

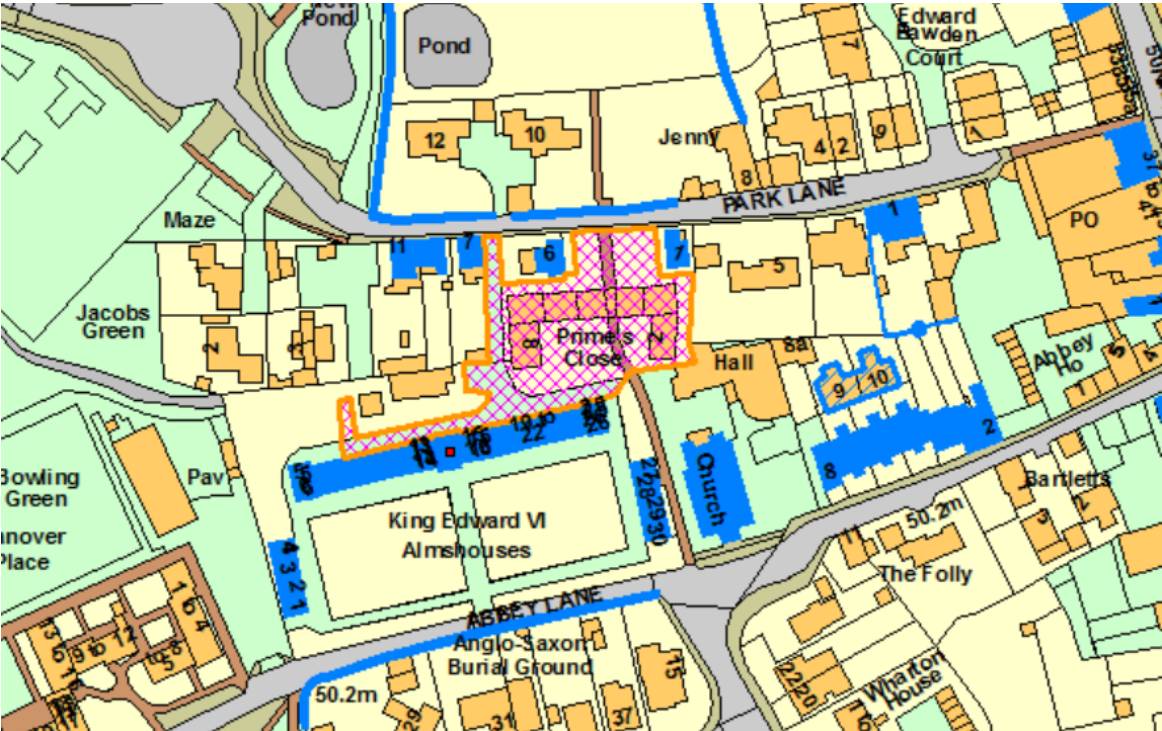
ITEM NUMBER: 7

PLANNING COMMITTEE DATE: 16 October 2024

REFERENCE NUMBER: UTT/24/1383/FUL

LOCATION: King Edward VI Almshouses
Abbey Lane
Saffron Walden

SITE LOCATION PLAN:



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Organisation: Uttlesford District Council Date: 25 September 2024

PROPOSAL: Proposed demolition of existing building containing 7 no. almshouse units and construction of new two storey building containing 16 no. almshouse units with associated bin store, car and cycle parking and landscaping. Replacement of part of River Slade culvert.

APPLICANT: KEVI Corporate Trustee Limited (Mr S Hasler)

AGENT: BB&C Architects Limited (Mr R McKinley)

EXPIRY DATE: 03 September 2024

EOT EXPIRY DATE: 21 October 2024

CASE OFFICER: Mr Avgerinos Vlachos

NOTATION: Within Development Limits.
Primes Close (Non-designated Heritage Asset).
Within Conservation Area (Saffron Walden 1).
Setting of Listed Building (1 and 9 Primes Close – Grade II).
Setting of Listed Building (King Edward VI Almshouses Central Block and Chapel – Grade II).
Setting of Listed Building (King Edward VI Almshouses East Block – Grade II).
Setting of Listed Building (King Edward VI Almshouses West Block – Grade II).
Setting of Listed Building (7 Park Lane – Grade II).
Setting of Listed Building (9 and 11 Park Lane – Grade II).
Setting of Listed Building (Garden Wall of Walden Place – Grade II).
Setting of Listed Building (United Reformed Church – Grade II).
Within Archaeological Site (No. 0408).
Within Flood Zones 2 and 3.
Public Right of Way (Footpath Through the Site).

REASON THIS APPLICATION IS ON THE AGENDA: Major application.

1. **EXECUTIVE SUMMARY**

- 1.1 This a full application for the demolition of an existing building containing 7 no. almshouse units and the proposed construction of a new 2-storey building, containing 16 no. almshouse units with associated bin store, car and cycle parking and landscaping. The proposal also includes the replacement of part of the River Slade culvert. The application does not propose affordable housing as defined in the NPPF glossary but rather provides more affordable units than the ones in the open market subject to certain means-tested criteria.
- 1.2 The site comprises a single storey building (non-designated heritage asset – NDHA) located within development limits in Saffron Walden. There are several Grade II listed buildings in the area and the site is also within the Saffron Walden 1 Conservation Area.
- 1.3 Two applications have been withdrawn following feedback from officers. Issues around heritage harm, residential amenity, flooding and the lack of a planning obligation raised in UTT/23/0976/FUL, have been resolved by the current application in light of additional evidence and pre-application. The total loss of significance of the NDHA asset (through its demolition) would be outweighed by its reducing significance due to the unviable nature of repairs. The adverse impacts of the scheme would include ‘less than substantial harm’ to the significance of several listed buildings and the Conservation Area. However, the net provision of 9 no. Almshouses, the provision of 16 no. Almshouses of high-quality accommodation for individuals in need and the net contribution of 9 no. units to the Council’s housing land supply would be public benefits that would outweigh these adverse impacts.
- 1.4 The Council’s housing delivery test (HDT) performance and its development plan not being up to date compels engagement with the presumption in favour of sustainable development (paragraph 11 of the NPPF). The planning and heritage balances would favour the development. Consequently, when assessed against the policies in the NPPF taken as a whole, and as there are no other material considerations indicating otherwise, the adverse impacts of the proposal would **not** significantly and demonstrably outweigh the benefits. The proposal would be sustainable development.

2. **RECOMMENDATION**

That the Strategic Director of Planning be authorised to **GRANT** permission for the development subject to those items set out in section 17 of this report -

A) Conditions

3. **SITE LOCATION AND DESCRIPTION:**

- 3.1 The application site comprises a single storey building, containing 7 no. 2-bed almshouse units, located within development limits in Saffron

Walden. The application building to be demolished is a non-designated heritage asset constructed in the early 1950s by A.E. Wiseman, who was a prolific Essex Architect known for a number of commissions undertaken for the Diocese of Chelmsford. The building is constructed of brickworks under a tiled roof. The site is within the Saffron Walden 1 Conservation Area with several Grade II listed buildings in the vicinity, including (nos. 1 and 9) Primes Close and the King Edward VI Almshouses Central Block and Chapel. The site lies between Park Lane to the north and Abbey Lane to the south with residential and other uses in the vicinity. A public footpath runs north-south within the site, passing through the existing building and the courtyards. Ground levels slope down northwards. The site is near the town centre and underground contains part of the River Slade culvert. The overall area contains an urban character and appearance with dwellings and other properties of varying architectural styles, sizes, ages and materials, including a plethora of heritage assets.

4. PROPOSAL

4.1 This a full application for the demolition of an existing building containing 7 no. almshouse units and the proposed construction of a new 2-storey building, containing 16 no. almshouse units with associated bin store, car and cycle parking and landscaping. The proposal also includes the replacement of part of the River Slade culvert. The application does not propose affordable housing as defined in the NPPF glossary but rather provides more affordable units than the ones in the open market subject to certain means-tested criteria.

4.2 The application includes the following documents:

- Application form
- Biodiversity checklist
- Archaeological assessment
- Archaeological review
- Background and benefits
- Bat hibernation report
- Biodiversity net gain assessment
- Biodiversity report
- Daylight or sunlight assessment
- Design and access statement
- Energy statement
- Flood risk assessment
- Flood risk assessment – Sequential and exception tests
- Heritage statement
- Housing need statement
- Planning statement
- Public benefits
- Schedule of drawings and documents
- Statement of community involvement
- Superseded acoustic report
- Surface water management strategy

- Viability assessment
- BNG metric
- SUDS checklist
- Revised acoustic report.

5. **ENVIRONMENTAL IMPACT ASSESSMENT**

5.1 The development does not constitute 'EIA development' for the purposes of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

6. **RELEVANT SITE HISTORY**

6.1

Reference	Proposal	Decision
UTT/23/0976/FUL	Demolition of existing building containing 7 no. 2-bed almshouse units. Construction of new two-storey building, containing 16 no. almshouse units in a mixture of 1 and 2 bed flats. Associated bin store, car and cycle parking, and landscaping. Replacement of part of the River Slade culvert.	Withdrawn (23.10.2023).
UTT/22/1153/PA	Development of Primes Close to increase social housing provision.	Closed (18.01.2023)
UTT/18/3407/FUL	Demolition of one single storey building consisting of seven residential units '2-8 Primes Close' Construction of three new buildings consisting of 15 new residential units in total. Associated landscaping surrounding the new buildings, including: Improved public footpath through site, four additional parking spaces including two accessible parking spaces; cycle parking for eighteen bicycles.	Withdrawn (22.05.2019)
SWB/0005/48	New Almshouses and demolition of existing Almshouses.	Unconditional approval (10.09.1948)

7. **PRE-APPLICATION ADVICE AND/OR COMMUNITY CONSULTATION**

7.1 Following withdrawal of previous applications (UTT/23/0976/FUL, UTT/18/3407/FUL), pre-application advice was sought from the local planning authority, including specialist heritage advice.

7.2 In the latest pre-application round, the in-house Conservation officer acknowledged that a 2-storey building existed on the site and requested more information on how the massing and number of units offered changed over time to allow comparisons with the current proposal. Conservation accepted the principle of the number of units proposed and noted the potential for the application to receive support subject to further information being submitted to justify the proposals in this sensitive heritage context. Similar advice was given by the then case officer, who accepted the principle of the development, the prior existence of a 2-storey building on the site and that the requirement for affordable housing would not come into play due to the nature of the Almshouses.

7.3 Community engagement events with some of the stakeholders were held:

- Drop-in sessions for the residents since 2021 and two information weekends in October 2022 and April 2024 for the public. The proposals received high levels of support with the main concerns raised about potential disruption during construction, funding mechanisms and potential overlooking and overshadowing issues). The latest event was advertised in the local press with a turnaround of 56 people.
- Presentation at the Town Council meeting in December 2022, on which the proposals were received positively and public benefits (such as the reduced flood risk due to the replacement of the culvert) acknowledged.
- The then UDC Housing portfolio holder expressed his support and did the local member of parliament and the lord lieutenant of Essex who visited the site in October and February 2022 respectively.
- The chief executive of the Almshouses Association was also in support of the scheme when he visited the site in November 2022.

7.4 Full details of the applicant's engagement and consultation exercises is presented in the Statement of Community Engagement.

8. **SUMMARY OF STATUTORY CONSULTEE RESPONSES**

8.1 **Highway Authority**

8.1.1 No objections subject to conditions (see full response in **Appendix 1**).

8.2 **Lead Local Flood Authority**

8.2.1 No objections subject to conditions (see full response in **Appendix 2**).

8.3 **Environment Agency**

8.3.1 No objections subject to conditions (see full response in **Appendix 3**).

8.4 Historic England

8.4.1 No comments.

9. TOWN COUNCIL COMMENTS

9.1 The Town Council raised no objections.

10. CONSULTEE RESPONSES

10.1 UDC Housing Enabling Officer

10.1.1 Full support as it will provide 16 new one- and 2-bedroom almshouses for those in housing need. Each of the new almshouses will be affordable housing provision and will replace the seven almshouses which were built in 1953, and which have reached the end of their serviceable life.

10.2 UDC Environmental Health

10.2.1 No objections subject to conditions.

10.3 Uttlesford (Conservation and Heritage)

10.3.1 The principle of the demolition of the existing building would be justifiable albeit would lead to the loss of the significance of the non-designated heritage asset. Concluded 'less than substantial harm' to the character or appearance of the Saffron Walden 1 Conservation Area and 'less than substantial harm' to the significance of several listed buildings in the area. Well-designed scheme that responds to its context. Recommended conditions.

