

1 Introduction

1.1 This representation has been produced on behalf of Stebbing Parish Council in response to the consultation on Regulation 18 Draft Uttlesford Local Plan, 2017. The draft Local Plan is intended to help shape the future growth of Uttlesford up to 2033 and beyond and comments on the following aspects of the Regulation 18 Local Plan.

- Vision and Objectives
- Policy SP2 – The Spatial Strategy 2011 – 2033
- Policy SP3 – The Scale and Distribution of Housing Development
- Policy SP4 – Provision of Jobs
- Policy SP5 – Garden Community Principles
- Policy SP8 – West of Braintree Garden Community
- Policy M1 – Monitoring and Review
- Policy M1 – Implementation and Monitoring of Major Projects
- Key Diagram
- Sustainability Appraisal

1.2 Stebbing Parish Council strongly objects to the proposed West of Braintree Garden Community; a development that could potentially deliver 10,000 new homes, employment land, and supporting social infrastructure on land that straddles the administrative boundary with Braintree District Council. Of these 10,000 new homes, it is anticipated that 970 could be delivered in Uttlesford towards the end of the Local Plan period but ultimately 3,500 could be constructed beyond 2033.

1.3 Stebbing Parish Council has formally objected to the Regulation 19 submission draft of the Braintree Local Plan. In summary, it does not consider the proposals would promote the principles of sustainable development as set out in the National Planning Policy Framework and would erode the unique character to the village and its setting within the wider landscape.

1.4 This representation firstly considers the provisions of the draft Uttlesford Local Plan and the level of housing need in the area. Secondly, it considers the comments contained in the Sustainability Appraisal and the overall approach that has been adopted towards the accommodation of additional growth. Thirdly, it considers the Vision, Objectives and Spatial Strategy as set out in the draft Local Plan and specific aspects of the assessment that has been undertaken for the West of Braintree



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Garden Community. Finally, it concludes by highlighting the inappropriate nature of the proposals.

2 Draft (Regulation 18) Uttlesford Local Plan

- 2.1** The draft Local Plan has identified a housing need for 14,100 new homes by 2033. The Council considers this need can be met without adverse impact on policies in the National Planning Policy Framework (NPPF) as a whole, or specific policies which might indicate that the need should be accommodated elsewhere. Equally no neighbouring authority has requested that Uttlesford should accommodate some of its need.
- 2.2** Information presented within the draft Local Plan suggests that after allowing for dwellings that have already been constructed (2,468), those that have planning permission (4,513) and those that are likely to come forward via ‘windfall’ sites (1,190) the overall supply for 2011 – 2033 is 8,171 dwellings. This produces a housing requirement of 5,929 dwellings.
- 2.3** The draft Local Plan seeks to distribute this requirement by directing growth to Saffron Walden, Great Dunmow and five key villages (see Policy SP3). It is however expected that the majority of the additional growth will be concentrated in three new Garden Communities. These are:
- Easton Park – a garden community comprising 10,000 new dwellings in which a minimum of 1,800 homes are anticipated by 2033;
 - West of Braintree – a garden community comprising 10,000 the majority of which is in the area administered by Braintree District Council but where a minimum of 970 homes will be built in Uttlesford by 2033; and
 - North Uttlesford - a garden community comprising 5,000 new dwellings in which a minimum of 1,900 homes are anticipated by 2033;

Housing Trajectory

- 2.4** The Uttlesford Local Plan Housing Trajectory is set out in Appendix 3 of the Draft Local Plan. It is evident from examination of the trajectory that housing delivery is expected to peak in 2018/17 then drop off for a few years before rising above the annual housing target in 2025/26, then staying above it for the final seven years of the Local Plan period.
- 2.5** History shows that the provision of new settlements usually takes considerably longer than originally envisaged, with build out rates often stretching out much further into the future. The bigger the settlement the greater the likelihood for delay. Consequently, there is a considerable risk that the emerging Local Plan will fail to deliver the required dwelling numbers (including affordable housing) within the plan period.
- 2.6** This risk is compounded by focusing a considerable proportion (4,670 dwellings (79%)) of the 5,929 dwellings required between now and 2033 in three new settlements to the north, east and west of the District. If any one of the new settlements fails to deliver on schedule, there will be no opportunity towards the end of the Local Plan period to bring forward alternative housing provision elsewhere.
- 2.7** The Parish Council is not aware of any local authority bringing forward three separate settlements at the same time. Furthermore, with other new settlements being proposed by local authorities in North Essex questions must be raised as to whether the development industry has sufficient capacity against the backdrop of a skills shortage within the industry to bring forward so many new large-scale settlements with their own complex infrastructure requirements exactly at the same time.
- 2.8** Stebbing Parish Council is therefore firmly of the view that the proposed settlement strategy is flawed and presents a considerable risk that will result in the potential under delivery of new jobs and homes, creating a need for an early review of the draft Local Plan. In addition, questions arise as to the need for 14,100 new dwellings by 2033.

3 West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA) and Objectively Assessed Need (OAN)

3.1 The key evidence base document for the preparation of the draft Uttlesford Local Plan is the ‘West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA) Report of Findings – September 2015’ which provides an analysis which results in the identification of Objectively Assessed Housing Need (OAHN) figures for the overall Housing Market Area and its individual components: Epping Forest, Harlow, Uttlesford and East Hertfordshire.

