

**SAWB2 : Planning Application 3/18/1760/FUL
Response by Sawbridgeworth Town Council**

1. The principle of the development

(i.e. District Plan Development Strategy)

- **DPS1 – Housing, Employment and Retail Growth**
- **DPS2 – Development Strategy 2011-2033**
- **DPS3 – Housing Supply 2011-2033**
- **DPS4 – Infrastructure Requirements**

This response deals with a specific planning application which must be considered against the provisions and Policies of the new District Plan.

The Council has a duty to reflect public opinion and to ensure that the standards of the community are retained.

The relevant Policies in the plan are:

- DPS1 – Housing, Employment and Retail Growth
- DPS2 – Development Strategy 2011-2033
- DPS3 – Housing Supply 2011-2033
 - In principle, the town council understands the need for the District Plan to specify the need for new housing in the area. In the town council's view the Plan is flawed in several respects especially in regards to the town of Sawbridgeworth.
- DPS4 – Infrastructure Requirements
 - Although the policy as stated in the District Plan identifies a number of requirements, this application raises a number of issues not covered by the policy. See section 13 *infra*.

2. Quality of layout and design; including, layout, integration, open space, permeability, landscaping, built design quality, energy/wastewater efficiency etc.

- **SAWB1 – Development in Sawbridgeworth**
- **SAWB2 – Land to the north of West Road**
- **DES1 – Landscape Character**
- **DES3 – Design of the Development**

- SAWB1 – Development in Sawbridgeworth
 - The application will bring the cumulative number of dwellings in the Sawbridgeworth to a number in excess of the total proposed for the town.
- SAWB2 – Land to the north of West Road
 - The site is in a poor position compared with the viable alternatives that have been suggested.

- This application is poorly thought out and does not adequately address the concerns that have been expressed by members of the public during the consultation period.
- DES1 – Landscape Character
 - The site is located on good arable land.
- DES3 – Design of Development
 - Poor design, unimaginative and tending towards a potential ghetto.
 - Does not sit comfortably in the site area
 - The proposed design is contrary to the essentially rural ethic of the town

3. Housing mix, density and affordable housing provision

- **HOU1 – Type and Mix of Housing**
- **HOU3 – Affordable Housing**
- **HOU6 – Specialist Housing for Older and Vulnerable people**
- **HOU7 - Accessible and Adaptable Homes**

- HOU1 – Type and Mix of Housing
 - The provision of two and a half storey buildings will be intrusive to the surrounding neighbourhood
 - No provision for essential worker dwellings
- HOU3 – Affordable Housing
 - Important that the 40% proportion is monitored and maintained.
- HOU6 – Specialist Housing for Older and Vulnerable people
 - There are no single storey dwellings which are essential for an adequate mix of dwelling types which reflects the demographic of the area.
- HOU7 - Accessible and Adaptable Homes
 - There is no commitment for the provision of wheelchair user dwellings.

4. Highway impact, parking and mitigation;

- **TRA1 – Sustainable Transport**
- **TRA2 – Safe and Suitable Highways Access and Mitigation**
- **TRA3 – Vehicle Parking Provision**

- TRA1 – Sustainable Transport
 - No mention is made of the issues relating to connecting with public transport, especially the rail links
- TRA2 – Safe and Suitable Highways Access and Mitigation
 - The access to the site via West Road is unacceptable. This is a narrow country road with significant current issues.
 - There is no specific provision for access for the transport used by less able people
 - There is no plan for traffic management through the construction phase.
 - Mitigation must be seen to be in place before construction starts.
 - Traffic surveys carried out thus far are invalid as they were carried out in school holidays.
 - Car use surveys quote 2011 data.

- West Road parking survey data is from 2014.
- No provision for parking for current West Road residents has been made.
- There is no circular route through the development.
- Access roads are not wide enough for utility / emergency vehicles.
- TRA3 – Vehicle Parking Provision
 - The provision of 1.5 car parking spaces per dwelling is inadequate
 - Provision on the development of 9 car park spaces for visitors is inadequate
 - If pavement parking is to be permitted, is the soil under-structure adequate.

5. Sustainable Transport

- **TRA1 – Sustainable Transport**

- TRA1 – Sustainable Transport
 - No cohesive plan for walking and cycling is present in the application.
 - No provision for electric charging points is shown.
 - No plan is in place for providing community transport, especially for connecting with the rail station.
 - No credible plan had been revealed for mitigation the West Road/London Road junction
 - The cumulative impact on transport from all propose developments has not been explored.

6. Healthy and Safe communities

(Secure by design, amenity space, play space, recreation etc.)

- **DES2 – Landscaping**
- **DES4 – Crime and Security**
- **CFLR1 – Open Space, Sport and Recreation**
- **CLFR7 – Community Facilities**

- DES2 – Landscaping
 - No effective provision has been made for the safety of pedestrians when they need to cross West Road
 - There is only one entrance / exit shown to the site, this is inadequate and unsafe.
- DES4 – Crime and Security
 - The change in demography, already demonstrated, caused by the migration of people
 - The “County Lines” effect already in existence in the area.
 - It is noted that at least one of the “apartment blocks” is close to the boundary of and will overlook Mandeville school.
- FLR1 – Open Space, Sport and Recreation
 - Only one green space / play area is shown, this is inadequate for the size of the proposed development.

