



**Public Participation on a Development Plan Document
Uttlesford Local Plan**

**Consultation on Additional Housing Numbers and Sites
18 November 2013 – 13 January 2014**

**Report of Representations,
Officer Comments and Recommendations**

Introduction

Consultation on the additional housing numbers and sites took place between 18 November 2013 and 13 January 2014, a total of 8 weeks.

3800 comments were received from 1276 people. Of the 3800 comments 23% were on question 1 on the plan period; 31% on question 2 on the number of houses; 12% on the policy for Ashdon Road Commercial Centre; 4.5% on the policies for land west of Great Dunmow/South of Stortford Road and adjacent to Buttley's Lane; 4.5% on the policy for Helena Romanes School site; and 25% on the policies for land north east of Elsenham.

This document summarises the representations and sets out officers' views and recommendations.

Summary of Recommendations

Question 1

No change - Pre-submission Draft Local Plan to be prepared for the period 2011 – 2031

Question 2

No change to the assessment of objectively assessed housing need and the requirement to provide 10,460 dwellings between 2011 and 2031.

Continue working proactively and constructively with neighbouring authorities and prepare and agree a memorandum of understanding with East Herts DC.

Update the Windfall Allowance background paper.

Consider extending the development limit around Helena Romanes School site to include land south of Graces Wood.

Question 3

Subject to the findings of the additional Highways Impact Assessment work no changes are proposed.

Question 4

Amendment to supporting text and policy in relation to the medical centre

Final recommendations will be made when the Highways Impact Assessment work has been completed.

Question 5

Subject to the findings of the additional Highways Impact Assessment work no changes are proposed.

Amend site boundary to reflect extent of school site

Question 6

Amendment to policy in relation to the medical centre

Final recommendations will be made when the Highways Impact Assessment work has been completed.

No changes are proposed to the Site Allocation Policy 6 – Land to the east of Old Mead Lane.

Question 1

Are there any reasons why the Council should not comply with government policy and prepare a plan for 15 years after it is adopted? Please clearly explain your reasons, set out what plan period you think is appropriate and explain how this can be justified against government guidance as set out in the NPPF.

This question was responded to by 896 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to http://uttlesford-consult.limehouse.co.uk/portal/planning_policy/ahns/ahns

NHS Property Services Ltd (NHSPS) has no objection to the proposed amendment to the Plan period.

English Heritage does not wish to comment on the assessment of housing numbers other than to note that it is clearly essential that the Local Plan is NPPF compliant. We note that the Council considered delaying the Local Plan review until the outcome of the Davies Review on Airports was available and rejected this. In view of the present uncertainty about the growth of Stansted airport, it may be appropriate to phase any housing requirement associated with future growth of the airport as a pragmatic approach.

Chelmsford City Council agrees that the plan should cover the period 15 years from the anticipated date of adoption.

Clavering Parish Council No reasons are noted why the Council should not comply with government policy and prepare a plan for 15 years after it is adopted.

Debden Parish Council considers that the plan should only be for 15 years up to 2030 and not 16 years up to 2031.

Elsenham Parish Council and **Henham Parish Council** consider that as the Plan is to be adopted in February 2015, 15 years is to March 2030 why is the Plan period up to 2031? If 15 years post adoption is correct then the plan period should be a maximum of 19 years but preferably less because of major uncertainty The NPPF does not make 15 years a definite requirement. Major changes to the nature of Uttlesford e.g. Stansted Airport could justify a 10 year Plan period for now.

Gt Chesterford Parish Council considers that taking account of the proposals contained in the earlier Draft Plan and subsequent consultation (June 2012) and the additional requirements now imposed by Government, that the proposals contained in the Consultation Document represent the least worst options available in the circumstances. The Parish Council accepts that Uttlesford District Council has no option but to comply with Government policy.

Great Dunmow Town Council considers that the Council should comply with government policy. The NPPF states (Policy 47)) that 'local planning authorities should identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15'. This document extends the life of the plan by 5 years from 15 to

20 years, hence 5 more years of housing provision at 523 planning consents per year. Why is this necessary? The Town Council would argue that a 15 year plan would be sufficient, and accordingly these additional houses are not necessary.

Saffron Walden Town Council considers that the district council should comply with government policy in preparing its local plan. The local plan fails to take account of longer term requirements adequately as there is no justification for the large strategic allocation between Elsenham and Henham being allowed to expand in the future to continue to meet housing requirements beyond the current plan period; all of which means that the local plan should be recommenced and prepared in accordance with the sustainability principles set out clearly in the Framework having full regard to:-

- the current settlement pattern including all of the major development proposals which have recently received planning permission which together will influence the nature of that settlement pattern;
- an updated evidence base which encompasses the findings of the Strategic Housing Land Availability Assessment, the most recent Strategic Housing Marketing Assessment, the Uttlesford Local Plan Highway Impact Assessment : Assessment of Highway Impact of Potential Local Plan Sites of October 2013 which must be updated to reflect the subsequent grant of planning applications for major developments and the most recent forecasts of population growth; and
- the need for the plan to both remain flexible (in order for it to be able to respond to changing circumstances) and the need to take account of longer term requirements (which should entail these two factors being inextricably linked such that the rate of development in what is demonstrated to be the optimum location is simply varied so as to meet the level of identified need within a particular timescale as necessary)

Takeley Parish Council states that it is completely unfair to ask people to provide an alternative plan.

Thaxted Parish Council agrees that the Council should prepare a plan however its scope should be determined locally.

The **Essex Branch of Campaign to Protect Rural England** are concerned that extending the time span of the plan has an almost automatic effect on increasing the numbers of houses in the plan This increase in housing availability will attract migration in from the surrounding area, not because of an intrinsic District need but because houses are available and the district is a pleasant place to live.

The **Parsonage Downs Conservation Group** has no issue with the Council preparing a plan for 15 years. The only issue we have is over the impact which the size of the developments has on the historical towns in the region.

We Are Residents support UDC choosing now to comply with their legal obligations and adopting a 15 year plan.

The majority of the responses from **residents** were based on the standard response compiled by the Joint Parish Council Steering Group of Elsenham, Henham, Ugley and Stansted. These responses raised three points

- The Plan is to be adopted in February 2015, 15 years is to March 2030 so why is the Plan period up to 2031 - 16 years?
- If 15 years post adoption is correct then the plan period should be a maximum of 19 years but preferably less because of major uncertainty.
- The NPPF does not make 15 years a definite requirement. Major changes to the nature of Uttlesford e.g. Stansted Airport could justify a 10 year Plan period for now.

Other points raised by respondents are that there is no evidence to justify that the Government would not have accepted a different plan period. Whilst conversely, others comment that there is no reason why the council should not comply with government policy with a plan period of 15 years or longer. A number of respondents are concerned about the backdating of the plan. Another respondent states that it's not the period that is important it's the detail over that period that's of greater significance.

One view put forward is that 15 years is not stipulated by the NPPF and is too long and will not allow for any substantial changes within the Uttlesford district to be taken into account such as the uncertainty with regard to Stansted expansion and pressure on housing in the Saffron Walden area due to its proximity to Cambridge. An opposing view is that to plan only for the next 15 years is significantly short-sighted. Because the population of Greater London is increasing at a very high rate, and will continue to do so well into the 21st Century, there will be a parallel demand for housing in the rest of the south-east of England. This will also continue well into the 21st Century. The District Council needs a plan - a TOWN planning strategy - for the next 50 years, similar to the New Towns initiative of the post-War years. Another view is that any plan should project forward and not have a finite cut-off date.

Some respondents consider that the Plan lacks meaningful detail in the following main areas.

- It fails to demonstrate compliance with paragraph 17 of the NPPF, the 12 Core Planning Principles.
- It fails to comply with paragraph 25 of the NPPF as it does not show how UDC will ensure the vitality of Town Centres, in particular, Great Dunmow and Saffron Walden.
- It fails to comply with paragraph 38 of the NPPF as it fails to show mixed use for most of the site allocations mentioned in it and makes no provision anywhere in the district for work and employment on site.
- It sets out no proposals for electronic communications networks and so fails to comply with paragraph 33 of the NPPF.
- It fails to mention paragraph 52 of the NPPF in any of its proposals for large scale development in Great Dunmow, Elsenham and Saffron Walden, and indeed it seeks to avoid compliance with this requirement by breaking these down into smaller scale phases.
- It fails to show any realistic measures for Promoting Healthy Communities as required by Section 8 of the NPPF.
- It fails to set out any firm Flood Control measures as required by section 10 of the NPPF.

- It fails to set out in detail any proposals for the Natural Environment as recommended at section 11 of the NPPF.
- It fails to mention when appropriate to do so any measures to ensure Land Stability as required by paragraph 120 of the NPPF. For example 11 hectares of land (20% of the total site area) at the West of Woodside Way allocation is directly affected by this paragraph yet the LP is silent on the matter.
- It fails to deal in the round with the three key elements of Local Planning, namely the Economic, Social and Environmental aspects of the process.
- It contains no proposals for linking the building of new homes to the creation of new jobs in the District. Without these key elements, paragraphs 151 and 152 of the NPPF makes it clear that sustainable development cannot be achieved and the aspirations of the local community will not be met. Paragraph 157 of the NPPF is worth special mention. It stipulates that Local Plans should, crucially- Plan positively for infrastructure in the area; there are no such positive plans, merely an incomplete, project by project wish list of section 106 requirements that the Council will not be able to enforce.
- The phasing out of section 106 and the enforcement of CIL is not mentioned in the current draft. The implication of this is, notwithstanding the Councils wish list mentioned above, from April 2015 onwards (unless its acts to reverse its decision of spring 2013) it will have no effective means of collecting any money at all from developers therefore no means of paying for any of the infrastructure projects it hopes to carry out.
- Be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations. The current plan is silent on how this is to be achieved.
- Concerned about provision of infrastructure and that the Council is relying on S106 to deliver this.

A number of the representations make general points about starting the plan again, looking at the evidence, listen to parish councils, town councils and residents, planning properly for infrastructure and not just focus on where to dump houses.

The representations made by **developers/landowners** support a plan covering a minimum of 15 years from the date of adoption. The overall response is that UDC is correct to take a cautious approach and plan up to 2031, which provides the flexibility to maintain a minimum 15-year plan period, should adoption slip from 2015 into 2016. It was noted that a plan period to 2031 is also consistent with two other adjacent authorities, East Herts and South Cambridgeshire, who are currently at a similar stage of preparing new local plans. It was also pointed out that the Council needs to ensure that appropriate monitoring and contingency measures are in place to address any potential failure to meet the housing requirement. This flexibility is crucial if the plan is to be effective over its lifespan.

Officer comment

The Council is proposing a plan with a plan period of 20 years covering the period 2011 to 2031. Under the Council's current Local Development Scheme, adoption is estimated as February 2015. However the timetable can change not only as a result of decision by the Council but following submission the timetable is dependent upon the Planning Inspectorate. The timetable only needs to slip by 2 months and the adoption falls within the following year in relation to the housing trajectory which uses the financial year as opposed to the calendar

year. Therefore by extending the plan period post adoption by 1 year to 16 years safeguards against having to suddenly allocate sites for an additional year.

Backdating the plan to 2011 allows for the new plan to continue from the current adopted plan. Furthermore, it allows for the completions since 2011 which have exceeded the annual requirement to be taken into account.

The report to the Local Plan Working Group of 17 October clearly sets out why it would be unwise of the Council to proceed with a plan period less than 15 years from adoption. This included considering the implications of the Davis Commission's report. However, if development sites were being proposed in locations which may be affected by a larger airport it would be legitimate to phase the delivery of these until the future of the airport was certain.

The Council consider that it is taking account of the longer term requirements and preparing a plan which is flexible. The emerging local plan identifies a range of sites some of which will be provided in the short term and some will be provided towards the end of the plan period and have the potential to be extended into the following plan period.

Large development sites which have been granted planning permission since the publication of the draft Local Plan for consultation have been taken account of as set out in the Composite report of representations on Draft Local Plan Site Allocations Policies.

The Council maintain an up to date evidence base. The SHLAA will be updated with any new sites proposed through this consultation. The SHMA was updated in 2012 and the Highway Assessment is currently being updated.

When the plan is read as a whole alongside all the strategic policies and Development Management policies and Site Allocations the plan can be shown to meet the requirements of the NPPF

Recommendation

No change

Pre-submission Draft Local Plan to be prepared for the period 2011 – 2031.

Question 2 –

Do you agree with the Councils assessment of objectively assessed housing need. If you do not please set out your preferred alternative method of calculating housing need and supply appropriate evidence. You should also explain how your calculation meets Government guidance as set out in the NPPF.

This question was responded to by 1175 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to http://uttlesford-consult.limehouse.co.uk/portal/planning_policy/ahns/ahns

English Heritage does not wish to comment on the assessment of housing numbers other than to note that it is clearly essential that the Local Plan is NPPF compliant. We note that the Council considered delaying the Local Plan review until the outcome of the Davies Review on Airports was available and rejected this. In view of the present uncertainty about the growth of Stansted airport, it may be appropriate to phase any housing requirement associated with future growth of the airport as a pragmatic approach.

Natural England comment that the proposed allocations and sites do not impact on areas of nationally designated landscape such as Sites of Special Scientific Interest, Special Protection Areas or Special Areas of Conservation (SSSI's, SPA or SAC). Natural England does not wish to offer any substantive comments in respect of this consultation document. The Council should look for opportunities to seek improvements, enhancements and creation of green/open spaces as part of the development proposals. Suitable and appropriate green infrastructure provision on site, as part of a sustainable development proposal, has the potential to alleviate foot pressure on the adjacent locally designated areas, where appropriate. Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. Natural England encourages the Council through its Local Plans and policies to ensure the district's green infrastructure is designed to deliver multiple functions.

NHS Property Services Ltd (NHSPS) has no comment to make on this matter.

Affinity Water states that as per the water cycle study, Affinity Water have a good general supply network around much of the Uttlesford area and so should be reasonably able to cope with the new housing proposals mentioned. If any areas of network do need improvement then it's likely these will be picked up through the usual developer contribution process.

Anglian Water Services support the requirement of the Site Allocation Policies for planning applications to be accompanied by a Drainage Strategy, however for clarity we would recommend 'approved' is inserted in front of 'drainage strategy', to ensure the applicant has consulted with the appropriate bodies (i.e. the wastewater provider and the Environment Agency) and agreed the strategy in advance of submission to the planning authority.

Braintree District Council is pleased that Uttlesford District Council is making provision to provide for its objectively assessed need. Whilst we have no specific objections to any of the sites put forward, some consideration should be given to the likely demand for additional housing created by employment generation at Stansted Airport. Braintree District Council does have a significant percentage of its residents commuting out of the district to work (including to the airport), and a more sustainable pattern of travel should be sought longer term.

Chelmsford City Council officers support a Plan which meets housing growth needs based on the SNPP 2010-R figures. It is agreed that an economic based housing need would constrain population and household growth in Uttlesford. This could not be justified and would be contrary to the NPPF. It could also place an unnecessary and unacceptable burden on neighbouring authorities to make up the shortfall. Further clarification is needed on the issue that the SHMA indicates that around 6,200 of the 11,500 homes would need to be affordable (approximately 54% of the total). This would not be met by the affordable housing policy requirement of 40% or 20% affordable housing on sites; which suggests that the Council should consider providing additional housing (over that proposed in the consultation document) to meet the full needs for affordable housing in their area. It is acknowledged that the evidence provided in the SHMA should not be viewed in isolation and that the majority of Chelmsford City Council's area is not within the Uttlesford Housing Market Area.

East Herts Council's main concerns have been the potential impact of significant development adjacent to Bishop's Stortford. Such development could bring benefits in strengthening Bishop's Stortford's historic role as a market town for eastern East Herts and north west Essex, in terms of residents looking to the town for some of their retail, employment, service, health and leisure needs. This in turn raises serious concerns over the fundamental issue of infrastructure availability generally and traffic congestion in particular, in and around Bishop's Stortford town centre and the locality. The Uttlesford proposed development strategy incorporates both a dispersed element around Uttlesford District and re-introduces concentration at Elsenham. The volume of residential development proposed is likely to have significant implications and impacts on this part of East Herts District, particularly Bishop's Stortford itself, which is linked to several of the proposed development locations through the highways network, as well as Junction 8 of the M11 motorway. Equally, Uttlesford Council should consider the impact of possible development options within Bishop's Stortford on Uttlesford. A robust strategy for both Districts will need to assess the combined impact of development in both directions across the District/County boundary. It is therefore proposed that Uttlesford and East Herts Councils continue to work closely together and share information and evidence in the preparation of their respective strategies, so that each may complement the aspirations of both Districts, within the context of the Duty to Co-operate. Co-operation should encompass a range of planning issues, including housing, transport and economic development. This collaborative approach will assist in identifying and managing potential positive effects of development, along with seeking to mitigate any adverse impacts on both Districts.

Epping Forest DC is glad to have been consulted but has no comments to make on the Consultation on Additional Housing Numbers and Sites.

Hertfordshire County Council welcomes a level of housing provision consistent with what the Council considers will meet its objectively assessed housing need though the County Council has no view on whether that assessment is robust within the context of the NPPF. It is suggested that the District Council make it clear that the council has fully met their obligation to constructively engage with neighbouring authorities under the duty to cooperate requirements.

Birchanger Parish Council would prefer to use the low growth scenario as it is not credible that the higher growth figures will be met in the planned period, particularly with the current economic downturn. There is already evidence of poor take up of housing in some of the developments being built now eg Woodlands Park. As accurate forecasting is difficult in an uncertain economic situation, a flexible approach is necessary. An approach which allows figures to be revisited is needed.

Debden Parish Council, Elsenham Parish Council, Henham Parish Council disagree with the Council's assessment of its need. It considers that there are more recent household projections available from DCLG (published in May 2013) based on the 2011 Census which forecast 500 dwellings p.a.. The NPPF does not prescribe the method of assessment but many planning authorities rely on the latest figures which are provided by DCLG. Figures in the SHMA are unreliable. The quantum of additional housing required has been hugely over calculated in the Consultation. Even for a 19 year plan period the total number of dwellings should be 9,500 and with 7,781 already built or permitted the requirement for additional dwellings should therefore be 1,719 (9,500 - 7,781) not 2,680 - a difference of 961 dwellings.

Great Dunmow Town Council do not agree with the way the housing need figures have been calculated. They should be based on historic figures over the past ten years. There is no indication that employment figures have been included. Existing figures show that the town already has sufficient homes built and approved to meet the needs of the revised Draft Local Plan until 2017. The Town Council are also concerned that the District Council has not demonstrated a clear infrastructure plan and is reliant on S106 agreements over which it has not control and will not have the opportunity to experience the community benefits of the CIL.

Newport Parish Council feels most strongly that if the 2770 additional houses included in this consultation are really needed, they should be embodied in the entire Local Plan and the whole process re-examined. Existing and additional infrastructure needed is not taken into account. The sustainability appraisal is flawed. Given the number of windfall houses being built in Newport, we believe the total across the district is grossly under estimated and the plan does not reflect this.

Saffron Walden Town Council agrees with the district council's assessment of objectively assessed need. However it considers that the correct determination of need should have been determined a lot earlier and then it should have resolved to assess how best to plan to accommodate all of the as yet uncommitted growth in the most sustainable manner. That would have inevitably involved rethinking the strategy underlying the local plan and recommencing its preparation in accordance with the sustainability principles in the Framework. Furthermore it is not accepted that the housing need can be met without any

adverse impacts on the policies in the NPPF because the strategy on which the plan is based must be reassessed and the plan reviewed as a consequence. That is because the draft plan will demonstrably fail to deliver sustainable development which, according to the Framework, is what the purpose of planning is to help to achieve.

Takeley Parish Council is concerned that the significant increase in house building numbers will not necessarily deliver the affordable homes the community needs. There is a lack of evidence within the consultation documents to demonstrate that UDC has listened to and indeed agreed the vision in conjunction with residents? UDC should ensure that the need for all forms of infrastructure is planned strategically to support development and ensure its viability. Takeley Parish Council does not believe that UDC have properly considered and compared all reasonable strategic options and therefore UDC should be revisiting its entire housing strategy, reviewing the district's infrastructure to identify the most sustainable solution for Uttlesford given the vastly increased housing numbers. Application for large developments should not be approved until infrastructure requirements or planning conditions are agreed in conjunction with local community (s). Infrastructure elements of proposals should be built and ready to open before occupation of dwellings. More specifically Takeley Parish Council raises the following questions

- What is the rationale to using the 2010 based SNPP?
- Does this plan meet or manage the need?
- What opportunity did people have to comment on the housing need? There is no opportunity for people to comment on the numbers, the sites selection, or the change of policy from (option 4) 'dispersal through hierarchy of settlements'.