10.4 Place Services (Ecology)

10.4.1 No objections subject to conditions, plus the statutory condition for biodiversity net gain.

10.5 Place Services (Archaeology)

10.5.1 No objections subject to conditions.

10.6 Crime Prevention Officer

10.6.1 Whilst there are no apparent concerns with the layout to comment further we would require the finer detail such as the proposed access and visitor control, secure mail delivery provision and physical security measures. Once more information was supplied, the consultee stated they have no further comments.

10.7 Stansted Airport Safeguarding Authority

10.7.1 No objections unconditionally.

10.8 Uttlesford (Urban Design)

10.8.1 Overall, the proposals represent a thoughtful and sensitive design response to both the context and the historic setting of the almshouses, taking cues from both the adjacent context and the historic 1872 building preceding the current 1950 existing building. The proposed height would be appropriate for its context, fitting in with a varied streetscene of mostly historic buildings. The architectural detailing will be crucial to the success of this building – a similar building built with more prosaic detailing would not be appropriate within this context, so the proposed design quality should be robustly secured through planning conditions. This scheme is fully supported as it represents a significant contribution to the infrastructure of the town providing new almshouses in a sustainable and accessible location that are of high architectural quality.

10.9 Anglian Water

10.9.1 No objections unconditionally.

10.10 Affinity Water

10.10.1 No comments.

11. REPRESENTATIONS

11.1 A site notice was displayed on site and notification letters were sent to nearby properties. The application has been advertised to the local press.

11.2 Support

- 11.2.1
- Accommodation for persons in need, hardship or distress.
 - Affordable accommodation.
 - Primes Close bungalows uninhabitable.
 - Empty bungalows.
 - Several public benefits.
 - Almshouses prolong the lives of their residents.
 - Previous building also 2-storey.
 - Energy efficient building.
 - Low carbon design is significant benefit.
 - Benefit of replacing part of the culvert, reducing flood risk to town.
 - Charity is run by volunteers.
 - Continuation of the ancient mission of Almshouses.
 - Solar panels not visible from the ground.
 - Persistent attempts to resolve damp and other issues.
 - Green building with renewable energy sources.

- Correct housing mix with smaller properties.
- Almshouses are the oldest form of social housing.
- Similar footprint with previous building.
- Housing model adaptable to housing crises.
- Close to town centre.
- Increased number of homes.

11.3 Object

11.3.1 No letters of objection received.

11.4 Comment

11.4.1 All material planning considerations raised by interested parties have been thoroughly reviewed when considering this application. Land ownership issues, right of way issues and issues around the deliverability of a planning permission are civil matters beyond planning and must not be considered when determining the application.

12. MATERIAL CONSIDERATIONS

12.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, this decision has been taken having regard to the policies and proposals in the National Planning Policy Framework, the Development Plan and all other material considerations identified in the “Considerations and Assessments” section of the report. The determination must be made in accordance with the plan unless material considerations indicate otherwise.

12.2 Section 70(2) of the Town and Country Planning Act requires the local planning authority in dealing with a planning application, to have regard to

- a) The provisions of the development plan, so far as material to the application:
- (aza) a post-examination draft neighbourhood development plan, so far as material to the application,
- b) any local finance considerations, so far as material to the application, and
- c) any other material considerations.

12.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that “In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”.

12.4 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that “In the exercise, with respect to any buildings or other

land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”.

12.5 The Development Plan

- 12.5.1** Essex Minerals Local Plan (adopted July 2014)
 Essex and Southend-on-Sea Waste Local Plan (adopted July 2017)
 Uttlesford District Local Plan (adopted 2005)
 Felsted Neighbourhood Plan (made February 2020)
 Great Dunmow Neighbourhood Plan (made December 2016)
 Newport and Quendon and Rickling Neighbourhood Plan (made June 2021)
 Thaxted Neighbourhood Plan (made February 2019)
 Stebbing Neighbourhood Plan (made July 2022)
 Saffron Walden Neighbourhood Plan (made October 2022)
 Ashdon Neighbourhood Plan (made December 2022)
 Great & Little Chesterford Neighbourhood Plan (made February 2023)

13. POLICY

13.1 National Policies

- 13.1.1** National Planning Policy Framework (2023).

13.2 Uttlesford District Local Plan (2005)

13.2.1	S1	Development limits for the Main Urban Areas
	GEN1	Access
	GEN2	Design
	GEN3	Flood Protection
	GEN4	Good Neighbourliness
	GEN5	Light Pollution
	GEN6	Infrastructure Provision
	GEN7	Nature Conservation
	GEN8	Vehicle Parking Standards
	H4	Backland development
	H9	Affordable Housing
	H10	Housing Mix
	ENV1	Design of Development within Conservation Area
	ENV2	Development affecting Listed Building
	ENV3	Open Space and Trees
	ENV4	Ancient Monuments and Sites of Archaeological Importance
	ENV8	Other Landscape Elements of Importance for Nature Conservation
	ENV10	Noise Sensitive Development
	ENV11	Noise Generators
	ENV12	Protection of Water Resources

ENV13	Exposure to Poor Air Quality
ENV14	Contaminated land

13.3 Saffron Walden Neighbourhood Plan

13.3.1 Saffron Walden Neighbourhood Plan was 'made' on 11 October 2022. The following policies were considered:

SW1	Housing Mix on New Developments
SW2	Affordable Housing
SW3	Design
SW4	Parking on New Developments
SW11	Ecological Requirements for All New Domestic and Commercial Developments
SW12	Promoting Walking and Cycling
SW17	Open Space for Informal Recreation
SW18	Public Rights of Way

13.4 Supplementary Planning Document or Guidance

13.4.1 Uttlesford Local Residential Parking Standards (2013)
 Essex County Council Parking Standards (2009)
 Supplementary Planning Document – Uttlesford District-Wide Design Code (July 2024)
 Supplementary Planning Document – Accessible homes and playspace
 Supplementary Planning Document – Developer's contributions
 Essex Design Guide
 Uttlesford Interim Climate Change Planning Policy (2021).

14. CONSIDERATIONS AND ASSESSMENT

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

- 14.2
- A) Principle of development (S1, GEN1, H4, SW12, NPPF)
 - B) Heritage impacts and balance / Character and appearance / Climate change (GEN2, ENV1, ENV2, ENV3, SW3, SW18, SPD Uttlesford District-Wide Design Code, SPD Accessible Homes and Playspace, Essex Design Guide, Interim Climate Change Planning Policy, NPPF)
 - C) Residential amenity (GEN2, H4, GEN4, GEN5, ENV10, ENV11, SW3, Essex Design Guide, NPPF)
 - D) Access and parking (GEN1, GEN8, parking standards, SW4, SW12, NPPF)
 - E) Ecology (GEN7, ENV8, SW11, NPPF)
 - F) Contamination (ENV14, ENV12, ENV13, NPPF)
 - G) Archaeology (ENV4, NPPF)
 - H) Flood risk and drainage (GEN3, SW3, SW11, NPPF)
 - I) Housing mix and affordable housing (H9, H10, SW1, SW2, NPPF)
 - J) Planning obligations (GEN6, SPD Developer's Contributions)
 - K) Other matters

L) Planning balance

14.3 A) Principle of development (S1, GEN1, H4, SW12, NPPF)

14.3.1 Emerging local plan and housing land supply:

Paragraph 226 of the NPPF allows for Councils that have reached Regulation 18 or 19 stage of the plan-making process, including the publication of both a policies map and proposed allocations towards meeting housing need, to only be required to identify deliverable sites equating to a minimum of 4 years' worth of the local housing need. Paragraph 226 was engaged on 08 August 2024, following publication of the Regulation 19 Local Plan. As of 20 August 2024, the Council can demonstrate **4.12 years**¹ of housing land supply (which includes a 20% buffer).

14.3.2 Notwithstanding the potential change in the NPPF to remove paragraph 226 (which will remove the 4-year requirement), footnote 8 states that paragraph 11(d) of the NPPF includes situations where the Housing Delivery Test (HDT) indicates that the delivery of housing was below 75% of the housing requirement over the previous three years. Given that the latest HDT for Uttlesford was 58%, situation (b) of Footnote 8 applies, which means that the Council must continue engaging with the presumption in favour of sustainable development under paragraph 11(d) of the NPPF. The age of the Local Plan is also supportive of this.

14.3.3 Due to its stage of preparation and that the proposed strategy has not been tested at examination, the emerging local plan can only be afforded **limited** weight.

14.3.4 Location (isolation, services and facilities):

Case law² defined 'isolation' as the spatial/physical separation from a settlement or hamlet, meaning that a site within or adjacent to a housing group is not isolated. The site is not isolated, as it is located within development limits in Saffron Walden. Paragraph 84 of the NPPF is not applicable.

14.3.5 Saffron Walden offers a wide range of services and facilities, being one of the most sustainable towns in the district, including schools, doctors' surgeries, supermarkets and a vast range of commercial and professional premises and services. The nearest serviced bus stop (High Street stop – 4' walk) is 260 metres from the site and the nearest supermarket (Saffron Walden Costcutter – 2' walk) is 160 metres away. The nearest school (St Mary's Primary School – 8' walk) is 550 metres from the site and the nearest health centre (Gold Street surgery – 6' walk) is 400 metres away. There are pedestrian footpaths both on Park Lane and Abbey Lane, lit, continuous and maintained, that link the application site to the bus stops and the above services and facilities.

¹ Currently at **4.89 years** in Apr 2022 (from 3.52 years, Apr 2021, and 3.11 years in Jan 2021 and 2.68 years before that).

² Braintree DC v SSCLG [2018] EWCA Civ. 610.

14.3.6 The occupants of the Almshouses would be able to safely access sustainable public transport and everyday services and facilities within easily accessible walking distances. Many movements to and from the site would be undertaken by means other than the private car. Opportunities to promote sustainable transport modes have been taken up and alternative transport options are promoted by the development, as the existing public right of way cutting through the site will be retained and improved to an accessible width between 1.8 – 2.0 metres. Therefore, the sustainability credentials of the location are eminent and the development would comply with paragraphs 108(c), 114(a) of the NPPF, policy SW12(1)-(2) of the Saffron Walden Neighbourhood Plan, and policy GEN1(e) of the Local Plan.

14.3.7 Previously developed land:

The site is previously developed land³, as there are planning records (see SWB/0005/48) and other material considerations, including the historic presence of Almshouses on the site, to support this.

14.3.8 Conclusion:

The principle of the residential use of the site is acceptable and complies with policies S1, GEN1(e) and H4 of the Local Plan, policy SW12(1)-(2) of the Saffron Walden Neighbourhood Plan, and the NPPF. However, the principle of the development would be subject to additional planning considerations, such as the impact of the proposal on heritage assets (see Section B and planning balance).

14.4 **B) Heritage impacts and balance / Character and appearance / Climate change (GEN2, ENV1, ENV2, ENV3, SW3, SW18, SPD Uttlesford District-Wide Design Code, SPD Accessible Homes and Playspace, Essex Design Guide, Interim Climate Change Planning Policy, NPPF)**

14.4.1 Heritage impacts:

Place Services Conservation was consulted in UTT/23/0976/FUL with their response being broadly in line with the response of the in-house Conservation officer for the current application. Conservation supports that the existing building⁴ was constructed in the early 1950s by a prolific Essex architect and positively contributes to the Saffron Walden 1 Conservation Area. Primes Close, which is proposed to be demolished, is a non-designated heritage asset (NDHA) due to its special architectural and historic interest, as it represents a later phase of development within Saffron Walden. The site is close to several Grade II listed buildings⁵ and

³ In the context of the NPPF glossary and a Court of Appeal decision: Dartford Borough Council v Secretary of State for Communities and Local Government & Anor [2017] EWCA Civ 141.

⁴ Known as Primes Close or Primes Close bungalows or Nos. 2-8 Primes Close bungalows.

