



Appeal Decision

Inquiry held on 12-15 February 2019 and 24-25 June 2019

Site visit made on 15 February 2019

by Stephen Normington BSc DipTP MRICS MRTPI FIQ FIHE

an Inspector appointed by the Secretary of State

Decision date: 30 August 2019

Appeal Ref: APP/C1570/W/18/3209655

Land south of Wicken Road, Newport, Saffron Walden

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Countryside Properties (UK) Ltd against the decision of Uttlesford District Council.
 - The application Ref UTT/17/2868/OP, dated 6 October 2017, was refused by notice dated 17 May 2018.
 - The development proposed is described as an outline planning application for the development of up to 150 dwellings (Use Class C3), provision of land for community allotments, associated strategic landscaping, open space, and associated highways, drainage and other infrastructure works, with all matters reserved for subsequent approval apart from the primary means of access, on land to the south of Wicken Road, Newport.
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Decision

1. The appeal is dismissed.

Preliminary and Procedural Matters

2. The description of the application in the banner heading above is taken from the appellant's letter to the Council dated 8 February 2018. This amended the original description of the development as set out in the Planning Statement accompanying the application and was used by the Council in the Decision Notice and in subsequent evidence in this appeal.
3. The application was submitted in outline with all matters, apart from the primary means of access onto Wicken Road, reserved for future determination. Only details of this one vehicular access to the site are submitted so any other access to, and access within, the site remain a reserved matter. The site access details are shown on the plan 'Access Plan – 23116A_73 Rev D'.
4. Prior to the submission of the application the Council issued a formal screening opinion on 3 March 2017 that concluded the proposal represented 'EIA development' and required an Environmental Impact Assessment (EIA). An EIA was carried out to address the matters identified in the subsequent scoping opinion dated 14 June 2017. In making my decision I have taken full account of the submitted EIA and addenda and all other environmental information, including comments and representations made by statutory consultees and members of the public.

5. A Land Use Plan (Ref 23116A_53 Rev I), Building Heights Parameter Plan (Ref 23116A_63 Rev F) and an Access Parameter Plan (Ref 23116A_73 Rev D) were submitted with the application. As the proposal constitutes EIA development, I have considered the location of built development within the site and the building height parameters in accordance with the details provided on these plans.
6. At the Inquiry an agreement under Section 106 of the Town and Country Planning Act (S106) was provided, signed and dated 13 March 2019, relating to the appeal development which would take effect should planning permission be granted. The S106 includes obligations relating to affordable housing and financial contributions relating to education and healthcare. The Council agree that the completed and executed S106 resolves its concerns relating to the pressure on the local infrastructure within the district and overcomes the third reason for the refusal of planning permission.
7. A Community Infrastructure Levy (CIL) Compliance Statement was submitted at the Inquiry by the Council. I have had regard to the provisions of the S106 in the consideration of this appeal and I shall return to this later in this decision.
8. Newport Parish Council (NPC) were accorded Rule 6(6) party status and presented evidence in support of its objections to the proposals. These included matters in relation to all three of the Council's original reasons for refusal. Although not a matter contested by the Council or Essex County Council (ECC) in its capacity as highway authority, highway safety and the effect of the proposals on the safe operation of the highway network in the surrounding area were of concern to NPC. In this regard, evidence was provided by witnesses on behalf of NPC and the appellant.
9. The Inquiry was held on the dates shown in the banner heading above. It was adjourned on 15 February 2019 to enable further evidence to be produced regarding the effect of the proposed development on the Saffron Walden Air Quality Management Area (AQMA). The Inquiry resumed on 24 June 2019. In addition to further evidence provided by the Council's and appellant's air quality witnesses, an addendum to the Environmental Statement, dated March 2019, was also submitted to include the latest air quality data and methodological issues raised by the Council during the Inquiry. The Inquiry was closed in writing on 28 June 2019 following the receipt of further evidence from the main parties on matters relevant to air quality issues.
10. During the Inquiry, three Statements of Common Ground (SoCG) were submitted. These related to general planning matters ('Planning SoCG'), highways and accessibility matters transport (Transport SoCG) and air quality matters (Air Quality SoCG).

Main Issues

11. All parties agree that the Council cannot demonstrate a five year supply of housing land, as required by the National Planning Policy Framework (the Framework). It is therefore necessary to consider the implications of this in determining the appeal. Having that context in mind, and taking into account the evidence before me and from what I heard at the Inquiry, the main issues are:

- The effect of the proposed development on the character and appearance of Newport and the surrounding countryside.
- Whether the proposed development would give rise to, or be affected by, unacceptable levels of air quality and the effect on human health.
- The effect of the proposed development on the safe operation of the local highway network.
- Whether there are any other material considerations, including the housing land supply situation and benefits of the proposal, which would indicate that the proposals should be determined otherwise than in accordance with the terms of the development plan.

Reasons

The appeal site and proposed development

12. The appeal site is located to the south east of Wicken Road and to the west of the built-up area of Newport. The submitted Planning SoCG indicates that the site comprises approximately 10.11 ha of agricultural land. An area of woodland is located along the western boundary of the site. A further area of woodland is located on both sides of a public footpath that runs east-west across approximately the middle of the site and forms part of a linkage between Frambury Lane to the east and Wicken Road to the west. To the west of Wicken Road is open countryside.
13. The site forms part of the valley side that leads towards Wicken Water and rises in a north easterly direction. Beyond the site boundary, the lower areas along Wicken Water are well vegetated with woodland planting and extend around the western periphery of the site and partially screen the M11 to the west. The Planning SoCG indicates that the site rises from approximately 62m AOD in the south western corner to approximately 80m AOD on its eastern boundary.
14. The Planning SoCG also indicates that there are no Scheduled Ancient Monuments, Listed Buildings or Conservation Areas within or adjacent to the appeal site or that would be affected by the proposed development. I have no reason to disagree with this view.
15. The village benefits from a range of services including a primary and secondary school, a railway station situated on the West Anglian main line railway and a number of shops and community facilities predominantly located on High Street. Local bus services provide access to Saffron Walden and Bishop's Stortford. On the basis of its location and facilities, both main parties agree that the village is a suitable location for some housing development. I concur with this view.
16. The submitted 'Land Use Plan' and 'Building Heights Parameter Plan' shows the location of where 2, 2.5 and 3 storey dwellings could be sited within the site with additional planting provided along the southern boundary and the provision of public open space. Land for allotment use is also shown which is indicated to form an extension to existing allotments located along the northern boundary of the site.

