and 3 bedroom affordable housing to meet the needs of families as evidenced by the most recent Strategic Housing Market Assessment having regard to local character, significance of heritage assets and the viability of the development which will be assessed on a site by site basis"" The officer report for the planning committee at outline application stage also says: 11.40 *"The final design, number and size of units would be determined at the reserved matters stage but it is considered that the application proposes an acceptable level of affordable housing on the site and is capable of providing an acceptable mix of dwellings. As such the application complies with Policies H9 and H10 of the Local Plan."* Policy H10 of the (current) Local Plan says: *"All developments on sites of 0.1 hectares and above or of 3 or more dwellings will be required to include a significant proportion of market housing comprising small properties."*	The officer report is unclear as to which Local Plan policy takes precedence. Paragraph 11.36 of the officer report refers to the emerging LP Policy H2, and paragraph 11.40 refers to the existing Local Plan policy H10. However, either way, the proposed housing mix does not meet either the current policy H10 or the eLP policy H2. Policy H2, requires a significant proportion of housing to be 3 and 4 bedroom. The total number of 3 and 4 bedroom houses in this application is 75. 75 houses out of 90 (83%) is way above what could be described as "significant", and is predominately the housing mix. Policy H10 requires a significant proportion of housing to be 2 and 3 bedroom. The total number of 2 and 3 bedroom houses in this application is 42. 42 houses out of 90 (46%) is below what could be described as "significant". The NPPF, Section 11 Making Effective Use of Land, subsection Achieving Appropriate Densities Paragraph 122 says: *"Planning policies and decisions should support development that makes efficient use of land, taking into account: a) the identified need for different types of housing".* This puts an emphasis on "need". eLP Policy D1 High Quality Design says *"Proposals for new development must meet the nationally described space standards and the necessary dwelling mix, privacy, daylight and sunlight for future occupiers".* This puts an emphasis on the dwelling mix being what is "necessary". The *Uttlesford District Council Local Plan Sustainability Appraisal and Strategic Environmental Assessment Scoping Report: Annex B – Baseline Information July 2015*. Page 13 of the document gives the percentages for the housing mix required.

Strategic Housing Market Assessments (SHMAs) are a crucial part of the evidence base that informs policy and helps shape strategic thinking in housing need and planning.

The SHMA for the Uttlesford District Council LOCAL PLAN encompasses the wider London commuter belt (east) / M11 sub-region and was finalised in October 2009, drawing on the figures set out in Policy H1 of the East of England Plan (2008) for the period 2001-2021. These figures specified 8000 dwellings to be built by 2021, of which currently (as of 2010/11 figures) 3,999 have been delivered.

The following table taken from the SHMA shows the breakdown of units required in the District from these figures/sources. The data is derived from the most recent Strategic Housing Market Assessment undertaken in 2008.

Table 15: Size mix of housing requirement, 2007 – 2021

Housing Type	Number	Percentage
Market Housing		
1 bedroom	-	1.0%
2 bedroom	800	19.4%
3 bedroom	1900	46.7%
4 bedroom	1100	25.9%
5 + bedroom	300	6.9%
Sub-total	4200	100.0%

Using these percentages, the proposal should be approximately for:
1 x 1-bedroom (1%); 17 x 2-bedroom (19.4%); 42 x 3-bedroom (46.7%); 23 x 4-bedroom (25.9%); and 6 x 5-bedroom (6.9%). (NB: one lost due to rounding)

Using these percentages, and applying Policy H2 there would be approximately 60 2 and 3 bedroom houses (67%) which would be closer to "significant".
Using these percentages, and applying Policy H10 there would be approximately 65 3 and 4 bedroom houses (72%) which would be closer to "significant".

	Therefore, if using these percentages and these numbers, and not those in the application, the application would meet both H2 and H10. The Saffron Walden Neighbourhood Plan research data (commissioned from Rightmove) firmly supports the provision of more 2 and 3 bedroom homes over and above the provision of 4 and 5 bedroom homes. The Neighbourhood Plan research indicates that ideally there would be more than one open market 1-bedroom home and there should be around 9 out of the total in order to rebalance supply with demand in Saffron Walden.