Thaxted Parish Council considers that the assessment uses old data and not the most recent data, published by DCLG in May 2013 which means the additional housing required has been over calculated. The 5% allocated to affordable housing is inadequate to meet local needs.

The **Essex Branch of Campaign to Protect Rural England** are concerned that whilst it may well be prudent to plan for a more buoyant economy the local economy in Uttlesford may well lag behind the National situation in terms of employment and non-agricultural productivity due to the rural nature of the area. Using the 2010 SNPP creates a higher level of housing need, not based on local requirements but need associated with the wider economy. As stated above, should more houses be made available than that which is required for the local population then inward migration is encouraged. This is likely to result in the District becoming populated by commuters, travelling out for work and family and social contacts. This has a detrimental effect on the environment and inflates house prices and disadvantages local people.

The Dunmow Society opposes each of the sites and each of the questions on the grounds that the strategy consulted on in 2012 was rejected by 99% of the more than 3000 responses. In accordance with the NPPF the Local Plan should reflect the collective vision and agreed priorities of the residents of Uttlesford. Instead of just consulting on these additional numbers UDC should be revisiting its entire housing strategy to identify the most sustainable solution for Uttlesford given the increased housing numbers. The Society understands that on 5 September 2013, John Mitchell, the Chief Executive of UDC

confirmed that UDC was not even working on a current plan. I do not believe that UDC could have properly considered and compared all reasonable strategic options in the one month between that date and the announcement of UDC's current proposals on 9 October 2013. The Dunmow society continue to believe that the only solution for further development is for a single site to the north of the district in Chesterford or to the west of Dudenhoe End where there are good transport connections to the M11 and main line railway stations at Great Chesterford and Audley End. We urge you to shelve this consultation, re-examine your evidence and create a sustainable solution that meets the long term needs of the District with the minimum of disruption and suffering to the residents of the areas you are currently targeting.

Sustainable Uttlesford considers that the proposed increase in housing numbers over the plan period should result in a complete reassessment of the LDF housing allocation policy. The Council should reviewing all known sites in the SHLAA and test the community sustainability benefits of alternative single settlement or wider dispersal strategies against their current policy of peripheral development on existing key communities. The current housing allocation strategy does not maximise community benefits but perversely places further burdens on existing inadequate infrastructure especially the road network which will result in increased congestion and air pollution. Sites along the strategic corridors of movement in the district should be reassessed. eg close to the M11 motorway junctions as well as the West Anglia line for a new settlement eg Chesterfords or along the old A120 expanding Takeley. These are options that have not been openly appraised as part of this new review process. It is disappointing that the strategy has not reassessed the district's village communities to see which can benefit from limited small scale development to enable the provision of affordable housing in our smaller communities and increase the long term viability of community facilities like village shops, pubs and schools. Such allocations to the villages will ensure that there continue to be balanced population structures in the villages rather than them becoming dormitory villages for commuters. We note that East Herts District which adjoins Uttlesford have included such a policy in their draft LDF.

We Are Residents disagree with both the UDC calculation of housing numbers over the proposed plan period and the sites proposed in the Consultation Paper on the grounds that the strategy consulted on in 2012 was rejected by 99% of the more than 3000 responses. In accordance with the NPPF the Local Plan should reflect the collective vision and agreed priorities of the residents of Uttlesford. Instead of just consulting on these additional numbers UDC should be revisiting its entire housing strategy to identify the most sustainable solution for Uttlesford given the increased housing numbers. There is no evidence that the Plan reflects the most sustainable solution based on a proportionate evidence base, because on 5 September 2013, in response to a Freedom of Information request, John Mitchell, the Chief Executive of UDC, confirmed that UDC was not even working on the current plan. WAR do not believe that UDC could possibly have properly considered and compared all reasonable strategic options in the one month between that date and the announcement of UDC's current proposals on 9 October 2013. There has been no updating of highways and air pollution evidence. WAR considers that housing strategy locates housing away from areas identified for growth in the Council's employment assessment.

WAR argues that no comparative sustainability analysis has been performed of the current proposals when set against any reasonable alternatives, and indeed no reasonable

alternatives have even been considered. Even though UDC recently rejected a new settlement at Elsenham, there are other new settlement options that are being promoted and deliverable, including one that would deliver the all of the required infrastructure, such as Secondary and Primary Schools before the housing. It is unclear to the public why UDC has dismissed these other options.

They also argue that there has not been a proper assessment of infrastructure requirements and the Council is failing to develop an evidence based and sustainable solution to housing growth.

In response to the specific question WAR consider that from the evidence that they have seen from other councils, we do not believe that UDC need to move away from the Economic-scenario based number, and certainly not to the base now proposed. Given the pressure on local resources, and UDCs often-repeated statements that UDC should be building the minimum number of houses required by the NPPF, we do not believe that choosing the maximum number of any reasonable scenario is sustainable.

Parsonage Downs Conservation Group is not qualified to either agree or disagree with the Councils assessment of housing need for the region. We do feel however that the views of respondents to this and previous consultations with regard to the impact these allocations have on the historic towns of Saffron Walden and Great Dunmow **MUST** be taken into account.

The majority of the responses from **residents** were based on either the standard response compiled by the Joint Parish Council Steering Group (JPCSG) of Elsenham, Henham, Ugley and Stansted or the standard response compiled by We Are Residents.

The standard response compiled by the JPCSG argues that the assessment uses data from forecasts in 2008 and 2010 “the highest” - to arrive at an average housing figure of 523 p.a.. More recent household projections are available from DCLG (published in May 2013) based on the 2011 Census which forecast 500 dwellings p.a.. The NPPF does not prescribe the method of assessment but many planning authorities rely on the latest figures which are provided by DCLG. It is therefore argued that the quantum of additional housing required has been hugely over calculated in the Consultation. Even for a 19 year plan period the total number of dwellings should be 9,500 (ie 19x500) and with 7,781 already built or permitted the requirement for additional dwellings should therefore be 1,719 (9,500 - 7,781) not 2,680 - a difference of 961 dwellings.

The standard response compiled by WAR and sent in by residents argues that

- the Draft Local Plan was already rejected in 2012: In June 2012, UDC conducted a public consultation on its draft housing strategy. That strategy was rejected by some 99% of the more than 3,000 responses, with only 39 responses in support. The NPPF requires that UDC’s Local Plan should reflect the collective vision and agreed priorities of the residents of Uttlesford. Instead of reviewing that rejected strategy, the current consultation assumes that the June 2012 draft plan will continue and that the latest 2,680 houses will simply be added to the sites overwhelmingly rejected by the public in the June 2012 consultation;

- Increasing housing numbers voids current draft Local Plan: On 9 October 2013, UDC proposed that the new plan would be extended to cover the period to 2031 with significantly increased new homes requirement from that previously published. The effect would be to increase the number of sites for new houses to be identified in the plan from 3,300 new homes by a further 2,680 new homes. Under the NPPF, UDC should now be revisiting its entire housing strategy to identify the most sustainable solution for Uttlesford given the increased housing numbers;
- Most sustainable solution not selected: The NPPF requires that the plan should reflect the most sustainable solution based on a proportionate evidence base. There is no evidence that UDC have done so. I understand that on 5 September 2013, John Mitchell, the Chief Executive of UDC confirmed that UDC was not even working on a current plan. I do not believe that UDC could have properly considered and compared all reasonable strategic options in the one month between that date and the announcement of UDC's current proposals on 9 October 2013;
- Proper strategy required: The current consultation is therefore based on an entirely inappropriate starting point, which I reject. It should be stopped immediately until UDC has prepared a proper housing strategy in accordance with the NPPF.

Finally they urge the council to tear up this consultation, re-visit the evidence and create a sustainable solution that meets the long-term needs of the District.

Representations from **developers/landowners** generally agree with the objectively assessed need. However, some consider that the Council should allocate alternative or additional sites because some of the sites being proposed are not justified; they disagree with the allowance made for windfall sites; that smaller sites are needed which are deliverable early to provide a 5 year supply of land; that any unmet need from adjoining authorities has not been considered under the requirements of Duty to Cooperate; no allowance for non-implementation of sites.

Sites being proposed to make up any shortfall are:-

Village	Site	SHLAA reference	Agent/Consultee
Barnston	land north east of Chelmsford Road	BAR2	Strutt and Parker acting for Hamilton
Birchanger	Land at Bishop's Stortford within A120 bypass	BIR1	Countryside Properties
Clavering	land west of the Cricketers	CLA1	Vila
	Stortford Road	CLA9	Sworders acting for Noble
Elsenham	Land adjacent Hailes Wood	ELS3	Pegasus Planning Group acting for Charles Church
	Elsenham Nurseries/The Gables	ELS5	Carter Jonas acting for Crown Estates
	Land west of Station Road (extension	ELS6	Carter Jonas

Village	Site	SHLAA reference	Agent/Consultee
	to permitted site)		acting for Crown Estates
Great Chesterford	Land south of the High Street	GtCHE9	Pegasus Planning Group acting for Hans House Group of companies
	Land between Walden Road and Newmarket Road	GtCHE7 (part)	Bidwells acting for Robinson
Great Dunmow	Land south of Graces Wood, Parsonage Downs	GtDUN32 and additional land to the south	Sworders acting for Elms
	Dunmow Park	GtDUN12	Boyer Planning
	Land west of Buttleys Lane, South of Stortford Road	GtDUN02 (Part)	John Clarke
Great Dunmow/Little Easton	Easton Park	LtEAS1	Barton Willmore acting for Land Securities
Hempstead	Land south of Longcroft	HEM1	Strutt and Parker acting for Haylock
	Land north west of Harvey Way	HEM2	Strutt and Parker acting for Haylock
Leaden Roding	land north of Stortford Road	L-ROD1	Strutt and Parker acting for Strutt and Parker Farms
Little Dunmow	Chelmer Mead – land to east of Little Dunmow and north of Flich Green	LtDUN1	Andrew Martin Associates acting from Chater Homes
Littlebury	Land east of Strethall Road	LIT2	Strutt and Parker acting for
Manuden	land south of Cock Farm, Carters Hill	MAN2	Strutt and Parker
Newport	Chalk Farm Quarry	NEW01	Andrew Martin Planning acting for Harlow Agricultural Merchants
	land west of Frambury Lane/London Road and south of Wicken Road	NEW09 (part)	Savills acting for Countryside Properties
	East of Chalk Farm	NEW14 plus land to the	Springfield Planning

Village	Site	SHLAA reference	Agent/Consultee
		south up to quarry access road	
Saffron Walden	Royal Mail delivery office and yard	Considered as Development Opportunity Site	DTZ acting for Royal Mail Group Ltd
Stansted Mountfitchet	Land at Bentfield Green	STA13	Bidwells acting for Edwards
	Land at Pines Hill	STA8	Collins & Coward acting from Pines Hill Consortium and Linden Homes
	land at Elms Farm to be explicitly included in figures and plans.	STA6	Shriplin Brown acting for Knight
	Gorsefield Study Centre, Grove Hill	New site	Coke Gearing
	Land east of High Lane	New site	Phase 2 Planning and Development
Stebbing	land north of primary school and rear of Garden Fields and Parkside	STE6 and STE11	Andrew Martin Planning
	Boxted Wood	STE1	URS acting for Galliard Homes/Icon Shield
	Andrewsfield – airfield east of Great Dunmow and west of Great Saling	STE2	Mabb Planning
Takeley	land south of Takeley between B183 and Great Canfield Road	TAK4	Strutt and Parker acting for Takeley Farming
	Extension to Priors Green	TAK02	Terence O'Rourke acting for Countryside Properties
	Land south of Takeley Street between Coppice Close and Hillcroft	TAK11	Shire Consulting
	Land at Parsonage Lane	TAK6	Sworders
Thaxted	Land at Watling Lane	THA8	Gladman
	Land north of Barnards Fields	THA14	Phase 2 Planning and Development Ltd

Some developers/landowners do not agree with the objectively assessed need.

Land Securities considers that the objectively assessed need sits somewhere between 670 -704 dwellings per year. This equates to a need for 13,400 -14,080 units between 2011 and 2031.

Fairfield Partnership considers that the housing numbers fail to take full account of the expansion of London Stansted Airport up to the maximum throughput for one runway and the implications this would have for economic activity, labour supply and housing. They are concerned that the level of employment growth at Stansted Airport is not properly reflected in the job target within the employment strategy. It is considered that a further 1,000 homes is required over and above the 2010 SNPP figures of 523 homes per annum in order to provide the housing required to support the increase of employment at Stansted Airport associated with its expansion to its permitted throughput of 35 mppa during the plan period. If this need is accepted then new housing should be located within the south of the District in a location with sustainable access to the airport. Land north-east of Elsenham has the capacity to accommodate additional growth that might respond to this additional requirement.

Manor Oak Homes consider the housing need should include the shortfall in provision since 2011 and a windfall allowance based on the median delivery rate.

The agent acting for **Andewsfeld**, Stebbing considers that the council should plan for nil-net migration and should locate housing sites east of Great Dunmow which is less convenient in terms of proximity to commuter stations. The Council should also include a 20% buffer within its 5-year land supply. Another agent considers there should be an indication, either within each policy, or within a trajectory, as to when the sites are expected to come forward, or indeed if they are being phased for release at particular points during the Plan period.

One landowner considers that the increase in housing numbers may require a review of the employment evidence and the allocation of additional sites.

One agent considers that having the flexibility of not specifically allocating all of the sites, gives the greater flexibility should re-assessment be necessary.

Sustainability Appraisal

There will be significant positive impacts on housing (SO9) through the implementation of 10,460 homes to 2031. This figure, having been obtained through population projections responds directly to identified need in the District relevant to migration and demographic change.

There will be positive impacts on health and social inclusion (SO8), securing infrastructure (SO10) and education and skills (SO11) through the level of housing required and financial contributions that will be required by the developer to the District and County Council to fund infrastructure improvements and community facilities. This level of housing also increases the ability of enabling development to be permitted, which can hope to address any potential infrastructure and housing deliverability issues. Impacts are limited however due to how the housing figures are reflected in terms of the housing strategy and the size and location of proposals against existing infrastructure in specific areas.

Uncertain impacts will also be realised for employment and economic growth (SO12). New housing allocations will need to be accessible to existing employment opportunities and additional planned employment growth allocations in the Local Plan. The finalised Local Plan, including site allocations for employment, should determine whether there is sufficient planned growth to correlate to locations for housing growth in a sustainable manner. It should be noted however that the 2010 SNPP, on which housing numbers are formulated, projects the delivery of 351 jobs per year in the District; correlating to a higher annual target than any of the other scenarios.

There will be a negative impact on reducing contributions to climate change (SO3) inevitably associated with an increase in growth of this scale.

There will be uncertain impacts in the short to long term associated with biodiversity and landscape (SO1), cultural heritage (SO2), pollution (SO4) and flooding (SO5). Environmental impacts are only evident on a case-by-case site-level basis. As such, these impacts are identified in site appraisals, the cumulative impact of which can be identified for the Local Plan at the Pre-Submission/Submission stage when a definitive list of allocated sites have been identified. It should be noted however, that housing development at the level identified has the potential for significant negative impacts throughout the District subject to the specific locations of identified site allocations and their individual and cumulative environmental conditions.

There will also be uncertain impacts on sustainable transport (SO6) and accessibility (SO7) associated with the housing figures identified. Growth at this level has the potential to negatively impact on existing public transport and highway networks beyond that experienced by the residents of new proposals/sites allocated in the Local Plan. These impacts should be considered when a definitive list of allocated sites has been identified.

Officer Comments

The impact of the uncertainty over the growth of Stansted Airport is dealt with under question 1.

The Council accept the points made by Natural England and consider that Development Management policies are being proposed which will ensure these issues are taken into account.

Like many authorities in the eastern region Uttlesford is subject to high house prices and a high demand for affordable housing. The percentage of affordable housing being requested is based on the evidence of the Viability Study accompanying the SHMA. To ask for a higher percentage would be unviable. To prepare a plan with an increased housing need solely in order to increase the number of affordable houses would be unrealistic as it result in the Council significantly exceeding it's objectively assessed need based on demographic forecasts. In response to the comment from Thaxted Parish Council, emerging draft policy is to require 40% affordable housing on sites of 15 or more dwellings, 20% on sites of 5-14 dwellings and financial contributions on sites of 2-4 dwellings.

The views of East Herts District Council are appreciated and it is proposed that this cooperation is formalised through a memorandum of understanding prepared to guide our joint working. As neighbouring authorities such as East Hertfordshire and Harlow publish their development strategy options it is becoming clearer that they are meeting their obligations in full and there is no unplanned demand within our SHMA area..

To be found sound the council must prepare a local plan based on its objectively assessed need unless good evidence says otherwise. The rationale for basing the Council's objectively assessed need on the 2010 based SNPP is set out in the report to the Local Plan Working Group on 17 October 2013 and in the Objectively Assessed Housing Need Technical Assessment October 2013. This makes it clear that a low growth scenario would not be a sound basis on which to prepare a plan. The Technical Assessment shows that historically population growth in Uttlesford is due to internal migration. The NPPF makes it clear that migration should be taken into account in determining need and therefore it would not be sound to prepare a plan which did not reflect this trend. Population and household projections are trend based and are therefore based on historic figures. The Technical Assessment does consider more recent CLG projections and the Council has to consider whether the trends that have been projected forward in the latest projections are likely to continue unchanged. In Uttlesford the issue is the extent to which household formation patterns have departed from previous trends. Uttlesford has seen an increase in household formations between the 2008 based and 2011 interim forecasts which is contrary to the national trend, but like elsewhere Uttlesford is projected to have a fall or relatively lower increase in households headed by younger age groups compared to households headed by older people. It must be recognised that the latest projections are interim projections produced before the full census results were available. This may have produced population growth projections that are either higher or lower than is likely. It seems likely that the 2011 census results were influenced by both the economic downturn and the effects of a long period of poor housing affordability. If conditions in the housing market and the economy more generally improve there may be a return towards previous trends. To base a plan on a projection influenced by the economic downturn, with the knowledge that housing market in Uttlesford is relatively strong is not considered sound. It is therefore considered sound to base a plan on a projection when the economy was stronger and bearing in mind that if conditions in the housing market and the economy more generally improve there may be a return towards these trends.

Any unmet need from the previous plan period will have been taken into account in the up to date objectively assessed need and therefore does not need to be rolled forward into the new Local Plan. The Council has considered whether there are any market signals which would require adjustment to the objectively assessed need. For the majority of indicators Uttlesford follows national or regional trends. However, it is recognised that the ratio of lower quartile house price to lower quartile earnings shows that housing is not affordable to those on low incomes. To prepare a plan with an increased housing need solely in order to increase the number of affordable houses would be unrealistic. As the draft National guidance says *Market signals are affected by a number of economic factors, and plan makers should not attempt to estimate the precise impact of an increase in housing supply. Rather they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period.* The Council is

already basing its Plan on a housing need based on a strong economy and it cannot be assumed that a further increase in housing supply would in practice improve affordability.

The Airports Commission does not forecast Stansted to be at 35mppa until 2030 – 2040 beyond the current emerging plan period. Stansted is our largest regional employer, and its employment strategy 2010 – 2015 predicts 16,800 employees at 35mppa (there were 10,231 in 2011). M.A.G's sustainability report 2012 (using the 2011 airport employee survey) says that of the 10,231 employees, 1,898 were Uttlesford residents. Therefore, 81.4% of airport employees do not live within the district, and the airport is putting itself forward as a driver of regional employment. A simple calculation gives Uttlesford's share of the additional employees to 35mppa as 1,221 and therefore the Council consider that it is providing sufficient housing to meet its assessed need.