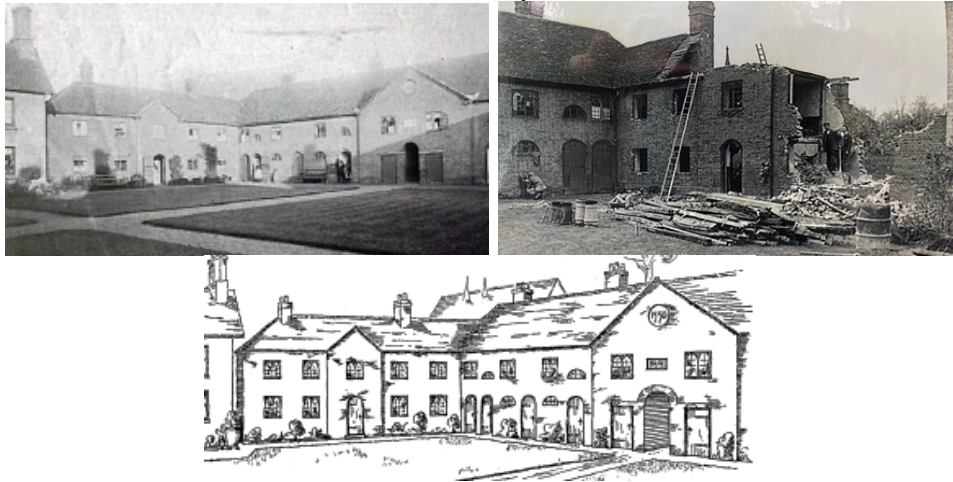
⁵ (1 and 9) Primes Close (Grade II) – Two buildings under one listing.

King Edward VI Almshouses Central Block and Chapel (Grade II), alternatively known as Main Range.

within the above Conservation Area with potential impacts to their significance.

14.4.2 In the withdrawn application (UTT/23/0976/FUL) concerns were raised for the principle of the demolition of the NDHA, as well as for the scale, massing, architectural details and plan form of the proposed building, being harmful to the significance of the listed buildings and the Conservation Area.

14.4.3 As a response to these concerns and a pre-application, the applicant provided additional information to fully detail and illustrate the evolution of the site since the Saffron Walden Almshouses were founded in 1400. A new analysis was provided to aid understanding of the historic occupancy of the 2-storey building that stood on the site from 1782 to 1953 (see images), suggesting that 16 – 18 no. two-room Almshouses were within the 1782 tenements. In light of this new evidence, the proposed number of units (16 no. units) would be appropriate as it would align more closely with the historic number of units on this part of the wider Almshouses site.



14.4.4 The scale and massing of the proposed building would be increased in comparison to the existing bungalows, and therefore a level of harm to the significance of the heritage assets would be inescapable as it would detract from their prominence. However, the proposed building would echo the scale of the 2-storey 1782 building, being marginally higher (0.25 metres, see image). The proposed gables would assist in breaking up the massing and volume of the new roof, resulting in well-balanced proportions. The council's Urban Design officer confirmed that the crown roof on the proposed building would create a roof form less dominant than either the existing building or its historic predecessor.

King Edward VI Almshouses East Block (Grade II).
King Edward VI Almshouses West Block (Grade II).
7 Park Lane (Grade II).
9 and 11 Park Lane (Grade II).
Garden Wall of Walden Place (Grade II).
United Reformed Church (Grade II).



14.4.5 Turning to design and form, Conservation praised the omission of the incongruous balconies from the withdrawn scheme and noted that the crown roof would soften the impact of the proposal in this heritage context. The council’s Urban Design officer reported that despite the historic 1782 building had a wider central gable below the main ridgeline and a lower pitched roof, the proposal “*by making the expressed gable taller and narrower, more successfully draws the eye to the retained footpath through the building*”. This would create a focal point in the streetscene as the gable above the footpath would be slightly projecting brickwork with a cast-stone bullseye and a higher ridgeline than the rest of the building (see image). The fenestration and openings were made more symmetrical and uniform in appearance with the French doors removed and visually ‘cleaner’ elevations. The use of parapets and a crown roof dropped below the ridge would reduce the visual impact of the solar panels in the area⁶. As such, the form and appearance of the new building would reference previous historic form of the demolished 1782 Almshouses in an improved manner.



14.4.6 The layout of the site would be improved as the open courtyard to the north would be visually enhanced with the proposed central gable. The courtyard to the south would become less formal (due to the rectilinear form of the new building), but the site would reach its historic capacity, being able to accommodate the same number of Almshouses as in the past.

14.4.7 The proposed replacement of part of the River Slade culvert would not have any heritage implications given its underground nature but would be preserved by record, as per the recommendations of Place Services Archaeology (see Section G).

⁶ See Design and Access Statement, page 32.

- 14.4.8** Therefore, the demolition of the existing building would lead to the complete loss of the NDHA and fail to preserve or enhance the character or appearance of the Saffron Walden 1 Conservation Area to which it positively contributes; paragraphs 208 and 209 of the NPPF being relevant. The proposed building, by reason of its increased scale and design features, would fail to preserve the setting and significance of the listed buildings and the character or appearance of the Conservation Area; paragraph 208 of the NPPF being relevant. The proposal would cause *medium* levels of ‘less than substantial harm’ to nos. 1 and 9 Primes Close cottages and the King Edward VI Almshouses Central Block; *low-to-medium* levels of ‘less than substantial harm’ to the Conservation Area; and *low* levels of ‘less than substantial harm’ to the rest of the heritage assets⁷.
- 14.4.9** The proposal would fail to comply with policies ENV1, ENV2 of the Local Plan, and policies SW3(1) and SW3(4)(a)-(c) of the Saffron Walden Neighbourhood Plan. Historic England refrained from commenting.
- 14.4.10** Heritage balance:
Paragraph 209 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a *balanced judgement* will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 14.4.11** The application has changed its position in relation to UTT/23/0976/FUL and no longer identifies the existing building as a non-designated heritage asset (NDHA)⁸. However, NDHAs may be identified during the decision-making process as evidence emerges and the Conservation Area appraisal and local heritage lists are not exhaustive documents. The application of certain guidance and methodology from Historic England can assist in the ad hoc assessment of potential NDHAs; this assessment was made in the response from UDC Conservation.
- 14.4.12** The application asserts that the existing building fails to offer appropriate living conditions for its occupants (due to damp, poor ventilation, poor insulation and mould growth), resulting to its gradual evacuation⁹. Although it is possible to upgrade the existing building “*it is not viable due to cost and, more critically, a number of serious residual problems that would be retained and putting the long-term viability of the building at risk despite the upgrades*”¹⁰. The applicant has gone to great lengths to substantiate a convincing case that the building is no longer fit for purpose and that any investment for repairs would be a meaningless waste of

⁷ No. 7 Park Lane, nos. 9 and 11 Park Lane, the east and west ranges, and the United Reformed Church.

⁸ Heritage Statement, paragraph 5.5.1; Planning Statement, paragraph 7.8.

⁹ Viability Assessment, paragraph 2.1.

¹⁰ Viability Assessment, Introduction, paragraph (vi).

resources, including evidence from construction cost consultants and condition surveys.

- 14.4.13** Considering the above, the total loss of the significance of the asset (through its demolition) would be outweighed by its diminishing significance due to the unviable nature of its repairs and the reducing appeal of its historic function. This 'balanced judgement' shows that the principle of the demolition of the NDHA is acceptable, in accordance with paragraph 203 of the NPPF.
- 14.4.14** Turning to the designated assets, paragraph 208 of the NPPF states that where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, this harm should be weighed against the *public benefits* of the proposal including, where appropriate, securing its optimum viable use. The heritage balancing exercise would require the above 'less than substantial harm' to be weighed against the public benefits of the scheme, which include:
- Provision of 16 no. Almshouses (net increase of 9 no. units) of high standard.
 - Net increase of 9 no. units to the housing supply.
 - Provision of accessible and energy/water efficient units.
 - Accessible and sustainable location.
 - Reduced flood risk due to the replacement culvert.
 - Ecological enhancements and biodiversity net gain.
 - Economic and social benefits.
- 14.4.15** Paragraph 205 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, *great* weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Therefore, the harm to the significance of the listed buildings and the Conservation Area identified above would be afforded **great** weight. The application asserts that the development would result in 'less than substantial harm' to the significance of the designated heritage assets apart from the Conservation Area¹¹ and maintains that such harm would be outweighed by the public benefits of the proposal¹².
- 14.4.16** Independently from the applicant's view, the net provision of 9 no. Almshouses and the provision of 16 no. new Almshouses that would offer high-quality living conditions to local persons in need would be **significant** public benefits of the proposed scheme. The net contribution of 9 no. units to the Council's housing land supply would also be a meaningful but **moderate** public benefit arising from the development. These public benefits alone would be adequate to outweigh the harm to the significance of the listed buildings and the Conservation Area, meaning that the heritage balancing exercise would favour the proposal, in accordance with

¹¹ Heritage Statement, paragraphs 7.6, 7.8.

¹² Planning Statement, paragraph 8.7.

paragraph 208 of the NPPF. The application of paragraph 208 would **not** provide a clear reason for refusing the development, in compliance with paragraph 11(d)(i) of the NPPF. The rest of the public benefits are discussed in the Planning Balance towards the end of this report.

14.4.17 Conservation suggested conditions to preserve the significance of the heritage assets, including the re-use of existing materials, the prevention of additional pipework, the specification of the materials and additional drawings for the doors, windows and other features of the new building. These conditions are important to ensure visually attractive building in keeping with the heritage sensitive location; it must be emphasised for future reference that any attempts to reduce the high design quality of the proposed building would be resisted by the Council.

14.4.18 Character and appearance:

The heritage-sensitive character and appearance of this part of the town has been mainly covered in the 'Heritage impacts' section above but some comments from UDC's Urban Design officer should be noted here. He said that the use of intricate brickwork detailing such as the dentil eaves to the main roof, the corbelled eaves to the gables and the inclusion of stone copings would be successful but recommended that the use of a single brick with a variety of detailing could be enlivened, for instance, through the use of a different coloured brick to the lintels, similar to the soldier course around the bulls-eye. The proposal would preserve the character and appearance of the area; but the above recommendations would further increase the design quality of the building and compliment the streetscene. A condition to withdraw permitted development rights would be necessary to preserve the significance of the heritage assets and the character and appearance of the area, including the retention of appropriate fenestration openings, the avoidance of any additional bulk and massing on the roof with dormers, and the avoidance of any outbuildings.

14.4.19 Turning to landscaping, the mature trees to the south of the site are outside the red line and shall not be harmed by the development. The application proposes removal of two small trees in the north courtyard for construction purposes and their replacement upon completion, as well as planting of 6 no. new trees on the wider Almshouses site (blue line) as part of the recommendations for biodiversity net gain¹³. A new rose bed along Park Lane would retain this attractive landscape feature post development, as suggested by nearby residents.

14.4.20 Notwithstanding the above and the Proposed Landscaping Plan, a landscaping condition would be necessary for further landscaping details to ensure appropriate enhancements to the Almshouses site and streetscene, such as specification of soft landscaping species, planting centres, native species mix for hedges, specification for hard landscaping

¹³ Design and Access Statement paragraph 5.4; Biodiversity Net Gain Assessment, paragraph 5.0; Planning Statement, paragraph 7.25; see also Proposed Landscaping Plan.

features with appropriate photographs of the final materials, and others. The above would ensure compliance with policy SW18 of the Saffron Walden Neighbourhood Plan that requires green landscaping to reduce visual impacts on developments that will be clearly visible from a public right of way.

14.4.21 Climate change:

Energy and water efficiency measures would be necessary, to ensure compliance with the adopted Climate Crisis Strategy 2021-30, the Interim Climate Change Planning Policy and section 14 of the NPPF. The matter will not be conditioned as it will be picked up at the Building Regs stage. The development would bring forward water and energy efficiency measures and construction techniques, including solar panels and 2 no. air source heat pumps¹⁴. Total water consumption would be 99.7 litres per person per day for each unit¹⁵, which complies with the 110 litres per person per day set out in interim policy 3 of the Interim Climate Change Planning Policy, and policy GEN2(e) of the Local Plan. These green technologies would be public benefits of the scheme both from a climate change mitigation perspective and from that of energy cost savings for the occupants of the new flats, who will be persons in need.

14.4.22 Potential for crime:

The Crime Prevention Tactical adviser of Essex Police reported no apparent concerns with the layout and requested the details of the proposed access and visitor control, secure mail delivery provision and physical security measures to provide further comments. However, some of these details have been submitted with the application or shall be conditioned (e.g. external lighting scheme). The proposal would comply with policy GEN2(d) of the Local Plan that aims at reducing the potential for crime, and paragraph 135(f) of the NPPF.