3. House Sizes

Detail at approved outline application	Detail at reserved matters application
Paragraph 5.1 of the Design and Access Statement says *"The proposed development will deliver a high standard of housing design irrespective of price or tenure. The scheme will focus on establishing a strong sense of community."*	The application states that the LPA does not have a policy on national space standards. The LPA does have an emerging policy on space standards. eLP D1 High Quality Design says *"Proposals for new development must meet the nationally described space standards and the necessary dwelling mix, privacy, daylight and sunlight for future occupiers"* If any proposed dwellings do not meet the nationally described space standards, the application should be refused on grounds of failing to meet eLP D1

4. Lack of consideration for climate change mitigation

Detail at approved outline application	Detail at reserved matters planning application

Paragraph 5.1 of the Design and Access Statement says "The built form of the homes will meet current standards of insulation and incorporate measures to minimise energy use. Both the design of the homes and the development layout together with the selection of materials is of key importance to the energy efficiency of the new properties."	The application fails to make provision for renewable energy and provides no evidence that the development has applied the Energy Hierarchy. The orientation and massing of the buildings seems to be completely random – there is no indication that the orientation has been designed to maximise solar energy production or for any other sustainable purpose. eLP Policy D8 requires that opportunities to maximise on-site renewable forms of energy should be taken, and eLP Policy SP12 as amended in the Local Plan Examination requires that all developments should maximise renewable energy use and minimise non-renewable energy use. There is no sign that any renewable energy measures have been incorporated, and in their presentation to the Town Council on 9th September 2019, the Applicant confirmed that no solar panels or other renewable energy sources, such as air source heat pumps, were proposed. Therefore, the application does not meet any of eLP Policies SP12, D8 or D9.

5. Quality of play equipment

Detail at approved outline application	Detail at reserved matters planning application
The outline application Design and Access Statement included a picture of high-quality metal play equipment which would be long-lasting:	The reserved matters application show equipment made of wood, which will not be long-lasting and which will not provide good value for money, especially in the light of the short maintenance contribution (set in the Section 106 at 5 years not 10). Again, this is unsustainable.

Locally Equipped Area for Play (LEAP)

The LEAP will be located within the area of public open space close to pedestrian and/or cycle routes.

The space will be designed to stimulate balancing, rocking, climbing, sliding, swinging, jumping, crawling, rotating, counting and touching and imaginative play, catering for children from 4 to 8 years.

Kompan Spider's Cottage (Pigmented roof in-ground) NRO1015-1311 CFH - 2.2m

Carousel with climbing net by Jupiter Play (Product code: L31)