3.2 The SHMA has since been updated by the publication of the ‘Establishing the Full OAN – July 2017’ and Affordable Housing Update – July 2017’ produced by Opinion Research Services (ORS).

SHMA: Establishing the Full Objectively Assessed Need – July 2017

3.3 The national Planning Practice Guidance (PPG) states that “household projections published by the Department for Communities and Local Government (DCLG) should provide the starting point estimate of overall housing need. The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice” [ID 2a-015].

3.4 At the time of the original SHMA, the DCLG 2012-based household projections provided the latest figures. These identified a growth of 49,638 households across the HMA over the 22-year period 2011-2033. Allowing for vacancies and second homes, this represented a housing need of 51,627 dwellings (paragraph 1.6).

3.5 The DCLG 2014-based household projections have since been published. These figures identify a growth of 50,697 households across the HMA over the same period, which represents a housing need of 52,728 dwellings and, as set out in the report produced by ORS, includes:

- 17,243 households and 17,785 dwellings in East Hertfordshire;
- 14,374 households and 15,049 dwellings in Epping Forest;
- 7,653 households and 7,903 dwellings in Harlow; and
- **11,427 households and 11,991 dwellings in Uttlesford.**

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- 3.6** Consequently, this provides the most up-to-date starting point estimate of overall housing need. Arising from the SHMA report's findings the following points are of significance:
- 3.7** Paragraph 2.5 refers to the fact that Uttlesford gained 9,000 migrants between the 2001 and 2011 Census (an average of 900 per year), which is said to be consistent with the 2012-based Sub-National Population Projections, which also project an average gain of 900 migrants each year over the 25-year projection period.
- 3.8** Paragraph 2.7 goes on to state that it is evident that the ONS SNPP suggests that the population will increase considerably more than it has in the past due to much higher levels of net migration. Whilst the HMA gained an average of 1,120 persons annually from 2001-2011 due to net migration, the 2012-based SNPP suggests a net gain of 2,640 persons on average each year.
- 3.9** Paragraph 2.8 highlights that the 2014-based SNPP also identify higher rates of migration than past trends: an average annual gain of 2,850 persons over the 25-year projection period 2014-2039. However, it is important to recognise that both projections are based on short-term migration trends.
- 3.10** Reference is made in paragraph 2.30 to the recently released GLA Interim 2016-based projections which were shared with local authorities across the Wider South East in July 2017. The GLA 2016-based projections central variant identifies a growth of 47,248 households and a housing need of 49,116 dwellings over the period 2011-2033, with net migration averaging a gain of 2,809 persons annually and household sizes projected to reduce to 2.315 persons by 2033. The short-term trend variant identifies a growth of 48,238 households (50,144 dwellings) based on net migration at 2,965 per year and household sizes reducing to 2.316 persons on average; whereas the long-term trend variant identifies a growth of 44,332 households (46,092 dwellings) based on net migration at 2,444 per year and household sizes reducing to 2.3 persons
- 3.11** It is particularly noteworthy that the GLA 2016-based projections long-term trend shows a household need of 46,092 dwellings, as opposed to the 52,778 dwellings requirement identified in the DCLG 2014-based projections.
- 3.12** An uplift of 20% to the demographic starting point was made to the OAN by the 2015 SHMA to take account of concealed households. If the same percentage increase

were to be applied to the 2014-based projections an OAN of 54,608 dwellings would be required for the HMA (paragraph 3.2).

- 3.13** ORS has concluded that an uplift of 6,200 dwellings is the most appropriate increase for West Essex and East Hertfordshire HMA, and this yields an overall housing need of 51,700 dwellings over the 22-year period 2011-2033 (paragraph 3.25). This figure represents an increase to the dwelling stock of 28.5% over the 22-year period, equivalent to an average increase of 1.3% each year (paragraph 3.30), and is a 14% uplift to the demographic starting point (paragraph 4.3). It is therefore acknowledged that the SHMA has incorporated a very significant uplift which should be sufficient to accommodate future needs.
- 3.14** Paragraph 3.31 deals with housing delivery during the 10-year period 2001-2011 and indicates that it averaged around 1,390 dwellings per annum (dpa). In terms of net additions to the stock; therefore, an OAN of 2,350 dpa represents a 69% increase in housing supply. This will require a step change in the rate of delivery which, as already indicated could present significant challenges to the development industry in view of the capacity issues that currently exist.
- 3.15** Figure 5 identifies the Full Objectively Assessed Need for Housing 2011-33 for the HMA as being 51,710 dwellings. This consisting of:
- 18,396 dwellings (836 dwellings per annum) in East Hertfordshire;
 - 12,573 dwellings (572 dwellings per annum) in Epping Forest;
 - 7,409 dwellings (337 dwellings per annum) in Harlow; and
 - **13,332 dwellings (606 dwellings per annum) in Uttlesford.**
- 3.16** In addition, the need for affordable housing has also been reassessed as outlined below.

SHMA: Affordable Housing Update – July 2017

- 3.17** Paragraph 3.62 of the SHMA Affordable Housing Update identifies the overall affordable housing need for the full Plan period 2011-2033 (which is included within the Full OAN figure identified immediately above).as being around 13,600 dwellings. This comprises around:
- 4,500 dwellings in East Hertfordshire;
 - 3,100 dwellings in Epping Forest;



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- 3,400 dwellings in Harlow; and
- **2,600 dwellings in Uttlesford.**

3.18 Fig 21 in the Update identifies an annual need for affordable housing of 127 dwellings. In terms of the proportion of overall need for affordable housing, the following needs have been identified:

- Harlow = 61%
- Epping Forest = 35%
- East Herts = 32%
- **Uttlesford = 26%**

3.19 It is particularly noteworthy that in terms of the West Essex and East Hertfordshire Housing Market Area, Uttlesford has a lower affordable housing requirement than other local authorities. This raises the important question of whether a greater proportion of the HMA's housing requirement should be diverted elsewhere to assist local authorities who have a much more substantive and pressing affordable housing need (e.g. Harlow).

