

Committee: Full Council

Date: 21 April 2009

Title: Response to Government Consultation on
Eco-Towns Planning Policy Statement

Author: Roger Harborough, Acting Director of
Development, 01799 510450

Agenda Item

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Item for
Decision

Summary

- 1 At the meeting of the Environment Committee on 17 March 2009 members resolved that a robust report rebutting the North East Elsenham eco town proposal be submitted for endorsement at this Full Council Meeting. This report draws together concerns which have been raised in response to the Government's Eco Town proposals and presents alternative responses for final consideration by Members. The closing date for comments is 30th April 2009.

Recommendations

- (i) Full Council determines its response to the draft Planning Policy Statement on Eco-towns based on the contents of this report.
- (ii) Full Council selects one of the alternative responses to ensure that all the points made are internally consistent
- (iii) Full Council acknowledges that any response to meet the government's consultation deadline must be limited by the uncertainties identified in the financial viability study of the eco-towns programme commissioned by the government, the relatively early stage in the preparation of proposals reached by promoters, and on going technical study work by local authorities, involving the Environment Agency, the Highways Agency and other relevant organisations, on eco-towns and other options for accommodating growth at various scales through local development frameworks.

Background Papers

Draft Planning Policy Statement (PPS): Eco-Towns Consultation

Eco-towns Sustainability Appraisal and Habitats Regulations
Assessment of the Draft Eco-Towns Planning Policy Statement and the
Eco Towns Programme (Non-technical summary)

Assessment of the Eco Towns Programme – North East Elsenham

Financial viability of the eco-towns programme

Impact

Communication/Consultation	Consultation on the draft PPS and sustainability appraisal is a statutory responsibility
Community Safety	N/A
Equalities	Consultation being undertaken in accordance with the Government's Code of Practice.
Finance	Potential resource implications for the preparation of the LDF core strategy; Possible loss of Housing and Planning Delivery Grant if delay in progressing Local Development Documents frustrates adherence to the proposed Local Development Scheme programme
Human Rights	N/A
Legal implications	N/A
Sustainability	Sustainability Impacts are assessed as integral part of the process.
Ward-specific impacts	Elsenham and Henham with transportation impacts over a wider area.
Workforce/Workplace	N/A

Situation

- 2 This issue as been considered at several meetings to date:
- a. Full Council received an initial report on the government's eco-towns programme in April 2008 and resolved that it was totally opposed to the development of an eco-town north east of Elsenham as proposed in the consultation paper Eco-towns living a greener future and to campaign to have this proposal removed from the shortlist. It would also support objectors to other locations that would be detrimental to the district.
 - b. At the meeting of the Environment Committee in June 2008 Members resolved to respond to the government's green paper that the Council was opposed to North East Elsenham, Hanley Grange, or any substitute location in the sub regions within which Uttlesford sits, being identified in a national planning policy statement as locations that have the potential to be an eco-towns. Local planning authorities should determine through their local development frameworks whether there

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are local circumstances that would favour an eco-town as an appropriate way of delivering housing to meet identified needs and achieving quality in the built and natural environment. The process of preparing a national Planning Policy Statement (PPS) and encouraging the submission of planning applications was being rushed, risking inadequate assessment of all the implications.

- c. At the meeting in November 2008 members welcomed the proposed change in the draft PPS which would allow the Local Planning Authority to decide through the Local Development Framework process whether a short listed eco-town was the most appropriate way of accommodating growth in the District.
 - d. In March 2009 the Environment Committee considered potential responses to some of the questions raised by Department of Communities and Local Government (DCLG) in the draft eco-town PPS.
- 3 The rest of this report considers in detail how the Council might respond to the PPS. The table below paragraph 3 is in two sections. The first looks at the general standards in the draft eco-town PPS and suggests an appropriate response based on Members' previous discussions with some additional officer comments. The second section of the table looks at the Sustainability Appraisal and key sustainability issues which have been identified for the Elsenham site: water resources, use of agricultural land, capacity of local roads, local roads unsuitable for walking or cycling, potential to change the setting and character of historic villages. Where relevant, the report considers four alternative ways of responding to the government:
- 1 Reiteration of the Council's objections that national planning policy statements should not seek to identify potential locations for eco-towns. The PPS should confine itself to providing support to high standards being set by local planning authorities in their local development frameworks for carbon emissions, climate change adaption, affordable homes, employment, accessibility and transport, local services, green space, habitat creation for biodiversity, water efficiency, flood risk management and waste, if the local authority identifies that an eco-town would be the most appropriate of all the reasonable alternatives. It should support local planning authorities in rejecting planning applications for proposals that do not meet exemplar standards which are "challenging and stretching".
 - 2 Objections to North East Elsenham being identified as a potential eco-town location because of the additional impacts arising from the an eco-town of 5,000 homes compared to a sustainable development of 3,000 homes, jobs, services and facilities as a strategic element of the Council's LDF Core Strategy Preferred Option.
 - 3 Objection to North East Elsenham as a strategic development location. This would endorse the arguments set out by the local communities and