The Council considered whether to prepare a CIL at its meeting of the LDF Working Group on 8 February 2013. Independent advice was that there does not appear to be a compelling case for adopting a CIL in Uttlesford. In the short to medium term the Council would achieve more by pooling Section 106 contributions. The Council is not compelled to adopt CIL by April 2015 and CIL could be adopted any time after this date.

This current consultation has been the opportunity for people to comment on the housing numbers. Consultation on the Pre-Submission Draft Local Plan will allow people to comment on the Plan as a whole.

The Sustainability Appraisal has been conducted independently and in accordance with the regulations and is not considered to be flawed.

The Council believe that it has considered and compared all reasonable strategic options and that it is not necessary to reconsider the strategy. In 2007 the Council consulted on 9 different distribution strategies which were later refined to 4 different strategies. The latter were further consulted on in 2010. In January 2012 there was consultation on the role of settlements and site allocations. The Council has had to reassess its strategy in the light of the scale of growth to be accommodated but the Council is not proposing a strategy which has not been the subject of consultation before. All stages of the plan preparation have been subject to a sustainability appraisal. Alternative locations for new settlements have been included in the distribution strategies and have been subject to Sustainability Appraisals. The delivery of all the required infrastructure, such as schools prior to the housing is not a viable proposal to the development industry. Policy does not preclude development in the villages subject to sustainability and environmental issues.

The scale of public objection to a policy is noted although the percentages being quoted in representations are questioned. The Council has to base its decision on planning matters and not the scale of objection or support.

The presumption that the Council was not working on a current plan in September 2013 is incorrect. The Council started working on a development plan to replace the 2005 Adopted Local Plan immediately in response to the Planning and Compulsory Purchase Act 2004 and work has been continuous since then. That work has always had to include the flexibility to cover changes in national policy. Indeed the changing external strategic framework has

been at the root of the reasons for the extended period of progress with preparation of a new plan.

The Council maintain an up to date evidence base. The Highways Assessment is currently being updated.

The Plan does not locate housing away from areas identified for growth in the in the Council's employment assessment. Housing development is being located in settlements which have existing employment opportunities and good transport links to centres of employment such as Stansted Airport, Cambridge, Harlow and London. In addition the large strategic in Saffron Walden, Great Dunmow and north east of Elsenham include areas for employment development.

The majority of the sites suggested have been considered in the past and none are considered to be more appropriate than those the council has identified in this consultation.

To read all the representations in full please go to http://uttlesford-consult.limehouse.co.uk/portal/planning_policy/ahns/ahns Use the 'Who Said What?' button and 'Search' for agent or consultee using the names in the table above.

Details of the sites can be found in appendix 8 of the SHLAA¹ ; and earlier consideration of the sites can be found in the report of representations to the Role of Settlements and Site Allocations consultation in January 2012² and the Draft Local Plan Consultation June 2012³.

The exact site to the south of the High Street Great Chesterford has not been clearly defined before. The agents are proposing a 2 ha site which currently comprises residential, commercial land and a caravan site for about 49 dwellings. They consider that the site is in a sustainable location and is available and deliverable in the short term. Officers' view is that the Council has identified sufficient land to meet its need and it is not considered that this site is more suitable than other sites proposed.

The site between Walden Road and Newmarket Road, Great Chesterford has only been considered in the past as part of larger new settlement site, however the agents are now proposing a development of 9.8ha. Their representation states that Great Chesterford is a sustainable location for development and there are no substantive reasons why this site should not be allocated. Officers' view is that the Council has identified sufficient land to meet its need and it is not considered that this site is more suitable than other sites proposed.

The sites south of Graces Wood, Parsonage Downs, Great Dunmow is sandwiched between the Helena Romanes redevelopment site and the houses on Parsonage Downs. The developable area extends to 0.95ha and would provide about 25 houses. Officers' view is that this may be a logical extension to the town development limits considering its location between existing and proposed housing.

¹ <http://www.uttlesford.gov.uk/article/1829/Background-Studies#Strategic%20Housing%20Land%20Availability%20Assessment%202012>

² <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=1048&p=0>

³ <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=2648&p=0>

The parcel of land west of Buttleys Lane is being proposed to be included in the proposal site to the east of the site with the potential use as playing fields, additional housing, medical centre or for commercial use without the need to widen Buttleys Lane or cross the Flitch Way. Officers consider that this site is not needed in order to deliver the school site however this and adjoining sites are well defined by the B1256 and the A120 and may be suitable for development and could be considered through the Great Dunmow Neighbourhood Plan process.

Although the Royal Mail delivery offices in Saffron Walden have been considered before in relation to a development opportunity site this is the first time Royal Mail Group Ltd have made a representation. They consider that although there are no current plans to close or relocate the delivery offices it is suggested that this is a suitable site for a mixed use development in the longer term but relocation of the present operations would be essential and would need to be viable and commercially attractive. The Council considered including this site as a Development Opportunity Site and a report was considered by the LDF Working Group on 8 February 2013. A viability assessment of the site concluded that a minor refurbishment of the site would be viable but a more extensive redevelopment incorporating the listed building would not. It was therefore agreed not to include this site as a development opportunity site. It is considered that this decision remains. Should the existing use cease, any redevelopment proposals would be considered against development management policies.

The report of representation on site allocations following the consultation on Draft Local Plan June 2012 includes a policy and allocation relating to Elms Farm

The new site being proposed is the Gorsefield Study Centre to the east of Stansted Mountfitchet. The agents acting for Gorsefield Studies Centre consider that this site could provide 200+ dwellings and 2.24 ha for public open space or educational uses. Officers consider that this site is separated from the built up edge of the town and its development would introduce an isolated urban element in the countryside. Officers' view is that the Council has identified sufficient land to meet its need and it is not considered that this site is more suitable than other sites proposed.

The land east of High Lane, Stansted Mountfitchet, is a 1.5 ha site and is being promoted as a site which is outside of the green belt, close to higher order shops and services, and is well related to existing development, in addition to being well screened from wider viewpoints. Officer's view is that similar concerns apply to this site as they do to SHLAA reference STA2 which adjoins to the north in that it would introduce an urban element into the rural landscape. Officers' view is that the Council has identified sufficient land to meet its need and it is not considered that this site is more suitable than other sites proposed.

It is not considered that additional sites are needed to meet the housing need.

The Council is confident that the methodology of calculating historic windfall rates is robust, and this can be updated to include recent years but it is recognised that the relationship between windfall sites and committed levels of housing should be re-evaluated.

Notwithstanding this, looking at the historic rate of development of small sites and the permitting of sites which although not allocated are considered sustainable in line with national policy a windfall allowance of 50 dwellings per year is considered sound. At a parliamentary debate on Planning Reform on 8 January 2014, Nick Boles MP confirmed that policy does not prevent windfall sites forming part of the plan and that it is reasonable for a local authority to say that part of its planned projections assumes a level of windfall delivery subject to evidence that there has been consistent delivery of such sites in the past and it is reasonable to expect it will continue. Such evidence exists for Uttlesford.

The Local Plan as a whole has identified a range of sites some of which will be provided in the short term and some will be provided towards the end of the plan period to ensure that the Council maintains a 5 year supply of land.

The Council has and continues to constructively engage with neighbouring authorities under the duty to cooperate. At this stage the Council is not aware that there is any unmet need from adjoining authorities which should be met in Uttlesford.

It is considered that the frontloading of the 5-year supply replaces the need for an allowance for non-implementation.

Since 2011 the Council has delivered more housing than the annual target and the number of completions for 2013/14 is awaited. If there is a shortfall this will be taken into account in the 5 year supply. The Council does not have a persistent record of under delivery of housing and therefore applying a 5% frontloading of housing is appropriate. This has been verified by the Inspector who considered an appeal in relation to land at Oakwood Park, Flitch Green. Any phasing of a specific site would be specified within the site allocation policy. The Pre-submission Local Plan will include a housing trajectory. This is updated annually through the 5-year land supply statement.

Officer Recommendation

Continue working proactively and constructively with neighbouring authorities and prepare and agree a memorandum of understanding with East Herts DC.

Update the Windfall Allowance background paper.

No change to the assessment of objectively assessed housing need and the requirement to provide 10,460 dwellings between 2011 and 2031.

Consider extending the development limit around Helena Romanes School site to include land south of Graces Wood.

Ashdon Road Commercial Centre, Saffron Walden

Question 3

Do you have any comments on this proposed site allocation or the above policy? If you think the policy should be changed please set out clearly in your comments what changes you would like to see.

408 people commented on Question 3. The following report is a summary of these comments. All the representations can be viewed on the consultation portal at http://uttlesford-consult.limehouse.co.uk/portal/planning_policy/ahns/ahns

Anglia Water Services have been approached via the pre planning service they offer and they have also made comment on the planning application, reference UTT/13/2423/OP. They do not envisage any issues or constraints regarding the foul drainage of the site. With regards to surface water, they would expect this development site to follow the drainage hierarchy. Disposal to surface water sewers should be seen as the last option when all sustainable urban drainage solutions (SUDs) and discharge direct to watercourse have been investigated and proven to be non viable.

English Heritage has commented previously in relation to the growth of Saffron Walden that the west and northwest sides of the historic town are the most sensitive. Nevertheless, the cumulative impact of growth allocations on the historic core must also be a serious consideration. Saffron Walden remains, to an unusual degree, legible as a small historic market town, and this contributes to its exceptional character. Any substantial development will jeopardise this. In our letter on the Local Plan Issues and Options consultation we noted that Saffron Walden has considerable traffic problems, and that there is a danger that additional development could result a worsening of conditions in the historic core. We understand that proposals may be under consideration by Essex County Council in respect of the circulation of traffic. Such an assessment should take the conservation and public appreciation of the historic environment of the town as a guiding principle. The Local Plan Sustainability Appraisal of options for growth of Saffron Walden should incorporate assessment of any potential traffic pressures resulting from new additions to the town on the character and quality of the town's historic centre, and identify how these may be avoided, or mitigated.

Highways Agency This is unlikely to have a material impact upon the strategic road network, although the Highways Agency would recommend that a Transport Assessment is carried out.

NHS Property Services welcomes the Policy requirement for the development to be designed to mitigate adverse effects upon existing residential and community interests. NHSPS submitted a consultation response to the outline application for a proposed development of this site, which is currently being considered by the Council (Ref: UTT/13/2423/OP). The consultation response seeks to secure provision for necessary healthcare mitigation to address the impacts arising from the proposed development.

The **Oil Pipeline Agency** have no objection to the site being allocated but asks to be consulted before works are undertaken and certain parts of the site may not be suitable for housing development.

Sport England have no comments on the potential allocation of the majority of this site for residential development but object to the allocation of the open space to the south west of the site which until 2013 was partially marked out for a football pitch that was used by a local community football club. The allocation of this area for development would involve the permanent loss of this playing field which reduces the supply of playing pitches in Saffron Walden and has resulted in the former users of the pitch being displaced to other sites. The loss of this playing field without mitigation would be contrary to Sport England's playing fields policy and Government planning policy on playing fields set out in paragraph 74 of the NPPF. Consequently, at this stage, Sport England would object to the potential allocation of part of this site for residential unless (in accordance with Government policy and Sport England playing fields policy) Site Allocation Policy 1 made provision for either retaining the area of open space that was used as a playing field, replacement provision is made within the development or off-site replacement playing field provision was made to mitigate the impact. Detailed comments have been made on the recent planning application (UTT/13/2423/OP) by Sport England in its role as a statutory consultee on planning applications affecting playing fields.

Chelmsford City Council – support in principle – this allocation is unlikely to result in harmful impacts (directly or cumulatively) on communities in the Chelmsford City Council area.

Essex County Council The scale of development would generate the need for 48 additional primary school places. Evidence suggests that there is a forecast deficit of primary school places in Saffron Walden from 2014-15 onwards and this development would increase the deficit. At secondary level Saffron Walden County High School (SWCHS) is currently operating above capacity and discussions are taking place with the school to ascertain the school's optimum size. The current deficit is forecast to increase over the next 5 years. The County Council considers that development of 167 dwellings would generate the need for 32 pupil places increasing pressure on the SWCHS and Newport Free Grammar School, the nearest secondary school if SWCHS could not accommodate the additional pupils. Without the additional provision proposed in the Draft Plan it is unlikely that adequate pupil places can be provided at existing primary schools to sustain the proposed new housing. The County Council considers that following determination of the optimum size for SWCHS by its Academy Trust it will be possible to use S106 contributions to the expansion of the school to the required capacity. If the Academy Trust does not wish to expand the school consideration would need to be given to the expansion of other secondary schools within the District. Consideration should also be given to early years and child care arising from this development.

Hertfordshire County Council - The potential transport impacts (particularly on the highway network) are a key consideration in the formulation of a preferred development strategy. The impact of the proposed development on the Hertfordshire road network has been considered on the basis of the estimated trip generation and traffic distribution contained in the Transport Assessment (September 2013) submitted in support of the

planning application. The site has an existing use and the Transport Assessment forecasts an increase of less than 100 vehicle trips in the peak hours. Given the scale of development and the distance from the Hertfordshire road network, it is expected that the traffic generated by the development of 167 dwellings on the Ashdon Road site could be accommodated within the existing Hertfordshire transport network.

Saffron Walden Town Council – the fact that the prospect of a new settlement is not even being considered is surprising. Uninformed first reactions to the proposed development of the Rigeons site might be along the lines that

- the site is previously developed and under-used;
- the proposed development would generate jobs;
- the proposed development would provide much needed affordable housing and that the proposal is therefore acceptable in principle.

However, somewhat more detailed consideration reveals the following:-

- the site is not all previously developed and the south western quadrant comprises the only area of amenity open space in the north-east part of town which is much used, and greatly valued, by local residents;
- that same south western quadrant of the site includes a football pitch (previously laid out to junior pitch specifications) which has been used by local junior teams for at least the last 17 years and has been used as a football pitch (albeit with brief gaps) for at least 40 years. Nor are there any replacement facilities to be provided “that better meet local recreational needs” (as required by local plan policy LC1);
- it has not been demonstrated that there is a reasonable prospect of the site being used for the allocated employment uses;
- the proposed development would have a serious adverse impact on areas of special roadside verge and the local wildlife site which support the rare Sulphur Clover *Trifolium ochroleucon* plants and other rare calcareous (chalk) grassland plants whilst also resulting in the needless loss of other wildlife habitats on the site. One such habitat is the pond at the bottom of the pit (situated at the front of Ridgeons to the left) which is proposed to be filled-in and a house built over it;
- the site is located on the ‘wrong side’ of town with regard to main destinations and routes to work because the nature and frequency of the existing public transport services, and the sheer distance of the site from the railway station and the town centre, is such that the use of sustainable modes of transport will be minimal;
- the additional development and resulting traffic would not only exacerbate existing traffic congestion but also lead to an unacceptable risk from excessive levels of air pollution;
- the proposed development would exacerbate existing problems with regard to infrastructure provision (including sewerage and roads). It would also create further education requirements in both primary and secondary schools for which there is neither existing capacity nor the scope to provide it.

It may well be that some form of development which regenerates the existing commercial buildings on the site would be perfectly acceptable. But the redevelopment of the whole site along the lines proposed would be unsustainable, and therefore unacceptable, for the reasons set out above.

The Town Council is concerned about the assumptions and methods used in the Highway Assessment which has been carried out and the mitigation being proposed.

The proposed one-way systems will result in substantial detours for many drivers (depending upon their approach to, and destination within, the town). This will cause longer journeys and hence increased pollution. It will also lead to ‘rat-runs’ which involve some drivers seeking

shorter routes using roads either not designed, or with the capacity, for an increased amount of 'through traffic' which has no business in the area. This would be likely to impact adversely upon both the environment of the area (with many of the potential routes being along residential roads) and road safety (as a consequence of relatively fast moving traffic along what may be confined road space because of parked cars).

Whilst the capacity of the junctions has been established, the same does not apply to the roads themselves. Many, if not all, of the roads that will be subject to increases in traffic and the introduction of one-way systems are already subject to on-street parking. Whilst it will be possible to remove this in order to smooth the flow of traffic, it may cause insurmountable problems to the people who use these spaces if they are local residents who do not have any feasible alternative parking options.

The increased amounts of traffic, and possibly increased speed along 'rat-runs', must inevitably result in the increased risk of accidents. This will particularly be the case in the vicinity of the County High School where Borough Lane is proposed to be made one-way north-bound.

The eventual introduction of 'no entry' signs on major routes into the town, together with the creation of one-way systems and associated sets of traffic lights along it in order to try to manage the effects of the dramatic increase in traffic that will result from the scale of the proposed developments, is not in keeping with the character of a country market town. It is more typical of what would be expected in large towns and cities where heavy traffic is the norm that has to be accommodated by using the road system to its maximum capacity. That kind of approach is not appropriate in a relatively small market town – especially one which has such a historic character and charm as Saffron Walden. The effect would be marked and adverse. This serves to emphasise that the town should not be subject to the scale of development currently proposed because it cannot accommodate it satisfactorily.

Essex County Council commissioned consultants to undertake an air quality assessment of the effects of proposed developments in the draft Uttlesford Local Plan on nitrogen dioxide (NO₂) concentrations. The study entitled 'Assessment of Uttlesford District's Local Plan on Air Quality in Saffron Walden: Nitrogen Dioxide Dispersion Modelling Report' was published in October 2013.

The results show the marked contrast that the different predictions have upon the findings of the study. But it clearly shows that:-

- the Thaxted Road/Radwinter Road and the High Street/George Street junctions will be subject to the highest concentrations of NO₂;
- the proposed link road would have a beneficial effect upon the Thaxted Road/Radwinter Road junction – as would be expected;
- the impact of the proposed link road and associated traffic management measures on the Borough Lane/Debden Road, Borough Lane/London Road and Newport Road/Audley End Road junctions are unknown; and
- the effect of the redevelopment of the previously developed sites without the 800 houses proposed in the local plan is totally unknown.

In relation to the deliverability of the required traffic mitigation measures - the preliminary estimates of the costs of implementing the proposed improvements identified to the various junctions are as follows:-

- B184 Thaxted Road / B1053 Radwinter Road: £18,500
- B184 Thaxted Road / Peaslands Road: £207,000
- Mount Pleasant Road / Debden Road: It is understood (by Essex County Council) that signalisation of this junction is a planning obligation of a recent planning approval and therefore no costing is required.
- B1052 London Road / Debden Road: £19,000
- B184 High Street / B184 George Street: £260,300
- B1052 London Road / Borough Lane + B1052 Newport Road / Audley End Road: two junction works combined - £473,300.

All of these preliminary costed schemes give a total of £978,100 (i.e. in reality an absolute minimum of £1 million). But these schemes would only be necessary in the long term if and when the 'link road' is operational. Essex County Council would be seeking unspecified 'contributions' to these schemes from developers of sites which might be expected to impact upon these junctions. But it cannot do so as yet because the local plan is only in draft form and there is no commitment to the individual schemes. Given the location and scale of the current development proposals for which planning permission is already being, or will shortly be, sought, it is apparent that there will be little or no scope to secure funding from developers such that the whole cost of the necessary junction improvements would fall to the County Council to provide. Hence it is very probable that, in the event of the 'link road' being provided and the junction improvements made necessary, the County Council, as highway authority, will have to fund them. That will entail a cost of £1 m. + at 2013 prices. Without such a commitment the required traffic mitigation measures will not be deliverable.

The study assumes that the link road (from Radwinter Road to Thaxted Road) will not be delivered before 2026. But, in the meantime, the council has already granted permission for 52 units at The Kilns, 14 houses at Goddards Yard, Thaxted Road, received planning applications for 300 houses east of Thaxted Road, 167 on the Ridgeons site, and will shortly receive a revised scheme for 50+ dwellings on the Willis and Gambier site and one for a further 300 units south of Radwinter Road which has recently been the subject of public consultation by the prospective developers. If it is assumed that all of these gain approval (and experience suggests that those outstanding will all be recommended for approval), that is some 880+ units. If the large schemes are developed at a rate of, say, 50 per year, then it is quite reasonable to expect that all 880+ will be developed by the end of 2020 – a full 6 years in advance of when the link road is anticipated. Given that, according to the draft local plan, the link road is an essential prerequisite to the provision of the 800 houses (in that it must be provided), let alone the 167 proposed at Ridgeons, plus the other sites, it is readily apparent that, if these schemes are allowed to go ahead, traffic in the town will be in complete and utter chaos from 2020 (i.e. 6 years hence) at the very latest.