14.4.23 Conclusion:

The heritage balance would favour the scheme, which would preserve the character and appearance of the area. The proposal would comply with paragraphs 208 and 209 of the NPPF, and sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

14.5 **C) Residential amenity (GEN2, H4, GEN4, GEN5, ENV10, ENV11, SW3, Essex Design Guide, NPPF)**

14.5.1 In terms of the residential amenity of the occupants, the proposed flats have bedroom/persons occupancies and gross internal areas (GIA) that exceed the minimum thresholds set out in the Nationally Described Space Standard (part from one exception):

- Flat 1: 1B1P 42.5 sqm (> threshold 39 sqm)
- Flat 2: 1B1P 43.8 sqm (> 39 sqm)
- Flat 3: 1B1P 42.4 sqm (> 39 sqm)

¹⁴ Energy Statement, pp.18 – 19.

¹⁵ Energy Statement, p.35.

- Flat 4: 1B1P 43.9 sqm (> 39 sqm)
- Flat 5: 1B1P 43.8 sqm (> 39 sqm)
- Flat 6: 1B2P 52.6 sqm (> 50 sqm)
- Flat 7: 1B1P 49.7 sqm (> 39 sqm)
- Flat 8: 2B3P 61.1 sqm (> 61 sqm)
- Flat 9: 1B1P 42.5 sqm (> 39 sqm)
- Flat 10: 1B1P 43.8 sqm (> 39 sqm)
- Flat 11: 1B1P 42.6 sqm (> 39 sqm)
- Flat 12: 1B1P 43.7 sqm (> 39 sqm)
- Flat 13: 2B3P 65.3 sqm (> 61 sqm)
- Flat 14: 1B1P 49.9 sqm (> 39 sqm)
- Flat 15: 1B2P 46.6 sqm (< 50 sqm) – slightly below standards
- Flat 16: 2B3P 61.1 sqm (> 61 sqm).

14.5.2 Flat 15 has a GIA that falls below the minimum standard, however, given that the majority (81%) of the flats are to be occupied by single persons, it cannot be reasonably concluded that flat 15 would offer sub-standard living accommodation for its future occupant whose residential amenity would be safeguarded. Previous concerns in UTT/23/0976/FUL regarding the provision of inadequate floor space for flats 1-2, 7-10 and 14-16 have been addressed. The proposals would accord with policy GEN2(c) of the Local Plan, and paragraph 135(f) of the NPPF.

14.5.3 The beneficiaries of the Almshouses would be able to enjoy spacious communal garden areas that well exceed the minimum threshold of 25 sqm per flat (see Essex Design Guide), in compliance with policy SW3(12) of the Saffron Walden Neighbourhood Plan. The layout was improved in relation to UTT/23/0976/FUL through smaller, more private spaces on the southern courtyard that achieve a better distinction between public and private space. The communal amenity space would be a public benefit because it will boost social interaction and inclusion for individuals that suffer from the physical and psychological effects of social isolation¹⁶. Given that the public footpath would allow access though the site, the layout would improve the existing situation without suffocating the communal spaces with close boarded fencing around the footpath, as that would not be in keeping with the heritage aspect of the site. The rest of the properties under the applicant's control retain the same level of amenity space.

14.5.4 In terms of noise, odours, dust, vibrations, light pollution and other disturbances, notwithstanding the concerns raised by neighbouring occupiers and following receipt of additional information, Environmental Health raised **no objections** subject to conditions. The conditions refer to a scheme of noise mitigation and a construction and environmental management plan.

14.5.5 After applying the design and remoteness tests (see Essex Design Guide) and the 45-degree tests, the following conclusions are drawn for the

¹⁶ Background and Benefits of Almshouses, p.1.

impact of the proposed development to the residential amenity of the neighbouring occupiers in terms of potential material overshadowing, overlooking (actual or perceived) and overbearing effects.

14.5.6 Potential overlooking and loss of privacy:

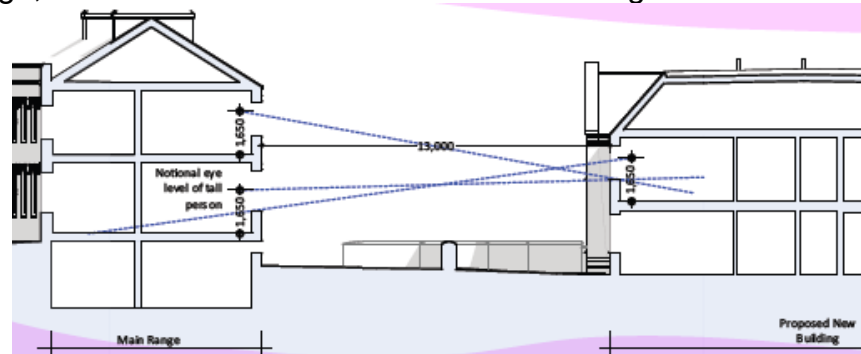
A condition to withdraw permitted development rights would be necessary to safeguard the residential amenity of existing and future occupiers.

- **Flat 9:**

- The living room and kitchen windows (west facing) have been replaced with rooflights to avoid creating a perception of overlooking to the private garden of no. 7 Park Lane, as in UTT/23/0976/FUL.
- The Juliet balcony (north facing) would face the space to the west of no. 9 Primes Close cottage. In the previous submission, the applicant failed to identify that this space is communal garden, and as such, a lower level of privacy would be reasonable.

- **Flats 11 and 12:**

- Concerns were raised in UTT/23/0976/FUL as the balconies would be directly facing into the habitable room windows on the north elevation of the main range. The balconies are now omitted and the floor levels are staggered between the two buildings, ranging from 1.3 to 1.5 metres out of alignment (see image). In addition, the majority of the main range windows are into non-habitable rooms and 3 no. bedrooms on each floor. The habitable room windows on the proposed building would face away, by design, from the habitable rooms of the main range.



- **Flat 16:**

- The bedroom window (east facing) has been replaced with a rooflight to avoid creating a perception of overlooking to the garden of no. 5 Park Lane, as in UTT/23/0976/FUL.
- The bedroom window (north facing) would face away from the small living room window on the south elevation of no. 5 Park Lane.

14.5.7 Potential overshadowing and loss of light:

Due to its size, scale and position, the proposed building would not lead to material overshadowing of, and loss of light to, the private gardens or habitable room windows of any existing properties in the area. The Daylighting and Shadowing Analysis submitted confirms this.

- 14.5.8** Potential overbearing effects:
Concerns were expressed in UTT/23/0976/FUL for overbearing effects ('tunnelling effect') to the garden of no. 9 Primes Close cottage due to the limited gap between the increased height of the proposed building and the existing 2-storey building at no. 7 Park Lane. However, it was not forthcoming at the time of that assessment that the garden of no. 9 Primes Close cottages is communal space, and as such, a level of enclosure would be justified given the open courtyards under the applicant's control that would be enjoyed by all residents in the Almshouses. The 9.8 metres distance between no. 9 Primes Close cottage and no. 7 Park Lane and the intervening driveway would allow enough space for this part of the shared garden to 'breathe' amongst the buildings.
- 14.5.9** The proposal would not materially harm residential amenities of existing and future occupants and would comply with policies H4(b)-(c) and GEN2 of the Local Plan, policy SW3(4)(g) of the Saffron Walden Neighbourhood Plan, the Essex Design Guide, and the NPPF.
- 14.6** **D) Access and parking (GEN1, GEN8, parking standards, SW4, SW12, NPPF)**
- 14.6.1** From a highway and transportation perspective, the Highway Authority raised **no objections** subject to conditions in the interests of highway safety, as the development would accord with the Essex County Council Supplementary Guidance – Development Management Policies (Feb 2011), policy GEN1 of the Local Plan, and paragraphs 115 and 114(b) of the NPPF. The conditions refer to parking provision, a temporary access scheme, a highway reinstatement scheme, a construction management plan and a travel information pack for sustainable transport.
- 14.6.2** Parking arrangements would include 2 no. additional parking spaces, one of which would be a disabled space. The existing parking layout of the wider site (blue and red lines) includes 11 no. spaces for 43 no. units (coverage 23.4%), whilst the proposed situation would bring coverage to 25% (13 no. spaces for 52 no. units given the net increase of 9 no. flats). Although parking provision will remain below the levels required by the Uttlesford Residential Parking Standards (2013) and the Essex County Council Parking Standards (2009), contrary to policy SW4(1) of the Saffron Walden Neighbourhood Plan, the *status quo* is slightly improved, and as such, the conflict with the above policy would hold **limited** weight.
- 14.6.3** It would also be unreasonable to suggest insufficient parking (or visitors' parking) given the proximity of the site to sustainable transport modes and the town centre. The proposal would accord with policy GEN8 of the Local Plan, as the number, design and layout of parking spaces is appropriate for this sustainable location.
- 14.6.4** The proposed cycle parking spaces (10 no. spaces) fall short of the requirement of the Essex County Council Parking Standards (2009), which would be 16 no. cycle spaces. However, this would be justified in

such a sustainable location, plus the common corridors and staircases within the proposed building would provide additional secure space for bicycles, which would be enough to meet the standards. The proposal would comply with policy SW4(2) of the Saffron Walden Neighbourhood Plan.

14.7 E) Ecology (GEN7, ENV8, SW11, NPPF)

14.7.1 Place Services Ecology, following review of the submitted information, raised **no objections** subject to conditions to secure biodiversity mitigation and enhancement measures. The development would comply with paragraphs 43, 180(d) and 186 of the NPPF, policies GEN7, ENV8 of the Local Plan, and policy SW11(5) of the Saffron Walden Neighbourhood Plan. The conditions refer to action in accordance with the appraisal recommendations, a Natural England licence for bats, a construction environmental management for biodiversity, a biodiversity enhancement strategy, a lighting scheme for biodiversity and a habitat management and monitoring plan.

14.7.2 Biodiversity Net Gain duty:

BNG is a statutory requirement set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. Place Services Ecology are satisfied that the **pre-development baseline has been calculated appropriately** and reported that the calculations for Habitat units and Hedgerow units are realistic and deliverable in principle. The proposals result in a net gain of 0.01 Habitat units (net increase of 5.92%) and a net gain of 0.24 Hedgerow units (net increase of 157.4%). To resolve this shortfall, the applicant proposes to plant 6 no. additional trees in land of their control (blue line). No watercourse units are being offered to deliver a 10% BNG; nevertheless, the finalised off-site measures (i.e. trees and watercourse enhancements) can be secured as part of the statutory condition. A habitat management and monitoring plan (HMMP) may be required for any 'significant on-site enhancements', as well as for any off-site measures. An HMMP is not required for on-site habitat, as none of the on-site habitats are being enhanced or are considered significant on-site enhancements at this stage.

14.7.3 Paragraph 13 of Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990 states that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition that the development may not be begun unless (a) a biodiversity gain plan has been submitted to the planning authority (see paragraph 14), and (b) the LPA has approved the plan. The government guidance suggests that the 'statutory condition' must be separate to the list of planning conditions in the decision notice (see first informative).

14.7.4 Based on the information available, this permission is one which will **require the approval of a biodiversity gain plan** before development is begun because none of the statutory exemptions or transitional

arrangements apply. To commence the development without approval of the biodiversity gain plan (statutory condition) may result to a breach of planning and/or an unlawful commencement of the development.

14.8 F) Contamination (ENV14, ENV12, ENV13, NPPF)

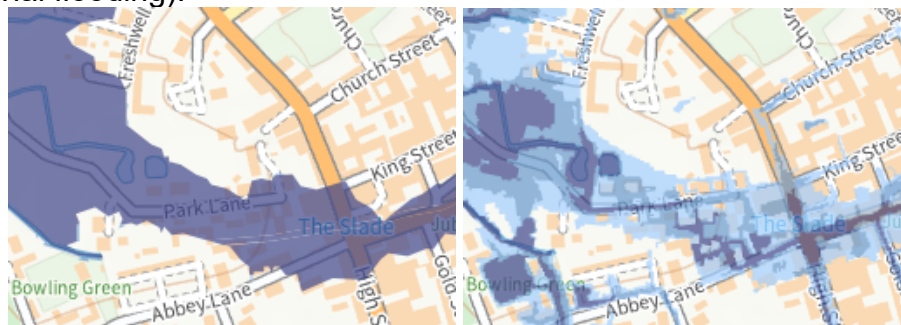
14.8.1 Environmental Health raised **no objections** subject to a condition to protect human health and the environment. The proposal would accord with policies ENV14, ENV12, ENV13 of the Local Plan, and the NPPF. The condition refers to potential land contamination.