other parties against Elsenham as a location for an eco-town of 5,000 homes. This approach would inevitably constrain the choices open to the Council in deciding what ultimately to propose in its local development framework core strategy.

- 4 Support for the draft PPS including its identification of North East Elsenham as a potential eco town location on the basis that: A) the Council has proposed the location for a new settlement which can be developed in a sustainable manner designed from the start as a public transport orientated settlement providing significant affordable housing, employment, the necessary infrastructure from its early stages incorporating renewable energy and low carbon technologies. Its scale makes such technology viable. B) The promoter of the eco-town proposal has indicated in its submissions to DCLG that its phasing plan includes the delivery of 250 homes a year from 2013. That means 2,750 homes by 2024, and 5,000 homes by 2033, compared to the LDF Preferred Option of 3,000 homes in this location by 2024. The location could accommodate growth needs beyond 2024.

Response to DCLG - Section 1

General Eco Towns Issues and Standards

<p>Q1. Does the draft Planning Policy Statement provide sufficient guidance on the consideration of eco-towns through the plan making process?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p><i>Yes. It is essential that the PPS retains the statement that there is no requirement to allocate an eco-town in a core strategy if a better way of meeting future need exists. National planning policy statements should not seek to identify North East Elsenham or anywhere else as potential locations for eco-towns. It should be for a local planning authority to determine whether, in the local context, an eco-town in a particular location or locations represents a reasonable alternative to other options for growth that the LPA might be considering through the Core Strategy.</i></p>	<p>1 and 3</p>
<p><i>Yes. It is essential that the PPS retains the statement that there is no requirement to allocate an eco-town in a core strategy if a better way of meeting future need exists. It is essential any eco-town location listed in the PPS should be assessed alongside any other options for growth that the LPA might be considering through the Core Strategy and that the Adopted Plan should set out the most appropriate strategy</i></p>	<p>2 and 4</p>

<i>when considered against the reasonable alternatives.</i>	
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Q2. Are the locational principles for eco-towns sufficiently clear and workable?	Answer to be used in response type 1/2/3/4 (see paragraph 6 above)
<i>The locational principle that eco towns should develop unique characteristics by responding to the opportunities and challenges of their location and community aspirations is supported. This is consistent with LDF core strategies determining if an eco-town is the most appropriate strategy for development.</i>	1,2,3 and 4
<i>It is agreed that, in identifying suitable locations for eco-towns, consideration should be given to: a) the proximity of the proposed eco-town to a higher order centre(s) where there is clear capacity for public transport links to that centre; b) the proximity of the eco-town to existing and planned employment opportunities; c) where the eco-town can play an important role in delivering other planning, development and regeneration objectives.</i>	1,2,3 and 4
<i>It is not agreed that criterion d) the Eco-towns programme should be considered. As in the response to Q1, the Council is firmly of the view that national planning policy statements should not seek to identify potential locations for eco-towns.</i>	1,2, and 3
<i>It is agreed that the location for an eco-town should have the capacity to accommodate a new settlement of between 5,000 and 20,000 homes.</i>	1,2,3 and 4
<i>It is agreed that eco towns may be appropriate when they are separate and distinct but well-connected to existing settlements, particularly major centres of employment, retail and leisure. However, the exclusion of urban extensions to such higher order centres as eco town locations is a missed opportunity by the draft PPS. The European exemplar schemes in the Green Paper included developments that have managed to achieve the necessary distinctiveness and self containment as sustainable neighbourhoods without separation from large urban areas.</i>	1,2,3 and 4

