UTTLESFORD DISTRICT COUNCIL



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Ref: UDC Reg18

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Braintree District Council Planning Policy Manager

RE: Uttlesford District Council response to Braintree District Council (Regulation 18 Stage) Preferred Options Local Plan Consultation Document

Please find a response regarding the above that is subject to confirmation by Council Cabinet on the 15th September 2016.

It should be emphasised that UDC has yet to make any decision on its own preferred option regarding allocations or new settlements. Therefore nothing in this response may or should be construed in any way as inferring any decision by UDC on its own preferred option regards allocations or new settlements. A decision on final options will be taken in due course.

Housing and Jobs growth

Braintree is committed to meeting all its own housing needs including a contingency to maintain a 5 year housing land supply over the plan period. This approach avoids pressure on Uttlesford for Braintree needs. BDC is providing sufficient housing to meet its housing and jobs needs. If it provided more housing then this may result in additional out-commuting with impacts on UDC.

UDC response

Uttlesford District Council (UDC) continues to plan to meet its full Objectively Assessed Housing Need welcoming BDCs commitment to fully meet its own housing needs and avoiding housing demands elsewhere.

Duty to Cooperate

It is noted Braintree and Uttlesford fall within different Housing Market Areas that provide the main vehicles for dealing with strategic issues. UDC is testing options with the West Essex and East Herts HMA Councils to help each meet its OAN with a view to entering an agreed position on the approach. There is effective on-going dialogue at a senior level between UDC and BDC on strategic planning issues that will continue.

UDC Response

UDC acknowledges Braintree District have taken a joint approach to DTC with joint evidence and strategy that comprises a joint plan. In particular this incorporates the potential for cross boundary new settlements to meet growth needs. UDC is testing

evidence regards different options that will inform its own decision on a preferred option. National Policy supports joint strategy/plan preparation as an effective way of dealing with DTC. UDC therefore considers that the joint strategic approach of the North Essex LPAs/North Essex Part One is helping in dealing with cross-boundary issues/positively planning the scale and distribution of growth. UDC will continue to liaise closely with BDC regarding:

- Considering evidence
- Assessing reasonable growth options/impacts of growth
- Planning for growth/assisting BDC positively plan its preferred option for growth
- Providing a joint position with BDC regards the scale and location of growth

Spatial strategy for growth

Draft Policy SP6 on the spatial strategy for North Essex makes existing settlements the main focus for growth according to scale, sustainability, and existing role. Beyond the main settlements three new Garden Communities are proposed as part of the sustainable strategy for growth.

It is noted that the proposed broad spatial strategy for Braintree District focuses new housing growth on:

- Braintree town (4000)
- Witham/A12 corridor (2000)
- Halstead (500)
- Planned new garden communities on east & west of district edges (3650)

It is noted that this follows BDCs proposed settlement hierarchy that ranks areas by order of their sustainability and constraints to new large scale growth. The largest urban areas are relatively small market towns in the wider context so a combination of settlement forms is proposed to meet need with urban extensions and new settlements.

Draft Policy SP7 sets out the principles of Garden City delivery that help to ensure sustainable growth including:

- Holistically/comprehensively planned with distinct identity
- Community/stakeholder empowerment in design from the outset
- Long-term governance/stewardship arrangements for garden communities
- Public private partnerships to improve delivery, especially infrastructure

BDC suggest a key element of the strategy are new settlements that can potentially straddle administrative boundaries. Garden communities were among a range of options preferred for growth due to the scale of development proposed, infrastructure constraints in the main settlements and deliverability. In particular they will provide a major long term supply of new homes.

UDC Response

UDC acknowledges the preferred Spatial Strategy draws from sustainable principles in the North Essex Part One including maintaining a network of linked towns in North Essex. In particular the proposed distribution is based on the strategy, constraints, evidence identified including initial assessment of the reasonable options. UDC acknowledges the Draft Sustainability Appraisal notes the garden cities are put forward as part of a wider housing allocation strategy (a range of allocations) that is essential for sustainable social and economic benefits. NPPF encourages making the best use of urban areas/ensuring rural areas have enough growth/limiting impact on the countryside. UDC supports the principle of new settlements especially where such sustainable principals/mechanisms are in the plan to support sustainable growth.

Preferred locations for growth

Draft Policy SP10 West of Braintree New Garden sets out the scale/key requirements of a new settlement. It notes a broad area of search is identified as a strategic area for a garden city with details/final number of homes to be set out in a Master plan framework, if applicable to be prepared jointly between BDC and UDC. It is proposed to incorporate:

- 2,500 homes proposed in Braintree District over the plan period
- Provision for Travellers
- Employment/Office development
- Neighbourhood centres with provision for convenience shopping, community, health, and cultural provision
- Primary schools, a secondary school, other appropriate facilities
- A high proportion of the garden community to be green infrastructure

Beyond 2033 the garden community could over a longer timeframe i.e. 30-40 years build up to 13,000 dwellings. This would provide the critical mass for services for a self-contained settlement based on major facilities. It is also acknowledged garden communities offer a long term planned solution to housing delivery providing a continuous supply of housing in LPA control. Master planning is a critical feature of Draft Policy SP10 directing/controlling the nature, form, and impact of proposals.

UDC response

UDC acknowledges the Essex Part One Key diagram/Diagram 3.3 "Location of Proposed New Garden Communities" shows broad Areas of Search for three new settlements. One Area of Search is shown West of Braintree straddling the boundary between UDC and BDC. It is therefore acknowledged that the strategic location provides the opportunity for a co-terminus new settlement on the borders of Uttlesford and Braintree Districts but without prejudice to UDC decisions on a preferred option.

UDC notes the opportunity the plan raises regarding a Master plan framework, if applicable to be prepared jointly between BDC and UDC. UDC is testing its scenarios and proposed that a hybrid be taken forward to meet its growth needs that would include a new settlement(s). A decision on final options will be taken in due course.

UDC acknowledges that place making and design quality would be based on high design standards, drawing on context and assets including Boxted Wood, the airfield, and gently sloping topography to the south. A greater understanding of these issues is required going forward. Equally, an agreed master plan would be essential for effective place making.

The new community would also address the relationship with existing communities including Stebbing Green and Stebbing in UDC. However UDC considers the role of Boxted Wood needs a greater understanding regarding:

- How proposed contiguous open space in BDC relates to Boxted Wood
- The proposed linkages/footpaths to Boxted Wood
- Careful consideration of use of land around Boxted Wood

Transport impacts

BDC has commissioned the County Council to produce assessments on major junctions in the district and those outside where impacts are anticipated. Six Development scenarios were tested for transport impacts with the best performing scenario being sites with high sustainability transport scores and the worst being sites spread across the district. It is noted that hotspots include Galleys Corner while the scale of development proposed will put the current network under pressure requiring new infrastructure and modal shift to non-car modes. More detailed transport assessment around the towns identifies viable solutions. It is noted that sites in the region of Rayne and Marks Tey are identified as having the most significant potential to improve their sustainable accessibility in terms of:

- Redirecting bus services
- Own supply of facilities such as schools and GPs

<u>UDC response</u>

Further assessment is needed for assessing impact on the highway network and implications for sustainable transport modes of the preferred scale and distribution of growth on UDC. This includes the A120 junctions and the M11 J8. UDC will continue to explore the transportation effects of options with BDC and look forward to the production of more detailed assessment of the impacts as the BDC Preferred Option progresses to submission.

Yours faithfully

Gordon Glenday Assistant Director - Planning Uttlesford District Council