Planning Policy Context

17. The development plan comprises the saved policies of the Uttlesford Local Plan 2005 (ULP). The appeal site is located outside of the identified development limits of Newport and lies within the open countryside.
18. The Council's first reason for the refusal of planning permission indicates that the proposal would have an unacceptable relationship to Newport's historic core. However, I concur with the parties views at the Inquiry that this issue is in relation to the setting of the village as a whole and does not relate to any identified impact on heritage assets. The parties agreed that this reason for refusal relates to development in the countryside and identifies conflict with Policy S7 of the ULP.
19. Policy S7 is a countryside protection policy with the countryside to which this policy applies being defined as all those parts of the Plan area beyond the Green Belt that are not within the settlement or other site boundaries. The policy indicates that in the countryside, which will be protected for its own sake, planning permission will only be given for development that needs to take place there, or is appropriate to a rural area. There will be strict control on new building and development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set.
20. The Council's latest assessment of five year housing land supply (5YHLS) identifies that there is a 3.46 years supply based on sites with planning permission and windfalls.¹ All parties accept that the Council cannot demonstrate a five year supply of deliverable housing sites. Paragraph 11(d) and (Footnote 7) of the Framework confirm, in these circumstances, that the policies which are most important for determining the application should not be considered up-to-date.
21. The parties agree that the 'tilted balance' in favour of sustainable development, as set out in paragraph 11(d)(ii), applies. This indicates that planning permission should be granted unless the impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
22. The question of the weight to be accorded to Policy S7 was the subject of considerable discussion at the Inquiry. The provision of the settlement boundary is to constrict development to within the boundary and to that extent Policy S7 is a policy directly related to the supply of housing. The judgement in the Suffolk Coastal District Council and Hopkins Homes Limited case² and the provisions of paragraph 11 of the Framework suggest that this policy should be afforded reduced weight. However, the aim of the policy to protect the character of the countryside is broadly consistent with the Framework principle set out in Paragraph 170(b) that indicates the intrinsic character and beauty of the countryside should be recognised.
23. Whilst the Framework takes a positive approach, rather than a protective one, to appropriate development in rural areas, Policy S7 is identified by the Council as being the only policy in the ULP that deals with development in the countryside. It seeks to protect and enhance the natural environment, an

¹ CD 6.02 - Housing Trajectory and 5 Year Housing Land Supply Statement (October 2018)

² CD 10.12 Supreme Court Judgement on Suffolk Coastal District Council v Hopkins Homes Limited

important part of the environmental dimension of sustainable development in the Framework. Taking into account these factors, I consider that Policy S7 should be afforded significant weight when considering development proposals in the countryside.

24. The Council's second reason for the refusal of planning permission identifies that the proposal would give rise to unacceptable levels of air quality within Newport which can have a harmful impact on human health, contrary to policy ENV13 of the ULP. This policy places a presumption against development that would cause users being exposed on an extended long-term basis to poor air quality outdoors near ground level. Although 'users' are not defined within the policy all parties accepted that the impact of the development on air quality was relevant to the occupants of residential properties in the Newport, particularly those near the junction of Wicken Road with High Street, and Saffron Walden Air Quality Management Areas (AQMA).
25. Although not referred to in the reasons for the refusal of planning permission, the Council is currently preparing a new local plan³. This emerging local plan (ELP) was submitted to the Secretary of State on 19 January 2019 for examination. The Planning SoCG confirms that there are objections to the ELP on many topics which need to be resolved⁴. Notwithstanding these objections, the ELP has reached a relatively advanced stage in the plan making process. Taking into account the requirements of paragraph 48 of the Framework, I have attached moderate weight to the policies contained therein.
26. The ELP does not propose the allocation of the appeal site for development. As with the ULP, the site is shown as being located in the countryside outside of, but adjacent to, the development limits of the village. However, paragraph 3.36 of the ELP identifies Newport as one of seven key villages that are proposed as a major focus for development in the rural areas.
27. Policy SP10 of the ELP is proposed to replace Policy S7 of the ULP. Amongst other things, this emerging policy indicates that the countryside will be protected for its intrinsic character and beauty and that the landscape character and local distinctiveness of the countryside will be protected and enhanced. It further indicates that proposals for development will need to take into account the landscape's key characteristics, features and sensitivities to change.
28. In terms of air quality, Policy EN15 of the ELP indicates, amongst other things, that development will be permitted where it can be demonstrated that it does not lead to significant adverse effects on health, the environment or amenity from emissions to air and that there is no adverse effect on air quality in an AQMA arising from the development.
29. The three villages of Newport, Quendon and Rickling are in the process of producing a Neighbourhood Plan for the period 2018 to 2033. This was subject to initial consultation during May and June 2018. However, no date is available as to when this plan may be submitted to the Council. Consequently, all main parties agree that the emerging Neighbourhood Plan is in an early stage of formulation and is currently not made.

³ CD 5.02 – Regulation 19 Local Plan and CD 5.03 - Addendum of Focussed Changes to Regulation 19 Local Plan

⁴ SoCG paragraph 6.6

30. The emerging Neighbourhood Plan proposes two housing allocations for Newport that exclude the appeal site. No evidence of any relevant emerging policies was provided by any parties that may be relevant to the consideration of this appeal. Therefore, this emerging plan is afforded little weight in the determination of this appeal.