14.9 G) Archaeology (ENV4, NPPF)

14.9.1 Place Services Archaeology reported that the site lies in the centre of the medieval town and has high potential for medieval deposits surviving. The consultee raised **no objections** subject to conditions for building recording of the culvert and a programme of archaeological evaluation and excavation to protect potential archaeological remains. The development would accord with policy ENV4 of the Local Plan, and paragraph 192(b) of the NPPF.

14.10 H) Flood risk and drainage (GEN3, SW3, SW11, NPPF)

14.10.1 Footnote 59 in paragraph 173 of the NPPF requires a site-specific Flood Risk Assessment (FRA) as the site falls within Flood Zones 2 and 3. The Local Flood Authority (Essex County Council) raised concerns in UTT/23/0976/FUL as they reported a lack of information for the locations and details of the sustainable urban drainage systems (SUDS) and the hydraulic modelling details that should have included climate change mitigation values. To resolve these concerns, the application submitted an updated FRA and a surface water management strategy, plus justification for the sequential and exception tests. The application asserts that *“there are no alternative locations within an appropriate site search area or within the wider site ownership”*¹⁷. Evidence is also presented to satisfy the exception test by showing that the development in flood zone 3 will provide wider sustainable benefits to the community and will be safe for its lifetime without increasing flood risk elsewhere. The Council would have no reason to contest this analysis. The following images show the extent of flooding from rivers (fluvial flooding) and from surface water (pluvial flooding).



¹⁷ Flood Risk Assessment – Sequential and Exception Tests, p.8.

- 14.10.2** The FRA concluded that the site is at risk of fluvial flooding during the critical 1 in 100-year flood event including an allowance for climate change and recommended measures to reduce flooding risk on site or elsewhere, including setting the finished floor levels at a minimum height of 48.65 metres above ordnance datum (AOD), extra flood resistance and resilience measures in the event the culvert is blocked (such as flood resilient materials at low level), subscription to the Environment Agency's flood warning service, development of a basic flood evacuation and protection procedure and discharge of surface water with infiltration via a soakaway.
- 14.10.3** The Local Flood Authority and the Environment Agency raised **no objections** subject to conditions. The proposal would comply with paragraph 173 of the NPPF, policy GEN3 of the Local Plan, and policies SW3(14) and SW11 of the Saffron Walden Neighbourhood Plan. The conditions refer to a detailed surface water drainage scheme, a maintenance plan, and yearly maintenance logs.
- 14.10.4** The Local Flood Authority did not comment on the proposed replacement of part of the River Slade culvert but the FRA confirmed that flood storage will be increased by the development, and as such, floodplain compensation would not be required. The replacement of part of the culvert that runs through the site (50 metres) would slightly decrease the possibility of blockages but the overall culvert under the town would not eliminate such events. The Environment Agency previously commented in UTT/23/0976/FUL that this section of the culvert will be more accessible for maintenance and structurally improved but its partial replacement will not eliminate flood risk to Saffron Walden as there are still other sections where blockages could occur. However, it will likely be a flood risk benefit and an improvement on the existing culvert in this section.
- 14.10.5** Anglian Water raised **no objections** and reported that the foul and sewage drainage systems have capacity to accommodate the proposed development. Affinity Water refrained from commenting. The Canal & River Trust refrained from commenting in UTT/23/0976/FUL as the site falls outside the notified area for its scale and location.
- 14.11 I) Housing mix and affordable housing (H9, H10, SW1, SW2, NPPF)**
- 14.11.1** Housing mix:
Policy H10 is applicable on sites of 0.1 hectares and above, or of 3 no. or more dwellings but is not relevant on this occasion given that it refers to market housing, not Almshouses.
- 14.11.2** Most of the flats are to be occupied by a single resident to meet the high demand (81%) for 1-bed properties in the Saffron Walden Almshouses¹⁸. This explains why only 3 no. of the proposed Almshouses (18.8%) would

¹⁸ Background and Benefits, p.4; see also Design and Access Statement, paragraph 5.2.3.

be 2-bed properties. The recommended housing mix in the Local Housing Needs Assessment (June 2024) for the Reg 19 version of the emerging Local Plan (see below) suggests that 55% of the rented affordable units should be 1- or 2-bed properties and that most of the units should be houses rather than flats although consideration will also need to be given to site specific circumstances (which may in some cases lend themselves to a particular type of development). The recommended housing mix of the emerging Local Plan is broadly in line with the proposed housing mix of the application as site specific circumstances (i.e. the specialist nature of Almshouses) would justify the proposal. The proposal would comply with policy SW1 of the Saffron Walden Neighbourhood Plan.

	Market	Affordable home ownership	Affordable housing (rented)	
			General needs	Older persons
1-bedroom	25%	20%	25%	40%
2-bedrooms		45%	30%	
3-bedrooms	45%	35%	35%	60%
4+-bedrooms	30%		10%	

14.11.3 Affordable housing:

Paragraph 66 of the NPPF states that where major development involving the provision of housing is proposed, planning decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. Policy H9 of the Local Plan and policy SW2 of the Saffron Walden Neighbourhood Plan require a 40% affordable housing contribution from major development. Paragraph 66 of the NPPF is not applicable here as the Almshouse units proposed are to be rented.

14.11.4 The application proposes Almshouse units that do not meet the definition of ‘affordable housing for rent’ in the NPPF, as the landlord would be a charity instead of a registered provider (such as a housing association). The proposal would therefore conflict with policy H9 of the Local Plan, and policy SW2 of the Saffron Walden Neighbourhood Plan.

14.11.5 However, Almshouses are exempt from ‘right to buy’ in government guidance¹⁹. The applicant is a registered charity which is obliged by the charity commission to allocate accommodation to “*persons of modest means who are in need, hardship or distress and who are resident in, or have a strong connection to, the former borough of Saffron Walden*”. If the applicant were to operate outside the regulatory context set out by the charity commission, the charity could be fined or even dissolved. This form of accommodation is let at below-the-market rental levels and is a means-tested application system because the allocation policy for the Saffron Walden Almshouses includes specific criteria that refer to need, aimed only at assisting those unable to afford rents in the private sector.

Therefore, although not affordable in the NPPF language, Almshouses, by definition, offer more affordable accommodation than the private market sector for rented properties. UDC Housing raised **no objections**

¹⁹ Your right to buy home: A guide (April 2024), p.10.
<https://www.gov.uk/government/publications/your-right-to-buy-your-home-a-guide--2>

and fully supported the scheme as “*Each of the new almshouses will be affordable housing provision [...] for the benefit of current and future generations*”. Despite the conflict with the Local and Neighbourhood Plans and by virtue of paragraph 2 of the NPPF, the above material considerations indicate that the application should not be determined in accordance with the development plan for the issue of affordable housing. The Council has been satisfied in light of the additional evidence submitted with the application that affordable housing would not be required on this distinct occasion, to make the development acceptable in planning terms.

14.12 J) Planning obligations (GEN6, SPD Developer’s Contributions)

14.12.1 Paragraph 57 of the NPPF sets out that planning obligations should only be sought where they are necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. This is in accordance with Regulation 122 of the Community Infrastructure Levy (CIL) Regulations. As explained in section (I), the proposed Almshouses comprise a distinct scheme that would not require the provision of affordable housing in accordance with the NPPF definition. The specialist nature of this housing type has also been covered in the description of the development.

14.12.2 Therefore, by virtue of paragraph 57 of the NPPF, a planning obligation would not be necessary on this occasion, in accordance with the Supplementary Planning Document – Developer’s Contributions (March 2023), the Essex County Council’s Developers’ Guide to Infrastructure Contributions, policies H9 and GEN6 of the Local Plan, and policy SW2 of the Saffron Walden Neighbourhood Plan.

14.13 K) Other matters

14.13.1 The Safeguarding Authority for Stansted Airport raised **no objections** unconditionally in the interests of flight safety.

14.14 L) Planning balance

14.14.1 The public benefits²⁰ of the scheme would include:

- Provision of 16 no. Almshouses (net increase of 9 no. units) of high standard – **significant** weight.
- Net increase of 9 no. units to the housing supply – **moderate** weight.
- Provision of accessible and energy/water efficient units – **limited** weight.
- Accessible and sustainable location – **limited** weight.
- Reduced flood risk to the town due to the replacement culvert – **limited** weight.
- Ecological enhancements and biodiversity net gain – **limited** weight.

²⁰ See Public Benefits; Background and Benefits.

- Economic and social benefits – **limited** weight.

- 14.14.2** The net provision of 9 no. Almshouses and the provision of 16 no. new Almshouses that would offer high-quality living conditions to local persons in need would be **significant** public benefits of the proposed scheme. The net contribution of 9 no. units to the Council's housing land supply would also be a meaningful but **moderate** public benefit arising from the development.
- 14.14.3** The accessibility and energy/water efficiency measures that would be incorporated in the design of the proposed building are supported by the NPPF, however, most of these measures are requirements under the Building Regulations regime outside planning, and as such, shall be afforded **limited** weight, mostly due to their comparison with the poor living conditions offered by the existing building.
- 14.14.4** The partial replacement of a 50-metre section of the River Slade culvert would reduce flood risk to the town but would not eliminate or substantially reduce the potential for flooding events given that blockages could still occur on the rest of the culvert outside the site. For this reason, this public benefit would be of **limited** extent.
- 14.14.5** The location of the site close to the town centre services and facilities and public transport links would also be a public benefit from a climate change mitigation perspective but rather of a **limited** extent, as the scheme would not be a completely car-free development.
- 14.14.6** The proposal would offer ecological enhancements and at least 10% biodiversity net gain; these matters would only attract **limited** weight given the legal requirement for such measures.
- 14.14.7** The proposal would also provide a modest contribution towards the wider local economy during construction, via potential short-term employment for local builders and suppliers of materials, and post-construction via reasonable use of local services in town. However, the economic benefits of 16 no. flats would be modest and attract **limited** weight.
- 14.14.8** The adverse impacts of the development would include:
- Medium level of 'less than substantial harm' to the significance of nos. 1 and 9 Primes Close – **great** weight.
 - Medium level of 'less than substantial harm' to the significance of the King Edward VI Almshouses Central Block and Chapel (main range) – **great** weight.
 - Low-to-medium level of 'less than substantial harm' to the significance of the Saffron Walden 1 Conservation Area – **great** weight.
 - Low level of 'less than substantial harm' to the significance of no. 7 Park Lane, nos. 9 and 11 Park Lane, east and west blocks, and the United Reformed Church – **great** weight.

- 14.14.9** The total loss of the significance of the NDHA asset (through its demolition) would be outweighed by its reducing significance due to the unviable nature of its repairs; therefore, the loss of the NDHA would be afforded **neutral** weight in decision-making. Similarly, parking provision would not meet the parking standards but this would be justified in such a sustainable location.
- 14.14.9.1** Paragraph 205 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, *great* weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Therefore, the harm to the significance of the listed buildings and the Conservation Area identified above would be afforded **great** weight.
- 14.14.10** Consequently, when assessed against the policies in the NPPF taken as a whole, and as there are no other material considerations indicating otherwise, the adverse impacts of the proposal would **not** significantly and demonstrably outweigh the benefits. The proposal would be sustainable development for which paragraph 11(d) of the NPPF indicates a presumption in favour.

15. ADDITIONAL DUTIES

15.1 Public Sector Equalities Duties

15.1.1 The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. It places the Council under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers.

15.1.2 The Committee must be mindful of this duty inter alia when determining all planning applications. In particular, the Committee must pay due regard to the need to: (1) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; (2) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (3) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

15.1.3 Due consideration has been made to The Equality Act 2010 during the assessment of the planning application, no conflicts are raised.

15.2 Human Rights

15.2.1 There may be implications under Article 1 (protection of property) and Article 8 (right to respect for private and family life) 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.

16. CONCLUSION

16.1 The planning and heritage balances would favour the development. Consequently, when assessed against the policies in the NPPF taken as a whole, and as there are no other material considerations indicating otherwise, the adverse impacts of the proposal would **not** significantly and demonstrably outweigh the benefits. The proposal would be sustainable development for which paragraph 11(d) of the NPPF indicates a presumption in favour.

16.2 It is therefore recommended that the application be approved subject to conditions.

17. 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 The development hereby permitted shall be carried out in accordance with the approved plans as set out in the Schedule.