3.20 In summary, the key points are that:

- the OAN requirement is 13,332 dwellings and not 14,100 as stated in the draft Local Plan, and
- a greater proportion of this need should be met elsewhere in the HMA where the needs are more pronounced.

4 Sustainability Appraisal

Identification of Reasonable Alternatives for the Uttlesford Local Plan 2011-2033 Topic Paper

- 4.1** The draft Local Plan is supported by a comprehensive Sustainability Appraisal (SA) which assesses the housing requirement of 14,100 dwellings (paragraph 3) but as already pointed out the District Council's latest OAN figure is 13,332 dwellings which is 768 dwellings below this figure; an amount that is 202 dwellings less than the figure proposed to the West of Braintree.
- 4.2** Paragraph 8 of the SA refers to 'testing', demonstrating that two 'New Settlement' options may not meet housing need in most cases. The increase in requirements is said to be challenging and that this would be exaggerated by unrealistic assumptions for housing delivery rates and 'start dates' from any individual option. It is stated that these circumstances and a lack of flexibility could be more pronounced in a strategy comprising only two New Settlement Options.
- 4.3** The assessment of 'New Garden Settlement Options' in Uttlesford District has previously explored up to seven potential locations for development:
- Easton Park
 - Great Chesterford
 - West of Braintree
 - Takeley
 - Elsenham
 - Birchanger
 - Chelmer Mead

Sustainability Appraisal of Strategic Options for the West Essex and East Hertfordshire Housing Market Area – September 2016

- 4.4** AECOM produced the Sustainability Appraisal of Strategic Options for the West Essex and East Hertfordshire Housing Market Area (HMA) in September 2016. Reference is made in paragraph 1.1 to growth in the area being promoted by the

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London Stansted Cambridge Corridor (LSCC) Growth Commission¹ which aims to raise the global economic potential of the LSCC. In August 2016, ORS updated the overall housing need to take account of more recent information including the DCLG 2014-based household projections and suggested a revised OAHN for the HMA of 54,608 disaggregated as follows:

- 19,427 dwellings in East Hertfordshire
- 13,278 dwellings in Epping Forest
- 7,824 dwellings in Harlow
- **14,080 dwellings in Uttlesford**

4.5 The ORS OAN 2016 requirement of 14,080 dwellings should however be reduced to 13,332 dwellings as already discussed above.

4.6 The following Table shows the various spatial options that were considered and the subsequent analysis of the key findings serves to support the strongly held views of Stebbing Parish Council that a settlement strategy which is heavily focused upon the provision of new garden communities is flawed. Furthermore, it fails to fully acknowledge the importance of supporting the vitality of existing towns and villages through modest growth.

¹ <http://www.lsccgrowthcommission.org.uk/wp-content/uploads/2016/07/LSCC-Growth-Commission-Final-Report-full.pdf>

Spatial distribution Options for the West Essex and East Hertfordshire HMA

Spatial Area	Option A	Option B	Option C	Option D	Option E	Option F
	Each LA meets its OAHN within its own area (N.B. – 14,150 at Harlow)	Less dev at Harlow & faster dev on the A120 (N.B. – 10,500 at Harlow)	Less dev at Harlow & 2 new settlements in East Herts (N.B. – 10,500 at Harlow)	Max Growth at Harlow & faster dev on the A120 (N.B. – 17,650 at Harlow)	Higher Growth Across the HMA (N.B. – 17,650 at Harlow)	Max Growth across the HMA (N.B. – 20,985 at Harlow)
Saffron Walden	500	500	500	500	500	750
*NS – Easton Park	2000	4000	2000	2000	2000	1400
*NS – West of Braintree	1000	2500	1000	1000	1000	1400
*Larger Villages / NP's	500	500	500	250	500	200
Other	0	0	0	0	0	100
Sub-total	4500	8000	4500	4250	4500	4600
Uttlesford District Total	12516 (OAHN = 12500)	16016 (OAHN = 12500)	12516 (OAHN = 12500)	12266 (OAHN = 12500)	12516 (OAHN = 12500)	12516 (OAHN = 14080)
Grand Total	48298 (OAHN = 46100)	48148 (OAHN = 46100)	47648 (OAHN = 46100)	46743 (OAHN = 46100)	51798 (clg 2012 – based household projections = 49638)	56242 (OAHN = 46100, but latest ORS advice = 54608)

*NB. NS = New Settlement

NP = Neighbourhood Plans

4.7 The assessment of the options upon Biodiversity found that:

“... In relation to Uttlesford, Option C will significantly increase the number of dwellings to be delivered to two new settlements at the A120. One of these locations, Land at Easton Park, is located close to the High Wood, Dunmow SSSI, which is a wet Ash Maple and Pedunculate Oak-Hornbeam wood (including ancient woodland) associated with a rich and varied flora. Both settlements are likely to impact on the Flitch Way nature route in terms of its biodiversity and quiet enjoyment. The proposed location for development is within the IRZ for ‘residential development of 100 units or more’. The second proposed location for a new settlement at Land at Boxted Wood/Andrewsfield is not located within an IRZ- however Boxted Wood itself is ancient woodland.