Kompan Bee Springer 40cm in ground NRO1014-0421 CFH 0.57m

Kompan One Seat Swing NRO1002 CFH - 1m

Kompan Double Combination Swing (Organic Rubber) NRO1001 CFH - 1.6m

APPENDIX C

Plot	Tenure	Type	Number bedrooms	Garden area (m^2)		Parking		
				Required	Proposed	Spaces	Garages	Total
1	Private	Jeweller SP1 M4(2)	4	100	135	2	1	3
2	Private	Hillard	3	100	108	2	1	3
3	Private	Coppersmith	3	100	100	2	0	2
4	Private	Blemmere	3	100	100	2	0	2
5	Private	Reedmaker	4	100	100	2	1	3
6	Affordable	Tillman	3	100	100	2	0	2
7	Affordable	Tillman	3	100	100	2	0	2
8	Affordable	Tillman	3	100	102	2	0	2
9	Affordable	Tillman	3	100	100	2	0	2
10	Affordable	Tillman	3	100	100	2	0	2
11	Affordable	Tillman	3	100	101	2	0	2
12	Affordable	Baker	2	50	50	2	0	2
13	Affordable	Baker	2	50	50	2	0	2
14	Private	Hillard	3	100	103	1	1	2
15	Private	Blemmere	3	100	101	1	1	2
16	Private	Reedmaker	4	100	136	2	1	3
17	Private	Reedmaker	4	100	138	2	1	3
18	Private	Hillard	3	100	100	1	1	2
19	Private	Luthier	4	100	118	2	1	3
20	Private	Hillard	3	100	101	1	1	2
21	Private	Blemmere	3	100	100	1	1	2
22	Affordable	Ploughwright	3	100	103	2	0	2
23	Affordable	Tillman	3	100	117	2	0	2
24	Affordable	Tillman	3	100	101	2	0	2
25	Affordable	Tillman	3	100	101	2	0	2
26	Private	Blemmere	3	100	100	2	0	2
27	Private	Luthier	4	100	111	2	1	3
28	Private	Jeweller SP1 M4(2)	4	100	107	2	1	3
29	Private	Jeweller SP2 M4(3)	4	100	109	2	1	3
30	Private	Reedmaker	4	100	103	2	1	3
31	Private	Reedmaker	4	100	100	2	1	3
32	Private	Jeweller SP1 M4(2)	4	100	132	2	1	3
33	Private	Coiner	2	50	66	2	0	2