It is important to note that the Uttlesford Local Plan Highway Impact Assessment has regard to the development proposals in the June 2012 Draft Local Plan updated to include further development proposals as at October 2012. Consequently, the study does not include:-

- 52 dwellings granted planning permission at the rear of The Kilns;
- 52 dwellings proposed on the former Willis and Gambier site; and
- 167 units proposed on the Ridgeons site which is subject to this consultation.

The report specifies that any subsequent changes in policy, or development assumptions could be expected to have an impact on the analysis. The 271 dwellings proposed on the 3 sites above, represents a 31% increase on the 800 earmarked for the area on the south-eastern edge of the town, which would clearly have a dramatic impact on the analysis.

Consequently, given that the 52 units at the Kilns have already been approved, of the order of 50 units at Willis and Gambier are likely to be, and the 167 at Ridgeons are intended to be incorporated into the local plan, the study needs to be redone, taking the current situation into account, if it is to have any meaningful output.

In relation to education the County's secondary school number of roll forecasts indicate a shortfall (i.e. a deficit) of 147 spaces for the County High School in 2016/17 rising to 186 when the then anticipated new housing is taken into account. But given that planning permission has already been granted for all of those developments, and that construction will therefore take place within the next one or two years, then the forecast deficit of places at the County High School (including an adjustment for new houses) has effectively risen from 186 to 206. There is, in addition, the prospect of residential development on the following sites:-

- former Willis and Gambier factory, Radwinter Road; and
- Ashdon Road Commercial Centre (i.e. Ridgeons site).

In the event that these were progressed and approved, they have the potential to jointly add a further 230+ dwellings, thus generating a further potential 46 pupils. This would take the shortfall to 252 places. It is understood that the County High School, which is now an academy does not wish to expand beyond its current size or take on extra responsibilities by way of another facility (such as a sixth form college). This must therefore mean that there is no scope whatsoever for the implementation of the proposal in the draft local plan of 800 houses to the south-east of the town as this would be expected to generate the need for an additional 160 places (making a potential total shortfall of 400 +).

Uttlesford District Council appointed Hyder Consulting (UK), in March 2012, to complete a Water Cycle Study to inform it of the possible constraints and opportunities to the suggested strategic sites. The 'Uttlesford District Water Cycle Study—Stage 2: Detailed Strategy' was published in November 2012. It found the following "Saffron Walden is predominantly served by a separate surface water and foul water sewerage system. The foul water sewerage system operates primarily by gravity, conveying wastewater to the WwTW to the northwest of the town. The development trajectory for Saffron Walden proposes that 880 new dwellings are to be constructed. The majority of the new development is planned to occur in AMP7 and AMP8 (i.e. from 2020 to 2028). The Local Plan allocation sites are located at the opposite side of the town to the WwTW. The existing sewerage network is at capacity and extensive upgrades will be required. The linear distance from the development to the WwTW is approximately 2 km but the actual sewer lengths will depend on the route of any new sewers or specific sections that need upgrading."

The proposed allocation of the Ridgeons site for predominantly residential purposes should be rejected because of the serious adverse impact that the huge amount of development that is proposed in the current draft local plan would have upon both the character and the infrastructure of the town to its very significant detriment. Saffron Walden should be able to develop in a way that will meet the current and future needs of its residents, businesses and visitors to the town. But that development should both respect and reflect the nature of the town and what makes it so very special in terms of both its history and its character. The town is now perceived, by both residents and the Town Council, as being under the threat of excessive and ill-considered development which will damage it irrevocably. That is not what the planning system is intended to deliver – quite the opposite, in fact.

The Town Council is not totally opposed to development taking place within the town and neither are its residents. It is right and proper that un- and under-used sites should be brought back into beneficial use. That includes the previously-developed part of the Ridgeons site. But the massive amount of development that is currently proposed will have such a dramatic adverse impact upon the town. That view could well be expected to change if Saffron Walden wasn't under the threat of such massive undesirable development. If the proposal to develop 800 houses on greenfield land (in the area between Radwinter Road and Thaxted Road) were to be deleted from the draft local plan then it would enable the Town and District Councils to properly plan for the future of this town in a manner which ensures that it delivers development which is sustainable.

This would necessitate the district council recommencing the local plan and preparing it in accordance with the sustainability principles set out clearly in the Framework such that it might be expected to satisfy the Inspector at the local plan inquiry. Para. 182 of the Framework states "...the plan should be the most appropriate strategy, when considered against the reasonable alternatives...". Given the proposed changes to the local plan regarding the period that it will cover and the scale of uncommitted development that it must accommodate, the district council now has not only the opportunity but also the duty to demonstrate that it has chosen 'the most appropriate strategy' if the local plan is to be adopted.

Proposed changes to draft policy

If the draft policy is to be accepted in principle, then this will be subject to the deletion of the 800 houses currently included in the draft local plan on the south-eastern edge of Saffron Walden. Under those circumstances then it will be possible to accept the principle of the redevelopment of the site for some form of employment-based development.

Nevertheless, any such acceptance would be subject to the following:-

- a comprehensive and independent study which clearly demonstrates that there is no reasonable prospect of a site being used for the allocated employment use (to satisfy para. 22 of the Framework);
- the current areas of special roadside verge and local wildlife site should be retained with the road access to the site amended accordingly if necessary;
- the retention of the area of amenity open space (including the area used as a football pitch) in the south west section of the site; and
- the retention of the wildlife habitats (including the dense continuous scrub, the semi improved grassland and the hedgerow/scrub areas) which would otherwise be needlessly lost.

Clearly it is nonsense for the draft policy to refer, as it does, to employment land and greenspace in terms of site area (i.e. hectares) but to dwellings in terms of absolute numbers. Thus, in order to encapsulate the requisite changes, the wording should be amended as follows:-

167 residential dwellings should read **3 hectares of land for housing**
4 hectares of natural and semi-natural green space to the northern and eastern edges of the allocation should read **5 hectares of natural and semi-natural green space to the northern, western and eastern edges of the allocation**

Birchanger Parish Council feel that the transport assessment must consider a relief road to reduce traffic pressure on the town centre. They agree with the landscape buffer.

Debden Parish Council are concerned that the District Council has merely adopted a planning application which has already been submitted for the redevelopment of the site. Any development should be sited where it is most suitable for the surrounding area and residents, taking account of existing transport arrangements and amenities and the difficulties that could be incurred in increasing transport and other amenities into existing infrastructures. The Government has emphasised the importance of Localism and this should be given priority. The residents of Debden use Saffron Walden as the nearest town and the proposal to develop the Ashdon Road site will probably result in traffic delays and congestion, not only for the use of the town of Saffron Walden itself, but to access the station and major highways. Debden does not have a secondary school and the proposed development could put the existing educational facilities under strain.

Sustainable Uttlesford consider that the proposed increase in housing numbers should result in a complete reassessment of the LDF housing allocation policy. The Council should review all the sites in the SHLAA and test the community sustainability benefits of alternative single settlement or wider dispersal strategies against their current policy of peripheral development on existing key communities. The current strategy does not maximise community benefits but places further burdens on existing inadequate infrastructure especially the road network which will result in increased congestion and air pollution. Sites along the strategic corridors or movement in the district should be reassessed. There are options that have not been openly appraised as part of this new review process. It is disappointing that the strategy has not reassessed the district's village communities to see which can benefit from limited small scale development to enable the provision of affordable housing in our smaller communities and increase the long term viability of community facilities like village shops pubs and schools. Such allocations to the villages will ensure that there continues to be balanced population structures in the villages rather than them becoming dormitory villages for commuters. We note that East Herts which adjoins Uttlesford have included such a policy in their draft LDF.

Parsonage Downs Conservation Group has no comment but they do have concerns about the overall impact that allocations will have on the historic towns in the region.

58% of the comments received were standard representations of objection to the inclusion of the Ridgeons site within the plan in addition to the 880 proposed in the June 2012 consultation for the following reasons – these reasons are also cited by **We Are Residents** in their response:

- all of the major sites are on the wrong side of town for sustainable access to jobs, the railway, main roads and the motorway, which are to the west;
- ECC Highways have shown that the Saffron Walden road system cannot cope with the numbers proposed, and that their proposed new one-way system would lead to an unacceptable increase in traffic through the town centre, where air pollution already exceeds legal limits.
- the proposal is not employment led, does not provide the required new infrastructure and is not sustainable.
- There is no provision to increase the already inadequate town centre parking and this and the increased congestion will damage town centre retail businesses.

Other reasons for people objecting to the site included concerns that residential use will reduce the employment possibilities. The four hectares of employment land is not sufficient to meet the employment needs of the new residents of this estate (not to mention all the other new housing estates built in Saffron Walden over recent years. One person is concerned that although the proposal mentions the provision of employment land it contains no meaningful proposals about how employment is likely to be created or what type of employment it will be or the number of jobs proposed or the timescale for creating them.

Concerns are raised about how public services will be improved to support the additional population, with existing facilities like schools, doctors, dentists currently all full in the town - additional housing on this scale cannot be contemplated without addressing these services. A number of people raised the loss of public open space – the open space around the site is used by residents as a football pitch and dog walkers. There is very little other space around SW that can be used for these activities. The Council should not be promoting a form of development that results in less accessible public open space after redevelopment than exists currently. A small number mentioned there is no need for a store and a hotel on this site and there were also concerns about the proximity to the fuel storage facility on Radwinter Road.

Many people are concerned about existing traffic problems, including parked cars in Ashdon Road, being exacerbated by the new development and the impacts of congestion e.g. air quality, lack of access for emergency services. Some potential solutions were suggested including a ring road/by pass, reducing the pavement width and widening the road to make it two way. One person made the comment that the link road proposed as the essential mitigatory measure is no longer deliverable as part of the land required to accommodate it is no longer in the control of a developer.

People referred to the Hyder Water Cycle report which made it clear that the area is water stressed and developers need to show how water use can be reduced. A few people have mentioned lack of capacity at the Sewage Works. Someone was concerned that fracking may take place south of Cambridge and the impact of the water demand which would arise from this.

Some people feel that the strategy to build more houses in Saffron Walden and other towns is not appropriate because of the need to upgrade services and infrastructure and with the numbers now required it would make more sense to build a new town creating a sustainable living environment. Some people have suggested the Stumps Cross/Great Chesterford Area with the M11 J.9 adjusted for full north/south access. Bosted Wood/Andrewsfield is also suggested as a possible alternative with direct access to the A120.

ASP on behalf of two separate clients accept additional development in Saffron Walden and Great Dunmow as they are identified as market towns which are a major focus for development in the district and suitable for larger scale development.

Andrew Martin Associates on behalf of three separate clients consider that the allocation of this site is contrary to the evidence base and is unjustified. The Employment Land Review does not suggest that the site should be redeveloped for housing. It is the role of planning to look beyond short term economic cycles and with economic recovery now forecast sites like

this could be increasingly sought after by new and expanding businesses. The dwellings should be reallocated. In one representation this is suggested to be a sustainable key village such as Newport and specifically the Chalk Farm Quarry Site in another Chelmer Mead.

Boyer Planning consider the site should remain as employment land to maintain the balance between jobs and housing and further feel that the Council should encourage improvements to the site for employment uses and apply a flexible market led approach to encourage economic growth by permitting a range of commercial uses at the site.

Januaries on behalf of the site owners support the allocation. The buildings are now coming to the end of their useful economic life. The type of buildings provided including the large warehouses are also offering the wrong type of employment floorspace relative to modern market demands. The redevelopment of the site for just commercial use is not viable. If the rundown and underused warehouses and industrial units are to be replaced with new commercial facilities that can provide better job opportunities some enabling development is required. Detailed assessments submitted in support of the outline planning application have demonstrated that 167 residential dwellings need to be provided if the remainder of the site can be viably redeveloped as a commercial centre.

Mabb Planning on behalf of clients consider that proposed location is beyond reasonable walking distance of the town centre and cannot be regarded as sustainable. The housing element of the proposal should be deleted and new housing provision directed to a sustainable new settlement with land allocated around Andrewsfield, east of Great Dunmow.

Pelham Structures are concerned that the plan is based on a strategy that is unlikely to be viable when all of the required infrastructure costs, education provision, shops, transport system and employment provision and 40% low cost housing requirements are considered. With single and larger individual settlements, new roads, drains, sewerage systems and utilities all require a vast amount of energy to construct and incorporate a massive amount of embodied energy within items such as concrete, tarmac etc. A more sustainable solution would be to add small numbers of houses meeting demanding sustainability standards to existing settlements. Smaller groups will require minimum infrastructure, affordable housing will be more readily assimilated and smaller developments are likely to be built by local builders so supporting the local economy.

Savills on behalf of Kier support development in this key gateway where development could improve the approach to the town. Saffron Walden is the largest town and the administrative and commercial centre. It is a location where services and facilities are concentrated which makes it suitable for new development. As a town with a high level of services and facilities it is entirely appropriate that it is identified at the top of the settlement hierarchy and in a position where it is a sustainable location for growth and should be accommodating significant levels of new development. We concur with the Council's assessment that the eastern expansion of the town is the most appropriate direction of growth and that the land identified within the Council's allocations for development within Saffron Walden are the most suitable.

Springfield promoting a site in Newport on behalf of a landowner consider that as this is a brownfield site it can broadly be supported by planning policy as the site proposes significant employment. But whilst a laudable objective to propose employment with housing as part of the mixed use the Council has somewhat inconsistently failed to follow this principle elsewhere notably in Newport where housing allocations are proposed but without any supporting employment. This is contrary to the findings of the employment land review.

Terence O'Rourke on behalf of Countryside Properties consider that whilst the site may be able to accommodate the additional number of houses proposed these will require a number of site specific and more localised infrastructure and service improvements. Such issues are likely to affect the deliverability and timing of development both at this site and the other Local Plan allocations in Saffron Walden. In view of these issues Countryside questions whether the addition of this site to the Local Plan allocations is appropriate and even if it were whether the housing would be likely to come forward at the anticipated rates during the plan period.

Some people have no objection to the development or support it because it is a brownfield site and because Saffron Walden is the main town and a development of this size is appropriate and can be absorbed. One person has suggested further that additional homes should be provided in Saffron Walden.

Sustainability Appraisal November 2013

Development of the site will have the following predominant effects:

Sustainability Objective	Impacts	Issues Highlighted
1) Retain, enhance and conserve the biodiversity and character of the landscape	Positive	
2) To maintain and enhance the district's cultural heritage, assets and their surroundings	Positive	
3) To reduce contributions to climate change	Uncertain	Impacts uncertain use of renewables and energy efficiency unknown.
4) Reduce and control pollution	Negative/Uncertain	Impact on AQMA, Site is within Ground Water Protection Zone Drainage strategies will be required for all allocated sites to make sure there is no off-site increased risk of

Sustainability Objective	Impacts	Issues Highlighted
		<p>flooding.</p> <p>Careful consideration of SUDs will be required on all sites with appropriate infiltration techniques for clean surface water.</p>
5) To reduce the risk of flooding	Positive/Uncertain	<p>Saffron Walden is considered to be susceptible to flooding at a number of locations from fluvial, ground and surface water sources. Parts of Saffron Walden are shown on our Flood Map as being within Flood Zone 3 (High Risk) of the Thaxted Road Slade, Kings Slade, and Madgate Slade.</p> <p>Drainage Strategies will be required for all allocated sites to ensure no off-site increased risk of flooding.</p> <p>Careful consideration of SUDS will be required on all sites with appropriate infiltration techniques for clean surface water.</p>
6) To promote and encourage the use of sustainable methods of travel	Negative/Uncertain	<p>Site is not within walking/cycling distance of school, GP</p>
7) Promote accessibility	Positive	
8) To improve the population's health and promote social inclusion	Negative	<p>Nearest GP is more than 800m away and site is not close to accessible natural greenspace.</p>
9) Provide housing to meet existing and future needs	Positive	
10) To promote the efficient use of resources and ensure the necessary	Negative	<p>Capacity in primary schools but none at secondary school. Not known whether</p>

Sustainability Objective	Impacts	Issues Highlighted
infrastructure to support sustainable development		transport infrastructure, water supply or existing WWTW can support new development.
11) To improve the education and skills of the population	Positive/Negative	Site is not within 800m of a primary school, and does not include new educational facilities.
12) To support sustainable employment provision and economic growth	Positive	

Officer Comments

Anglia Water Services comments are noted. The Council will consult with the Environment Agency and Essex County Council – Flood and Water Management Team to make sure that the development is in accordance with the drainage hierarchy and SUDs are properly considered in line with current advice and the relevant policy in the emerging Local Plan.

The SA/SEA of the Local Plan is being carried out by Essex County Council. The SA/SEA for the pre-submission consultation will take account of all the sites being proposed and will take into account the Highways Assessment work and any mitigation being proposed as requested by English Heritage.

In relation to the Highways Agency comments, policy requires that the planning application should be accompanied by a transport assessment and a transport assessment has been submitted in support of the current planning application (UTT/13/2423/OP) and is also required by the policy.

Any requirements set out by NHS Property Services will also be considered as part of the determination of the planning application.

Contributions to education will be determined in accordance with Essex County Council adopted standards. The requirement would be regulated by legal obligation.

Although the open space to the south west of the site was used by a local community football club it has no formal status and is not identified as playing fields to be safeguarded in the current Local Plan. New playing fields have been and will be provided elsewhere in Saffron Walden.

Potential impacts on the Special Roadside Verge and Local Wildlife Sites are capable of mitigation and appropriate measures will be secured through the planning application.

In relation to the comments made by Birchanger Parish Council the transport assessment has considered the relief road proposed to the east of the town alongside other mitigation measures. Support for the landscape buffer is noted.

Debden Parish Council are concerned about the impact of the development but this is a brownfield site where there will already be significant traffic movements and some of these will be heavy goods vehicles servicing the employment uses currently on the site.

A new settlement has been considered at various stages in the preparation of the new local plan. Most recently in October 2013 when the Council considered the options for delivering the additional housing growth. The Council also reviewed the SHLAA sites as part of this work, The issue with spreading development around smaller communities is that the scale of development likely to be acceptable will not deliver the required infrastructure. Policy does not preclude development in villages.

The Council does not consider that the policy should refer to land for housing in hectares rather than numbers which is consistent with all the other policies in the plan.

The findings of the Uttlesford Local Plan Highway Impact Assessment (October 2013) which included the sites in the Draft Local Plan has been previously reported. The conclusions were that Saffron Walden is a historic market town with a restricted highway network. There is not going to be a solution which will improve the capacity of every junction. Based on what is achievable in Saffron Walden the solution proposed by Essex Highways is considered by them to be the most suitable solution which brings about the most benefit to the most users. The Highways Assessment is currently being updated to take account of the additional sites and the findings reported in due course.

In response to developers suggesting that the site should remain as employment land the Council considers that a mixed use development on this site is the best way of securing employment land in the long term. If the employment use were to cease there will be pressure to release the site in it's entirety for housing, which would be supported by the NPPF (para 22)

It would not be possible to deliver all new sites within a short walking distance of the town centres. It is unlikely that even with a new settlement this could be achieved.

The comments of the Oil Pipeline Agency, Chelmsford City Council and Hertfordshire County Council are noted.

The representations of support are noted. The promotion of alternative sites has been considered in response to Question 2.

Officer Recommendation

Subject to the findings of the additional Highways Impact Assessment work no changes are proposed.

**Land west of Great Dunmow , South of Stortford Road
Land adjacent to Buttleys Lane**

Question 4

Do you have any comments on the proposed allocation or the policies for the land west of Great Dunmow, South of Stortford Road and land adjacent to Butley's Lane? If you think the policies should be changed please set out clearly in your comments what changes you would like to see.

This question was responded to by 128 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to http://uttlesford-consult.limehouse.co.uk/portal/planning_policy/ahns/ahns

Anglian Water Services state that they have already discussed this site via their pre planning service they offer to developers. They stress that upgrades to the network will be required. They state that the site should follow the drainage hierarchy and disposal to surface water sewers should be a last option when all sustainable urban drainage solutions and discharge to watercourse have been investigated and proven to be non-viable

Birchanger Parish Council states that the transport assessment should consider M11 junction 8 and not just the A120 and roads immediately around Great Dunmow.