4.8 In relation to Community and Wellbeing the assessment acknowledges that:

“... Directing increased levels of housing delivery to the larger settlements will support access to services and facilities for those living within or close to these settlements. However, there is significant potential for enhancements to the vitality of smaller settlements in the HMA to be secured through increased population growth. This may support the availability and viability of services and facilities in smaller settlements, helping to improve access to services and facilities, promoting social connections and supporting physical activity. In this context, Options B, C and E, which promote an increased proportion of housing in the parts of the HMA outside of Harlow may support enhancements to such facilities in these locations. It should be noted however such an approach has the potential to lead to an increased dispersal of development without the requisite services being delivered. Such an approach also has the potential to increase the need to travel for employment purposes - for example Uttlesford District has two residents per job and there is a significant level of out commuting to London across the sub-region”.

4.9 In terms of Economy and Employment the assessment recognises that:

“... Options A, B, C, E and F through increasing the proportion of development to be located in a wider range of settlements, have the potential to do more to support the economic vitality of a broader range of settlements. These include Bishop’s Stortford, Hertford, Sawbridgeworth, Ware, Chigwell, Chipping Ongar, Epping, Theydon Bois, Waltham Abbey Saffron Walden and Great Dunmow and

the larger villages in Uttlesford. Having said this, economic vitality can also be adversely affected by increased traffic congestion associated with new development...”.

4.10 In relation to land the assessment acknowledges that:

“... All of the options, due to the lack of available brownfield land in the HMA, will lead to the significant loss of greenfield land. In this context, each Local Planning Authority in the sub-region have completed a Strategic Housing Land Availability Assessment, and all reasonable and available opportunities for use of brownfield land have been explored...”.

4.11 Finally, in relation to Transport the assessment points out that:

“... Options A, B, C and E, which promote the delivery of increased proportion of housing in the parts of the sub-region outside of Harlow, have the potential to facilitate the development of new housing at locations which are more integrated with the existing built up area of settlements, and with increased potential of supporting the viability of existing sustainable transport links at these locations. However, spreading growth across the sub-region may do more to stimulate traffic than focusing housing at Harlow because smaller settlements will have less employment opportunities. This may increase the length of journeys to work and encourage more travel. This is a factor that developers cannot easily mitigate. Dispersed growth is also more difficult to serve by public transport and may not achieve the ‘critical mass’ necessary to deliver new/improved public transport services to the nearest employment centres. As a result, more trips are likely to be made by private car...”.



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4.12 The transport modelling indicates a 35 - 40% increase in trips on the network by 2033 based on 14,000 new homes in and around Harlow (and 48,000 across the wider HMA) (NB 14,000 equates to Option A). Given the transport modelling, it was concluded that a major improvement at Junction 7 of the M11 and a new Junction 7A were both essential to deliver growth. It was also concluded that a major improvement at Junction 8 was essential to support HMA growth as well as potential expansion at Stansted Airport beyond the currently consented growth of up to 35 million passengers per annum (mppa).

4.13 In view of the assessment the preferred Spatial Option is given in the table below.

Preferred Spatial Option alongside the spatial distribution options considered

Spatial Area	The Spatial Option	Option A	Option B	Option C	Option D	Option E	Option F
		Each LA meets its OAHN within its own boundaries (N.B. – 14,150 at Harlow)	Less dev at Harlow & faster dev on the A120 (N.B. – 10,500 at Harlow)	Less dev at Harlow & 2 new settlements in East Herts (N.B. – 10,500 at Harlow)	Max Growth at Harlow & faster dev on the A120 (N.B. – 17,650 at Harlow)	Higher Growth Across the HMA (N.B. – 17,650 at Harlow)	Max Growth across the HMA (N.B. – 20,985 at Harlow)
Completions	2468	1914	1914	1914	1914	1914	1914
Permissions	4598	5202	5202	5202	5202	5202	5202
Windfall Assumption	850	900	900	900	900	900	900
Sub-total	7916	8016	8016	8016	8016	8016	8016
Great Dunmow	750	500	500	500	500	500	750
Saffron Walden	750	500	500	500	500	500	750
*NS – Easton Park	1400	2000	4000	2000	2000	2000	1400
*NS – West of Braintree	1400	1000	2500	1000	1000	1000	1400
*Larger Villages / NP's	500	500	500	500	250	500	200
Other	100	0	0	0	0	0	100
Sub-total	4600	4500	8000	4500	4250	4500	4600
Uttlesford District Total	12516 (OAHN = 12500)	12516 (OAHN = 12500)	16016 (OAHN = 12500)	12516 (OAHN = 12500)	12266 (OAHN = 12500)	12516 (OAHN = 12500)	12516 (OAHN = 14080)
Grand Total	51094 (OAHN = 46100)	48298 (OAHN = 46100)	48148 (OAHN = 46100)	47648 (OAHN = 46100)	46743 (OAHN = 46100)	51798 (clg 2012 – based household projections = 49638)	56242 (OAHN = 46100, but latest ORS advice = 54608)

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4.14 The assessment points out on p.34 that the Spatial Option represents a 'hybrid' of Options A-F given in the preceding table. With respect to the overall quantum of c. 51,100 new homes, this reflects the furthest the authorities consider that they can reasonably go in delivering the most recent advice from ORS regarding housing need, i.e. 54,608 homes to 2033, given the available evidence. Critically, the figure of c. 51,100 significantly exceeds the formal OAN of 46,100 established through the SHMA and represents strong progress towards the revised figure.