- Existing STC play area is on the opposite side of what will become a very busy route.
- CLFR7 – Community Facilities
 - No current recognition is made of the need to increase the provision of medical facilities such as a doctor’s surgery, dental surgeries and pharmacies.
 - It is noted that the area committed for the expansion of Mandeville School has been reduced to below the level needed by the school.

7. Sustainable Drainage

- **WAT1 – Flood Risk Management**
- **WAT5 – Sustainable Drainage**

- WAT1 – Flood Risk Management
 - Discharge into main river will increase flood risk downstream.
 - Culvert capacity is not big enough to cater for 100 year time frame.
 - Existing evidence of flood water gathering on road and unable to disperse
- WAT5 – Sustainable Drainage
 - The SuDS plan must be proved to be valid for all areas of the site and a governance requirement for providing ongoing maintenance.
 - No commitment has been made by Thames Water to cater for the additional waste water that will be generated.

8. Environmental impact

(contaminated land, noise and air quality impact etc.)

- **EQ2 - Noise Pollution**
- **EQ3 - Light Pollution**
- **EQ4 - Air Quality**

- EQ2 - Noise Pollution
 - This issue has not been addressed, there are no noise pollution reports.
 - Impact of construction vehicles must be assessed
- EQ3 - Light Pollution
 - This issue has not been addressed, there are no light pollution reports.
- EQ4 - Air Quality
 - This issue has not been addressed, there are no air quality reports.
 - Noted however that air quality monitoring in the area has ceased.

9. Impact on the natural environment

- **GBR1 – Green Belt**

- GBR1 – Green Belt
 - The proposal extends development beyond the present curtilage and will introduce urban sprawl.

- No provision is made for preserving ancient hedgerows
- There is no tree survey report available
- There must be an 8 metre buffer zone next to the water course
- There must be a 5 metre hedge set back to provide a buffer zone.

10. Heritage impact, including archaeology;

- **HA1 – Designated Heritage Assets**
- **HA2 – Non-Designated Heritage Assets**
- **HA3 – Archaeology**

- HA1 – Designated Heritage Assets
 - There may be some affected by this application
- HA2 – Non-Designated Heritage Assets
 - There may be some affected by this application
- HA3 – Archaeology
 - A geophysical survey and an archaeological investigation must be required on this ancient site prior to any disturbance.
 - Attention to be paid to the Domesday Book records of the area.

11. Neighbour impact;

- **DES3 – Design of Development**

- It is important to understand the impact of this proposal upon the neighbourhood, specifically:
 - The effect on the existing residents in West Road
 - The loss of parking facility in West Road
 - The increased congestion in areas such as Coney Gree
 - The impact upon children walking to school
 - The change in demography which will be caused by the migration of people
 - The effect of shifting population from Bishops Stortford South
- DES3 – Design of Development
 - The application pays little attention to the desirable elements of this policy, in particular in relation to the provision of electric charging points, Wi-Fi etc.
 - There is no commitment to the installation of full fibre broadband (fibre-to-the-premises) to each new home.

12. Other matters (not covered above)

- No commitment has been made to a construction plan. This is vital if the neighbourhood is not to be disturbed.
- Commitment is needed to give priority to local people for social housing
- Schools admissions policy must also be geared to local people.
- Commitment must be given to providing key worker housing.
- There is no Sustainability and Energy Statement submitted as part of the planning application.

13. Infrastructure delivery, including s106 matters;

- **CLFR9 – Health and Wellbeing**
- **CLFR10 – Education**
- **DEL1 – Infrastructure and Service Delivery**
- **DEL2 – Planning Obligations**

- CLFR9 – Health and Wellbeing
 - s106 funding needed for essential expansion of medical services
- CLFR10 – Education
 - s106 funding needed for essential expansion of primary and secondary education facilities
 - existing access road must remain for the exclusive access to the school
 - there is no nearby drop-off zone planned for the area adjacent to the school
 - any pedestrian crossing in West Road must be light controlled in the interests of safety
 - school needs must be met and have not been addressed
- DEL1 – Infrastructure and Service Delivery
 - s106 and/or s278 funding needed for essential provision of road infrastructure to prevent escalation of existing congestion.
- DEL2 – Planning Obligations
 - s106 funding needed for delivering Planning Obligations, which must be put in place as part of this planning application process

14. Conclusion - consideration of the planning balance (positives and negatives) of all of the above issues to assess overall sustainability.

From the points summarised on the preceding pages it is clear that this application is contrary to a number of the Policies contained in the adopted District Plan.

It is particularly noted that there is no Sustainability and Energy Statement submitted as part of the planning application. This is regarded as an essential aid to monitoring the quality and suitability of any construction.

In particular the cumulative impact on the neighbourhood of this application and the other applications that can be anticipated as a result of the District Plan will irrevocably damage the nature of the area.

Therefore the town council **OBJECTS** to the submitted planning application.