Chelmsford City Council supports the allocation in principle, stating that it is unlikely to result in harmful impacts on communities in the Chelmsford City Council area. They suggest UDC should consider highways impacts at all the new sites being suggested and request for further modelling work to ensure all highways impacts are identified and mitigation measures planned for.

English Heritage stress the need to consider the impact of an urban extension on the towns distinctive character and heritage, they prefer development consistent with the grain of the town, and are concerned that the allocation poorly relate to the main built up area. They are concerned that development could butt up to the Flitch Way and the new A120, however they do support the reference to a substantial landscape buffer along the Flitch Way. They stress the need to keep the area proposed for playing fields free from built development. They are concerned the reference to enabling development in para 5.1 and 5.3 could be confused with the references in the NPPF to development required to secure the future of heritage assets and request these references are amended to clarify the nature of the exchange proposed in this instance.

Environment Agency wish to seek assurances that adequate funding for any wastewater treatment solutions and network improvements is in place prior to large scale development commencing. They stress the need to phase development in Great Dunmow to give the water company time to explore and implement appropriate technology and help secure funding to mitigate the issues.

Essex County Council Environment, Sustainability and Highways point out that the additional 500 dwellings in Great Dunmow would generate need for 135 additional primary school

places. They advise that there is no further capacity to accommodate growth in the existing two primary schools serving Great Dunmow, and a forecast deficit of primary school places from the school year 2014-15 and the proposed developments would increase this deficit. Concern is expressed that all of the S106 funding on the two Great Dunmow sites would be used to fund the relocation of Helena Romanes School, therefore there would be no funding available to meet the cost of providing additional primary school places. They express the need to carefully consider and discuss the allocation of these sites. More detail needs to be given regarding the level of funding that is needed to enable delivery of the secondary school and the medical centre.

Essex County Council Technical Officer explains that the additional sites would generate the need for an additional 135 primary school places and would therefore need to be accommodated in the two proposed schools in the Draft Local Plan 2012 consultation. The proposal to relocate and rebuild Helena Romanes would provide the necessary site capacity to accommodate the additional pupils generated by the new housing in the area. Questions how the complex financial arrangement will be structured over a number of years, and requests a viability assessment be undertaken. Stresses that there is not sufficient capacity of room to expand the existing Helena Romanes school to accommodate all the growth planned and recommends consideration be given to allocating additional land within easy travelling distance of the school that could be used for a 6th form centre. It is also considered that the additional development should provide support for the development of appropriate early year's places to meet the needs of the new residents.

Great Dunmow Neighbourhood Plan Steering Group and Great Dunmow Town Council support the additional site allocations facilitating the relocation of Helena Romanes. They express concern that infrastructure will not be delivered in a timely fashion or at all. They consider Great Dunmow to have lack of employment land and suggest the site allocated for Helena Romanes, if it doesn't get delivered, should be protected for employment use. They question whether the health centre conforms to the plans of the healthcare providers and express the need for it to be accessible by public transport. The reference to play space is supported, however, the stress these need to be of a useable size. The reference to a strategic landscape buffer is supported, however it should be ensured that the passage for school children across the Flitch Way is properly managed. They express the need to engage closely with the Town Council when deciding on the wider and longer term planning benefits.

Hertfordshire County Council Children's Services state that financial contributions to the provision of school places in Hertfordshire may be required and it would be helpful if this could be acknowledged in the infrastructure delivery plan. The provision for a new secondary school is supported.

Hertfordshire County Council express the need to work closely with UDC on the potential transport impact and are concerned that there will be significant impact on junction 8, the A120/B1383 and the A1250.

High Easter Parish Council welcomes the addition of a health centre but wishes to see further clarity on the impact of all amenities, including primary and secondary school places and road infrastructure.

High Roding Parish Council accepts that there is a need for more housing and would rather there were a few big sites as opposed to smaller ones. However, they question whether this is meeting local need, is there the infrastructure to cope, how much affordable housing would be provided, where would all the residents work, where will children go to school and will there be provision of sports facilities?

Highways Agency states that they are not aware of evidence that identifies the likely level of impact upon the A120 and its junctions with the local road network. They therefore question the deliverability of the sites and the documents soundness. Reference to a travel plan is supported, however, reference should be made specifically for the need to encourage modal shift and reduce the need to travel through the provision of land use planning and a travel plan. They express the need to mention an indicative level of improvement (if identified through the evidence base) that would be expected at trunk road junctions.

NHS North Essex welcomes the reference to a health centre, however, this would have to be approved by NHS Business Case approval procedures and it may be the case that financial contributions would be preferred. They suggest the following changes to the policy:

Para 5.1– This 17 hectare site to the west of Great Dunmow, south of Stortford Road and north of the Flitch Way is a strategic allocation for an enabling residential development to support the new secondary school with playing fields. The provision of the new school site and buildings will be partially funded by the redevelopment of the existing Helena Romanes school site for residential use. This site is on a key approach to Great Dunmow and improvements to this approach will be sought as part of the development.

Site allocation 2, bullet point 3 – it provides land and the provision of a new health centre of approximately 1800m² floorspace together with ancillary parking facilities and an ambulance pick up/drop off point landscaping to a specification agreed with NHS England, and with such provision being subject to NHS Business Case approval procedures. In the event that a business case is not confirmed financial contributions to increase healthcare capacity elsewhere in the locality would be required.

Sport England express the need for site allocation policy 3 to make it explicit that land adjacent to Butleys Lane is safeguarded for replacement school playing fields as well as the school itself, and that the replacement playing fields will include provision for a replacement floodlit artificial grass pitch to replace that displaced from the existing school. They wish the policy to state that the playing fields will be at least equivalent in quantity and quality to the existing facilities and as accessible to the community as the existing pitches are.

Strutt and Parker on behalf of Helena Romanes School are in support of the allocation stating that it consistent with national policy. The location of the site is in conformity with the NPPF as it is in close proximity to jobs, services and will support the local economy. The location of the development will protect the local distinctiveness and historic character of the rural settlements. The new school will help meet the growing demand for secondary school places.

Thaxted Parish Council express their wish for all development to be located south of the A120 to protect the historic settlements in the north.

The Dunmow Society object as it is agricultural land.

Local Doctors Surgery support the reference to a health care centre in the policy but express the importance of planning for the next 20 years.

There were a number of responses from residents objecting to the policies covering the following points:

- no evidence of local need
- concern that the school and sports centre will be so far apart
- concerns that the residents of the new development will be too close to the A120 and quality of life would not be good
- questions where the funding for the school will come from
- stress the need to take into account all of the development planned and completed in Great Dunmow
- suggestion of other settlements to take the housing instead including Great Chesterford and Stebbing Green
- concerns over the loss of agricultural land
- infrastructure cannot cope with the proposed growth
- requests to start the plan making process again
- scale of development would be detrimental to Great Dunmow
- unsustainable in terms of the localism act
- Garden City design development should take place
- Windfall sites should be accounted for in the housing numbers
- UDC should work with Great Dunmow Town Council and the Neighbourhood Planning Group
- Not compliant with the NPPF paras 150-177
- Sitting a school next to the dual carriageways is dangerous for the school children
- Lawful consultation has not been undertaken
- A suitable sustainability appraisal has not been undertaken

Developer/Landowner of the site supports the allocations, however, suggests the following amendments. Para 5.1 – This 17 hectare site to the west of Great Dunmow and south of Stortford Road and north of the Flitch Way is a strategic allocation for an enabling residential development to support the provision of a medical centre and a new secondary school with playing fields. The provision of the new school site and building will be partially funded by the development of this site and redevelopment of the existing Helena Romanes School site for residential use. It may be necessary to reduce the requirement for other community benefits in terms of affordable housing etc to enable delivery of the school site and buildings and the medical centre.....

Para 5.2 – A 14 hectare site adjacent to Butleys Lane, is a strategic allocation, safeguarded for the development of a new secondary school in connection with enabling residential development on the land to the east and at the Helena Romanes School site.....

Site Allocation 2 – the land to the west of Great Dunmow and south of Stortford Road is allocated for at least 400 dwellings. The following criteria must be met: The development provides for a mixed and balanced community to include: at least 5% older persons and 1 and 2 bed bungalows across tenure it provides land and the provision of a new Health

Centre approximately 1800m² floorspace together with parking and an ambulance pick up/drop off point, it provides for open space (LAPS LEAPS and NEAPS) and a substantial strategic landscape buffer to the south along the boundary of the Flitch Way Country Park the extent of which will be established at the planning application stage. The development is designed to mitigate adverse effects upon existing residential and community interests and may be required by legal obligation, to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact. The nature of such contributions may need to be weighted appropriately to enable delivery of site and buildings associated with the above medical centre and the new secondary school on the site adjacent to Butleys Lane.

A number of landowners/developers objected to the sites questioning deliverability and viability. There were concerns regarding the lack of affordable housing provision and the distance from the town centre. One objects on the grounds that it is not supported by clear evidence. A number of alternative sites were suggested.

The proposal is supported by a number of individuals and Siemens Benefit Scheme.

Sustainability Appraisal November 2013

Development of the site will have the following predominant effects:

Sustainability Objective	Impacts	Issues Highlighted
Retain, enhance and conserve the biodiversity and character of the landscape	Negative	within 100m AshGrove/Oak Spring and Flitch Way B10 Broxted Farmland Plateau moderate to high sensitivity to change. Close to B14 Roding Farmland Okateau moderate to high sensitivity to change
To maintain and enhance the districts cultural heritage, assets and their surroundings	Negative	8 grade II listed building on the edge of the site Adjoins Great Dunmow Conservation Area 17 EHER on and off site ECC Historic The site has high archaeological potential
To reduce contributions to climate change	Uncertain	
Reduce and control pollution	Positive	

Sustainability Objective	Impacts	Issues Highlighted
To reduce the risk of flooding	positive/uncertain	
To promote and encourage the use of sustainable methods of travel	Positive	
Promote accessibility	Positive/Negative	In top 20% of most deprived area for Barriers to Services sub-domain The site is not within the town centre.
To improve the populations health and promote social inclusion	Positive	
Provide housing to meet existing and future needs	Positive	
To promote the efficient use of resources and ensure the necessary infrastructure to support sustainable development	Positive	
to improve the education and skills of the population	Positive	
to support sustainable employment provision and economic growth	Negative	The development will not encourage retail and business diversity. Community health facilities and public open space as well as a secondary school will be provided but no other business use

Officer comment

Anglian Water Services comments are noted, this will be dealt with at Planning Application stage

The Highways Assessment does take account of the cumulative impact on M11 Junction 8 and UDC has been working closely with East Herts DC, Hertfordshire County Council and other local authorities on this issue. At present a further Highways Assessment is being undertaken to assess the impact of the additional sites proposed.

In response to English Heritage comments there is no reference to built development on the playing fields. It is not considered that the reference in paragraphs 5.1 and 5.3 to enabling development will be confused with paragraph 55 bullet point 2 of the NPPF as this explicitly refers to 'appropriate enabling development to secure the future of heritage assets...'

Discussions and consultation with the Water Companies are ongoing, their views will also be sought at planning application stage and if need be mitigation measures will be sought.

Viability assessment of the site has been carried out on behalf of the school and in conjunction with the land owners. Discussions with Essex Council Education department are on-going. Two new primary schools are being provided on land north of Stortford Road and west of Great Dunmow and land west of Chelmsford Road, which will help overcome the problems at existing town primary schools and cater for the need generated by the new developments.

NHS North Essex has been consulted throughout the plan making process and their views will be taken into account when finalising the policy and at planning application stage.

Employment land is being provided elsewhere in Great Dunmow, such as the Elms Farm development.

40% affordable housing will be sought on this site in line with development management policies, although it is accepted that the percentage may be lower to provide sufficient funding for the new school.

NHS North Essex comments are noted and changes to the policy wording are proposed.

Details regarding the playing fields will be discussed at planning application stage, and Sports England's view will be sought.

Evidence of need for the whole District comes from the SNPP. All development, both proposed and completed has been taken into account throughout the preparation of the Local Plan. This consultation is not a stand-alone document; it will form part of the plan along with the proposals in the June 2012 consultation document.

It is not felt necessary to make reference to the possibility of reducing the requirement for other community benefits, including affordable housing, as the current policy wording is clear as it is 'enabling development'.

Helena Romanes School is in full support of the allocation and do not have any concerns regarding the distance between the proposed school and the existing sports centre. A new school would include its own sports facilities.

The local plan is being undertaken with the NPPF in mind. When the plan is read as a whole alongside all the strategic policies and Development Management policies and Site Allocations the plan can be shown to meet the requirements of the NPPF. This consultation has met the legal requirements for consultation, as set out in The Town and Country Planning (Local Planning) (England) Regulations 2012.

The representations of support are noted. The promotion of alternative sites has been considered in response to Question 2.

Recommendation

Final recommendations will be made when the Highways Impact Assessment work has been completed. Amend supporting text and policy to Land north of Stortford Road and West of Great Dunmow:

This 17 hectare site to the west of Great Dunmow, south of Stortford Road and north of the Flitch Way is a strategic allocation for an enabling residential development to support the provision of a ~~medical centre and~~ a new secondary school with playing fields. The provision of the new site and building will be partially funded by the redevelopment of the existing Helena Romanes school site for residential use. This site is on a key approach to Great Dunmow and improvements to this approach will be sought as part of the development.

Land west of Great Dunmow and south of Stortford Road

The land to the west of Great Dunmow and south of Stortford Road is allocated for 400 dwellings.

The following criteria must be met:

The development provides for a mixed and balanced community to include:

At least 5% older persons 1 and 2 bed bungalows across tenure

It provides land and the provision of or financial contributions to a new Health Centre of approximately 1800m² floorspace together with parking and an ambulance pick up/drop off point

It provides for open space within the development including informal recreation areas, the provision of children's play spaces (LAPS, LEAPS and NEAPS) and a substantial strategic landscape buffer to the south along the boundary of the Flitch Way Country Park.

The development is designed to mitigate adverse effects upon existing residential and community interests and may be required by legal obligation, to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact.

The application should be accompanied by a Transport Assessment and Drainage Strategy and other required documents and any recommended improvements/remedial works will be controlled through the legal obligation.

Development will need to be implemented in accordance with the Master Plan and design guidance approved by the Council and other Development Management Policies. Implementation of the Master Plan proposals will be regulated by legal obligation in association with the grant of planning permissions.

Land at Helena Romanes School

Question 5

Do you have any comments on this proposed site allocation or the above policy? If you think the policy should be changed please set out clearly in your comments what changes you would like to see.

130 people responded to Question 3. The following report is a summary of the comments made. The full text of all the representations can be viewed on the consultation portal at http://uttlesford-consult.limehouse.co.uk/portal/planning_policy/ahns/ahns

English Heritage The use of 'enabling development' in the policy could be confused with the references in the NPPF to development required to secure the future of heritage assets (NPPF, paras 55 and 140). We recommend the policy is amended appropriately to meet the circumstances of this proposal. It is particularly important that any development here, close to the town centre, should be consistent with Great Dunmow's historic grain and character.

Highways Agency Significant development is already proposed in Great Dunmow which may have an operational impact upon the A120 including its junctions with the local road network. The Agency is not aware of evidence that identifies the likely level of impact, therefore there may be questions regarding deliverability of these sites and consequently the documents soundness. Whilst the Highways Agency welcomes the reference to the need for a Transport Assessment and acknowledges reference to the need for adequate travel planning in other documentation, reference should be made specifically to the need to encourage modal shift and reduce the need to travel through the provision of a travel plan.

Essex County Council Technical Officer explains that the sites would generate the need for an additional 135 primary school places and would therefore need to be accommodated in the two proposed schools in the Draft Local Plan 2012 consultation. The proposal to relocate and rebuild Helena Romanes would provide the necessary site capacity to accommodate the additional pupils generated by the new housing in the area. Questions how the complex financial arrangement will be structured over a number of years, and requests a viability assessment be undertaken. Stresses that there is not sufficient capacity or room to expand the existing Helena Romanes school to accommodate all the growth planned and recommends consideration be given to allocating additional land within easy travelling distance of the school that could be used for a 6th form centre.

It is also considered that the additional development should provide support for the development of appropriate early year's places to meet the needs of the new residents.

NHS Property Services welcomes the policy requirement for the development to be designed to mitigate adverse effects upon existing residential and community interests,

Sport England have no objection to the principle of this allocation as provision is made through Site Allocation Policy 3 for replacing the school including its playing fields and other sports facilities, However, there are several matters that the site allocation policy needs to provide clarity on as follows: - the policy should confirm that the replacement school playing field provision (both natural turf playing fields and artificial grass pitch) at the Buttleys Lane

site will need to make at least equivalent playing field provision in terms of quantity, quality and community accessibility. This is required in order to ensure that the loss of the site to residential would accord with Sport England 's playing fields policy and Government planning policy on playing fields set out in paragraph 74 of the NPPF as the allocation of this site for development would only be acceptable in principle on this basis. The policy should confirm that the new school including its playing fields will be completed and available for use before any development commences on this site in order to ensure continuity of access to the sports facilities for both school and community users. While it is expected that this phasing will be delivered in practice in order to meet the operational requirements of the school, it is pertinent for playing fields as the construction of new playing fields takes around 18 months on average and Sport England has had experience of new school playing fields not being available for use when new schools have opened due to the length of time take to construct playing fields not being accounted for at the outset. The policy should confirm that the Great Dunmow Leisure Centre will be excluded from the allocation and will remain operational throughout the construction of the development in order to safeguard access to this important community facility if residential development does take place. Due to the leisure centre currently being an integral part of the existing school site, this clarification would help ensure that it is safeguarded in practice and access to it maintained to avoid potential issues arising at a later date. While Sport England would not object to the principle of the floodlit artificial grass pitch (AGP) being relocated to the new school site, the Council are urged to review whether its inclusion in this site allocation (and therefore its relocation to the new school site in site allocation policy 3) is appropriate in practice. AGPs unlike grass pitches are intensively used floodlit facilities which are used in this case both during the day and the evening by the school and the wider community. The AGP on this site is a dual use facility which forms an integral part of the leisure centre. If the AGP is to be relocated, the new school would need to be planned and designed to facilitate significant community use outside of school hours (the AGP would need to be appropriately located within the new site) and formal dual use arrangements would need to be put in place to secure community use access over a long term period in practice. The AGP would also be costly to relocate and may affect development viability. The current national average cost of providing a new equivalent facility would be £685,0000 plus there would be a need to provide ancillary facilities that are suitable for community use such as changing and car parking. Consideration should also be given to whether removing the AGP from the leisure centre would have any consequential implications for the sustainability of the leisure centre as AGPs are usually one of the main income generators for leisure centres. Sufficient space in a suitable location within the new school site would also need to be provided to accommodate the facility (around 0.64 ha). In this regard, it is noted that the area to the south of the Flitch Way (in site allocation 3) is proposed for replacement playing fields. However, this area would not be suitable for an AGP due to need for the facility to be in close proximity to the ancillary facilities provided on the main school site due to the intensive use of it. Sufficient space would therefore need to be included to the north of the Flitch Way to accommodate an AGP. As the AGP would need to be floodlit and would be intensively used, consideration should also be given to the suitability of relocating it to the new school site in planning terms due to the potential impact in terms of the environment (noise) and highways (A120). Collectively, it is considered that the above issues would justify a review of whether the AGP be included in the proposed site allocation although it is acknowledged that if the AGP was retained, there would be a need for school users to travel off-site to access it in its current location if the school was relocated.

Chelmsford City Council supports the allocation in principle and do not consider this allocation is likely to result in harmful impacts (directly or cumulatively) on communities in the Chelmsford City Council area. They note that the Essex Highways report looks ahead to 2026 and does not appear to have considered highways impacts at all of the new sites being suggested. UDC is urged to undertake further additional modelling work to ensure that all highways impacts are identified and mitigation measures planned for.