4.15 In summary, the key points are that:

- the sustainability appraisal is biased towards the promotion of new settlements, and
- insufficient consideration has been given to a more dispersed approach to maintain and enhance the vitality of existing towns and villages and the role that neighbourhood plans can perform in achieving this.

5 Vision, Objectives, and Spatial Strategy

- 5.1** The Spatial Strategy for Uttlesford is set out in Policy SP2 of the draft Local Plan. It directs much of future growth to the proposed garden communities with a lesser amount to Saffron Waldon and Great Dunmow and the five larger villages of Elsenham, Great Chesterford, Stansted Mountfitchet, Takeley and Thaxted.
- 5.2** It seems very surprising that the District Council has set out a Spatial Strategy when it is yet apparently to produce a composite Strategic Land Availability Assessment, which is usually the starting point for determining an overall development strategy.
- 5.3** The precise scale and distribution of the proposed growth is covered by Policy SP3 in the draft Local Plan which indicates that 4,670 new dwellings (79%) of the 5,929 dwellings required between now and 2033 is to be accommodated in three new settlements to the north, east and west of the District.
- 5.4** Policy SP8 in the draft Local Plan deals specifically with the development of a new garden community to the West of Braintree and states:

Policy SP8: West of Braintree Garden Community

Permission will be granted for a new garden community at land West of Braintree following approval of a detailed development framework jointly by Uttlesford and Braintree District Councils. All criteria in this policy relate to the part of the garden community to be delivered in Uttlesford. The new garden community at West of Braintree will:

- a) Deliver 3,500 new dwellings in Uttlesford, of which 970 will be delivered by 2033. A mix of housing sizes and types of housing will be delivered in accordance with housing needs including affordable homes and homes for older people. Specific provision will be made for self and custom build housing.**
- b) Deliver a range of local employment opportunities.**
- c) Include a network of local centres incorporating a mix of retail, business and community uses (including A1, A2, A3, A4, A5, B1(a), D1 and D2 uses). Land and financial contributions towards eight primary schools (seven being two form entry and one being three**

form entry) and one large or two smaller secondary schools to be provided to total for the whole the garden community – distribution between Braintree district and Uttlesford to be determined through the masterplanning. Early years and childcare facilities, health care facilities, community and youth centres will also be provided.

- d) Provide transport choice, including high quality, frequent and fast public transport services to Great Dunmow and Braintree, and a network of safe walking and cycling routes, including connections with and improvements to the Flich Way.**
- e) Reconfiguration of and improvements to junctions on the A120, allowing access in all directions. Contributions to improving M11 Junction 8 will also be sought. Enhancements to the local highway network will be required, including mitigations measures along the B1256 Braintree Road, contributions to traffic management and safety measures in Braintree and Rayne, and traffic management on the local rural road network. Contributions towards capacity and sustainable transport mitigation measures along Essex Regiment Way are also required.**
- f) Include new primary substations in the medium to long term and reinforcements to the energy network in the shorter term.**
- g) Enhancements to the water recycling centre at Bocking, new connections, network upgrades and reinforcements to the sewerage network.**
- h) Provision of Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood risk management.**
- i) Provide allotments, open space, play, leisure and recreation in line with standards established in the Local Plan. j) Provision of natural, semi-natural and amenity green space in accordance with standards established in the Local Plan.**
- k) Incorporate measures to protect and enhance Boxted Wood.**

6 Assessment of the West of Braintree Garden Community

- 6.1** Policy SP8 in the draft Local Plan has been assessed in the Sustainability Appraisal that accompanies the Local Plan and it is pertinent to note some of the conclusions that have been reached in the Environmental Report – June 2017 produced by Essex Place Services. In its report consideration is given as to how the West of Braintree proposal affects specific objectives.

To conserve and enhance water quality and resources and help achieve the objectives of the Water Framework Directive (Table 86, p.192)

“Development at this location has the potential to impact on flows entering Stebbing Brook and River Ter. There are multiple water bodies on the site but the size of the site means there is the potential to mitigate against any negative impacts. The site is not within any groundwater protection zones”.

- 6.2** Stebbing Parish Council considers that the extensive amount of water bodies present could result in residential development being more challenging thereby undermining the delivery of the proposals

To conserve and enhance the District’s landscape character and townscapes (Table 86, p.193)

“The landscape of the majority of the area has a moderate to relatively high sensitivity to change; the western part of the area having a higher sensitivity to change in association with the River Chelmer. Development in the area could see the coalescence of Stebbing in the north and Flich Green in the south, although it should be noted that the presence of the A120 running through the area would act as a means of separation. A Landscape Assessment undertaken for the site acknowledges that the development proposal will alter the characteristics of Landscape Character Areas B13 (Rayne Farmland Plateau) and A12 (Pods Brook River Valley (Para 8.3) however the scale of the proposal is such that mitigation can be incorporated through effective masterplanning”.

- 6.3** In November 2016, Stebbing Parish Council, via its Neighbourhood Plan Steering Committee, commissioned The Landscape Partnership to undertake a Landscape Sensitivity and Capacity Appraisal of the parish of Stebbing to determine the sensitivity of the various landscapes within the parish to change and their capacity to

accommodate new development. The study has been produced to assist the Parish Council in making informed decisions as to whether any future development could be absorbed into the landscape, and if so, what scale of development would be appropriate and what mitigation measures might be required to ensure that there would be no unacceptable residual effects on the landscape.