Character and appearance – landscape character

31. The appeal site does not have any statutory landscape designation. However, it is within an area that is subject to county and district level landscape character assessments. In particular, the site lies within area 'A1:Cam River Valley' of the Uttlesford District Council Landscape Character Assessment (LCA)⁵.
32. The LCA identifies key features of this landscape character as a rolling, open landscape. The eastern slopes of the Cam Valley being a large-scale landscape of primarily arable fields with valley sides descending quite steeply to the river. The LCA confirms that this area has a relatively high sensitivity to change. It identifies that the open skyline of the valley slopes is visually sensitive, with new development potentially being highly visible within panoramic inter and cross-valley views.
33. The LCA provides a number of landscape planning guidelines applicable to the Cam River Valley. These include, amongst other things, the need to conserve and enhance the landscape setting of settlements, maintain cross-valley views and ensure that any new development on the valley sides is small scale and responds to the historic settlement pattern, form and building materials.
34. The landscape and visual impact of potential development on the site was considered in the submitted Landscape and Visual Impact Assessment (LVIA)⁶. This was appraised by the landscape witness on behalf of NPC. Taking the LCA into account, and based on the analysis of the various LVIA's, I find that overall landscape significance of the site is major/moderate.
35. Whilst there was a degree of commonality in aspects of the landscape evidence provided at the Inquiry there are variances in the assessment of the magnitude of change and the significance of the impact of development. Furthermore, NPC do not consider that the LVIA adequately addresses a number of matters including the topographic location of the site beyond the Cam Valley and the role of the site in the landscape setting of Newport. Variance in the consideration of the landscape and visual impact of development is not uncommon in assessing the subjective nature of these considerations and I have taken all of the relevant evidence into account in reaching my views below.
36. However, NPC consider that the site forms part of a 'valued landscape' and it is necessary to form a view on this matter before I consider the landscape and visual effects of the proposals
37. Whilst the term 'valued landscape' is not defined in the Framework, paragraph 170 does seek to protect and enhance them 'in a manner commensurate with their statutory status or identified quality in the development plan'. The site and surrounding landscape is not covered by any statutory or local landscape

⁵ CD 7.01 Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessments

⁶ CD 2.11

designation. Neither is it identified within the development plan for its particular landscape quality.

38. Based on the evidence submitted and my own observations, I agree that the appeal site, has value both in its own right and as part of the wider landscape. In addition, I acknowledge that local residents clearly value the site and the surrounding countryside. However, this does not necessarily mean that it is a valued landscape in the context of the Framework. The site provides an important part of the setting of Newport and is typical of the landscape character of the area. However, its character is not particularly rare.
39. Overall, based on the available evidence, I find that the attributes identified by NPC as contributing to the valued landscape are not unduly unusual and are generally representative within the wider countryside in the area. I find that, in this instance, they are insufficient, individually or in combination, to demonstrate that the landscape is valued within the meaning of paragraph 170 of the Framework.
40. However, the above conclusion on 'valued landscape' does not mean that the site has no value. The appeal site shares some of the characteristics of the character area in comprising part of the rolling open landscape and offers wide views of the surrounding countryside from the higher ground. As such, it makes an established contribution to the character of the local landscape and the setting of the village which are important characteristics recognised in the LCA.
41. The proposed development would be located to the west of the ridgeline that separates the Cam Valley to the east and the Wicken Water Valley to the west. Historical evidence provided at the Inquiry demonstrates that Newport has evolved in the Cam Valley by expanding westwards beyond the valley floor and up to the western (east facing) slope of the valley. All development on the valley slopes of Newport has been consistent with that pattern, being east or south-east facing towards the core of the settlement rather than away from it. The proposed development would be the first in Newport to face westwards towards the open countryside and away from the village core.
42. The existing properties on Frambury Lane are effectively located on the ridgeline between the Cam Valley and the Wicken Water Valley. As such, views of this part of the village and across the Wicken Water Valley from the wider countryside to the east are predominantly of a rural landscape comprising agricultural land and tree belts with the roof tops of some properties on Frambury Lane being visible on the ridge line. All of these features contribute to the agricultural landscape setting to the south west of the village and is shown in the appellant's viewpoint 16⁷ and NPC landscape witness viewpoints C1/C2⁸.
43. The proposed development of up to 150 dwellings cannot be considered as being small scale. It would transform part of the previously undeveloped eastern slope of the Wicken Water Valley from a rural to an urban landscape which would be visible in views from the west and, in particular, from the nationally supported Harcamlow Way public footpath. Such development on the eastern slope of the valley would have a significant negative effect on the

⁷ Appendix 2 proof of evidence Mr Gibbs

⁸ Appendices to Michelle Bolger's proof of evidence.

setting of the village in the rural landscape. The urbanisation of the eastern valley side of the Wicken Water Valley would result in cross valley views failing to be maintained. Furthermore, in being the first development beyond the ridgeline that currently marks the edge of the settlement, it would fail to respect the settlement pattern of the village. All of these factors are contrary to the guidance provided in the LCA.

44. The Land Use Plan shows development adjacent to the northern end of Frambury Lane and close to the ridgeline. This would have the effect of increasing the prominence of development in localised views of the skyline over Frambury Lane in views from the west.
45. The plan also shows that to the south of the footpath that runs through the centre of the site development would be located approximately 50m⁹ from the existing urban edge. Intervening public open space would be located between Frambury Lane and the proposed new houses. Whilst I recognise that this is to avoid development close to the high point of the site, the consequence is that the development to the south of the footpath would appear as being unacceptably isolated in the countryside both in local and distant views.
46. As a consequence of the above, I consider that the proposed development would not acceptably visually integrate into its surroundings. It would appear as a significant standalone extension to the village that, owing to its extent and suburban form, would significantly and adversely change the character of the approach to the village.
47. Overall, in considering the landscape impacts of the proposal, the development would be contrary to the guidelines provided in the LCA. It would intrude negatively into the landscape by eroding part of its open rural character. As a consequence of the surrounding topography, the landscape impacts would not be wholly successfully mitigated and the part standalone nature of the development would not successfully integrate into the morphology of the existing village. Overall, I consider this harm to a high/medium sensitivity landscape to be substantial.

Character and appearance – visual impacts

48. Turning now to the visual impacts of the proposal, my accompanied site visit followed the route agreed by the parties at the Inquiry¹⁰. I observed views of the appeal site from the public footpath which runs through the centre of the site and from Harcamlow Way to the west. Both of these appear to be well-used public rights of way, the users of which I consider to be sensitive receptors.
49. In wider views from the west on Harcamlow Way views of the appeal site are quite apparent. Although, I have described the character of such views of the appeal site above, views to the north east are also dominated by the incongruity of the Wicken Lea development which, owing to its urban form and materials, appears as a disjointed protrusion into the rural landscape and displays little integration with the rest of the village. Although this development faces east towards the village, its incongruity serves to emphasise my concerns at the sensitivity of the landscape to change and the

⁹ Paragraph 8.2.6 Michelle Bolger's proof of evidence

¹⁰ NPC9

harm that can be created by a relatively large-scale modern development that fails to integrate into its surroundings.