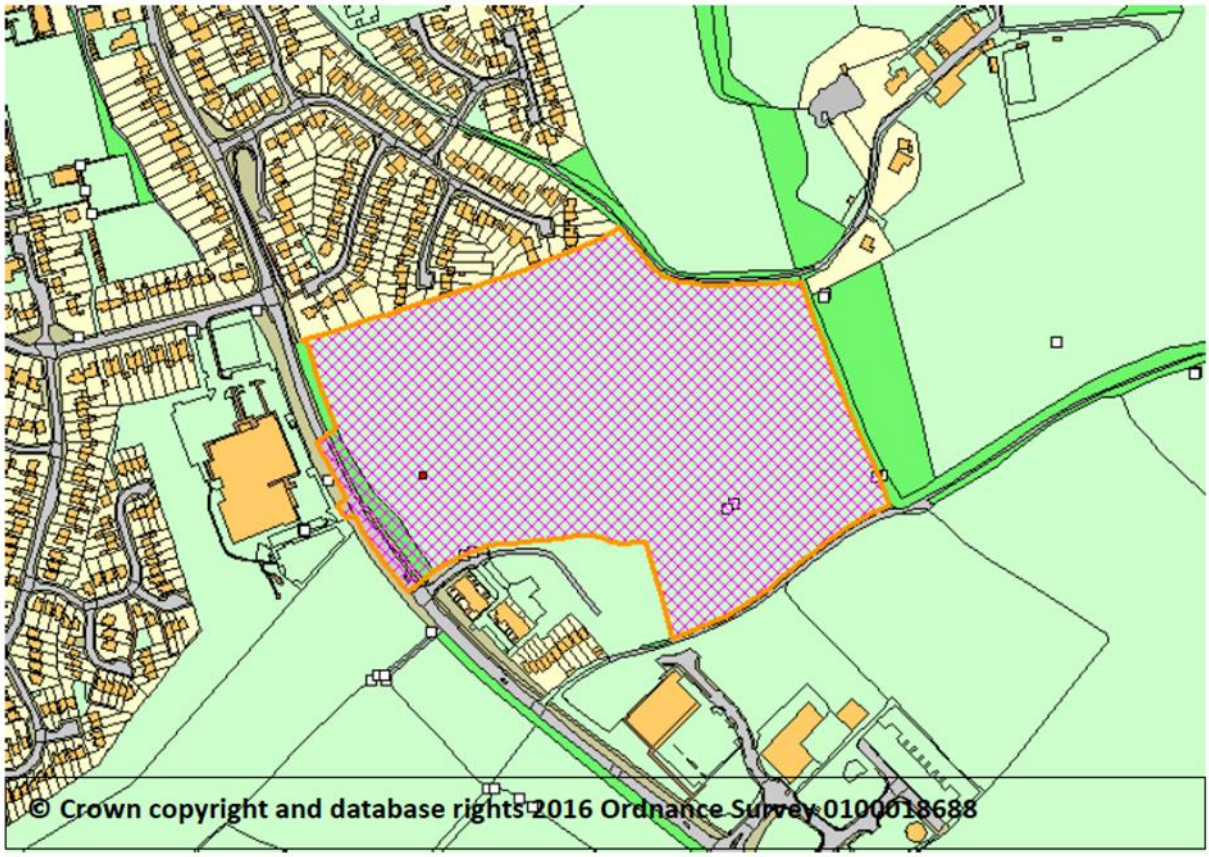
34	Private	Coiner	2	50	71	2	0	2
35	Private	Reedmaker	4	100	115	2	1	3
36	Private	Coiner	2	50	62	2	0	2
37	Private	Coiner	2	50	53	2	0	2
38	Private	Blemmere	3	100	104	2	0	2
39	Private	Reedmaker	4	100	112	2	1	3
40	Private	Luthier	4	100	107	2	1	3
41	Private	Blemmere	3	100	100	2	0	2
42	Private	Luthier	4	100	143	2	1	3
43	Private	Luthier	4	100	132	2	1	3
44	Private	Luthier	4	100	169	2	1	3
45	Private	Reedmaker	4	100	103	2	1	3
46	Private	Jeweller SP2 M4(3)	4	100	113	2	1	3
47	Private	Luthier	4	100	102	2	1	3
48	Private	Luthier	4	100	128	2	1	3
49	Private	Reedmaker	4	100	101	2	1	3
50	Private	Luthier	4	100	135	2	1	3
51	Private	Blemmere	3	100	100	2	0	2
52	Private	Hillard	3	100	100	1	1	2
53	Private	Hillard	3	100	101	1	1	2
54	Private	Blemmere	3	100	122	2	0	2
55	Private	Coiner	2	50	56	2	0	2
56	Private	Coiner	2	50	72	2	0	2
57	Private	Luthier	4	100	169	2	1	3
58	Private	Jeweller SP1 M4(2)	4	100	111	2	1	3
59	Private	Luthier	4	100	156	2	1	3
60	Private	Jeweller SP1 M4(2)	4	100	130	2	1	3
61	Private	Luthier	4	100	166	2	1	3
62	Private	Reedmaker	4	100	112	2	1	3
63	Private	Jeweller SP1 M4(2)	4	100	174	2	1	3
64	Affordable	Baker	2	50	67	2	0	2
65	Affordable	Baker	2	50	84	2	0	2
66	Affordable	Tillman	3	100	104	2	0	2
67	Affordable	Tillman	3	100	101	2	0	2
68	Affordable	Baker	2	50	54	2	0	2
69	Affordable	Baker	2	50	76	2	0	2