6.4 The Landscape Appraisal refers to the fact that the preferred options Braintree Local Plan 2016 proposed in draft Policy SP10 a West of Braintree New Garden Community, which is a new settlement of between 10,000 to 13,000 homes to the west of Braintree that could potentially be extended into the parish of Stebbing. The broad area of search included Andrewsfield, Boxted Wood and land to the west of Stebbing Green. Although the area of search for the proposed development is largely within the neighbouring parishes of Great Saling and Rayne it does extend into the south-eastern part of Stebbing parish. As such, it has the potential to have major impact on the area and adversely affect the setting of the village, and particularly the hamlet of Stebbing Green. Consequently, the report analyses the essential area of minimum separation between Stebbing and the proposed new garden settlement.

6.5 Stebbing Parish Council strongly urges the District Council to take the findings reached by The Landscape Partnership fully into account should it ultimately decide to proceed with the West of Braintree Garden Community notwithstanding its fundamental objection to the proposals. It is essential that an extensive good quality landscape buffer be provided to separate Stebbing from any West of Braintree settlement.

To conserve and enhance soil and contribute to the sustainable use of land
 (Table 86, p.194)

“The site is predominantly a mixture of Grade 3 and Grade 2 Agricultural Land”.

6.6 The District Council should be seeking to maximise development on brownfield land before developing agricultural land. It needs to demonstrate that it has sought to maximise SHLAA and Brownfield Register opportunities. Stebbing Parish Council does not consider there is currently sufficient evidence available to demonstrate that this has occurred.

To maintain and enhance the district’s cultural heritage assets and their settings (Table 86, p.196)

“There are a number of Listed Buildings on site at Parkes Farm and a Protected Lane bisecting the entire site from north to south along two stretches in the eastern part of the site. There are also two registered Parks and Gardens, one Scheduled Monument and a number of designated woodlands within proximity to the site. The Landscape Assessment undertaken for the site raises the possibility that the setting of these two Registered Parks and Gardens (most notably Saling Grove) may be altered as a result of the proposals, as well as the wider setting of the Listed Buildings both on and in close proximity to the site. The Scheduled Monument is however unlikely to be affected as a consequence of the development. The site abuts the conservation area of Great Saling on its northern boundary. Further assessment also highlights elements of the WWII airfield that also survive. Below ground, there is also a known Roman villa site within the site in the area of Boxted Wood and the potential for earthworks within the Ancient Woodland. Despite this, these considerations can be factored into the proposal in adherence to Garden City principles. This is also the case for the Conservation Area and the Registered Parks and Garden at Great Saling bordering the site boundary in the north, subject to further assessment. In line with the findings of the Landscape Assessment undertaken, it will be crucial that enhancement is sought to any heritage assets and their settings that may be affected, and the historic environment, as part of any masterplanning”.

- 6.7** It is apparent that the land identified for the construction of the garden community possesses several important heritage assets which could potentially suffer harm.

Reduce and Control Pollution (Table 86, p.198)

“A Contamination Report recognises that a quarter of the site can be classed as Brownfield due to its historic WWII uses. A tenth of the site has been classed as a Medium Risk due to facilities associated with its WWII use, including bomb storage area and Petrol Storage area. The remaining nine tenths of the site have been categorised as a ‘Low Risk’ area. Regarding remediation, it is possible that a degree of remediation work may be required in proportion of the medium risk areas, to improve land quality prior to constructing housing/school/attendant infrastructure. The nature of any

remediation work is likely to be of small scale and relatively quick to implement. The southern parts of the site are within an area susceptible to poor air quality due to its proximity with a junction of the A120; however, the majority of the site is not within an area of poor air quality and the size and scale of the proposals would allow effective and appropriate mitigation. The site is within 250m of Clarkes waste facility; however again, the size of the site is such to allow any medical or educational uses to be located more than 250m from this facility to avoid any possible significant negative impacts”.

- 6.8** The fact that a tenth of the land has been classed as a Medium Risk due to its former WWII use, including the presence of bomb and fuel storage areas which might require remediation is important as it could potentially cause delay in the overall delivery of the project and significantly add to overall development costs.
- 6.9** What is of more importance is the acknowledgement that the southern parts of the proposed garden community are located within an area already susceptible to poor air quality due to its proximity with a junction of the A120. This is a further serious cause of concern particularly given the increased level of traffic likely to be using the A120, not just resulting from the West of Braintree proposals but also from other garden settlements along its route, as well as from other traffic.

To reduce the risk of flooding (Table 86, p.200)

“There is an area of high fluvial flood risk through the centre of the area and to the east but this is confined to a narrow floodplain by topography. The eastern boundary of the site falls within Flood Risk Zones 2 and 3 following the Pods Brook Channel however the proposals indicate that this area of Flood Risk would be retained as a vegetated/ woodland area; a Flood Risk Assessment undertaken states that this could be used to mitigate fluvial flood risk, which the assessment deems to be low risk. In regards to Surface Water Flood Risk, the report states that parts of the North West corner of the site and along the Pods Channel Brook are at a medium to high risk of surface water flooding. For the north-west corner of the site, SuDS could be used to reduce surface run off and reduce the risk. The Call for Sites assessment states that the southern-most portion of the site includes a strip of the River Ter and so is partly within Flood Zone 2 and 3, but that this would be remediated within the design proposals”.