Hertfordshire County Council have made an initial assessment of the impact on the Hertfordshire road network of 100 homes on land west of Great Dunmow using the spreadsheet based analysis. The analysis shows that that the proposed allocation would increase traffic along the A120 towards the M11 junction 8 and Bishop's Stortford. The estimated number of trips entering the Hertfordshire road network is however expected to be low and the existing road network should therefore be capable of accommodating the development without significant changes to the highway network. It should be noted that this development will impact on the same area of the Hertfordshire road network affected by Bishop's Stortford North and the land west of Great Dunmow. The Harlow Stansted Gateway Model (HSGTM) is a sub-regional Saturn model covering the Harlow, Bishop's Stortford and Sawbridgeworth areas. Unlike a spreadsheet based approach it is able to take into account the impact of new infrastructure, congestion effects at junctions and also behavioural changes such as the re-routeing of existing traffic to avoid congestion. The HSGTM currently contains the Uttlesford sites previously presented and does not include the four site allocation options at the scale discussed above. It will need to be updated to test the stated site allocation options at Great Dunmow and Elsenham, in the context of other local plan allocations and development applications to establish any requirements for infrastructure improvements. Should the analysis gaps highlighted not be sufficiently evidenced within the draft plan for consultation then it is likely that the highway authority will have concerns with the impact of the strategy on its network.

Birchanger Parish Council questions the decision to site the new secondary school adjacent to Buttleys Lane. Building a secondary school at what will be the furthestmost end of Great Dunmow will almost certainly increase traffic pressure primarily in one direction and especially along the Stortford Road and town centre. It should not be assumed that pupils will all use public transport when considering the school transport links. The school would be better placed towards the eastern end of the land detailed in Site Allocation Policy 2. This would reduce travel time and potentially allow use of the playing fields by a wider group.

Great Dunmow Town Council does not agree that the additional 2680 homes are required. The Town Council and the **Great Dunmow Neighbourhood Plan Group** support the site allocation as an enabling development. This support is contingent on it being necessary for the relocation of Helena Romanes' School; Clarification is sought regarding what is meant by the policy that this development will "part fund" a new school site; The provision of children's play space is strongly supported and, again this must be provided as a priority within the development. It should be reasonably sized and positioned, and these factors should be closely reviewed whenever detailed planning permission is sought; The 1.8ha landscape buffer to the north and west of the site "to form a link with existing woodland habitats" is strongly supported. Tree planting should be encouraged here, using tree species which maximise the value to biodiversity and the absorption of rainwater. The emerging

Neighbourhood Plan will include a suggested list of suitable tree species; Further to the landscape buffer it may be better if the buffer zone to the north were extended (without affecting that to the west). This is because the lower field on the school site (the area currently given over to the landscape buffer to the north) has historic drainage problems and building up to the boundary of the field may well exacerbate those problems potentially damaging the quality of the zone as a wildlife and woodland habitat. This may also have flooding consequences for other low lying areas in the vicinity. It would be preferable if the landscape buffer zone (and tree planting) extended beyond where it is proposed to end (further south), and if the construction of new houses were restricted as far as possible to the existing footprint of the school building; A buffer zone to protect existing properties bordering the site would be supported; The area of this site is of high character value. The current school buildings architecturally detract from this value and the opportunity of starting again with houses of far greater value and appropriate architectural merit should not be lost; The exemption of this site from the "usual community benefits in terms of affordable housing etc" is supported; It is requested that the Town Council is consulted when deciding on the "wider and longer term planning benefits" which may be sought according to the policy to alleviate pressure on infrastructure.

High Easter Parish Council has no comment on the proposed site allocation. Whilst it welcomes a new purpose built secondary school it wishes to see further clarity on the impact on all amenities, including primary school places and road infrastructure.

High Roding Parish Council accepts there is a need for more housing and would rather a few big sites as opposed to smaller ones. The following questions were raised. Is the housing fulfilling local need? Where will the families come from? Is there the infrastructure to cope? Where will the residents work? They will need to commute? Will the rail service be improved? How much of the development will be affordable housing? Will the development ruin the characteristic of Great Dunmow as a small market town? More people will mean more cars, children who live in Great Dunmow walk to school - will buses be provided for children from new developments who live too far from the schools to walk? Will additional sports facilities be provided?

Clavering Parish Council considers no development should take place on the proposed site unless a commitment is in place for accommodating an increase in secondary schooling capacity and facilities.

Parsonage Downs Conservation Group - the majority of residents in the immediate vicinity of Parsonage Downs are not antagonistic towards this proposed site allocation, but have certain issues which need to be addressed during the consultation process. The issues and comments of the PDCG can be summarized in the following points:

- The likelihood of this scheme proceeding and should it not what are the Council plans for a replacement scheme.
- Impact of development on adjacent conservation area and local wildlife.
- Traffic and congestion issues both during construction and after houses are built
- The likelihood of this scheme proceeding and should it not what are the Council plans for a replacement scheme.
- The proposal for building 100 homes on this site is contingent upon the relocation of the existing school to the land West of Great Dunmow and our view is that this HRS site

should not be considered by itself but should be considered in conjunction with the site on the land West of Great Dunmow included in question 4 above.

- There have been well published views that the likelihood of this scheme proceeding for a variety of reasons, including the upfront costs to a developer and the PFI contract issues surrounding the leisure centre, is not great. As we are not party to the information held by the Council and the School we cannot comment either way on this, but our primary concern is over the Council's plans should this scheme fail. We question why these schemes are included in the consultation if there is a significant question mark over their feasibility. We have noted with concern the 'development creep' outside of the consultation process (Sector 4 Woodlands Park being one such example) and feel that we should be consulted now on any proposal the Council has to meet the housing shortfall should the scheme fail.
- Impact of development on adjacent conservation area and local wildlife. The site is adjacent to a conservation area (to which all planning frameworks agree that considerable importance and weight to its conservation must be given) which on this northern boundary to the town has very low density housing. The majority of the few houses and cottages present and certainly those immediately in view reflect the rural nature of this entrance into Great Dunmow. It is agreed that special care is needed where development is close to a conservation area. Any development would need to be in keeping with the existing form of housing in the adjacent conservation area and needs to preserve or enhance the character of the adjacent conservation area. In addition any development should take into account the setting and views into and out of the conservation area.
- The site is also adjacent to Parsonage Downs which is an extensive green that forms the northernmost part of the Great Dunmow conservation area. Parsonage Downs is registered as a potential Wildlife site which has documented presence of species such as Great Crested Newts and is an important wildlife corridor to the River Chelmer. The dozen or so listed properties on the Downs, some with tiled roofs, others thatched, add to the areas visual and historic importance. Parsonage Downs is treed in parts and there are several ponds that add to the visual and ecological importance of the area. Parsonage Downs is set in open arable countryside for the most part and this openness is very much a part of its visual attraction and character particularly as it forms the entrance to Great Dunmow from the North. As residents our only concern is the effect on the current environment on both people and wildlife is minimised. We believe this can be achieved by: Creating a planted buffer area along the entire boundary between the site and the conservation area. We believe that the buffer area, rather than being limited to certain sections of the boundary, should extend along the entirety of the site and should be planted to both act as a visual screen and protection for those houses on the Downs in addition to protecting and indeed encouraging wildlife. This buffer area should be planted as soon as the scheme has received approval (if it ever did receive approval) rather than waiting until the site is developed. Taking the opportunity of the demolishing of the school and its related buildings (which we believe do not add to the historic ambiance of this important area) to ensure that the houses that are built are in keeping with the current ambiance and environment of the existing houses in the area. The houses should be restricted in height to ensure they do not encroach on the views as you enter Great Dunmow. Traffic and congestion issues both during construction and after houses are built. There is currently only one access route to the site which crosses the Parsonage Downs potential Wildlife site and the existing residents have concerns over the noise pollution which would arise both during construction and post construction. The pattern and quantity of traffic will change significantly from one which has defined times (school times and leisure centre times) to one which is typical of a residential area with 100 houses and potentially 200 cars accessing their properties at any time of day and night. We believe that there needs to be thorough traffic assessments carried out and that plans should be put in place to mitigate the impact of

the level of traffic on the area. We believe that the Council must consider plans for mitigation including ensuring that there are plans in place to develop further access points to the site so that the issues of a single access off a busy road are alleviated. For instance have the Council considered taking the opportunity of the sector 4 Woodlands Park development to develop another access route into the site. If the Council persist in considering ad hoc developments like Sector 4 as standalone developments we will persist with these issues. The Council needs to take a holistic view of development in Great Dunmow so that issues such as this are considered and plans are in place to mitigate the issues. Traffic controls both into the site itself and on Beaumont Hill itself which experiences congestion as cars are permitted to park on the road.

Sustainable Uttlesford - Sustainable Uttlesford considers that the proposed increase in housing numbers over the plan period should result in a complete reassessment of the LDF housing allocation policy. The Council should reviewing all known sites in the SHLA and test the community sustainability benefits of alternative single settlement or wider dispersal strategies against their current policy of peripheral development on existing key communities. The current housing allocation strategy does not maximise community benefits but perversely places further burdens on existing inadequate infrastructure especially the road network which will result in increased congestion and air pollution. Sites along the strategic corridors of movement in the district should be reassessed. eg close to the M11 motorway junctions as well as the West Anglia line for a new settlement eg Chesterfords or along the old A120 expanding Takeley. These are options that have not been openly appraised as part of this new review process. It is disappointing that the strategy has not reassessed the districts village communities to see which can benefit from limited small scale development to enable the provision of affordable housing in our smaller communities and increase the long term viability of community facilities like village shops, pubs and schools. Such allocations to the villages will ensure that there continue to be balanced population structures in the villages rather than them becoming dormitory villages for commuters. We note that East Herts District which adjoins Uttlesford have included such a policy in their draft LDF.

The Dunmow Society - Redevelopment of the Helena Romanes school site which would not provide for any social housing and would not provide for any social housing and would be dependent on finance and agreement to re-site the school to the north west of the town which would continue to rely on car and bus transport. This would just move the traffic movements from one side of the town to the other without further improvement to all exiting congested junctions and this is not acceptable. it would also be argued that the Leisure Centre (a PFI scheme) would have to either be purchased by a developer or the community charge from residents of Uttlesford

In principle it is right for large scale development to be in the larger settlements. Great Dunmow already has significant new housing allocated to it in the previous consultation proposals and in recent off plan planning permissions. The cumulative impact of these developments must be thoroughly assessed and any necessary infrastructure ensured before final decisions are made.

48 people submitted standard response as follows: Helena Romanes School is an Academy, with a significant PFI contract for the town and school swimming pool and leisure centre attached to it. It is an independent entity over which UDC has little or no direct control. The school has announced no formal commitment to this scheme, nor has it published any

intentions of carrying out a feasibility study or options appraisal. Unless UDC has secured the agreement of the school to this scheme UDC should not have taken what is little more than an untried, untested idea and insert it into the current version of the Local Plan. The school has publicised the fact that it is nearing its maximum capacity of 1600 pupils and according to its own forecasts, will reach it before most of the planned new developments are fully underway. Therefore it will not be able to meet medium and long term demand for secondary school places without a significant increase in capacity within the foreseeable future, whether it stays where it is or moves to a new site. The scheme is unlikely to succeed. UDC is probably aware that any proposed relocation and capacity increase will cost in the region of £20-30 million net present value and such major projects typically take 7-10 years, so the out-turn cost is likely to be about £30-35 million allowing for inflation. To this can be added the cost of demolishing the school, remediating the site and constructing new access roads and infrastructure, which could add a further £3-5 million to the scheme cost, and give an overall total of perhaps £33-40 million. The scheme could be subject to EU and UK construction procurement rules on competitive tendering adding time and cost to each stage. Even the developer procurement stage may be subject to these. In addition UDC is faced with the cost of dealing with the existing PFI contract to run the town swimming pool and leisure centre at no extra cost or other detriment to community charge payers. So far the Council has avoided giving any direct answers as to how it proposes to do this. To bring this project to fruition, HRS (not UDC) must obtain funds for the capital cost of an increase in capacity of about 25% (400 pupils) and find a developer willing to fund a £40 million school relocation and redevelopment up front before it builds a single house. HRS must also continue to run the school whilst finding management skills within its own organisation to successfully negotiate each stage with all its risks and pitfalls, or else appoint external consultants to undertake this work. It must then design and build the new school and oversee relocation with its chosen developer or another contractor. A developer wishing to participate must be of such size, technical and financial capacity to accept the risks of doing so. It must further accept that in order to build 100 homes on this site, it will incur an up-front charge of about £40 million that it would not incur on any other scheme of a comparable nature and this will be reflected in an average surcharge on each new home of at least £400,000. This in turn will configure the type of houses that can be built on the site and their asking price, which will probably be in the region of £800k-£1,000,000, and the time, trouble, cost and difficulty of building the houses and developing the site against many other investment opportunities available to such developers. I question why any rational developer, or HRS, would want to be part of this scheme, when each probably has more attractive, appropriate and affordable options. It also raises questions about the type of house to be built, who would want to buy them with a £400k surcharge, and is there any local need for them. These factors must raise serious doubts about the scheme's viability and deliverability. Why then does UDC propose to include in its Local Plan a scheme with a high possibility that any competent examiner would find this aspect unsound? It is incumbent upon HRS - not UDC - to carry out a full Feasibility Study and Options Appraisal in line with recognised standard procurement practice as if it were still a public sector body. Until HRS has done this and decided whether or not it wishes to proceed, UDC has no authority to assume this is a viable scheme and may be acting Ultra Vires in propelling the school and the town into this particular policy at this particular time. UDC should remove all reference to it from its Local Plan with immediate effect, as it may well block alternative schemes with a greater chance of success and prejudice the progress of the Plan. However, the issue of the future of secondary education and the future of HRS remains of paramount importance and

must be addressed in a feasible way by UDC in its draft plan. One option open to HRS, if it wishes to take it, would be to plan to stay on its existing site. It could explore the possibility of obtaining Sector 1 Emblems from Wickford Developments and to consider turning this into its main playing fields. Wickford has held a valid planning consent for this land since 1992; it has done no significant work since then and at present rates of progress it is likely to be 30-40 years before it builds any houses on this land. This could enable the school to plan further expansion of its buildings and facilities on its existing site and playing fields. Clearly this is a much lower cost option than the one currently under consideration, the risks to HRS and all concerned are much lower and the time to completion is significantly less. If Wickford and present landholders co-operate it could be done in 2-3 years. The land acquisition costs could be of the order of £3-5million, construction costs for the increase in capacity could be £5-7 million, fees and other on-costs might add £2-3 million to this so the overall cost could be £10-15 million most of which could be met by ECC as it is a direct result of expansion for extra pupils. It will take a partnership comprising HRS, UDC, GDTC and ECC (and probably the Leisure Centre PFI contractor) and the partnership should seek ways of undertaking this initially in co-operation with Wickford and the landowner. However, if this is not forthcoming then the partnership should explore coercive means, provided always that it is what the school actually wants and is able to afford. UDC makes clear in its draft policy that it believes it will require a section 106 agreement to give practical effect to this policy. Section 106 is to be repealed and replaced in April 2015 by Community Infrastructure Levy, under which inter alia - GDTC will be entitled to 25% of the value of the transaction, which could add further £10 million+ to its total. At least until it knows the full details of how this change will affect its policy UDC should remove this site from its draft Local Plan.

Other **individuals** have raised concerns about the overall scale of development proposed in Great Dunmow, one suggesting that the housing should be concentrated nearer to where most people work e.g. Great Chesterford and Stebbing Green. The need for improvements to services e.g. Doctors and the need to make sure that adequate school places are being provided has been raised. One person highlights the need to make sure that facilities are provided before construction on the housing is allowed to start. There is some concern about traffic impacts. Some people have raised concerns about the deliverability of the site because of uncertain funding and reliance on third parties. A few people have raised concerns about the new school being so far from the facilities at the leisure centre which serve both students and members of the public. One person has stressed the need for adequate controls over the development to deliver a high quality development. The skyline view across the Downs from the B184 to the west is highlighted as one which should be preserved. One resident suggests that there should be traffic calming along the B184. One resident has raised concerns about the impact on the Flitch Way and how children will access the playing fields across the main road.

Residents of Parsonage Downs support the proposal to provide a much needed modern school facility – it will help resolve local congestion problems and improve safety for pupils and residents. They are concerned that the impact on the current environment on people and wildlife is minimised. This can be achieved by creating a buffer area along the boundary between the HRS site and the conservation areas. Access to the building site and the impact of construction traffic on listed building, the need for effective traffic management and the need for only 2 storey houses to be built near the conservation area are highlighted as issues which need to be addressed.

Andrew Martin Planning on behalf of 3 Clients welcome the principle of enhanced secondary education capacity to serve Great Dunmow and its surrounding catchment. Concern is raised about the proposals to redevelop the existing school site for housing. The potential relocation of the school is known to be simply at the consultation stage and there is no firm commitment by any party to the move. It is not clear how UDC arrived at the decision to reserve land to the west of the town or the evidence base that this decision was based on. Not only are there issues with the size of the new site, who will fund the new school before the old school is able to be redeveloped and the justification for relocating the school to the west of the town in the first place, but it is also not clear who will meet the potential increased operating costs of separating the school and leisure centre onto different sites. Until proper evidence is prepared to support and justify the decision to relocate the school in this way, there is no case to identify the existing school site for housing development. Accordingly our clients object to Site Allocation Policy 4 on the grounds that the relocation of the school it is not supported by clear evidence and is unjustified (as defined by paragraph 182 of the NPPF) at this stage.

Barton Willmore on behalf of Land Securities We have no objection in principle to the allocation of Helena Romanes school site, but we do object to its allocation on the basis of a lack of certainty and clarity about the likelihood of the site becoming free for development in the plan period. Insufficient information and justification has been put forward by UDC to be able to assess the proposed allocation robustly and for it to be considered a sound allocation.

Terence O'Rourke on behalf of Countryside Properties – development at this site and further housing in this locality will be partially reliant on the construction of a new school. This requirement raises uncertainty over the current secondary school capacity in the areas and anticipated cost and timing for the construction of the new school. Significant growth is proposed in Great Dunmow but delivery issues in the town would prevent development being brought forward in a timely manner. There are a significant number of homes with planning approval which have yet to be constructed. This untapped supply will affect the marketability and delivery of further allocations within the town during the plan period.

Boyer Planning on behalf of Taylor Wimpey suggests that the policy wording should make clear that the existing school site cannot come forward for development until such a time as the new school site has been developed. It is unclear how this will happen given that the release of this site for housing is described as enabling development to help fund the new secondary school. That the site is being released without any requirement for community benefits emphasises the importance of allocating other sites for development which are able to contribute towards affordable housing and other social and physical infrastructure.

Boyer Planning on behalf of Dunmow Land. The use of the land at Helena Romanes school for residential development would have a significant impact on the character of the area. The replacement of the school with new facilities to the west of Great Dunmow would not be a sustainable approach and there is no evidence of viability for such development.

Mabb Planning consider that the school's objectives of expansion and modernisation would be better and more realistically achieved by redevelopment and improvements at the present site, with possible extensions into surrounding, presently undeveloped land. The existing buildings are generally in good condition and have many years of useful life, redevelopment would therefore be wasteful of resources - the existing leisure centre would cease to be in joint school and community use, and may therefore become unviable for retention as a local facility. A more reliable funding model would be facilitated by the Council allocating land for a new settlement at an appropriate location elsewhere. ALL of the district's housing requirement can be easily met by the creation of a Garden Village on land in the control of Andrewsfield New Settlement Consortium (ANSC) around the old WW2 airfield, east of Great Dunmow and west of Great Saling.

Springfield on behalf of Client – wonder why the current school cannot redevelop on its own site which is large enough. The existing buildings could be remodelled or replaced incrementally in the existing site.

The Fairfield Partnership notes the proposals to deliver a new secondary school on a split site west of Great Dunmow. The identification of the site for a 'potential' future secondary school is objected to as the proposed new school is an essential prerequisite to the redevelopment of the existing secondary school site. The two must be clearly linked in policy terms and a timing mechanism written into Local Plan policy to ensure that the redevelopment of the Helena Romanes site only takes place once alternative provision is in place.