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<p>Q3. Taking overall the standards set out in the draft PPS do you think that they achieve a viable eco-towns concept?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p><i>The viability study by Price Waterhouse Cooper indicates by analysis of the Fairfield Partnership's proposals for North East Elsenham, even in high housing market demand areas (under pre 2007 market conditions), the importance of assumptions about build costs in meeting the required housing standards (Building for Life Silver standard and Code for Sustainable Homes Level 4 as a minimum), and sales values. The viability of the scheme may vary significantly depending on the assumptions made. It is agreed that the current assessment can only illustrate potential. It is noted that there are several areas of concern which need further investigation. Two represent significant risks to the development going forward. These are the promoter's low build costs and on site transport sums assumed. The obligations that would be necessary to address impacts and deliver the sustainable development envisaged could result in costs at the high end of the range tested, and sales revenue might not match expenditure, especially if the housing market does not recover to its 2007 heights, leading to the risk of a deficit. This underlines the importance of concluding the site specific transport assessment work and water cycle study before determining the deliverability of an eco-town location.</i></p> <p><i>Price Waterhouse Cooper has carried out adequate sensitivity testing to demonstrate that an eco-town at North East Elsenham has the potential to generate sufficient value to cover the direct and indirect costs of delivering the scheme without recourse to public subsidy over and above existing public sector funding sources such as social housing grant. As one of the two closest locations listed in the draft PPS to London, this is not surprising. It is anticipated that the costs of building to eco-town standards and providing the necessary facilities and infrastructure will be reflected in the land costs paid by the developer to land owners.</i></p>	<p>1,2, and 3</p> <p>4</p>

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<p>Q4. We would like your views on the Government's proposed standards for eco-towns, in particular:</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6</p>
<p>Q4.1 Do you consider that the standards provide a clear basis on which to make decisions on planning applications for eco-</p>	<p>1/2/3/4 (see paragraph 6</p>

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towns?	above)
<i>It is essential that the PPS should support local planning authorities in rejecting planning applications for proposals that do not meet exemplar standards that are challenging and stretching. Generally the eco town standards proposed are supported but there are concerns about their deliverability. It is not clear from the draft PSS what safeguards are in place and what measures might be available to a Local Planning Authority to make sure the standards would be achieved and the benefits would be delivered throughout the lifetime of the development. It is essential that if the obligations do not deliver the expected outcomes in terms carbon gas emissions, trip generation, employment, self sufficiency and containment, robust enforceable mechanisms would be available to bring back the effects on track.</i>	1,2,3 and 4

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Q4.2 Do you consider that the cost of implementing the standards will undermine the viability of eco-towns?	Answer to be used in response type 1/2/3/4 (see paragraph 6 above)
<i>See response to Q3 above</i>	1,2,3 and 4

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Q4.3 Are there any standards that you feel are missing? (That are not covered in other Government policy or guidance)	Answer to be used in response type 1/2/3/4 (see paragraph 6 above)
<i>No</i>	1,2,3 and 4

Q4.4 Are any of the standards not essential?	Answer to be used in response type
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	1/2/3/4 (see paragraph 6 above)
<i>No, eco-towns are meant to be exemplar developments</i>	1,2,3 and 4

<p>Q4.5 The zero carbon standard attempts to ensure that carbon emissions related to the built environment in eco-towns are zero or below. Have we specified the calculation of net emissions clearly in a way that avoids perverse incentives and loopholes? Is this standard the most cost effective way to do this?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p><i>While agreeing that eco-towns and, indeed, all new development should achieve the maximum possible carbon reduction, the definition of zero carbon for the site and the individual dwelling standards of 70% improvement on Part L 2006 would seem to leave room for use of fossil fuel for heating in the eco-town, provided that this is offset by exports of zero-carbon electricity or heat. This potential for at least partial fossil fuel reliance seems a little at odds with the 'Eco-town' concept. Also, to achieve the standard, there will be a need for a large amount of renewable electricity to be supplied on-site, and possibly biomass fuelled heating plant. In the absence of technological breakthroughs, this raises the question of viability of proposals/sites because of the physical limitations of:</i></p> <ul style="list-style-type: none"> ▪ <i>accommodating enough photovoltaic panel area</i> ▪ <i>accommodating large wind turbines/having great enough wind speeds</i> ▪ <i>biomass supply in the area</i> <p><i>As the new DEFRA consultation on Zero-Carbon indicates, the government is seeking to include greater flexibility for off-site solutions to achieve a net-zero carbon standard in new dwellings by 2016 and all buildings by 2019. It is important to set a higher standard for eco-towns of achieving zero-carbon fully on-site, for all buildings, potentially ahead of the national schedule. However, the fact that there is a national timetable for all built environment to be zero-carbon does reduce the significance of eco-towns in this regard, and therefore increases the importance of reducing transport emissions and the eco-towns' other objectives such as quantity and quality of green space, opportunities for space within homes,</i></p>	<p>1,2,3 and 4</p>