- 6.10** It is not apparent how precisely the southern-most portion of the garden community which includes a strip of the River Ter and is partly within Flood Zone 2 and 3, could be remediated within the design proposals.

To promote and encourage the use of sustainable methods of travel (Table 86, p.202)

“The area is well related to public transport from Braintree and Great Dunmow and there is the potential for modal shift with public transport links into town (and along B1256/A120) and to for high quality bus services to rail links in Braintree or Braintree Freeport or possible Notley. There are currently relatively good existing bus links. The existing Flitch Way also offers a direct route to Stansted and Braintree for cycling and walking; in addition, the proposal includes the provision of a network of new and improved pedestrian and cycle connections, integrated within the existing routes, and also an express bus service between Braintree and Stansted as part of the West of Braintree new settlement”.

- 6.11** Stebbing Parish Council considers that whilst there may be opportunities to utilise bus services to and from Dunmow and Braintree, neither of these two towns are of a sufficient scale and size in terms of facilities and services, to mean that a high proportion of future inhabitants of a West of Braintree community are likely to utilise them. Furthermore, both Braintree and Uttlesford itself suffer from a serious commuter outflow. Consequently, it seems likely that the vast bulk of journeys undertaken by future habitants of a garden community would be by private vehicles.

To ensure accessibility to services (Table 86, p. 203-204)

“The site benefits from good accessibility to the strategic road network in its southern and central parts and is reasonably well related to Great Dunmow and Braintree. The site is located on the A120 corridor and as such is well suited to employment development/Stansted related growth; although it could be argued that such links would see a rise in car use. The Transport Assessment sets out a number of transport improvements that would be made as a result of the development, including Improvements to the existing B1256 Dunmow Road/ A120 eastbound on-slip roundabout, upgrade to the B1417/B1256 junction from priority to roundabout, improvements to the Blake End Road/ A120 Junction/ link and the implementation of a new roundabout

before the B1256/ Stebbing Green Junction. The Call for Sites form states that access to the site will be via two points on the existing B1256, and also via the road to Great Saling on the east of the site. Access to the A120 will be via the east facing slip roads. These infrastructure requirements are likely to increase the viability of car use; however the development of high frequency bus links to Braintree rail services and the utilisation of the Fritch Way for walking and cycling is similarly likely to increase inclusive access by sustainable means”.

- 6.12** Stebbing Parish Council agrees that the location on the proposed garden community on the A120 corridor would make it suited to employment development/Stansted related growth. It does however consider that such links would inevitably see a rise in car use. Significant additional vehicular traffic accessing and departing the A120 in this location, also has the potential to adversely affect traffic flow along this busy east - west route to the Haven ports.

To improve the population’s health and promote social inclusion (Table 86, p.206)

“Although the main employment, housing and related infrastructure (including employment, retail, community or educational land) will be in Braintree this should not be a criticism or barrier to its allocation in the Uttlesford Local Plan. The site is more than 800m from a GP surgery and any significant shopping facilities however the proposal includes new healthcare facilities and two new district centres containing shopping facilities. The proposal includes a country park, formal and informal green spaces, neighbourhood play areas and allotments, and it should additionally be noted that more than 50% of the site meets Natural England’s ANGSt criteria”.

- 6.13** Stebbing Parish Council is concerned that a large new settlement being located near to the A120, where air quality concerns already exist, is only likely to exacerbate matters. Air quality issues have moved significantly higher up the political agenda as a result of recent legal judgments and the District Council will need to ensure that appropriate health concerns are properly taken on board and addressed within Local Plan allocations.

To provide appropriate housing and accommodation to meet existing and future needs (Table 86, p.208)

“The proposal indicates that there will be 3,500 homes in total in the district as part of a larger cross-boundary scheme of approximately 10,000 new homes in Uttlesford and Braintree administrative areas. The proposal supports the North Essex Authorities (BDC, CBC, TDC) Section One Strategy of meeting needs through West of Braintree Garden Community and as such is in line with NPPF regards positively contributing to cross-boundary issues by meeting growth needs. Despite this, the majority of the scheme will be in a different Housing Market Area. The main employment, housing and related infrastructure will be in Braintree with additionally no employment, retail, community, or educational land shown in Uttlesford. There will be some cross-boundary housing implications of the AoS which may affect the proportion of the dwelling yield that can contribute to the District’s housing target. The yield will contribute affordable housing units however it is unclear how many of these units will be located within the district. The location of the development will support some of the wider existing housing needs of the district, however these are limited in terms of location and the cross-boundary nature of the proposal”.

- 6.14** Stebbing Parish Council considers that there is a lack of clarity regarding the intended scale of the proposed West Braintree Garden Community. The draft Local Plan refers to potentially 3,500 dwellings in Uttlesford out of approximately 10,000 dwellings with the remainder being in Braintree. Policy SP7 ‘Development and Delivery of New Garden Communities in North Essex’ in the Braintree Publication Draft Local Plan (2017) however refers to an overall total of between 7,000 – 10,000 dwellings. If the West of Braintree Garden Settlement might only be 7,000 dwellings in size, it would not seem necessary for it to stretch across into Uttlesford.