50. The visual impacts of the proposed development when viewed from Harcamlow Way would fundamentally and unacceptably change the characteristic open rural character of the valley slope. This change would be visibly and perceptibly experienced at close quarters by users of the public right of way on the approach to the village such that in views looking east, the village would appear as more of a modern 'suburbanisation' of a rural settlement within the rural landscape. This change would be substantial and would adversely affect the enjoyment of the users of the path.
51. The footpath (Footpath No 11) through the centre of the site links the residential properties on Frambury Lane with the surrounding countryside. The route currently has a tranquil character being through a tree belt with agricultural fields on either side. Although the tree belt would predominantly remain, the Land Use Plan shows that there would need to be some form of access through it with resultant loss of trees and views of the proposed development being exposed. Consequently, the tranquil rural nature of this path would be changed to a path within a tree belt through a substantial modern residential development. Similarly, this change would also be substantial and would adversely affect the enjoyment of the users of the path.
52. Notwithstanding the fact that the planning application is in outline, as explained earlier in this decision, I have taken into account the Building Heights Parameter Plan. This shows that 3 storey housing could be positioned in the south western corner of the site. Whilst existing planting would screen some of the future properties, in my view, there would be glimpses of this part of the development through and above the existing trees from views along Wicken Road on the approach to the village. Not only are 3 storey dwellings predominantly uncharacteristic on the rural interface of the village, such properties in this location would appear as unacceptably dominant features in the approach to Newport along Wicken Road.
53. The eastern side of Wicken Road in the vicinity of the site on its approach to the village has a substantial and relatively mature woodland belt that is partly on the embankment above the road. This provides this stretch of road with a 'sunken lane' character. The formation of the site access and the creation of the visibility splays would result in the removal of trees on the Wicken Road frontage with significant earthworks required on the north western side of the access. Although there are no detailed engineering drawings to show conclusive extent of the earthworks, the formation of visibility splays would result in the loss of a significant part of the woodland belt.
54. Users of the road are sensitive receptors. The formation of the access would result in a localised change to the character of Wicken Road in its approach to the village. The access would open up views of the development. The appearance and rural character of this part of the road would adopt a more urbanised appearance would prevail. This further adds to my concerns regarding the unacceptable visual impact that the proposed development would cause to the existing rural character of the road.
55. I have taken into account the fact that a future landscaping scheme would provide some screening and softening of the proposed development as the planting matures. I also recognise that the proposed location of open space

has been subject to careful landscape and topographical considerations. However, these potential positive attributes of the scheme do not alter my view that the loss of the two fields, which are characteristic of the local landscape, and their replacement by up to 150 dwellings would represent a highly adverse magnitude of change.

Character and appearance - Conclusion

56. Taking the above factors into account, I find that the proposed development would cause unacceptable harm in both landscape character and visual terms. It would represent a significant incongruous development on the eastern slope of the Wicken Water Valley that would appear unacceptably prominent in the context of the local landscape. In addition, it would fail to respect the historic settlement pattern of the village and interrupt cross valley views contrary to the landscape guidance provided in the LCA.
57. Accordingly, I conclude that the development would have a significant adverse effect on the landscape character of the surrounding area and would cause significant adverse visual harm. As such, it would be contrary to Policy S7 of the ULP. In failing to recognise the intrinsic character and beauty of the countryside there would be conflict with the provisions of paragraph 170 of the Framework. In addition, it would be contrary to Policies SP10 and C1 of the ELP. These policies, amongst other things, seek to protect the intrinsic character and beauty of the countryside and require that any development preserves the landscape pattern, protects cross valley views and preserves the historic settlement pattern. My conclusion on this issue weigh significantly against the proposal.

Air Quality

58. The appellant's updated air quality evidence is based on the original information contained in the EIA and the Air Quality Assessment that underpins the 'Addendum to the Environmental Statement' dated March 2019. These consider the air quality impacts at 107 worst-case receptors, representing existing properties in both Newport and Saffron Walden where impacts are expected to be greatest. The updated evidence included an updated methodology for considering the potential impacts of emissions from queuing vehicles at the junction of Wicken Road with High Street and impacts on the Saffron Walden AQMA¹¹.
59. The Air Quality SoCG, dated 24 June 2019, identifies that the focus of this appeal is the potential impact of the development on annual mean concentrations of nitrogen dioxide (NO₂). It confirms that the hourly mean Air Quality Objective for nitrogen dioxide and the Air Quality Objectives for all other pollutants are currently achieved across the District and are expected to continue to be achieved in the future. In addition, the hourly mean European Union (EU) limit value for nitrogen dioxide and EU limit values for all other pollutants are currently achieved across the District and are expected to continue to be achieved in the future.
60. Matters of disagreement between the main parties relate the fact that the proposed development could affect the ability of the Government to meet the annual mean NO₂ concentrations of 40µg/m³; the extent to which emissions

¹¹ CD 9.09

from queuing traffic have the potential to affect local air quality; that National fleet composition does not necessarily reflect the fleet composition of Saffron Walden and that the appellant should have explicitly considered this within the air quality assessment; whether the appellant's sensitivity test regarding future vehicle emissions represents an acceptable worst-case scenario to account for the possibility that the national predictions may not be accurate and may not apply in Saffron Walden and Newport.