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<p><i>promotion of healthy living choices, housing mix and economies of scale and increases in land value to deliver transport infrastructure and community facilities.</i></p> <p><i>In relation to carbon mitigation there appears to be a contradiction and it is not clear whether or not off-site solutions are going to be allowed. 'Off-site' suggests any carbon saving device or measure which is not directly within or connected to the town. As mentioned above if the zero-carbon standard for built environment in eco-towns is the same as the national standard, it begs the question what is special about eco-towns in terms of energy efficiency, and turns the focus onto their other qualities.</i></p>	
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<p>Q4.6 The climate change adaptation standard, alongside existing planning guidance, aims to ensure that eco-towns will be more future-proof. Is it sufficiently clear and workable?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p>Yes</p>	<p>1,2,3 and 4</p>

<p>Q4.7 Should the PPS be more prescriptive than set out in paragraph 4.9 (e) in relation to energy efficiency? Do you agree that 70% is an appropriate level of carbon mitigation through on-site means?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p>See response to Q4.5 above</p>	<p>1,2,3 and 4</p>

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<p>Q4.8 Is this employment standard sufficiently clear and workable?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p><i>The importance of residents having access to local employment opportunities and keeping unsustainable commuter trips to a minimum is agreed. However, even if the employment opportunities generated by the allocation of new</i></p>	<p>1,2,3 and 4</p>

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<p><i>sites, provision of serviced accommodation and the facilities within the development such as schools and shops theoretically meet the required standard of 1 job per dwelling, it is unlikely the LPA can influence employers' decisions or residents' choice to the extent that the types of jobs being provided will match the potential age/skills mix of residents so exactly that that no unsustainable commuting will result. The London jobs market will inevitably continue to be a strong draw.</i></p> <p><i>There is a risk that the Elsenham location could compete with Harlow for business investment, undermining its regeneration.</i></p>	<p>1,2 and 3</p>
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<p>Q4.9 The transport standard attempts to support people's desire for mobility whilst enabling low carbon living. Is it sufficiently clear and workable?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p><i>It is important that walking, cycling and public transport are available to residents from first occupations so that they do not need to rely on the private car for all trips.</i></p> <p><i>It is important that walking, cycling and public transport are available to residents from first occupations so that they do not need to rely on the private car for all trips. Travel plan targets that 50% of trips originating in eco-towns be made by non-car means are, however, unlikely to be achieved. This would be unprecedented in a rural Essex context.</i></p>	<p>1,2 and 4</p> <p>3</p>

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<p>Q4.10 The local services standard allows flexibility to reflect existing local provision and the size of the development. Does it cover the essential services which will be needed in eco-towns?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p><i>Yes – all types of facilities which might be expected in a new settlement are mentioned.</i></p>	<p>1,2,3 and 4</p>

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<p>Q4.11 The standards proposed on green infrastructure and biodiversity aim to ensure that development is undertaken in such a way that it protects and enhances the best features of local landscapes for the benefits of both people and wildlife. Are these standards reasonable and deliverable?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p><i>While the standards relating to green infrastructure and biodiversity are supported, experience on other large scale developments within the district suggests that the amount of green space in the final development is often less than that shown in the original master plan as the development evolves and subsequent revisions are made. The statement in Para 4.31 of the draft PPS that there should be a presumption in favour of the original master plan is therefore supported.</i></p>	<p>1,2,3 and 4</p>

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<p>Q4.12 The water and flood risk standards aim to ensure that eco-town developments are planned to that they will minimise water use and flood risk, and raise quality. Are the standards proposed clear and deliverable?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p><i>Making a development as water efficient as possible and reducing flood risk to a minimum should be a key element of the eco-towns programme. Water efficiency and flood reduction measures would need to be embedded in the concept of the development from the start. However, requiring all eco-towns to be water neutral will be challenging. Uttlesford is an area of water stress and has high levels of household water consumption which may, in part, be due to the relative affluence of the population. The means required to achieve water neutrality within the development would be likely to involve the use of new technologies and approaches which might reduce the appeal of the homes to future purchasers, therefore affecting viability. The success of this strategy also relies on the retrofitting of water efficient products in existing buildings and other measures within the water resource zone. These measures are only likely to be carried out if the water companies can secure funding through their programme plans and it is unlikely that this will be achieved, certainly not in the short term.</i></p> <p><i>Making a development as water efficient as possible and</i></p>	<p>1,2, and 3</p>