To promote the efficient use of resources and ensure the necessary infrastructure to support sustainable development (Table 86, p.210)

West of Braintree – The main employment, housing and related infrastructure will be in Braintree with no employment, retail, community, or educational land shown in Uttlesford. Although part of the same scheme, the provision of infrastructure in Uttlesford is unknown at this stage however this will not affect the sustainability of the proposal. Despite this, the location of the site is such that there would not be the same level of wider benefits for existing communities in Uttlesford as other options. The implications of utility provision

are unknown at this stage however it is anticipated that the issues will be generally similar to other options.

- 6.15** Given that there would be no employment, retail, community or educational provision located within Uttlesford, Stebbing Parish Council fails to see how the proposed West Braintree Garden Community will promote the efficient use of resources or ensure the necessary infrastructure to support sustainable development within Uttlesford District.

To improve the education and skills of the population (Table 86, p.211)

West of Braintree – Five new primary schools are proposed as part of this development. A new secondary school is also included in this proposal.

- 6.16** As already mentioned immediately above, the proposed West Braintree Garden Community would not result in any provision of primary or secondary school facilities within Uttlesford District. Consequently, Stebbing Parish Council does not consider that the education and skills of the Uttlesford population would be enhanced. Whereas other housing provision proposals that are better related to Uttlesford's existing settlements and hierarchy would be far more capable of improving the education and skills of Uttlesford's population.

To ensure sustainable employment provision and economic growth (Table 86, p. 212-213)

West of Braintree – The site is in close proximity to employment in the town of Braintree and accessible to the city of Chelmsford. The proposal will also deliver up to 75,000 sq m employment however this will also be located within Braintree. The proposal would therefore meet the employment strategy of Braintree District Council to avoid leakage of jobs to other jobs centres, such as those in Uttlesford such as Stansted Airport. A Viability Report has allowed the following; 32,000sq.m employment space, 6,500sq.m Retail Foodstore space and 6,500sq.m for other Retail/ Leisure Space.

- 6.17** Stebbing Parish Council believes that reiterates that employment provision proposed will be to the benefit of Braintree resident's rather than Uttlesford residents. It considers that an alternative spatial strategy should be pursued, which would be of more benefit to Uttlesford's existing settlements and communities.

Recommendations made through the SA (Paragraph 9.3, p.221)

Policy SP8 – West of Braintree Garden Community - It is recommended that the Policy is expanded to include requirements for a Heritage Impact Assessment to explore the impacts of proposals on the historic environment. It is also recommended that the policy is expanded to specifically address landscape implications. It is further recommended in relation to this point, that updated landscape evidence work is prepared to inform future iterations of the Policy and Plan, or otherwise to inform the development framework / masterplan for this Garden Community.

- 6.18** Stebbing Parish Council has significant concerns regarding the potential heritage and landscape impacts that could accrue should the West of Braintree Garden Settlement go ahead.

Appraisal of the Garden Community Permutations / Options (Table 88, p.228)

“The following table appraises the above 12 options. Please note that for the purposes of this assessment, West of Braintree has also been considered a constant component in so far as it is a preferred site within Part 1 of the Braintree District Council Local Plan (within a different Housing Market Area) and is therefore largely outside the scope of this work. Where relevant, cumulative impacts of this site have been considered in the below appraisal, however in some instances it has been considered pertinent to omit it from consideration in order to focus the SA”.

- 6.19** Stebbing Parish Council is concerned that the Sustainability Appraisal has taken the West of Braintree Garden Settlement as a ‘given’ and that there has been inadequate scrutiny of its potential impacts.
- 6.20** In the light of the findings contained within the Sustainability Appraisal Stebbing Parish Council has serious misgivings about the suitability of the area identified for the construction of a new garden community. Inadequate regard has been had to the potential heritage and landscape impacts of the proposal upon Stebbing Parish.
- 6.21** Furthermore, the Parish Council considers that the focus of the proposed Garden Settlement is upon addressing Braintree’s needs, and that inadequate regard has been given to addressing the housing, employment and retail needs of Uttlesford in



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as sustainable manner as possible. Accordingly, the proposed strategy will not provide Uttlesford with the key infrastructure it requires.



7 Braintree Local Plan

7.1 It is quite evident that West of Braintree Garden Community is an integral component of the Braintree Local Plan which is due to be submitted for Examination in Autumn 2017. Stebbing Parish Council submitted representations to the recent public consultation in respect of that Local Plan which are appended to this representation (please see **Appendix 1**).

7.2 For identical reasons given in that representation, Stebbing Parish Council strongly objects to the proposals contained within the Draft Uttlesford Local Plan for the construction of a new Garden Community to the West of Braintree.



8 Conclusions

- 8.1** In conclusion Stebbing Parish Council considers that it is premature for the District Council to be asking consultees to identify their preferred approach for meeting its housing need, when serious questions remain over the housing provision target for the plan period. The Government's stated intention to publish a common methodology for assessing local authority housing needs compounds this issue.
- 8.2** In the Parish Council's opinion, the promotion of a Spatial Strategy that relies heavily upon the construction of three new garden communities when there are similar proposals being promoted in north-east Essex is unsound. It is well known that the delivery of new settlements is notoriously difficult and it is therefore highly questionable whether the District Council will be able to fulfil its housing requirements.
- 8.3** Stebbing Parish Council is firmly of the view that the proposals for the West of Braintree Garden Community are not sustainable within the meaning provided by the National Planning Policy Framework and that an alternative Spatial Strategy which is less reliant upon new settlements should be pursued.

PC/1472/NW
4 September 2017