61. The appellant's air quality assessment considers three future years; 2022, assuming that up to 98 dwellings are occupied; 2023, assuming complete occupation of the proposed development and 2024, the first full calendar year of complete occupation. A sensitivity test has been applied which considers the potential under-performance of emission control technology on future diesel cars and vans and therefore resulting in higher emissions than those predicted in the DEFRA Emissions Factor Toolkit (EFT). The EFT allows users to calculate road vehicle pollutant emission rates for for a specified year, road type, vehicle speed and vehicle fleet composition.
62. The appellant's modelling assessment shows that the annual mean concentrations of NO₂ in Newport are predicted to be below 40µg/m³ at all receptors in the three years assessed, with or without the scheme. In Newport in 2022 the impacts with the sensitivity test are mostly described as negligible, with slight adverse at seven receptors and moderate adverse at two receptors. In 2024 the impacts are described as negligible with slight adverse impacts predicted at eight receptors.
63. In Saffron Walden, annual mean NO₂ concentrations are also predicted to be below the objective limit at all receptors, with or without the scheme. In 2022, 2023 and 2024 the percentage changes in concentrations, relevant to the air quality objective of 40µg/m³ (when rounded) are predicted to be zero at all locations in Saffron Walden. The appellant therefore considers the air quality effects in Saffron Walden as 'not significant'.
64. The appellant's evidence indicates that in Newport, the small number of slight or moderate adverse impacts are unlikely to have any significant effect. The moderate adverse impacts are transient and only occur in the sensitivity test for 2023 at two receptors and do not arise by 2024. The appellant's assessment with and without the sensitivity test show that all receptors experience a reduction in NO₂ exposure between each assessment year despite an increase in traffic from the scheme. As such the appellant also considers the air quality effects in Newport as 'not significant'.
65. The Council's air quality expert witness has used the same modelling method and software as the appellant's expert witness and differ only by some of the specific inputs to the model and reach different predictions of the future effects. In particular, the Council considers that the assessments provided by the appellant under estimate the likely annual mean NO₂ concentrations with the result that the levels at some receptors would exceed 40µg/m³.
66. Other than the matters contained within the Air Quality SoCG, it was apparent during the Inquiry that there was no agreement between the main parties on which of the outputs from the models should be consider as being the more robust. It is therefore difficult to conclude, with any degree of certainty, which model should be relied on for the purpose of considering the effect on air quality. Therefore, to conclude on this issue, I have considered below the

matters that contribute to this divergence, as identified in the Air Quality SoCG and from the evidence submitted during the Inquiry.

67. The first, and main, divergence of approach is in relation to queuing traffic. There is no dispute between the parties that queuing occurs at the junction of High Street and Wicken Road. However, there is dispute regarding the impact of idling vehicles, queue length at AM peak (08.00 – 09.00) and the composition of vehicles in the District.
68. The Council considers that the appellant has failed to take into account idling emissions in the model and has instead used emissions equivalent to the difference in emissions between vehicles travelling at a speed of 35kph and a speed of 5kph. The shortcoming is considered to be demonstrated by comparing the appellant's modelling results with diffuser tube monitoring data at site UT039, located at the High Street/Wicken Road junction which gives a significant difference in observed and predicted data. This suggests that the model is underpredicting pollution levels at this location by a factor of 3.27.
69. To account for this, the appellant has applied an adjustment factor of 3.27 to the model results in Newport. Whilst there remains dispute regarding the modelling of idling vehicles and the use of data from diffuser tube UT039, I do not consider the appellant's approach to apply a correction factor to be unreasonable. In arriving at this view, I have also taken into account the evidence provided by Mr Mayle in respect of emissions from cold engines.¹²
70. The Council also considers that the appellant has underestimated the queue length at the High Street/Wicken Road junction in considering only 1.3 vehicles queuing during the AM peak hour in 2017 and 7.9 vehicles in 2023. Essex County Council in its role as highway authority did not dispute the appellant's evidence of predicted queue lengths on High Street/Wicken Road junction as a consequence of the proposed development. Consequently, for reasons that will be explained in more detail later in this decision, I do not find the appellant's assessment of queue length used in the air quality model to be unreasonable.
71. Turning now to the emissions from vehicles, the appellants model uses the assumptions made in the 2018 (EFT). For assessment years beyond 2020 the EFT makes assumptions regarding the expected performance of diesel vehicles.
72. The Council considers that these vehicle emissions used by the Appellant to represent Saffron Walden/Newport fleet composition use a national average that is very unlikely to represent the study area fleet. Evidence provided by Cllr Hargreaves demonstrated that the local bus fleet comprised of vehicles that were predominantly older than 5 years and as such did not comply with the latest European standards for vehicle emissions¹³. There was a suggestion that the composition of the car fleet in the local area may also be older than the national average.
73. I recognise the Council's concerns regarding vehicle age in the locality and that throughout the country there may be local variations in fleet age composition. However, in the absence of any clear and robust local emission information, I consider that the use of nationally defined emission standards as set out in the EFT to be an entirely appropriate basis on which to base the model.

¹² NPC 8

¹³ NPC 9

74. With regard to sensitivity testing, the appellant's assessment applies a sensitivity test for nitrogen dioxide emissions. This is based on the fact that some diesel vehicles are likely to emit higher nitrogen oxide emissions from those predicted in the EFT. In particular, the EFT assumes that diesel vehicles registered after 2020 will, on average, emit significantly less nitrogen oxide than earlier models. The applied sensitivity test assumes that the post 2020 technology does not deliver the improvements identified in the EFT. Again, I consider that this is a reasonable and appropriate basis to be applied in the model.
75. The Council also suggest that no queuing conditions were modelled in Saffron Walden by the appellant. In particular, that relevant monitoring sites were not used to verify the dispersion model performance and that key monitoring sites (UT004 and UT005) were not included which capture queuing and junction conditions in Saffron Walden. Without the inclusion of this data the Council considers that it is not possible to ascertain (verify) how the model is performing at these hot spot locations. This matter was partly the basis on which the Inquiry was adjourned to enable consideration of these concerns.
76. Taking into account my findings above regarding the use of the appellant's modelling methodology, I am satisfied that the Air Quality Assessment that supports the Addendum to the Environmental Statement provides an acceptable basis for the consideration of air quality issues in the Saffron Walden AQMA.
77. A further point raised in the Inquiry relates to the Council's concerns that the dispersion modelling at the roundabout at London Road and Debden Road in Saffron Walden applies the 'Advanced Street Canyon Module' to define the porosity of building walls relevant to road length. Parts of the road length in this area does not have adjacent buildings. However, on review of the appellant's Supplementary Air Quality Information – June 2019¹⁴, I am satisfied that as the development related traffic flows and emissions are so low, the impacts of these emissions would be expected to remain negligible and the effects on annual mean NO₂ concentrations would not be significant.
78. I have also taken into account the proposed air quality mitigation measures including electric vehicle charging points, a travel plan and the promotion of car sharing. Were the appeal to be allowed, planning conditions could be considered in relation to these and other related matters.
79. The Council's concerns are not without merit and the areas of disagreement between the parties mainly relate to assumptions made within the respective modelling. However, on the basis of the evidence before me I have no reason to conclude that the proposal would give rise to unacceptable levels of air quality to the extent that there would be demonstrable harm to human health. Consequently, there would be no conflict with Policy ENV13 of the ULP or Policy EN15 of the ELP.