REASON: For the avoidance of doubt as to the nature of the development hereby permitted, to ensure development is carried out in accordance with the approved application details, to ensure that the development is carried out with the minimum harm to the local environment, in accordance with the Policies of the Uttlesford Local Plan (adopted 2005) as shown in the Schedule of Policies.

3 Prior to commencement of the development hereby approved, a Construction and Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the local planning authority. The statement shall specify (but not be limited to) measures for:

- (a) Dust mitigation and management measures.
- (b) The location and operation of plant, wheel and underbody washing facilities.
- (c) Measure to reduce demolition and construction noise.
- (d) Hours of operation.
- (e) Details of a complaints procedure with a designated person on site responsible for complaint handling.
- (f) Vehicle routing.
- (g) The parking of vehicles of site operatives and visitors.

(h) The storage of materials used in constructing the development.

The control of noise and dust emanating from the site and shall be consistent with the best practicable means as set out in the Uttlesford Code of Development Practice. Thereafter, the approved CEMP shall be adhered to throughout the construction period.

REASON: To safeguard residential amenities, 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 accordance with the adopted Uttlesford Local Plan Policies GEN1, GEN2, GEN4, ENV10, ENV11, and the National Planning Policy Framework (2023).

- 4** Prior to commencement of the development hereby approved, a construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority.

The CEMP (Biodiversity) shall include the following:

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements), including a precautionary method statement for bats, and Great Crested Newts.
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

Thereafter, the approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

REASON: To conserve and enhance protected and priority species and habitats and allow the local planning authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), s40 of the Natural Environment and Rural Communities (NERC) Act 2006 (priority habitats & species) as updated by the Environment Act 2021, s17 of the Crime and Disorder Act 1998, in accordance with the adopted Uttlesford Local Plan Policies GEN7, ENV8, and the National Planning Policy Framework (2023).

- 5** Prior to commencement of the development hereby approved, a temporary access scheme shall be submitted to and approved in writing

by the local planning authority. This should include, but not limited to, details for a temporary works access, loading and unloading of plant and materials and any other arrangements necessary, to allow the works to take place without compromising highway safety. The approved temporary access scheme shall be adhered to throughout the construction period until the substantial completion of the development.

REASON: To ensure the safe and suitable access can be provided to the benefit of highway safety, in accordance with the adopted Uttlesford Local Plan Policies GEN1, GEN8, the adopted Uttlesford Local Residential Parking Standards (2013), the adopted Essex County Council Parking Standards: Design and Good Practice (2009), and the National Planning Policy Framework (2023).

- 6** Prior to commencement of the development hereby approved, one of the following shall be submitted to and approved in writing by the local planning authority:
- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or
 - b) a statement in writing from Natural England to the effect that it does not consider that the specified activity/development will require a licence.

REASON: To conserve and enhance protected and priority species and habitats and allow the local planning authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (priority habitats & species) as updated by the Environment Act 2021, section 17 of the Crime and Disorder Act 1998, in accordance with the adopted Uttlesford Local Plan Policies GEN7, ENV8, and the National Planning Policy Framework (2023).

- 7** Prior to commencement of the development hereby approved, a Habitat Management and Monitoring Plan (HMMP), in line with the approved Biodiversity Gain Plan, shall be submitted to and approved in writing by the local planning authority. The HMMP must be in line with the final and approved biodiversity net gain plan.

The HMMP should include:

- a) A management and monitoring plan for onsite biodiversity net gain including 30-year objectives, management responsibilities, maintenance schedules and a methodology to ensure the submission of monitoring reports in years 2, 5, 10, 15, 20, 25 and 30 from commencement of development, demonstrating how the Biodiversity Net Gain Plan is progressing towards achieving its objectives, evidence of arrangements and any rectifying measures needed.
- b) A management and monitoring plan for all offsite biodiversity net gain including 30-year objectives, management responsibilities, maintenance schedules and a methodology to ensure the submission of monitoring

reports in years 2, 5, 10, 15, 20, 25 and 30 from commencement of development, demonstrating how the Biodiversity Net Gain Plan is progressing towards achieving its objectives, evidence of arrangements and any rectifying measures needed.

Thereafter, the development shall be implemented in full accordance with the requirements of the approved HMMP, with monitoring reports submitted to the LPA at the specified intervals.

REASON: To allow the development to demonstrate mandatory biodiversity net gain and allow the local planning authority to discharge its duties under Schedule 7A of the Town and Country Planning Act 1990 and in accordance with the National Planning Policy Framework (2023).

8

Prior to commencement of the development hereby approved, 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, shall be submitted to and approved in writing by the local planning authority.

The detailed surface water and drainage scheme shall include but not be limited to:

- Limiting discharge rates to 1:1 Greenfield runoff rates for all storm events up to and including the 1 in 100 year rate plus 45% allowance for climate change.
- 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 45% climate change event.
- Demonstrate that soakaways function adequately in the scenario of two consecutive 1 in 100 +cc storm events in 48 hours. Information required.
- Demonstrate that features are able to accommodate a 1 in 10 year storm events within 24 hours of a 1 in 30 year event plus climate change.
- Provision of 10% urban creep allowance applied to the impermeable areas used to calculate the required storage, in accordance with BS8582.
- Any SuDS features located within made ground to be lined with an impermeable membrane.
- Final modelling and calculations for all areas of the drainage system.
- Detailed engineering drawings of each component of the drainage scheme.
- A final drainage plan which details exceedance and conveyance routes, FFL and ground levels, and location and sizing of any drainage features.
- An updated drainage strategy incorporating all of the above bullet points including matters already approved and highlighting any changes to the previously approved strategy.

Thereafter, the scheme shall be implemented as approved before the units are occupied for residential purposes.

REASON: To prevent flooding on site or elsewhere by ensuring a satisfactory storage/disposal of surface water from the site, to ensure the effective operation of sustainable urban drainage systems over the lifetime of the development, and to provide mitigation of any environmental harm which may be caused to the local water environment, in accordance with policy GEN3 of the adopted Uttlesford Local Plan (2005), and the National Planning Policy Framework (2023).

9 (a) Prior to commencement of the development hereby approved, a Written Scheme of Investigation (WSI), to secure a programme of archaeological investigation, shall be submitted to and approved in writing by the local planning authority.

(b) Prior to commencement of the development hereby approved, the programme of archaeological investigation identified in the Written Scheme of Investigation (WSI) shall be completed.

(c) Following completion of the archaeological investigation and within six (6) months from that completion, a post excavation assessment shall be submitted to the Local Planning Authority. The post excavation analysis shall be completed when a full site archive and report is deposited at the local museum and a publication report is submitted to the Local Planning Authority.

REASON: To preserve potential archaeological remains, in accordance with the adopted Uttlesford Local Plan Policy ENV4, and the National Planning Policy Framework (2023).

10 (a) Prior to commencement of the development hereby approved, a written scheme of investigation (WSI) for a programme of historic building recording for the culvert shall be submitted to and approved in writing by the local planning authority.

(b) Prior to commencement of the development hereby approved, the programme of historic building recording for the culvert identified in the WSI shall be completed.

(c) Following completion of the recording and within six (6) months from that completion, the results of the building recording programme shall be submitted to the Local Planning Authority and the applicant should confirm the deposition of the archive to an appropriate depository as identified and agreed in the WSI.

REASON: To preserve potential archaeological remains and advance historic knowledge of the culvert, in accordance with the adopted Uttlesford Local Plan Policy ENV4, and the National Planning Policy Framework (2023).

11 Prior to any works above slab level, a schedule of the types and colours of the materials (including photographs) to be used in the external finishes

shall be submitted to and approved in writing by the local planning authority. Thereafter, the development shall be implemented in full accordance with the approved materials.

REASON: To preserve the character and appearance of the area, to preserve the significance of heritage assets, and to ensure the development is visually attractive, in accordance with policies S1, GEN2, ENV1, ENV2 of the adopted Uttlesford Local Plan (2005), the Essex Design Guide, the adopted Uttlesford District-Wide Design Code (2024), policy SW3 of the Saffron Walden Neighbourhood Plan (2022), and the National Planning Policy Framework (2023).

- 12** Prior to any works above slab level, details of all hard and soft landscaping shall be submitted to and approved in writing by the local planning authority. Thereafter, the development shall be carried out in full accordance with the approved details prior to occupation of the development hereby approved.

The landscaping details to be submitted shall include:

- a) proposed finished levels (earthworks to be carried out);
- b) means of enclosure of the land (boundary treatments including photographs);
- c) hard surfacing and other hard landscape features and materials (including photographs);
- d) existing trees, hedges or other soft features to be retained;
- e) details of planting or features, including specifications of species, sizes, planting centres, number and percentage mix;
- f) details of siting and timing of all construction activities to avoid harm to all nature conservation features;
- g) management and maintenance details;
- h) final parking layout for private vehicles with bays of appropriate size.

All planting, seeding or turfing and soil preparation comprised in the above details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings, the completion of the development, or in agreed phases whichever is the sooner, and any plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the local planning authority gives written consent to any variation. All landscape works shall be carried out in accordance with the guidance contained in British Standards, unless otherwise agreed in writing by the local planning authority.

REASON: To preserve the character and appearance of the area, to preserve the significance of heritage assets, and to ensure the development is visually attractive, in accordance with policies S1, GEN2, GEN4, ENV1, ENV2 of the adopted Uttlesford Local Plan (2005), the Essex Design Guide, the adopted Uttlesford District-Wide Design Code

(2024), policy SW3 of the Saffron Walden Neighbourhood Plan (2022), and the National Planning Policy Framework (2023).

- 13** Prior to any works above slab level, a revised elevation drawing, to show the extent of materials confirmed for reuse from the demolition of the existing building, shall be submitted to and approved in writing by the local planning authority. Thereafter, the building hereby approved shall be implemented in accordance with the approved elevations drawing.

REASON: To ensure a high-quality finish to the external elevations of the building, in accordance with policies ENV1, ENV2, GEN2 of the adopted Uttlesford Local Plan (2005), and the National Planning Policy Framework (2023).

- 14** Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected and priority species shall be submitted to and approved in writing by the local planning authority.

The Biodiversity Enhancement Strategy shall include:

- a) purpose and conservation objectives for the proposed enhancement measures;
- b) detailed designs or product descriptions to achieve stated objectives;
- c) locations of the enhancement measures by appropriate drawings;
- d) persons responsible for implementing the enhancement measures;
- e) details of initial aftercare and long-term maintenance (where relevant).

Thereafter, the ecological works shall be implemented in accordance with the approved details prior to occupation of the development hereby approved.

REASON: To conserve and enhance protected and priority species and habitats and allow the local planning authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), s40 of the Natural Environment and Rural Communities (NERC) Act 2006 (priority habitats & species), s17 of the Crime and Disorder Act 1998, in accordance with the adopted Uttlesford Local Plan Policies GEN7, ENV8, and the National Planning Policy Framework (2023).

- 15** Prior to any works above slab level, additional drawings that show details of the approved new windows, doors, eaves, verges and sills to be used by section and elevation between 1:20 and 1:1 (as appropriate) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the works shall be implemented in accordance with the approved details and shall be maintained as such in at all times unless otherwise agreed in writing by the local planning authority.

REASON: To preserve the significance of the heritage assets and to ensure that the development is carried out to the highest standards of architecture and materials, in accordance with the adopted Uttlesford

Local Plan Policies S1, GEN2, ENV1, ENV2, sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, policy SW3 of the Saffron Walden Neighbourhood Plan (2022), and the National Planning Policy Framework (2023).

- 16** Prior to occupation of the development hereby approved, a maintenance plan detailing the maintenance arrangements, including who is responsible for different elements of the surface water drainage system and the maintenance activities/frequencies on each plot, shall be submitted to and agreed in writing by the Local Planning Authority.

If any part of the site will be maintainable by a maintenance company, details of long-term funding arrangements should be provided to the Local Planning Authority prior to the occupation of the development hereby approved.

REASON: To prevent flooding on site or elsewhere, in accordance with policy GEN3 of the adopted Uttlesford Local Plan (2005), and the National Planning Policy Framework (2023).

- 17** Prior to occupation of the development hereby approved, 2 no. fully wired and connected electric vehicle charging points shall be provided on site for the development. Thereafter, the charging points shall be maintained as such at all times.

REASON: To encourage the use of electric vehicles for better air quality, in accordance with the National Planning Policy Framework (2023).

- 18** Prior to occupation of the development hereby approved, the vehicle parking and turning areas indicated on the approved plans shall be provided. Thereafter, the vehicle parking and turning areas shall be retained as such at all times and shall not be used other than for the benefit of the occupants of the dwellings hereby approved.