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<p><i>reducing flood risk to a minimum should be a key element of the eco-towns programme. Water efficiency and flood reduction measures would need to be embedded in the concept of the development from the start. Requiring all eco-towns to be water neutral will be challenging. Uttlesford is an area of water stress and has high levels of household water consumption which may, in part, be due to the relative affluence of the population. Concentrating new development in an eco-town, however, would be likely to achieve more efficient use of water resources than other options for growth.</i></p>	<p>4</p>
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<p>Q4.13 The waste standard aims to ensure that eco-towns manage their waste effectively from their construction onwards. Is the proposed waste standard a clear and workable way of doing this?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p><i>The draft PPS refers to the need for a sustainable waste and resources plan, outlines its scope and refers to the need to “demonstrate how these targets will be achieved, monitored and maintained”. The recognition that ongoing action and further interventions may be necessary is welcome, but there is a difference between a plan demonstrating how those targets will be maintained and actually ensuring delivery for the lifetime of the development.</i></p>	<p>1,2,3 and 4</p>

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<p>Q4.14 The transition and development standard should ensure that initial residents will not live in un-serviced and isolating building sites. Does it get the balance right between supporting initial residents and enabling developers the flexibility they need to build and grow the town?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p><i>This is a concern which has been raised locally. Residents of existing communities and potential eco town residents need certainty that the facilities required will be delivered and in a timely way so that existing services are not overwhelmed. There is some question whether the arrangements set out in 4.32 would deliver this without any indication of the enforceable mechanisms which the LPA might bring to bear should these not come about. This particularly applies where third parties need to be involved in delivery.</i></p>	<p>1,2,3 and 4</p>

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<p>Q4.15 The community and governance standard attempts to ensure: that eco-towns will be successful communities; that residents will have a say in how their town is run; and that standards are maintained. Is this standard clear and workable?</p>	<p>Answer to be used in response type 1/2/3/4 (see paragraph 6 above)</p>
<p><i>The arrangements set out seem to allow for some flexibility for new approaches e.g. co-operatives, which is welcomed. It is important that existing local communities e.g. parish and local councils are also involved in the process as well as the occupants of new homes.</i></p>	<p>1,2,3 and 4</p>

Section 2

Comments relating to the Sustainability Appraisal and Habitats Regulation Assessment for North East Elsenham

<p>Location Within a Water Stressed Area</p> <p><i>Type 1,2,3 and 4 responses:</i></p> <p><i>Three Valleys Water is under an obligation to provide a water supply to new development in Uttlesford. Information provided so far as part of the water cycle study for the District has indicated that water supply infrastructure in the District is at the extreme edge of Three Valleys Water’s operating area and the supply network is relatively small and “rural in nature”. However the network capacity improves towards the western side of the district, and developments to the west of the District are likely to require lower levels of infrastructure improvement, with consequent lower costs - this is an initial high level qualitative assessment and further work is ongoing.</i></p>			
<p><i>Type 1 response:</i></p> <p><i>No decision should be made about the suitability of this site to accommodate this large scale</i></p>	<p><i>Type 2 response:</i></p> <p><i>2,000 additional homes will increase water use. More detailed study work is needed on the quality and</i></p>	<p><i>Type 3 response:</i></p> <p><i>Elsenham is a poor location in terms of water quality since the site is at the headwaters of 3 water courses.</i></p>	<p><i>Type 4 response:</i></p> <p><i>In terms of water quality the scale of the eco-town could make pre-treatment on site a more</i></p>

<p><i>development in terms of water supply and waste water treatment until a water cycle strategy has been completed. The most appropriate way for this to be assessed is through the LDF.</i></p>	<p><i>capacity of the water courses and the nearby treatment works and the viability of pre treatment on site</i></p>	<p><i>More detailed study work is needed on the quality and capacity of the water courses and the nearby treatment works</i></p>	<p><i>viable proposition. More challenging standards could result in more re-use of water on site.</i></p>
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Greenfield Location comprising Best and Most Versatile Agricultural Land