Strutt and Parker on behalf of Helena Romanes School The proposed allocation of the site at Helena Romanes School is consistent with National and local policy and is therefore strongly supported as a deliverable site within the emerging Local Plan. The proposed allocation is, as enabling development, integral to the provision of a new, expanded secondary school on a site to the south of Great Dunmow (development allocation policy 3). Development allocation policy 3 proposes the safeguarding of land adjacent to Buttleys Lane, South of Stortford Road, for future secondary education use. Policy 2, integrally linked to policy 3, proposes the construction of 400 homes, on further land south of Stortford Road, to act as enabling development for the new school. This proposed expansion of housing stock will put pressure on local services, in particular on Helena Romanes School. The current school is both considered unsuitable for modern-day teaching standards and, as the only secondary school in the town, is reaching capacity; further housing will only increase the pressure of numbers. As policy SP17 of the draft Local Plan states, development must take account of the needs of new and existing populations in terms of school classrooms, pre-school place, sports provision Paragraph 72 of the NPPF states that local authorities should give great weight to the need to create, expand or alter schools. Paragraph 162 asks that local authorities should assess the quality and capacity of infrastructure for education and its ability to meet forecast demands. The construction of a new school is consistent with these policies. The construction of 100 plus houses on, and subsequent sale of, the Helena Romanes Site is critical to funding of this new school. In this regard it is considered that the wording of policy 4 of the Local Plan needs to be changed in order to support a minimum of 100 dwellings, rather than 100 as currently stated. It is considered that the site has capacity for above 100 dwellings and that a higher number of dwellings will help facilitate an exceptional educational facility on the proposed new site. The improvement to education

facilities as a result of the proposed new secondary school is strongly supported by national policy and is an important material consideration to support the allocation of this site for housing. Any additional costs will be covered by s.106 contributions. In order to ensure the construction of the new school is viable, s.106 contributions and affordable housing numbers on the Helena Romanes Site will need to be kept to a minimum. In addition the proposal to deliver a minimum of 100 homes on the site is consistent with the proposed council housing strategy and national policy outlined above and is deliverable based on the reports outlined in this document. The site, indeed, has capacity for further building if required. Paragraph 70 of the NPPF states that local plans should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. The Helena Romanes Site, on the very edge of Great Dunmow, a short walk from the centre, is located close to existing community facilities and services. In addition the site promotes sustainable transport (section 4, NPPF); close to the centre of town, in a location that will reduce the need for residents to drive. The allocation is therefore justified in relation to these policies. This site is located outside of the green belt. A 1.8 hectare landscape buffer to the north and west of the site is proposed to form a link with existing woodland habitat. The NPPF (sections 9 & 11) emphasises the importance of protecting the Green Belt and of environmental protection: the planning system should contribute to and enhance the natural and local environment. Further mitigation of damage to the environment and to local heritage will be carried out in accordance with the reports outlined in this document. Uttlesford Council's priority is to develop previously-developed land, such as the school site. The NPPF similarly states that planning should encourage the effective use of land by reusing land that has been previously developed. Finally the allocation will involve the provision of open space, providing children's play spaces (LEAPs). This accords with NPPF section 8 and Local Plan policy SP18. As stated in the NPPF access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. The removal of the school to a new site with a larger area of playing fields than at present also accords with this approach. Subject to the change, to the policy to include provision for a minimum of 100 dwellings. The allocation of this site, integral to the provision of a new school in Great Dunmow, is strongly supported as part of a positively prepared, sound, and objectively assessed development plan

The proposal is supported by a number of individuals and Blue Sky Planning on behalf of Siemens and Kier Group .

Sustainability Appraisal November 2013

Development of the site will have the following predominant effects:

Sustainability Objective	Impacts	Issues Highlighted
Retain, enhance and conserve the biodiversity and character of the landscape	Positive	

Sustainability Objective	Impacts	Issues Highlighted
To maintain and enhance the districts cultural heritage, assets and their surroundings	Negative	7 listed buildings all Grad II Great Dunmow Conservation Area adjoins the eastern edge of the site Archaeological site to NW of development site
To reduce contributions to climate change	Uncertain	
Reduce and control pollution	Positive	
To reduce the risk of flooding	Positive/Uncertain	
To promote and encourage the use of sustainable methods of travel	Negative/Uncertain	The two primary schools are just outside the 800m buffer. the secondary school currently on site will be relocated on the other side of the town. Primary health care facilities are just outside the 800m limit near the town Centre.
Promote accessibility	Uncertain	Top 20% most deprived for barriers to services. No mixed use on development site. The site is on the northern edge of the settlement, not within the town centre.
To improve the populations health and promote social inclusion	Positive	The site is just outside the 800m of healthcare facilities
Provide housing to meet existing and future needs	Negative	100% market housing, no affordable housing or mixed use

Sustainability Objective	Impacts	Issues Highlighted
To promote the efficient use of resources and ensure the necessary infrastructure to support sustainable development	Positive	
to improve the education and skills of the population	Positive/Negative	The site is not located within 800 meters of a primary school The site does not include educational facilities
to support sustainable employment provision and economic growth	Negative	The development does not provide opportunities for job creation, retail and mixed use.

Officer Comments

In response to English Heritage comment it is not considered that the reference to enabling development will be confused with paragraph 55 bullet point 2 of the NPPF as this explicitly refers to 'appropriate enabling development to secure the future of heritage assets...'

The new playing fields will have to meet the national standards and Sport England will be consulted with at the time of the planning application. The Leisure Centre is excluded from the site boundary, it is therefore unnecessary to state that in the policy. Discussions regarding public use of the new sports pitches will be subject to discussion at application stage and also subject to contractual negotiation. The provision of high quality sports provision will be inherent in any proposal and the costs will be met by enabling development.

The Highways Assessment does take account of the cumulative impact on M11 Junction 8 and UDC has been working closely with East Herts DC, Hertfordshire County Council and other local authorities on this issue. At present a further Highways Assessment is being undertaken to assess the impact of the additional sites proposed.

The term 'part-fund' in the policy means that this site, along with site allocation Land west of Great Dunmow and south of Stortford Road will jointly fund the new secondary school. Both allocations are needed to ensure the provision of the new school. There are no other plans for the sites if development doesn't go ahead.

This site will be low density (10 dwellings per hectare) with large areas of greenspace/landscaping, it is not considered to have any negative affect on the historic core of the town or the conservation area. Matters of design will be dealt with at planning application stage in line with development management policies which ensure the design is

in character with the local surroundings. Any issues regarding flooding and impact on the adjacent local wildlife site will be assessed in detail at planning application stage and mitigation measures, if needed, will be sought.

Helena Romans School is in full support of the proposed allocations and a viability test has been undertaken. Essex CC confirms that there is no capacity at the existing school to expand and cater for additional children.

No affordable housing will be sought on this site, as stated in the supporting policy text; the full value of the development is required to part-fund the new secondary school.

Discussions with Essex CC Education Department are on-going regarding primary schools. Two new primary schools are proposed in Great Dunmow as part of the site allocations Land north of Stortford Road and west of Great Dunmow and Land west of Chelmsford Road.

The local plan is being undertaken with the NPPF in mind. When the plan is read as a whole alongside all the strategic policies and Development Management policies and Site Allocations the plan can be shown to the requirement of the NPPF.

Development within the smaller villages, identified as rural settlement Type B in the Draft Local Plan June 2012, may be allowed limited growth where this is supported through a community plan. There is also a Rural Exceptions development management policy proposed which will allow housing for local people.

UDC are requesting Transport Assessments for allocated sites, this will seek to encourage journeys from private cars to public transport.

HRS has commissioned a viability assessment which also considers the aspects of phasing. The new school would need to be constructed and operational before the old one can be redeveloped. This is understood by the school and will form part of the detailed planning phase.

The representations of support are noted.

Officer Recommendations

No change to supporting text

No change to policy

Amend site boundary.

Final recommendations will be made when the Highways Impact Assessment work has been completed.

Land North East of Elsenham and Land East of Old Mead Lane

Question 6 - Do you have any comments on the proposed allocation or the policies for the Land North East of Elsenham and Land east of Old Mead Lane? If you think the policies should be changed please set out clearly in your comments what changes you would like to see.

965 (check) people responded to this question. The following is a summary of the key points raised by the representations. To read all the representations in full please go to http://uttlesford-consult.limehouse.co.uk/portal/planning_policy/ahns/ahns

Anglian Water Services Ltd Elsenham is on the boundary between Thames Water and Anglian Water areas. The foul network is operated by Anglian Water and the flows treated at Stansted Mountfitchet water recycling centre operated by Thames Water . Currently, there is insufficient capacity to accept the ultimate development flows to the local water recycling centre (WRC) at Stansted Mountfitchet for the proposed development north east of Elsenham . Thames Water, as the statutory water recycling provider for Elsenham, have confirmed there would be significant constraints to overcome to provide the additional capacity at Stansted Mountfitchet WRC needed. The proposed developer approached AW to look at alternative options for serving the site including the developer commissioning a new water recycling centre to be put forward to AW to adopt under section 104 of the Water Industry Act 1991. This is considered the most sustainable option. Other options would be upgrading the network to enable the flows to be taken to an alternative water recycling centre a significant distance away where capacity is or can be made available.

English Heritage notes the difficult choices the Council has to make in the distribution of growth in the District. It may be that growth at Elsenham could be a less sensitive location for growth than other locations, in terms of the character of the historic settlements, and provide development better related to public transport. In previous consultations the Council has referred to the sensitivity of archaeological deposits in this area. The significance of these and the extent to which impacts can be mitigated should be considered carefully. If the site is selected, policy 5 should incorporate a qualification relating to this aspect. We are also concerned that the policy makes no reference to the conservation areas of Henham and Elsenham. The proposal for Land to the East of Old Mead Lane should be subject to a landscape appraisal to understand the requirement for good separation between Henham village and the proposed expanded settlement of Elsenham.

Environment Agency The sensitivity of the water environment at this location has already been recognised through work on the Water Cycle Study and during previous correspondence and discussion with the Local Authority Planners, developers and their consultants regarding development at Elsenham. From a wastewater/water quality perspective there is a huge challenge in accommodating large numbers of houses on land at the headwaters of the River Cam without causing a breach of environmental legislation. In the immediate vicinity there are no local watercourses that can offer any significant dilution and dispersion of large volumes of sewage effluent. After protracted discussion and negotiation with Anglian Water we have removed our objection regarding the discharge of effluent from 800 dwellings from the Fairfield site. Agreement on a foul water treatment and

disposal solution has finally been reached that could prevent a deterioration in river quality should this proposed development go ahead. The agreed solution, however, is on the very borderline of being acceptable. This solution requires a new treatment plant to be built that will have to produce effluent of a very high quality beyond that currently considered as reliably achievable by conventional treatment technology and the discharge location is several kilometres distant from the development site. As such, the proposal could be challenged regarding its sustainability credentials as there are risks to the water environment through direct impacts on river quality should the plant not operate as planned, but also in the wider context the carbon footprint will be much greater than for a 'normal' local conventional treatment plant. A Joint Position Statement issued by the Environment Agency and Anglian Water sets out our current understanding and confirms that the solution identified is specifically to cope with the development included in the outline application under reference UTT/13/0808/OP. Any additional development at Elsenham will add significantly more risk on several counts:

- Risk of breaching environmental legislation as discharge permit limits will need to be even more stringent. (Anglian Water have indicated, albeit informally, that they consider that the new permit limits can be reliably achieved.)
- Risk of failing any sustainability test. Tighter discharge permit limits mean more energy is required to treat sewage leading to greater CO₂ emissions
- Risk of abortive investment in sewerage infrastructure. If additional/better treatment is required, the current solution for 800 dwellings may no longer be sufficient or appropriate. Similarly, the agreed remote discharge location may no longer afford the required level of dilution for the final effluent. Any proposal to build additional dwellings at Elsenham will likely result in an objection from us until it can be shown that these issues can be fully resolved. On this matter we consider that any objection would be supported by Policy SP17 Infrastructure in the emerging Uttlesford Local Plan. This policy states that "Each development must address [among other things] sewage disposal.." We also consider that an objection would be supported by the fifth bullet point in paragraph 109 in the National Planning Policy Framework (NPPF) which states that new development should not contribute to unacceptable risks to soil, air, water or noise or land instability. Paragraph 165 of the NPPF requires planning policies and decisions to be based on up-to-date information about the natural environment including drawing on River Basin Management Plans. In this connection local planning authorities are required to have regard to River Basin Management Plans. Where it is apparent that development is likely to result in a deterioration of water quality, this will likely result in the Water Framework Directive (WFD) being invoked and a WFD compliance assessment will be required. The proposed additional dwellings must be shown to be deliverable and sustainable in the wider context. A foul drainage strategy must demonstrate that the proposed solution can be delivered without breaching environmental legislation and that the solution is financially viable in the long term. It should also consider the environmental impact in terms of energy use/carbon cost associated with building and running a treatment plant that will have to operate considerably beyond that considered as conventional treatment technology.
- Water Resources Although we have no major concerns regarding this proposal the following advisory comments should be noted.

- Development should not be committed ahead of secure water supplies. The development lies within the area traditionally supplied by Anglian Water Services (although the developer may choose to take supply from another company, and the Agency would encourage consideration of minimising the environmental impact of providing a water supply). The report should state where the water is to be sourced from, and whether abstraction is made under current abstraction licensed conditions or not. The planners should seek advice from the water company to find out whether a new source needs to be developed or if a new abstraction licence is to be sought. We may not be able to recommend a new or increased quantity under an abstraction licence where water resources are fully committed to existing abstraction and the environment. The location of development should be taken into consideration the relative availability of existing developed water resources. The timing and cost of infrastructure improvements will be a factor to be considered as part of this development and should be discussed with the water company. Every opportunity should be taken to build water efficiency into new developments, and innovative approaches should be encouraged. The Environment Agency supports all initiatives aimed at reducing water use. It is assumed that the new houses will be constructed with water meters fitted. Other water saving measures that we wish to see incorporated include low flush toilets, low flow showerheads, water butts for gardens etc. We understand that water companies carry out investigations with respect to water use in the home and enforce regulations controlling plumbing in homes called the Water Supply (Water Fittings) Regulations 1999. The Agency also supports the idea of greywater recycling as it has the potential to reduce water consumption in the average household by up to 35%. This must however be achieved in a safe and hygienic manner.
- The Uttlesford local plan should incorporate the additional waste arisings from potential construction and operational phases. It is environmentally important that waste management is addressed for any potential increase in waste arisings. An adherence to the Waste Framework Directive including the waste hierarchy and that legally permitted waste facilities and carriers are only to be considered. In addition all relevant local, national and European waste policies and strategies should be considered.

Highways Agency - Development of this scale is likely to have a material affect upon M11 J8. The Highways Agency is not aware of any testing of this level of development in the recent work carried out. Therefore there may be questions regarding deliverability of this site and consequently the documents soundness. Whilst the Highways Agency welcomes the reference to the need for a Transport Assessment and acknowledges reference to the need for adequate travel planning in other documentation, reference should be made specifically for the need to encourage modal shift and reduce the need to travel through the provision of a travel plan. The Highways Agency would expect to see mentioned in the documentation an indicative level of improvement (if identified through the evidence base) that would be expected at trunk road junctions. In identifying likely transport impacts, it should be noted that sections of the network, for example the M11 junction 8, are currently running close to capacity during peak periods. Additional growth may exacerbate this existing situation without suitable mitigation. Consideration also needs to be taken of adjacent authorities such

as East Herts District Council where there may be an accumulative impact on road network from proposed growth which will need to be taken into account.

NHS Property Services welcomes the Policy's recognition that the healthcare needs arising from the development of this site would require mitigation. The Elsenham area currently has a deficit in GP capacity of minus 596 patients (0.33 GPs). The implications of planned growth (2,100 dwellings) give rise to a need for 2.92 GPs, which could increase to 4.07 GPs overall, if the growth area is enlarged to 3,000 dwellings, as envisaged by the developer. The existing Elsenham surgery at Station Road currently accommodates 2.8 whole time equivalent GPs with limited scope for further extension. Provision for a new GP surgery on this strategic site for 3 - 4 GPs (up to approximately 500 m² floorspace) may therefore be warranted within the proposed Local Centre. The wording of Site Allocation Policy 5 therefore ought to be amended as follows; Site Allocation Policy 5 - Land North East of Elsenham Amend the sixth bullet point relating to the health centre provision as follows; i, It provides a local centre within the development including provision for retail, employment, and community buildings including a new health centre, with the health centre provision being subject to NHS Business Case approval procedures. In the event that a business case for a health centre is not confirmed, financial contributions to increase healthcare capacity elsewhere in the locality would be required and a contribution towards a health centre.

Sport England The criterion in the policy relating to the development providing for recreation open space including playing pitches is welcomed as this would help ensure that the development meets the additional outdoor sports facility needs that it generates. Sport England has made detailed comments on the outline planning application (UTT/13/030/OP) for this proposal in relation to community sports facility needs.

Thames Water Property - It is understood that the majority of the proposed allocation site is located within the area for which Anglian Water is the statutory waste water undertaker. The existing sewerage system operated by Thames Water in and around Elsenham has insufficient capacity for a development of the scale proposed. Elsenham is currently served by Stansted Mountfichet Sewage Treatment Works (STW) and there is also insufficient treatment capacity at the existing Stansted Mountfichet STW to accept the waste water from a development of this scale. Should any subsequent development drain to Thames Water's waste water network and Stansted Mountfichet STW, significant upgrades would be required to the network and the STW. The majority of the Elsenham Site Allocation area is within Anglian Water's area of operations it is understood that development could drain to Anglian Water's network, dependant on consideration of the most sustainable options to serve any future development. The time necessary to deliver new and upgraded network and treatment capacity should not be underestimated. It can take 18 months - three years for local upgrades, 3 - 5 years for strategic upgrades and 7 - 10 years to build new sewage treatment facilities. The above comments are consistent with the findings of the Uttlesford District Water Cycle Study Stage 2: Detailed Strategy (November 2012), Stansted Mountfichet WwTW serves both Elsenham and Stansted Mountfichet. TWU estimate that the outfall sewer from Elsenham currently has the capacity to accept flows from a maximum of 500 new dwellings, although it is understood that the existing local network capacity here is less than that (around 20-30 dwellings max). Thames Water recommends that the Water Cycle Study be revisited to determine the most sustainable options to serve development of the scale proposed at Elsenham with water and waste water infrastructure. The requirement set

out in Site Allocation Policy 5 for a planning application to be accompanied by a Drainage Strategy is supported. The following additional text is also recommended for inclusion within Site Allocation Policy 5, or the supporting text: "The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development"

Essex County Council Primary and Secondary School Provision Evidence suggests that the additional 2,100 dwellings would generate a need for 600 additional primary school places. A 3 form entry pre/primary school as required by the policy may accommodate up to 630 pupils which will serve the development. The additional 2,100 dwellings would generate a need for some 400 additional secondary school places. Whilst Forest School could accommodate the pupils from the early phases of this development its restricted site area might prevent it from accommodating all of the pupils from the later stages of the development. This could be addressed if 3 ha of land adjacent to the school could be safeguarded to enable the school to expand up to 1500 places, including a 6th form, should this prove necessary. The consultation states that the site is a large strategic allocation which has the potential to expand in the future to continue to meet housing requirements beyond the current plan period. If this proves to be the case then consideration should be given to the development of a new secondary school, or an expansion of an existing school, on the 9ha site identified as being safeguarded for the development of a new secondary school. The County Council is aware of the more complex cross-border movement of pupils between Essex and Hertfordshire. Evidence suggests that at least 90-100 pupils per year residing in the Forest Hall School priority admissions area apply for and are allocated secondary school places in Bishops Stortford at the primary-secondary transfer stage. Hertfordshire County Council has advised that secondary school places in Bishops Stortford are currently under pressure and places are being sought at Forest Hall School for those pupils living in Bishops Stortford who are unsuccessful in obtaining a secondary school place in the town. This situation is likely to be exacerbated in the short term by the new Bishops Stortford North development of up to 2,200 dwellings. As the new secondary school provision to serve this new development to the north-west of Bishops Stortford will be put in place after the commencement of the new housing it is likely that further pressure will be put on secondary school places in Bishops Stortford. This may result in fewer children from Forest Hall School's priority admission area being allocated a place in a Bishops Stortford School or children moving into Bishops Stortford being unable to obtain a secondary school place in the town. In either case there is likely to be greater demand than in previously for places at Forest Hall School once the development of Bishops Stortford North commences. This is likely to result in fewer surplus places being available at Forest School to accommodate pupils from the new development at Elsenham, although the full impact may not be apparent for a number of years. This situation will be monitored carefully in conjunction with Hertfordshire County Council. There are currently uncertainties in terms of the location of housing allocations beyond the current plan period and the future cross

border movement of pupils between Essex and Hertfordshire in this area. As a consequence the safeguarding of 3 ha of land adjacent to the current Forest Hall School site, in addition to the safeguarding of 9ha of land east of old Mead Lane for the development of a new secondary/ expansion of an existing secondary school, would provide Essex County Council with the flexibility required to ensure that there were sufficient secondary school places for all of the pupils generated by new housing in the area. A decision could be made between the expansion of Forest Hall School on land adjacent to its existing site or the development of a new secondary school / expansion of an existing secondary school when the demand for secondary school places in the area becomes clearer. Early Years and Child Care Evidence outlined in Appendix 1 that at Elsenham early years and child care places are full, and therefore additional places are required. The proposals for residential development at Elsenham will require support for early years and child care places to ensure future social and community needs generated from new housing is met.