REASON: To ensure that appropriate parking and turning is provided in the interests of highway safety, in accordance with the adopted Uttlesford Local Plan Policies GEN1, GEN8, the adopted Uttlesford Local Residential Parking Standards (2013), the adopted Essex County Council Parking Standards: Design and Good Practice (2009), and the National Planning Policy Framework (2023).

- 19** Prior to occupation of the development hereby approved and following its substantial completion, a highway reinstatement scheme shall be submitted to and approved in writing by the local planning authority. This should include, but not limited to, reinstatement of the footway and any other works necessary to reinstate the highway. Thereafter, the cycle highway shall be reinstated as per the approved scheme and shall be retained as such at all times.

REASON: To ensure the safe and suitable reinstatement of the highway for all highway users in the interest of highway safety, in accordance with the adopted Uttlesford Local Plan Policies GEN1, GEN8, the adopted Uttlesford Local Residential Parking Standards (2013), the adopted Essex County Council Parking Standards: Design and Good Practice (2009), and the National Planning Policy Framework (2023).

- 20** Prior to occupation of the development hereby approved, the Developer shall be responsible for the provision and implementation of a Residential Travel Information Pack (per dwelling) for sustainable transport, approved by the Essex County Council, to include six one day travel vouchers for use with the relevant local public transport operator.

REASON: In the interests of reducing the need to travel by car and promoting sustainable development and transport, in accordance with ULP Policies GEN1, GEN8 and with the Uttlesford Local Residential Parking Standards (2013), the Essex County Council Parking Standards: Design and Good Practice (2009), and the National Planning Policy Framework (2023).

- 21** Prior to occupation of the development hereby approved, a lighting design scheme for biodiversity in accordance with General Note: 08/23 (Institute of Lighting Professionals) shall be submitted to and approved in writing by the local planning authority.

The scheme shall:

a) identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and

b) show how and where external lighting will be installed (through provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

Thereafter, all external lighting shall be installed in accordance with the specifications and locations set out in the approved scheme and shall be maintained in accordance with the scheme at all times. Under no circumstances should any other external lighting be installed without prior consent in writing from the local planning authority.

REASON: To conserve and enhance protected and priority species and habitats and allow the local planning authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (priority habitats & species) as updated by the Environment Act 2021, section 17 of the Crime and Disorder Act 1998, in accordance with the

adopted Uttlesford Local Plan Policies GEN7, ENV8, and the National Planning Policy Framework (2023).

- 22** Prior to first beneficial use of the development hereby approved, noise from fixed or temporary plant associated with the development shall meet specifications as detailed in the Noise Impact Assessment (reference: 21282/3/2/12, dated: 5th July 2024) which includes details on Mitigation/Controls. Thereafter, the approved scheme of noise mitigation shall be implemented maintained as such at all times.

REASON: To safeguard residential amenities, in accordance with the adopted Uttlesford Local Plan Policies GEN2, GEN4, ENV10, ENV11, and the National Planning Policy Framework (2023).

- 23** Prior to first beneficial use of the development hereby approved, the existing structures (including the existing Primes Close building and the culvert under the site) and hard surfaces on the application site shall be completely demolished and all the debris from the demolitions shall be permanently removed from the site by an appropriate contractor.

REASON: To preserve the character and appearance of the area, and to preserve the significance of heritage assets, in accordance with policies S1, GEN2, ENV1, ENV2 of the adopted Uttlesford Local Plan (2005), the Essex Design Guide, the adopted Uttlesford District-Wide Design Code (2024), policy SW3 of the Saffron Walden Neighbourhood Plan (2022), and the National Planning Policy Framework (2023).

- 24** Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking or re-enacting that Order with or without modification), no development within Classes A, B, E, F of Part 1 of Schedule 2 and Class A of Part 2 of Schedule 2 of the Order shall take place without the prior written permission of the local planning authority.

REASON: To prevent the site becoming overdeveloped, to preserve the character and appearance of the area, to preserve the significance of designated heritage assets, and to safeguard residential amenities in the area, in accordance with the adopted Uttlesford Local Plan Policies GEN2, ENV1, ENV2, policy SW3 of the Saffron Walden Neighbourhood Plan, and the National Planning Policy Framework (2023).

- 25** The development hereby permitted shall be provided in accordance with the guidance in Approved Document S 2021 and shall be built in accordance with Optional Requirement M4(2) (Accessible and adaptable dwellings) of the Building Regulations 2010 Approved Document M, Volume 1 2015 edition, apart from 1 no. of the approved units which shall be built in accordance with Optional Requirement (M4(3) (Accessible and adaptable dwellings) of the Building Regulations 2010 Approved Document M, Volume 1 2015 edition.

REASON: To ensure compliance with the adopted Uttlesford Local Plan Policy GEN2, and the adopted Supplementary Planning Document 'Accessible Homes and Playspace'.

- 26** Other than those shown on the approved drawings, no soil stacks, soil vent pipes, flues, ductwork or any other pipework shall be fixed to the building hereby approved.

REASON: To ensure that the development is carried out to the highest standards of architecture and materials in accordance with policies ENV1, ENV2, GEN2 of the adopted Uttlesford Local Plan (2005), and the National Planning Policy Framework (2023).

- 27** The applicant or any successor in title must maintain yearly logs of maintenance which should be carried out in accordance with the approved Maintenance Plan. These yearly logs must be available for inspection upon request by the Local Planning Authority.

REASON: To prevent flooding on site or elsewhere, in accordance with policy GEN3 of the adopted Uttlesford Local Plan (2005), and the National Planning Policy Framework (2023).

- 28** If during any site investigation, excavation, engineering or construction works evidence of land contamination is identified, the applicant/developer shall notify immediately and in writing the Local Planning Authority. Any land contamination identified shall be remediated to the satisfaction of the local planning authority prior to occupation of the development hereby approved to ensure that the site is made suitable for its end use.

REASON: To ensure the development will not harm human health, the water environment and other receptors, in accordance with the adopted Uttlesford Local Plan Policies GEN2, ENV14, and the National Planning Policy Framework (2023).

- 29** All ecological mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (Greengage Environmental Ltd, March 2022), Bat Survey Report (Greengage Environmental Ltd, October 2022) and Bat Hibernation Report (Greengage Environmental Ltd, March 2024). Thereafter, the enhancement measures and/or works shall be carried out in full accordance with the approved details and shall be maintained as such at all times.

REASON: To conserve and enhance protected and priority species and habitats and allow the local planning authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (priority habitats & species) as updated by the Environment Act 2021,

section 17 of the Crime and Disorder Act 1998, in accordance with the adopted Uttlesford Local Plan Policies GEN7, ENV8, and the National Planning Policy Framework (2023).

APPENDIX 1 – ESSEX COUNTY COUNCIL HIGHWAYS

Your Ref: UTT/24/1383/FUL
Our Ref: 56471
Date: 3rd July 2024



Essex County Council

Director for Highways
and Transportation

To: Uttlesford District Council
Assistant Director Planning & Building Control
Council Offices
London Road
SAFFRON WALDEN CB11 4ER

County Hall
Chelmsford
Essex CM1 1QH

Recommendation

Application No. UTT/24/1383/FUL
Applicant Mr Steve Hasler
Site Location King Edward VI Almshouses Abbey Lane Saffron Walden CB10 1DE
Proposal Proposed demolition of existing building containing 7 no. almshouse units and construction of new two storey building containing 16 no. almshouse units with associated bin store, car and cycle parking and landscaping. Replacement of part of River Slade culvert.

From a highway and transportation perspective the impact of the proposal is acceptable to the Highway Authority, subject to the following measures:

1. The proposed development shall not be occupied until such time as the vehicle parking area indicated on the approved plans, has been provided. The vehicle parking area and associated turning area shall be retained in this form at all times. The vehicle parking shall not be used for any purpose other than the parking of vehicles that are related to the use of the development unless otherwise agreed with the Local Planning Authority. **Reason:** To ensure that on street parking of vehicles in the adjoining streets does not occur in the interests of highway safety
2. No development shall take place, including any ground works or demolition, until a temporary access scheme has been submitted to, and approved in writing by, the local planning authority. This should include, but not limited to, details for a temporary works access, loading and unloading of plant and materials and any other arrangements deemed necessary, to allow the works to take place without compromising Highway safety. **Reason:** To ensure the safe and suitable access can be provided for the works in the interests of Highway Safety.
3. Upon completion of the development, a highway reinstatement scheme shall be submitted to, and approved in writing by, the local planning authority. This should include, but not limited to, reinstatement of the footway and any other works deemed necessary, to reinstate the Highway. In the interests of clarity this scheme shall be implemented prior to first occupation of the development, in agreement with and to the satisfaction of the Highway Authority. **Reason:** To ensure the safe and suitable reinstatement of the Highway for all Highway users in the interests of Highway Safety.

4. No development shall take place, including any ground works or demolition, until a Construction Management Plan has been submitted to, and approved in writing by, the local planning authority. The approved plan shall be adhered to throughout the construction period. The Plan shall provide for;
 - i. vehicle routing,
 - ii. the parking of vehicles of site operatives and visitors,
 - iii. storage of plant and materials used in constructing the development,
 - iv. wheel and underbody washing facilities.

Reason: 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

5. Prior to occupation of the proposed development, the Developer shall be responsible for the provision and implementation of a Residential Travel Information Pack per dwelling, for sustainable transport, approved by Essex County Council, (to include six one day travel vouchers for use with the relevant local public transport operator) **Reason:** In the interests of reducing the need to travel by car and promoting sustainable development and transport

The above conditions are required to ensure that the development accords with the Highway Authority's Development Management Policies, adopted as County Council Supplementary Guidance in February 2011 and Uttlesford Local Plan Policy GEN1.

Informative:

- i. All work within or affecting the highway is to be laid out and constructed by prior arrangement with, and to the requirements and satisfaction of, the Highway Authority, details to be agreed before the commencement of works. The applicants should be advised to contact the Development Management Team by email at development.management@essexhighways.org or by post to Essex Highways, Springfield Highways Depot, Colchester Road, Chelmsford, Essex, CM2 5PU.
- ii. The Public Right of Way network is protected by the Highways Act 1980. Any unauthorised interference with any route noted on the Definitive Map of PROW is considered to be a breach of this legislation. The public's rights and ease of passage over public footpath no. 55 (Saffron Walden) shall be maintained free and unobstructed at all times to ensure the continued safe passage of the public on the definitive right of way.

The grant of planning permission does not automatically allow development to commence. In the event of works affecting the highway, none shall be permitted to commence until such time as they have been fully agreed with this Authority. In the interests of highway user safety this may involve the applicant requesting a temporary closure of the definitive route using powers included in the aforementioned Act. All costs associated with this shall be borne by the applicant and any damage caused to the route shall be rectified by the applicant within the timescale of the closure.

- iii. Under Section 148 of the Highways Act 1980 it is an offence to deposit mud, detritus etc. on the highway. In addition, under Section 161 any person, depositing anything on a highway which results in a user of the highway being injured or

endangered is guilty of an offence. Therefore, the applicant must ensure that no mud or detritus is taken onto the highway, such measures include provision of wheel cleaning facilities and sweeping/cleaning of the highway

- iv. There shall be no discharge of surface water onto the Highway.
- v. Under Section 23 of the Land Drainage Act 1991, prior written consent from the Environment Agency is required to build any culvert (pipe) or structure (such as a dam or weir) to control or alter the flow of water within an ordinary watercourse. Ordinary watercourses include ditches, drains and any other networks of water which are not classed as Main River.
- vi. Prior to commencement of the development, the areas within the curtilage of the site for the purpose of loading / unloading / reception and storage of building materials and manoeuvring of all vehicles, including construction traffic shall be provided clear of the highway.
- vii. Prior to any works taking place in public highway or areas to become public highway the developer shall enter into an appropriate legal agreement to regulate the construction of the highway works. This will include the submission of detailed engineering drawings for approval.

F. Masnie

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pp. Director for Highways and Transportation
Enquiries to Eirini Spyratou

APPENDIX 2 – ESSEX COUNTY COUNCIL LEAD LOCAL FLOOD AUTHORITY

Essex County Council
**Development and Flood Risk
Environment and Climate Action,**
C426 County Hall
Chelmsford
Essex CM1 1QH



Planner
Uttlesford District Council
Planning Services

Date: 28th June 2024
Our Ref: SUDS-007564
Your Ref: UTT/24/1383/FUL

Dear Sir/Madam,

Consultation Response – UTT/24/1383/FUL – King Edward VI Almshouses (Primes Close) Abbey Lane Saffron Walden

Thank you for your email received on 06/06/2024 which provides this Council with the opportunity to assess and advise on the proposed surface water drainage strategy for the above mentioned planning application.