<p><i>Type 1 response:</i></p> <p><i>The most appropriate way to assess the significance of this is through the LDF process where the extent of the losses and the quality of the land and the landscape at Elsenham can be properly assessed against the impacts of the other reasonable options.</i></p>	<p><i>Type 2 response:</i></p> <p><i>Additional land take to the north of Old Mead Road to deliver 5,000 homes as opposed to the 3,000 in the Council's Core Strategy Preferred Option would result in further loss of greenfield land, which is best and most versatile farmland.</i></p>	<p><i>Type 3 response:</i></p> <p><i>Good quality agricultural land should be preserved. Providing green infrastructure within the development and as a green wedge around the development is not appropriate mitigation for the loss of this valuable resource.</i></p>	<p><i>Type 4 response:</i></p> <p><i>Development which embodies all the eco town standards would deliver a more sustainable form of development making better use of the available land.</i></p>
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Impact on the setting of Henham's historic core

<p><i>Type 1 response:</i></p> <p><i>The most appropriate way to assess the significance of this is through the LDF process where the impact on the setting of</i></p>	<p><i>Type 2 response:</i></p> <p><i>Development north of Old Mead Lane would inevitably impact on the approach to the Henham village conservation area.</i></p>	<p><i>Type 3 response:</i></p> <p><i>There will inevitably be impacts on the approaches to the village conservation area and views out of the village over its setting. Henham is</i></p>	<p><i>Type 4 response:</i></p> <p><i>There will be no direct effects on the historic core of Henham. Elsenham developed in the post medieval and modern periods.</i></p>
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<p><i>Henham's historic core can be properly assessed against the impacts of the other reasonable options, including their potential impact on the exceptional historic interest of the District generally and the effects of locating development elsewhere on its character.</i></p>		<p><i>highly characteristic of the Essex settlement pattern. Such a major development as an eco-town will change the historic settlement pattern of the area. There is aerial photographic evidence of archaeology (an enclosure site) with the eco-town location.</i></p>	
<p>Capacity Constraints of the Local Road Network leading to the potential for congestion and pressure to upgrade and widen rural lanes</p>			
<p><i>Type 1, 2,3 and 4 responses:</i></p> <p><i>Transport is an important issue in relation to the Elsenham site. The Highways Agency and Essex County Council are still discussing the transport assessment with consultants acting for the Fairfield Partnership and reaching agreement on the trip generation assumptions, network flows and effect of mitigation measures. Further work, including agreement on the necessary sensitivity testing, is required to show that Elsenham can meet the standards required. It is important to note no conclusion has been reached as to whether either 3,000 or 5,000 homes could be accommodated on the existing road network in the Elsenham location were appropriate mitigation measures to be introduced.</i></p>			
<p><i>Type 1 response:</i></p> <p><i>Comparative transport assessment work being carried out as part of the LDF Core Strategy preparation will enable the transport impacts of an eco-town at Elsenham to be compared with the impacts of other</i></p>	<p><i>Type 2 response:</i></p> <p><i>The additional trips likely to be generated by development at 5,000 rather than 3,000 homes would increase the risk of congestion at key junctions on the local network.</i></p>	<p><i>Type 3 response:</i></p> <p><i>The site is connected to higher order centres and the strategic highways system by a rural road network. The route preference of the existing community is through Stansted Mountfitchet where traffic flows are</i></p>	<p><i>Type 4 response:</i></p> <p><i>Concerns about the nature of the local road network for access to the location need to be balanced against its rail access potential. There is likely to be a business case for investment on the West Anglia Main Line in the period beyond 2014 to</i></p>