70	Affordable	Baker	2	50	77	2	0	2
71	Affordable	Baker	2	50	75	2	0	2
72	Affordable	Baker	2	50	77	2	0	2
73	Affordable	Baker	2	50	54	2	0	2
74	Affordable	Baker	2	50	54	2	0	2
75	Affordable	Baker	2	50	64	2	0	2
76	Affordable	Tillman	3	100	100	2	0	2
77	Affordable	Tillman	3	100	111	2	0	2
78	Private	Jeweller SP1 M4(2)	4	100	106	2	1	3
79	Private	Luthier	4	100	129	2	1	3
80	Private	Luthier	4	100	245	2	1	3
81	Private	Luthier	4	100	225	2	1	3
82	Private	Jeweller SP2 M4(3)	4	100	104	2	1	3
83	Private	Luthier	4	100	118	2	1	3
84	Private	Reedmaker	4	100	155	2	1	3
85	Private	Luthier	4	100	112	2	1	3
86	Private	Jeweller SP1 M4(2)	4	100	105	2	1	3
87	Private	Coiner	2	50	77	2	0	2
88	Private	Coiner	2	50	79	2	0	2
89	Private	Blemmere	3	100	100	1	1	2
90	Private	Luthier	4	100	113	2	1	3
91	Private	Reedmaker	4	100	100	2	1	3
92	Private	Hillard	3	100	123	1	1	2
93	Private	Hillard	3	100	140	1	1	2
94	Private	Jeweller SP1 M4(2)	4	100	152	2	1	3
95	Private	Luthier	4	100	143	2	1	3
96	Private	Luthier	4	100	113	2	1	3
97	Private	Luthier	4	100	109	2	1	3
98	Private	Luthier	4	100	105	2	1	3
99	Private	Jeweller SP1 M4(2)	4	100	120	2	1	3
100	Affordable	Baker	2	50	56	2	0	2
101	Affordable	Baker	2	50	57	2	0	2
102	Affordable	Tillman	3	100	107	2	0	2
103	Affordable	Tillman	3	100	102	2	0	2
104	Affordable	Tillman	3	100	103	2	0	2
105	Affordable	Cartographer	4	100	101	3	0	3

106	Private	Quilter SP1	3	100	100	1	1	2
107	Private	Quilter SP1	3	100	106	1	1	2
108	Private	Jeweller SP2 M4(3)	4	100	100	2	1	3
109	Affordable	Bungalow	2	50	63	2	0	2
110	Affordable	Bungalow	2	50	105	2	0	2
111	Affordable	Bungalow	2	50	80	2	0	2
112	Affordable	Bungalow	2	50	78	2	0	2
113	Affordable	Tillman	3	100	107	2	0	2
114	Affordable	Baker	2	50	57	2	0	2
115	Affordable	Baker	2	50	50	2	0	2
116	Affordable	Baker	2	50	55	2	0	2
117	Affordable	Baker	2	50	50	2	0	2
118	Affordable	HA50	1			1	0	1
119	Affordable	HA50	1			1	0	1
120	Affordable	HA50	1			1	0	1
121	Affordable	HA50	1			1	0	1
122	Affordable	Baker	2	50	52	2	0	2
123	Affordable	Tillman	3	100	106	2	0	2
124	Private	Coppersmith	3	100	116	2	0	2
125	Affordable	Baker	2	50	65	2	0	2
126	Affordable	Baker	2	50	70	2	0	2
127	Affordable	Tillman	3	100	118	2	0	2
128	Affordable	Cartographer	4	100	109	3	0	3
129	Affordable	Baker	2	50	52	2	0	2
130	Affordable	Baker	2	50	76	2	0	2
131	Private	Coppersmith	3	100	107	1	1	2
132	Private	Blemmere	3	100	100	1	1	2
133	Private	Hillard	3	100	105	1	1	2
134	Private	Hillard	3	100	104	1	1	2
135	Private	Hillard	3	100	146	1	1	2
136	Private	Coiner	2	50	88	2	0	2
137	Private	Coiner	2	50	92	2	0	2
138	Private	Hillard	3	100	144	2	1	3
139	Private	Quilter SP1	3	100	100	2	0	2
140	Private	Blemmere	3	100	100	2	0	2
141	Private	Quilter SP1	3	100	100	2	0	2

142	Private	Quilter SP1	3	100	100	2	0	2
143	Affordable	Baker	2	50	61	2	0	2
144	Affordable	Baker	2	50	90	2	0	2
145	Affordable	Baker	2	50	90	2	0	2
146	Affordable	Baker	2	50	60	2	0	2
147	Affordable	Baker	2	50	61	2	0	2
148	Affordable	Baker	2	50	58	2	0	2
149	Affordable	Baker	2	50	72	2	0	2
150	Private	Blemmere	3	100	135	2	0	2
Total						**281**	**67**	**348**

UTT/19/2355/DFO



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