Effect on the safe operation of the local highway network in the area

80. The effect of the proposal on the safe operation of the highway network in the area is not a matter contested by the Council. The Planning SoCG identifies that there are no unresolved matters relating to highways¹⁵. Although the

¹⁴ APP 10

¹⁵ SoCG paragraph 8.5.

Council did not contest this matter, it was of considerable concern to local residents and NPC.

81. The Framework advises in paragraph 109 that development should only be prevented on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. The planning application was supported by a Transport Assessment and accompanying 'Technical Notes'. Essex County Council (ECC), in its capacity as highway authority, raised no objections to the proposed development. ECC identified that the proposal would not have a severe impact and can be accommodated safely and efficiently on the local highway network¹⁶.
82. The Transport SoCG identifies that there are no highways or transport related reasons to prevent the proposed development from taking place¹⁷. In particular, the Transport SoCG identifies that the site is located in an accessible location with a range of travel modes available; that the scale of the proposed development would not result in a severe impact on the operation of the highway network; would not cause a material increase in queue lengths at the junction of Wicken Road with High Street; and that the proposed vehicular access as a simple priority junction to Wicken Road is appropriate in terms of its form and achievement of visibility.
83. NPC considers that the design of the proposed junction from the appeal site to Wicken Road is not safe and is inappropriate; that a potential new footway from the proposed site access on the southern side of Wicken Road to join the existing footpath in the vicinity of No 85 Wicken Road is not deliverable; that the level impact on the junction of Wicken Road with High Street has been underestimated and that bus access is poor.
84. As a consequence of these matters, NPC considers that the proposal would be contrary to Policy GEN1 of the ULP. This policy, amongst other matters, requires that the local highway network can accommodate traffic generated by the proposal, the design must not compromise road safety, encourage transport means other than the car and take into account the needs of pedestrians and cyclists. I consider each of the above matters raised by NPC below.
85. With regard to the site access, NPC considers that as the vehicular movements from the site would be in excess of 300 per day the advice provided in the Design Manual for Roads and Bridges (DMRB)¹⁸ should apply. This indicates that the design of the site access junction should incorporate a 'ghost island' right turn lane where traffic flows on the minor arm of the junction exceed 300 vehicles per day.
86. In addition, NPC considers that the introduction of access visibility splays with the consequential removal of roadside vegetation would increase forward visibility on Wicken Road and hence result in a likely increase in vehicle speeds. As a consequence, the observed vehicle speeds used to inform the design of the junction may be inadequate.

¹⁶ CD 3.04 - ECC's consultation response dated 13 February 2018.

¹⁷ SoCG with ECC – paragraph 9.1

¹⁸ APP5- Highways Agency-Geometric Design of Major/Minor Junctions (replaces Core Document 8.01)

87. The issue of a ghost island and the advice contained in DMRB was considered by ECC. Wicken Road does not form part of the trunk road network for which standards included in DMRB are mandatory. DMRB advises in paragraph 1.1.1 that where its requirements are applied to other roads, the specific highway authority acting as the 'overseeing organisation' should decide on the extent to which the requirements of DMRB are appropriate.
88. The application of DMRB requirements on roads other than trunk roads is therefore entirely at the discretion of the local highway authority. In this case, Appendix A of the Transport SoCG clearly demonstrates that this matter, and the evidence provided by NPC's highway witness, was considered. The traffic flow modelling contained within the Transport Assessment indicates that 15% of traffic arising from the completed development would be travelling to/from Wicken Road west of the site access therefore resulting in very low numbers of right turn vehicles accessing the site. ECC consider that the capacity analysis demonstrates that a simple priority junction works well within capacity, with no right turn queuing on the main arm of the junction. Consequently, a ghost island is not necessary.
89. Given that this matter has been considered by the ECC in its role as the competent 'overseeing organisation' and the discretionary nature of the application of DMRB requirements, I do not consider that there is any prescriptive basis for a ghost island to be provided.
90. Turning now to vehicular speeds, the Wicken Road site frontage is subject to the national speed limit. However, automatic traffic counts undertaken by the appellant established that the 85th percentile speeds are lower, influenced by the change in speed limit to 30mph to the east of the site and the sinuosity of the road and local topography.
91. The 85th percentile observed speeds were 62kph westbound and 68.8 kph eastbound. In calculating the visibility splay requirements, the adopted westbound design speed used by the appellant was 70kph and 78kph eastbound, both in excess of the observed speed. In this case DMRB was used to determine junction visibility requirements of 120m westbound and 140m eastbound.
92. From my observations on site, I agree with the appellant that to obtain the visibility splay to the east would not require any significant earthworks or vegetation removal. Consequently, I do not consider that the provision of the visibility splay would change the current visibility parameters to cause a material increase in traffic speeds on approach to the proposed junction from the east.
93. To accommodate the visibility splay to the west some vegetation removal and earthworks would be required which could potentially result in increased forward visibility and a potential increase in vehicle speed on this part of Wicken Road. However, no evidence was provided by NPC as to the extent to which vehicle speeds could increase.
94. The observed eastbound speed would require a visibility splay of 105m. By use of the increased adopted design speed, 140m is proposed. Whilst recognising that vehicle speeds could increase as a consequence of the earthworks and vegetation removal, I agree with the appellant that this is unlikely to exceed