<p><i>reasonable growth locations.</i></p>		<p><i>restricted.</i></p> <p><i>There is no commitment to rail capacity enhancements, notwithstanding the government's programmes and plans, that would ensure that Elsenham benefited from an improved rail service.</i></p>	<p><i>provide sufficient capacity for long term growth across all its rail passenger markets, and further improvements to services beyond those already committed. These commitments are set out in the High Level Output Statement setting targets for 2009 to 2014. The plan is that investment in additional carriages will provide for 12 car trains in the peak on services between Liverpool Street and Cambridge. It is noted with particular interest that the DfT's WAML Progress Report March 2009 states in relation to the longer term development strategy there is an opportunity to provide "more frequent stops at those stations south of Cambridge where significant spatial growth is forecast over the long term". The indicative train service that could be operated between Cambridge and Liverpool Street is 4 tph in the peak.</i></p>
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			<p><i>The forecasts of passenger demand are a key driver for improvements and are based on regional demand growth, incorporating planned growth in Harlow and Uttlesford, as set out in the East of England Plan.</i></p>
<p>Unsuitability of local roads for walking and cycling</p>			
<p><i>Type 1 response:</i></p> <p><i>The appropriate weight to attach to this factor should be determined through the LDF Core Strategy. It will be a factor affecting other options for growth.</i></p>	<p><i>Type 2 response:</i></p> <p><i>There would be new opportunities for cycle ways and footpaths to be developed to link the housing to jobs, shops and schools and also the new transport interchange at the railway station. Recreational cycling and walking opportunities could be provided in the open space around the eco-town.</i></p>	<p><i>Type 3 response:</i></p> <p><i>Use of cycling and walking for local trips to work, social or recreational purposes beyond the eco-town by both its residents and those of existing communities would be discouraged if Elsenham were to be chosen as a potential location.</i></p>	<p><i>Type 4 response:</i></p> <p><i>There would be new opportunities for cycle ways and footpaths to be developed to link the housing to jobs, shops and schools and also the new transport interchange at the railway station. Recreational cycling and walking opportunities could be provided in the open space around the eco-town.</i></p>

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ii) Habitats Regulations Assessment

Type 1,2,3 and 4 responses:

In relation to Para 3.2.4. on water resources it is not clear why there is reference to numbers of homes in Braintree district when Elsenham is within Uttlesford District. It appears that the Elsenham site might have been assigned to the wrong catchment. Uttlesford is supplied by Three Valleys Water but Colchester and Braintree are located within the Anglia Water supply area. Work that the Council has done so far on the water resource implications of a large scale development to the North East of Elsenham has not indicated any link with the Ardleigh Reservoir and the Colchester

*Sewage Treatment Works and has therefore not identified any potential impact on the Colne Estuary or Essex Estuaries SAC. This is unlikely to be a favoured supply option because of the distance that the water would need to be pumped and other potential environmental implications. The assessment needs to consider all options and this option may have been included because **if** it were to be considered it **may** have an impact on a European site. It may, alternatively, have been included in error, so this needs to be clarified.*

Risk Analysis

Risk	Likelihood	Impact	Mitigating actions
By objecting to Elsenham as a strategic location for large scale new housing development the Council risks prejudicing its preferred option for the Core Strategy.	3 The Council would need be consistent in the judgements it makes both in responding to the Eco-towns PPS and deciding on the elements of its LDF core strategy.	4 Significant delays in achieving a sound core strategy. Prolongs uncertainty for the communities within the District who may be affected by the Elsenham proposal or any of the other possible alternative locations. Risk of planning by appeal with an increasingly dated policy framework within which to determine major planning applications.	That the Council protects its position by choosing the type of response above which focuses on rejecting the selection of eco-town locations in a national PPS, or supports the eco-town and does not raise objections in principal to Elsenham as a strategic location for new housing.
A planning application for the North East Elsenham eco-town proposal is submitted by its promoters before the LDF core strategy is submitted	2 The promoter's proposals are still at an early stage of development. The likelihood of an application being submitted before the LDF is settled will also depend on whether any national PPS that	4 Determination of a planning application for such a strategic development would undermine significantly the purpose of the LDF Core Strategy.	Oppose the identification of potential eco-town locations in the PPS. Maintain progress in preparing the LDF Core Strategy

Response to draft Eco towns PPS

Full Council, Item 8ii

	<p>is approved identifies potential locations, and if so Elsenham's inclusion on the list. It will also depend on the promoter's assessment of whether a controversial PPS is likely to be withdrawn before any application could be determined.</p>		
<p>Risk of ad hoc planning by appeal contrary to the will of the Council because of an increasingly dated policy framework within which to determine major planning applications. Risk of planning applications for alternative new settlements.</p>	<p>2 - Five year land supply currently exists. Proposals still at an early stage in development, but we are receiving major applications. Developers are also anticipated to be seeking consents so that sites are available for delivery when market conditions do improve.</p>	<p>4 - Planning by appeal would frustrate comparative assessment of impacts</p>	<p>Maintain progress in preparing the LDF Core Strategy</p>

1 = Little or no risk or impact

2 = Some risk or impact – action may be necessary.

3 = Significant risk or impact – action required

4 = Near certainty of risk occurring, catastrophic effect or failure of project.