As the Lead Local Flood Authority (LLFA) this Council provides advice on SuDS schemes for major developments. We have been statutory consultee on surface water since the 15th April 2015.

In providing advice this Council looks to ensure sustainable drainage proposals comply with the required standards as set out in the following documents:

- Non-statutory technical standards for sustainable drainage systems
- Essex County Council's (ECC's) adopted Sustainable Drainage Systems Design Guide
- The CIRIA SuDS Manual (C753)
- BS8582 Code of practice for surface water management for development sites.

Lead Local Flood Authority position

Having reviewed the Flood Risk Assessment(ref: UK18.4109 dated 23rd May 2024) and the associated documents which accompanied the planning application, we wish to issue a **do not object** to the granting of planning permission based on the following:

Condition 1

No works except demolition shall takes 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:

- Limiting discharge rates to 1:1 Greenfield runoff rates for all storm events up to and including the 1 in 100 year rate plus 45% allowance for climate change

- 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 45% climate change event.
- Demonstrate that soakaways function adequately in the scenario of two consecutive 1 in 100 +cc storm events in 48 hours. Information required.
- Demonstrate that features are able to accommodate a 1 in 10 year storm events within 24 hours of a 1 in 30 year event plus climate change.
- Provision of 10% urban creep allowance applied to the impermeable areas used to calculate the required storage, in accordance with BS8582.
- Any SuDS features located within made ground to be lined with an impermeable membrane
- Final modelling and calculations for all areas of the drainage system.
- Detailed engineering drawings of each component of the drainage scheme.
- A final drainage plan which details exceedance and conveyance routes, FFL and ground levels, and location and sizing of any drainage features.
- An updated drainage strategy incorporating all of the above bullet points including matters already approved and highlighting any changes to the previously approved strategy.

The scheme shall subsequently be implemented prior to occupation.

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.

Condition 2

Prior to occupation a maintenance plan detailing the 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 surfacewater drainage system to function as intended to ensure mitigation against flood risk.

Failure to provide the above required information prior to occupation may result in the installation of a system that is not properly maintained and may increase flood risk or pollution hazard from the site.

Condition 3

The applicant or any successor in title must maintain yearly logs of maintenance which should be carried out in accordance with any approved Maintenance Plan. These must be available for inspection upon a request by the Local Planning Authority.

Reason

To ensure the SuDS are maintained for the lifetime of the development as outlined in any approved Maintenance Plan so that they continue to function as intended to ensure mitigation against flood risk.

We also have the following advisory comments:

- We strongly recommend looking at the Essex Green Infrastructure Strategy to ensure that the proposals are implementing multifunctional green/blue features effectively. The link can be found below.
<https://www.essex.gov.uk/protecting-environment>
- Please note that the Environment Agency updated the peak rainfall climate change allowances on the 10 May 2022. Planning applications with outline approval are not required to adjust an already approved climate change allowance, however, wherever possible, in cases that do not have a finalised drainage strategy please endeavour to use the updated climate change figures
Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk)
- Please note that where discharge is to a public sewer, consent from the relevant authority will be required. The links can be found below.
<https://www.anglianwater.co.uk/developing/drainage-services/sustainable-drainage-systems/>
<https://www.thameswater.co.uk/developers>
- Any works to a ditch may require a S23 Ordinary Watercourse Consent. Please see the below link for more information and how to apply.
<https://flood.essex.gov.uk/maintaining-or-changing-a-watercourse/>

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.

Summary of Flood Risk Responsibilities for your Council

We have not considered the following issues as part of this planning application as they are not within our direct remit; nevertheless these are all very important considerations for managing flood risk for this development, and determining the safety and acceptability of the proposal. Prior to deciding this application you should give due consideration to the issue(s) below. It may be that you need to consult relevant experts outside your planning team.

- Sequential Test in relation to fluvial flood risk;
- Safety of people (including the provision and adequacy of an emergency plan, temporary refuge and rescue or evacuation arrangements);
- Safety of the building;
- Flood recovery measures (including flood proofing and other building level resistance and resilience measures);
- Sustainability of the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.

Please see Appendix 1 at the end of this letter with more information on the flood risk responsibilities for your council.

INFORMATIVES:

- Essex County Council has a duty to maintain a register and record of assets which have a significant impact on the risk of flooding. In order to capture proposed SuDS which may form part of the future register, a copy of the SuDS assets in a GIS layer should be sent to suds@essex.gov.uk.
- Any drainage features proposed for adoption by Essex County Council should be consulted on with the relevant Highways Development Management Office.
- Changes to existing water courses may require separate consent under the Land Drainage Act before works take place. More information about consenting can be found in the attached standing advice note.
- It is the applicant's responsibility to check that they are complying with common law if the drainage scheme proposes to discharge into an off-site ditch/pipe. The applicant should seek consent where appropriate from other downstream riparian landowners.
- The Ministerial Statement made on 18th December 2014 (ref. HCWS161) states that the final decision regarding the viability and reasonableness of maintenance requirements lies with the LPA. It is not within the scope of the LLFA to comment on the overall viability of a scheme as the decision is based on a range of issues which are outside of this authority's area of expertise.
- We will advise on the acceptability of surface water and the information submitted on all planning applications submitted after the 15th of April 2015 based on the key documents listed within this letter. This includes applications which have been previously submitted as part of an earlier stage of the planning process and granted planning permission based on historic requirements. The Local Planning

Authority should use the information submitted within this response in conjunction with any other relevant information submitted as part of this application or as part of preceding applications to make a balanced decision based on the available information.

Yours sincerely,

Mabel Golding, Development and Flood Risk Officer

Team: Green Infrastructure and Sustainable Drainage

Service: Climate Action and Mitigation

Essex County Council

Internet: www.essex.gov.uk

Email: suds@essex.gov.uk

Appendix 1 - Flood Risk responsibilities for your Council

The following paragraphs provide guidance to assist you in determining matters which are your responsibility to consider.

- Safety of People (including the provision and adequacy of an emergency plan, temporary refuge and rescue or evacuation arrangements)

You need to be satisfied that the proposed procedures will ensure the safety of future occupants of the development. In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs formally consider the emergency planning and rescue implications of new development in making their decisions.

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals as we do not carry out these roles during a flood.

- Flood recovery measures (including flood proofing and other building level resistance and resilience measures)

We recommend that consideration is given to the use of flood proofing measures to reduce the impact of flooding when it occurs. Both flood resilience and resistance measures can be used for flood proofing.

Flood resilient buildings are designed to reduce the consequences of flooding and speed up recovery from the effects of flooding; flood resistant construction can help prevent or minimise the amount of water entering a building. The National Planning Policy Framework confirms that resilient construction is favoured as it can be achieved more consistently and is less likely to encourage occupants to remain in buildings that could be at risk of rapid inundation.

Flood proofing measures include barriers on ground floor doors, windows and access points and bringing in electrical services into the building at a high level so that plugs are located above possible flood levels. Consultation with your building control department is recommended when determining if flood proofing measures are effective.

Further information can be found in the Department for Communities and Local Government publications '[Preparing for Floods](#)' and '[Improving the flood performance of new buildings](#)'.

- Sustainability of the development

The purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF recognises the key role that the planning system plays in helping to mitigate and adapt to the impacts of climate change, taking full account of flood risk and coastal change; this includes minimising vulnerability and providing resilience to these impacts. In making your decision on this planning application we advise you consider the sustainability of the development over its lifetime.

APPENDIX 3 – ENVIRONMENT AGENCY



Avgerinos Vlachos
Uttlesford District Council
Council Offices London Road
Saffron Walden
Essex
CB11 4ER

Our ref: AC/2024/132203/01-L01
Your ref: UTT/24/1383/FUL
Date: 27 June 2024

Dear Avgerinos

PROPOSED DEMOLITION OF EXISTING BUILDING CONTAINING 7 NO. ALMSHOUSE UNITS AND CONSTRUCTION OF NEW TWO STOREY BUILDING CONTAINING 16 NO. ALMSHOUSE UNITS WITH ASSOCIATED BIN STORE, CAR AND CYCLE PARKING AND LANDSCAPING. REPLACEMENT OF PART OF RIVER SLADE CULVERT.

KING EDWARD VI ALMSHOUSES (PRIMES CLOSE) ABBEY LANE SAFFRON WALDEN ESSEX CB10 1DE

Thank you for your consultation dated 07 June 2024. We have reviewed the documents as submitted and we have no objection to this planning application. Please find further information on flood risk, permitting and biodiversity in the relevant sections below.

Flood Risk

In accordance with the National Planning Policy Framework (paragraph 168), development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for you to determine if the Sequential Test needs to be applied and whether there are other sites available at lower flood risk. Our flood risk standing advice reminds you of this and provides advice on how to apply the test.

Please be aware that although we have raised no objection to this planning application on flood risk grounds, this should not be taken to mean that we consider the proposal to have passed the Sequential Test.

Flood Risk Assessment

We have no objection to the proposed development, but strongly recommend that the mitigation measures proposed in the submitted Flood Risk Assessment (FRA), ref. UK18.4109, dated 23 May 2024, are adhered to. In particular, the FRA recommends that:

Environment Agency
Ioeni House Cobham Road, Ipswich, IP3 9JD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

- Finished floor levels will be set no lower than 48.65m AOD.
- Flood resilient measures will be incorporated up to a minimum of 450mm above finished floor levels.

Advice to Applicant

Any proposed flood resistance or resilience measures should follow current Government Guidance. For more information on flood resilience techniques, please see the Department for Communities and Local Government (DCLG) guidance document "Improving the Flood Performance of New Buildings – Flood Resilient Construction, 2007", which is available on the following website: <https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>.

Flood Risk Activity Permit

Under the terms of the Environmental Permitting Regulations (EPR), a permit will be required from us for the proposed replacement of this section of the River Slade Town Centre Culvert and may be required for any other works in, under, over or within 8 metres of the culvert, which is designated a 'main river'.

Information on how to apply for a permit and application forms can be found on our website at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Anyone carrying out a flood risk activity without a permit where one is required, is breaking the law.

Biodiversity

In line with previous comments on the withdrawn application UTT/23/0976/FUL, referenced AE/2023/128400/01 and dated 23 June 2023, we note that the opportunity to open up a section of the culvert and restore more natural processes to the water course has not been explored. This is something that should still be considered.

If this is not possible, then we strongly recommend that the proposed mitigation measures outlined in the Preliminary Ecological Appraisal and the Design and Access Statement are followed as outlined in the grant of permission. This is to ensure that the protected species on site are adequately protected before, during and after the development works.

Biodiversity Net Gain

An initial review of the Biodiversity Net Gain (BNG) assessment indicates that impacts have been identified on the watercourse. However, there are no proposed measures to deliver Net Gain on the watercourse. This does not meet the trading rules within the metric, as the BNG element of the proposal is unambitious and inadequate, particularly in respect of the watercourse. We recommend that you

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www.gov.uk/environment-agency
Cont/d..

consider its options in relation to this aspect of the mandatory requirements for BNG not being met.

We trust that this advice is useful.

Yours sincerely

A handwritten signature in cursive script that reads "Lucy Fielder".

Miss Lucy Fielder
Sustainable Places - Planning Advisor

Team e-mail Planning.eastanglia@environment-agency.gov.uk
Team number 02084 745242

Environment Agency
Iceni House Cobham Road, Ipswich, IP3 9JD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
End

APPENDIX 4 – HISTORIC ENGLAND



Mr Avgerinos Vlachos
Uttlesford District Council
Council Offices
London Road
Saffron Walden
Essex
CB11 4ER

Direct Dial: 01223 582784

Our ref: **W**: P01578188

2 July 2024

Dear Mr Vlachos

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**KING EDWARD V1 ALMSHOUSES (PRIMES CLOSE), ABBEY LANE , SAFFRON
WALDEN, ESSEX
Application No. UTT/24/1383/FUL**

Thank you for your letter of 7 June 2024 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Yours sincerely

Rosa Teira Paz
Inspector of Historic Buildings and Areas
E-mail: rosa.teirapaz@historicengland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.