- 9kph (78kph design speed used – 68.8kph observed), with the remaining sinuous alignment of Wicken Road continuing to influence vehicle speeds.
95. ECC consider that the proposed visibility splays are adequate. In addition, by the use of the increased design speeds outlined above, I consider that there are sufficient margins built into the visibility splay design to address any concerns about potential speed increases as part of vegetation removal and earthworks.
96. Turning now to a potential footway along Wicken Road, the initial response of ECC to the planning application dated 13 February 2018¹⁹ suggested that a planning condition be imposed requiring that a footway be provided along the entire site frontage on Wicken Road, to tie into the existing footway to the east, measured at a maximum 2m wide where achievable based on the availability of highway land. The Transport SoCG identifies that although the provision of this footpath was requested in the consultation response by ECC to the Council, it is not essential to make the site accessible given that alternative points of access, particularly along Frambury Lane, are potentially available.
97. There was considerable discussion at the Inquiry regarding walking distances from various potential site access points to facilities and schools within the village. However, I am of the view that some prospective occupants of the proposed development, particularly for those properties in the vicinity of the proposed vehicular access point, would seek to walk into the centre of village via Wicken Road and therefore a safe pedestrian footway would be desirable.
98. No detailed design drawings or conclusive highway authority ownership information was available to make any substantive assessment as to whether a footway could be provided on highway land or land controlled by the appellant along Wicken Road. However, were I minded to allow this appeal, I consider that this matter could be dealt with at reserved matters stage by a suitably worded planning condition.
99. With regard to the impact on the junction with High Street the NPC highway witness conceded that the only fully modelled approach was that provided by the appellant. A study area encompassing the Wicken Road junctions with High Street, School Lane, Frambury Lane and the proposed site access was used. The operational performance of these junctions was tested using PICARDY modelling and with 4 days of observed data being used and growth factors applied.
100. The use of an average of 4 days traffic flows provides a reasonable level of confidence that the observed flows are typical of the flows on Wicken Road and in my view provides a robust basis for modelling. On review of the available evidence, and taking into account the views of the highway authority, I am satisfied that the conclusions found in the Transport SoCG are robust. These confirm that all of the study area junctions would operate within capacity under all scenarios modelled. The development impact at the Wicken Road junction with High Street would not be severe.
101. Whilst there are limited bus services to Bishop's Stortford and no buses to Cambridge, there are relatively frequent rail services to these and other places.

¹⁹ CD 3.04

Existing bus services to Saffron Walden operate to a timetable that complements traditional commuting periods.

102. NPC assert that the walking distance from the appeal site to the nearest public transport facilities exceeds the suggested guidance of 300m as contained within the Chartered Institution of Highway's and Transport publication 'Buses in Urban Developments'. However, I have not taken a prescriptive approach to the application of this guidance in this appeal which relates to development in a rural village and not an urban area.
103. The appellant referred to research under taken by Whyte Young and Green, entitled 'How far do people walk?'²⁰ which identified that the mean walk distance to access a bus stop in the East of England Region is 630m. Analysis of walking distances from various points in the site to bus stops was provided by the appellant which indicates distances range from 396m to 805m with most distances being at or below 640m.
104. Taking into account the aforementioned research, I do not consider that the walking distance to bus stops would be a deterrent to the use of public transport as suggested by NPC. Overall, I find that the frequency of, and accessibility to, public transport to be acceptable.
105. I recognise that there is a genuinely held perception that the proposed development would give rise to highway safety problems and that the highway network may be unable to cope with the increase in traffic that would result. However, based on the evidence before me, the discussions at the Inquiry and my observations of the site and its surroundings at different times of the day, I have no reason to take a different view to those of the highway authority. In addition, I do not see any reason to doubt the validity of the submitted Transport Assessment and Highways evidence provided by the appellant.
106. Taking the above factors into account, I do not consider that the proposed development would be detrimental the safe operation of the local highway network and the residual cumulative impacts on the road network would not be severe. As such, there would be no conflict with Policy GEN 1 of the ULP.

Other matters

107. I have carefully considered all other matters raised, both at the Inquiry and in written submissions, including implications for local infrastructure. Beyond the mitigation set out below in the Section 106 Agreement these are not identified as matters for objection by the local planning authority, and I have little reason to conclude otherwise.
108. The parties in this appeal have referred to many appeal decisions which have been provided to support their respective case. However, it is rarely the case that appeal decisions on other sites will bring to light parallel situations and material considerations which are so similar as to provide justification for a decision one way or another. My decision is based squarely on the evidence before me. For that reason, I do not consider that appeal decisions brought to my attention have a determinative influence on my consideration of the appeal case.

²⁰ CD 8.06 - How far do people walk?

Planning Obligation

109. The part of the Section 106 Agreement between the appellants and ECC includes obligations relating to financial contributions towards 'Early Years' childcare provision in Newport and Primary and Secondary Education' facilities. The part of the agreement between the appellants and the Council includes obligations requiring that 40% of the dwellings constructed are provided as affordable housing, and financial contributions towards health care facilities.
110. The Council agree that the completed and executed S106 Agreement would resolve its concerns relating to the pressure on the local infrastructure within the District and overcomes the third reason for the refusal of planning permission. There is no substantive other evidence before me which would indicate that the available services and facilities would not have sufficient capacity to accommodate demand arising from the development beyond those that require the provisions of the planning obligation.
111. At the Inquiry the Council submitted a CIL Compliance Statements which confirms that none of the obligations would conflict with Regulation 123 requiring that no more than five contributions are pooled towards any one specific infrastructure scheme.
112. Having regard to the above, and based on the evidence before me, I am satisfied that all of the provisions set out in the obligations are necessary to make the development acceptable in planning terms, are directly related to the development and fairly and reasonably related in scale to the development. Therefore, they all meet the tests as set out within paragraph 52 of the Framework and CIL Regulations 122 and 123. I am satisfied with the form, drafting and content of the agreement and therefore I have attached weight to the provisions contained therein in this decision.

The Planning Balance

113. The parties agree that the Council cannot demonstrate a five year supply of deliverable housing sites and agree that the 'tilted balance' in favour of sustainable development, as set out in paragraph 11(d)(ii), applies. This indicates that planning permission should be granted unless the impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
114. In respect of the main issues I have concluded that the proposal would not give rise to unacceptable levels of air quality and that it would not be detrimental the safe operation of the local highway network or cause severe residual cumulative impacts on the road network.
115. The proposal would have a significant adverse and unacceptable effects on the landscape character of the area and would also result in unacceptable visual impacts. Consequently, I find that the scheme would be unacceptably harmful to the character and appearance of the surrounding area for the reasons described. This harm results in conflict with paragraph 170 of the Framework and Policy S7, which for the reasons explained earlier, is afforded significant weight. Furthermore, such harm would not accord with the environmental dimension of sustainable development.
116. There is no dispute between the main parties that the location is, in principle, one potentially benefitting from reasonably sustainable modes of

transport and has a range of facilities. However, the identified harm needs to be balanced against the benefits of the proposed development.

117. The provision of up to 150 dwellings comprising of market and affordable housing carries substantial weight in a District with an acknowledged shortage of housing. Such benefits would be consistent with the social dimension of sustainable development.
118. I have also taken into account the proposed provision of open space and allotments. In my view, the open space would primarily serve the residents of the proposed new houses and would be of limited benefit to the existing residents of Newport. The proposed allotments would complement the existing allotments to the north of the site. I observed at my site visit, and from evidence provided in the Inquiry, that the existing allotments have a number of vacant plots and therefore the community value of providing further allotments may be limited. Furthermore, the proposed development would harm the amenity value of the existing allotments by materially changing the outlook from them from countryside views to views influenced by an adjoining urban environment. There is also a modest set of ecological enhancements in the change of use of part of the land to green infrastructure. Therefore, collectively I have afforded these benefits limited weight.
119. The investment represented by the development would also be consistent with the economic dimension of sustainable development. The undisputed economic benefits would include investment in construction and related employment for its duration. Benefits would also include an increase in local household spending and demand for services. These benefits are also afforded substantial weight.
120. In considering the planning balance I have identified that there are some clear benefits of the proposal that attract substantial weight. However, I have found that there would be significant and unacceptable harm to the landscape character of the area and that there would also be significant and unacceptable visual impacts. Consequently, the proposal would not accord with the environmental dimension of sustainable development.
121. I conclude that the significant and unacceptable and adverse impacts of granting planning permission upon the character and appearance of the surrounding area arising from the extent of development proposed would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, and with regard to the development plan as a whole.

Conclusion

122. For the above reasons, based on the evidence before me and all other matters raised, I conclude that the appeal should be dismissed.

Stephen Normington

INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY

Josef Cannon

of Counsel instructed by the Solicitor
for Uttlesford District Council

He called

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Michelle Bolger Expert Landscape
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MCIWM

Gardner Planning Ltd

INTERESTED PARTIES

Neil Hargreaves	District Councillor and local resident
Howard Bowman	Deputy Chair of Newport Parish Council and local resident
Judy Emanuel	Parish Councillor and local resident
Anthony Gerard FRICS	District Councillor, Parish Councillor and local resident
Paul Fairhurst	District Councillor, Mayor of Saffron Walden
Clive Bridgeman	Local resident
David Mayle	Local resident
Lorna Ward	Local resident

Richborough Estates

DOCUMENTS SUBMITTED DURING THE INQUIRY

NPC1	Appeal decisions (APP/Q3115/W/18/3200335, APP/Z1510/W/17/3172575 and APP/Q3115 /W/16/3153639) supplementing appendices to Michelle Bolger's landscape evidence
NPC2	Aerial photograph with developments in Newport superimposed
NPC3	Appeal decision APP/C1570/W/16/3160739 missing from appendices to Geoffrey Garner's proof
NPC4	Newport Parish Council's opening statement
NPC5	Plan showing pedestrian access positions to shops and secondary school
NPC6	Institute of Highways and Transportation Guidelines for Providing Journeys on Foot
NPC7	Email correspondence dated 18 January 2019 between Bruce Bamber and Essex County Council
NPC8	List of objectors proposing to speak
NPC9	Plan illustrating suggested route and viewpoints for accompanied site visit
NPC10	Newport Parish Council closing submissions
APP1	File provided by appellant containing all witness proofs
APP2	File provided by appellant containing key core documents
APP3	A3 size photomontages to supplement A4 sized versions contained in Paul Gibbs proof
APP4	Appellant's opening statement
APP5	Highways Agency-Geometric Design of Major/Minor Junctions (replaces Core Document 8.01)
APP6	Appellant's closing submissions
APP7	Air Quality SoCG
APP8	Signed and dated S106 Agreement
APP9	Air Quality Assessment March 2019
APP10	Supplementary Air Quality Information – June 2019
APP11	TN02 Response to Air Quality Assessment Review of Annual Average Daily Traffic
LPA1	Council's opening statement
LPA2	CIL Compliance Statement
LPA3	Council's closing submissions
LPA4	Large Plan of UT004 and UT005 locations
LPA5	Nitrogen Oxide emissions for Euro4 cars
LPA6	Response to the Supplementary Air Quality Information on Canyon Street model set up UT028
ID1	Amended list of suggested planning conditions
ID2	Certified Copy of Section 106 Agreement dated 13 March 2019
ID3	Transcript of comments read by Judy Emanuel
ID4	Transcript of comments read by Howard Bowman
ID5	Transcript of comments read by Neil Hargreaves
ID6	Photographs provided by Neil Hargreaves
ID7	Essex Wildlife Trust Analysis of Accessible Natural Greenspace Provision for Essex provided by Neil Hargreaves
ID8	Photographs provided by Paul Fairhurst
ID9	Transcript of comments read by Paul Fairhurst
ID10	Transcript of comments read by Clive Bridgeman
ID11	Vehicle speed data on Wicken Road provided by Clive Bridgeman
ID12	Transcript of comments read by David Mayle
ID13	A3 traffic emission graphs provided by David Mayle

ID14	Transcript of comments by Lorna Ward
ID15	Transcript of comments by Anthony Gerard FRICS
ID16	Transcript of comments by David Mayle regarding air quality
ID17	Transcript of comments by Neil Hargreaves regarding air quality
ID18	Copy of Stephensons Bus Fleet List

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