In relation to this Historic Environment the County Council considers that none of the sites within Saffron Walden, Great Dunmow and Elsenham directly affect scheduled monuments. However impact on listed buildings is anticipated at Elsenham and within Great Dunmow at Land West of Great Dunmow, South of Stortford Road. The NPPF states that Local Planning Authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. The County Council therefore recommends that all of the additional sites set out within the consultation require a detailed historic environment assessment in advance of the submission of any planning applications to assess the significance of the historic environment and the impact that these developments will have.

Hertfordshire County Council There are a number of children who currently reside in Elsenham and attend school in Hertfordshire. The proposed additional homes could therefore impact upon HCC school places. Land East of Old Mead Lane (9ha secondary school site) HCC support the safeguarded allocation for the development of a new secondary school. Cross boundary financial contributions to the provision of school places in Hertfordshire may be required. It would be helpful if this could be acknowledged in the Uttlesford IDP.

The potential transport impacts (particularly on the highway network) are a key consideration in the formulation of a preferred development strategy. In order to assist this process, evidence from existing transport analysis has been collated and assessed by Hertfordshire County Council Highways. The analysis shows that the proposed housing allocation would increase traffic along the A120 towards the M11 junction 8 and Bishop's Stortford. The impacts on the A120/A1250/Birchanger Lane roundabout and A1250 Dunmow Road would in particular require further analysis. If the strategy for routing of traffic was to change for a larger development, then the areas of impact on the Hertfordshire road network may change. The site allocation for 2,100 dwellings would impact on similar areas of the road network to the two sites at Great Dunmow, and the Bishop's Stortford North planning application. The quantum of development would result in a greater impact on the M11 junction 8, A120 and the A1250 Dunmow Road compared with the site allocations at Great Dunmow. Although a smaller development at Elsenham has been included in the Harlow Stansted Gateway Model (HSGTM) tests to date, the allocation represents a considerable increase on these numbers and therefore the cumulative impacts of these proposals should be reassessed in the model. The Harlow Stansted Gateway Model (HSGTM) is a sub-regional Saturn model covering the Harlow, Bishop's Stortford and Sawbridgeworth areas. Unlike a spreadsheet based

approach it is able to take into account the impact of new infrastructure, congestion effects at junctions and also behavioural changes such as the re-routeing of existing traffic to avoid congestion. The HSGTM currently contains the Uttlesford sites previously presented and does not include the four site allocation options at the scale discussed above. The HSGTM will need to be updated to test the stated site allocation options at Great Dunmow and Elsenham, in the context of other local plan allocations and development applications to establish any requirements for infrastructure improvements. Should the analysis gaps highlighted not be sufficiently evidenced within the draft plan for consultation then it is likely that the highway authority will have concerns with the impact of the strategy on its network.

Chelmsford City Council support the proposal in principal – the allocation is unlikely to result in harmful impacts (directly or cumulatively) on communities in the Chelmsford City Council area.

Birchanger Parish Council – transport infrastructure will need considerable upgrading. One option would be a direct link to the A120 or the airport. School provision is unclear. The impact of pupils travelling from Stansted needs to be considered in the transport assessments. Transport issues must be considered as a whole rather than viewing each proposal as a separate entity. The plans in neighbouring districts also need to be taken into account.

Bishops Stortford Town Council – Any development in this area may have a material effect on the residents and the town of Bishops Stortford and the town council ask to be involved on an ongoing basis should the proposals be approved. Key concerns are schools and road and rail transport. The town council is concerned there could be a delay between the construction of the houses and the construction of the school. If enough school places are not provided some pupils will travel to schools in Bishops Stortford which are already oversubscribed and cannot accommodate a significant increase in numbers. The land should not be merely be reserved for future use but the construction of a secondary school should form part of any development proposal. The proposed rail infrastructure improvements are welcome however they will be ineffective without corresponding improvements in the rail services. In the absence of these improvements residents will continue to use Bishops Stortford station further increasing congestion in the town. The town council is also concerned about the impact of the additional traffic on the road network in Bishops Stortford – the Dunmow Road/Hockerill junction (an air quality management area) and Rye Street and both likely to experience increased traffic flows.

Broxted Parish Council is totally opposed to the proposed development for North East Elsenham. The area lacks all infrastructure “ roads, water, schools, surgeries, broadband - and any development there is likely to be so piece-meal that the necessary infrastructure would not be provided as required. Future development should be centred on the towns and larger villages in the District, with the exception of Elsenham for which there is already permission granted for 500 new homes with more applications in the pipe-line. Furthermore, imaginative schemes for enabling small numbers of new homes to be built in the smaller villages should be brought forward to ensure their social and economic viability.

Elsenham Parish Council, Henham Parish Council, Debden Parish Council, Millstream Family Trust

- the numbers do not justify it and there are better and more sustainable locations.

- The Consultation proposes sites for 667 dwellings (if the Elsenham site is excluded) so that the maximum shortfall is 1,052 (1,719 - 667). The Elsenham site is excessively large (2,100 dwellings) to cater for a maximum need for 1,052 dwellings.
- Although the Consultation proposal is for 2,100 new dwellings Fairfield have already stated that it will be pushing for 3,000 dwellings - a huge development tacked on to a village.
- The site NW of Dunmow, previously refused could provide 700 of the 1,052 requirement. This is a truly sustainable site on the edge of a main settlement, with good access to the full range of employment, schooling, shopping and many services. The main reasons for previous rejection were lack of coordination with the preferred site to the south and lack of access to the new bypass - which is now due to open very soon.
- The remaining 352 (1,052 - 700) dwellings could be dispersed throughout the District. Great Chesterford is also a possible location having much better highway access, including a connection to the M11.
- The Elsenham site is huge and the massive development has always been opposed by UDC since the 2007/8 Eco town and through the rejection of 'option 4'. In the interests of consistency, should be rejected again. On each occasion there have been 3,500 - 4,000 objectors.
- The Council have already twice refused planning permission for 800 dwellings on part of the site (almost 2,000 objectors). It is simply irrational to now be promoting an even larger development in the same location and simply ignores the overwhelming wishes of the community.
- Truly sustainable locations have access to the services of the largest settlements - Elsenham is just a 'Key Village' and tiny in comparison to the two main settlements. The scale of the proposed development would 'swamp' Elsenham (around 1,000 existing dwellings) and Henham (less than 500 dwellings). The proposal in reality is for a 'new town' not a village extension.
- This is not a sustainable location. It is on the edge of Elsenham, and although includes some employment and sites for community use the sustainable label could apply to any location around the edge of many settlements in Uttlesford. Most residents (existing and proposed) do and would travel out, mainly by car, to reach most facilities.
- There is inadequate education capacity and no guarantee the Education Authority would actually build a new school (yet existing schools are full). There are suggestions for a doctor and dentist but no agreement with existing local providers. It is acknowledged in the application that main shopping will be accessed at nearby towns.
- There would be substantial loss of countryside and best and most versatile agricultural land. The development would have a massive landscape impact.
- Elsenham and Henham are connected to the outside world via country roads which are not suitable for a major urban extension.
- There should be a comprehensive consultation on all sites to be included in the new Local Plan, not just so-called additional sites. The Consultation is perceived as a late bolt on arrived at in a climate of panic. Proposed changes for housing numbers and the plan period are too fundamental to the nature of the Local Plan to merely consult on a very limited number of sites. The last consultation is now 1½ years old, planning permission has been granted on many sites (including some previously identified sites). A full assessment of all sites found suitable in the SHLAA should be undertaken. A new level playing field requires a new consultation on all new sites which do not yet have planning permission, to allow comprehensive comparison as at December 2013/January 2014.
- It is assumed that the population of the new development would access: (i) Saffron Walden by the road passing under 'Toot Bridge', a single lane, which it is proposed

will have traffic lights installed; (ii) Stansted by Chapel Hill, another single lane which already has traffic lights, and (iii) Thaxted by the road from Stansted to Thaxted, via Pledgden Green. It is commonly found that other roads around developments are used and the roads from Henham to Debden Green, then left to Saffron Walden or right to Thaxted are likely to be used, and become rat runs. Sibley's Lane (Henham to the Stansted/Thaxted Road) and Chickney Road Henham were both categorised a Protected Lane, prior to the Uttlesford Protected Lanes Assessment of March 2012, but according to that document, Chickney Road does not meet the new criteria, making it easier to be altered (eg widened).

- It does not appear that the District Council has identified this site by looking at its requirements, and finding suitable locations, but because the owners of this land are prepared to offer it for development.

Stansted Parish Council remain strongly opposed to building 2,100 new homes at Elsenham for reasons already given in previous consultations. 800 homes on this site were recently refused by Uttlesford District Council Planning Committee which recognised that it is unsuitable for development. We fail to see how the Council can now proceed with this proposal for 2,100 homes on the same site. 2,100 new homes would be a new settlement and not a village extension, with the likelihood of more houses in the future. Putting a large number of houses in one location is a change from the Council's policy of dispersing the houses around the district. Stansted Parish Council believes that, as this is the case, other sites for large scale development should be considered, tested and compared to the Elsenham site. The impact of 2,100 homes in Elsenham would be adverse for Stansted Mountfitchet. There would be a huge knock-on effect on our local roads with no scope to accommodate this on top of the 1,000 additional houses that have already been given permission and partly developed.

Takeley Parish Council objects to the Elsenham proposal. Access to key transport links would be via country roads which are not suitable for the proposed increased volumes of traffic. HGVs cannot use Grove Hill because of a weight restriction, and there is no access via Chapel Hill, Stansted. Lorries (over 7.5T) are not permitted on airport land and therefore will travel via Molehill Green Road, along Parsonage Road & then via B1256 through Takeley. The consultation excludes any mention of the impact on Takeley. Despite the 'Uttlesford Sustainable Development Guide' (published Nov 2013) which advocates the avoidance of growth of traffic or congestion. It states: 'New housing should be sited in such a way that it does not contribute to further traffic growth & congestion in existing settlements thus reducing their quality of life'. The Highways Agency has acknowledged capacity issues at M11, Jtn 8; particularly at peak times with evidence of congestion and queuing on the approaches to the junction. Further development in Elsenham (& Takeley/Lt Canfield) will exacerbate the existing problem. Great Chesterford has better highway access, including connection to the M11. TPC urges you to tear up this consultation, re-visit your evidence and create a sustainable solution that meets the long-term needs of the District.

Thaxted Parish Council disagree with the disproportionate amount of housing allocated to Elsenham. We fail to see how there is adequate transport infrastructure to support this development either road or rail (access through Ugley, Henham and Stansted). It is an unnecessary loss of rural land which will adversely affect the identity of this settlement. There are far better locations with good access links and employment opportunities i.e. to the North of Saffron Walden.

The Thaxted Society is opposed to all development which occurs outside development limits. The Society has no developed or agreed policy on matters beyond Thaxted boundaries where they do not have immediate and material impact upon Thaxted. The development proposed at Elsenham may be shown to impact surrounding villages with both traffic and visitors. The ECC design guide, UDC's own conservation guidelines do not remove sufficiently robust protection for historically sensitive areas such as Thaxted and therefore we believe we are at risk from large developments within short-trip distance. The society must oppose such developments where the exceptional nature of Thaxted and its detriment is not recognised within the proposal.

Sustainable Uttlesford considers that the proposed increase in housing numbers over the plan period should result in a complete reassessment of the LDF housing allocation policy. The Council should be reviewing all known sites in the SHLAA and test the community sustainability benefits of alternative single settlement or wider dispersal strategies against their current policy of peripheral development on existing key communities. The current housing allocation strategy does not maximise community benefits but perversely places further burdens on existing inadequate infrastructure especially the road network which will result in increased congestion and air pollution. Sites along the strategic corridors of movement in the district should be reassessed. eg close to the M11 motorway junctions as well as the West Anglia line for a new settlement eg Chesterfords or along the old A120 expanding Takeley. These are options that have not been openly appraised as part of this new review process. It is disappointing that the strategy has not reassessed the district's village communities to see which can benefit from limited small scale development to enable the provision of affordable housing in our smaller communities and increase the long term viability of community facilities like village shops, pubs and schools. Such allocations to the villages will ensure that there continue to be balanced population structures in the villages rather than them becoming dormitory villages for commuters. We note that East Herts District which adjoins Uttlesford have included such a policy in their draft LDF.

ASP on behalf of 2 clients accept development in Saffron Walden and Great Dunmow but the proposed allocation at Elsenham is clouded in uncertainty as to delivery. A recent application was refused on the grounds of impact on the countryside and the CPZ. This proposal will result in greater harm and greater loss of the best and most versatile land without any of the advantages that might result from a proper long term co-ordinated approach to a new settlement that could and should be planned in that way from the outset. Development should be directed to a range of market towns and key villages throughout the District.

Andrew Martin on behalf of Chater Homes object to Site Allocation Policy 5 on the grounds that it is not the most appropriate strategy when considered against the reasonable alternatives and therefore is unjustified (as defined by paragraph 182 of the NPPF). The 2,100 dwellings identified for delivery at North East Elsenham should be redistributed to more sustainable locations across the district, including to locations where the delivery of new homes will go hand-in-hand with new services and facilities to address existing local deficiencies and to enhance the sustainability of their surroundings such as at Chelmer Mead. Mineral assets may need to be safeguarded and/or extracted which could delay delivery. The future implementation of the Stansted Airport G1 planning permission, to increase use of the existing runway, will compound effects of heavy traffic and aircraft noise. As a result noise is likely to have a detrimental effect on the health of new residents at North

East Elsenham. The transport elements of plans at North East Elsenham have a number of shortcomings.

Andrew Martin on behalf of Harlow Agricultural Merchants and Perfect Properties - objects to the draft allocation of NE Elsenham for the following reasons: ECC has recognised that there are minerals of potential economic value at North East Elsenham and these assets may need to be safeguarded and / or extracted prior to any development taking place. Widespread prior extraction could delay the delivery of a new settlement here by a decade or more. North East Elsenham is located within the Broxted Farmland Plateau, a landscape which has a moderate to high sensitivity to change. The plateau's characteristics include dispersed settlements and few villages of any notable size, big sky views and large open landscape character of few internal divisions. Proposals for a new settlement would fundamentally and permanently change the landscape character of the area, an area which is sensitive to change. Development at North East Elsenham would impact on the local distinctiveness of Henham and its defined Conservation Area. There is also potential for coalescence between Elsenham and Henham. Although Elsenham has a railway station, there are severe capacity constraints at the station and on the rail line generally, particularly during peak periods. Despite being located in reasonable proximity to the M11 and A120, access to the strategic highway network from Elsenham is very poor and involves either a difficult 5 mile journey through the centre of Stansted Mountfitchet or a convoluted 7.5 mile journey along Hall Road and through Takeley (via the B1256). Both of these routes are constrained. The effects of heavy traffic and aircraft noise are evident near Stansted Mountfitchet and Elsenham. The future implementation of the Stansted Airport G1 planning permission, to increase use of the existing runway, will compound this problem. As a result noise is likely to have a detrimental effect on the health of new residents at North East Elsenham. Site Allocation Policy 5 does not represent the most appropriate strategy when considered against the reasonable alternatives and therefore is unjustified (as defined by paragraph 182 of the NPPF). The 2,100 dwellings identified for delivery at North East Elsenham should be redistributed to more sustainable locations across the district including Newport.

Barton Willmore on behalf of Land Securities objects to the identification of Elsenham as a new settlement location because the draft allocation is not based on sufficiently robust analysis to confirm it is technically deliverable nor that it is the best option when compared to alternatives. It is clear that UDC and ECC has not in fact undertaken any technical highways analysis that has been published for public consideration backing up the identification of land north east of Elsenham. Without this the identification of land north east of Elsenham is not a sound basis on which to promote the spatial strategy for meeting the required housing need over the plan period. Land Securities considers that Easton Park represents a superior location for a new settlement and has consistently promoted the location through the plan process since 2008.

Bidwells on behalf of clients (Edwards) object because the scale of the allocation is inconsistent with the dispersed development strategy Site 5 cannot be considered as a credible allocation in the context of a refused application for 800 new homes on part of the allocated land. The scale of the allocation of Site 5 plainly does not align with the spatial strategy as set out in the draft Local Plan. The allocation for 2100 units, on top of the 400 envisaged in the draft Local Plan, is of such strategic scale that is at odds with the spatial

strategy. The numbers arising from the removal of Site 5 should be re-distributed to allow for non-implementation and in order to accord with the draft Local Plans spatial strategy.

Bidwells on behalf of clients (Robinson) The identification by Uttlesford District Council that significant additional Housing is required, requires a new consideration of potential additional development opportunities. We consider the Plan to be 'Unsound' if it seeks to meet this additional identified housing need through allocating development sites that were previously found unacceptable to the Council. Such a fundamental increase in Housing need must be properly explored through a separate Call for Sites, In particular we object to allocation of a new settlement at Elsenham and Henham which would create a coalescence of the two existing distinctly separate communities which would be entirely contrary to the high level Vision, Spatial Strategy and Strategic Policy 6 set out within the Draft Local Plan (June 2012). The scale of growth proposed would be contrary to the settlement hierarchy as Elsenham and Henham would receive the largest share of growth it is considered appropriate for Great Chesterford to receive a higher level of growth than presently allocated in order to help meet the District and local needs whilst remaining in accordance with the Plan Vision and Spatial Strategy. Evidence submitted demonstrates that there are no substantive reasons why land between Walden Road and Newmarket Road at Great Chesterford should not be allocated.

Boyer Planning on behalf of Taylor Wimpey Developments Limits consider that the additional housing requirement should be distributed using the spatial strategy set out in the draft Local Plan (June 2012) and that additional allocations of suitable sites should be made in the towns and larger villages, not only to ensure choice and competition in the market but to support a robust strategy for delivery of the additional housing requirement.

Carter Jonas on behalf of the Crown Estate – the Methodology for Selecting Additional Housing Sites October 2013 (MSAHS) does not adequately explain why the Council has chosen the option of a highly concentrated locational strategy when the relative benefits of a more dispersed strategy clearly make this a preferable option. In our view the Council should follow it's spatial strategy from the DLP2012 more closely and spread the allocations more widely than currently proposed. This will deliver much greater certainty of delivery and therefore remove the ongoing risk of speculative applications and appeals that the district has faced over the past couple of years. Development of Land West of Station Road and the Nurseries, Elsenham (SHLAA Ref. ELS5 and ELS6) would represent a logical and deliverable "rounding off" of the western side of the village. We have undertaken technical work to assess the development potential of these sites and can confirm that there are no reasons why they cannot be delivered. On the basis that the plan continues to propose the allocation at North East Elsenham we have concerns over the Council's proposed concentration of development in a small number of locations. This is a high risk strategy in terms of delivery. Development of 2,100 homes at this single location within the remainder of the plan period is considered unlikely. Even assuming a start on site in 2017 it would require an annual average delivery of 150 units at a time when there will be other consented sites in the process of delivery at least in the period up to 2020. The next draft of the plan must provide flexibility and should explicitly refer to the delivery of Elsenham within and beyond the plan period and include a reduced allocation for it within the plan period with ELS 5 and ELS6 also being included. Land north east of Elsenham 1,950 units Extension to the west of Policy Area 1 (ELS6) - 100 units Land at Elsenham Nurseries/The Gables (ELS5) - 50 units

Should the Council revert to a more dispersed pattern of development there are clear reasons why Elsenham should remain as one of the focuses for development for the remainder of the plan period and for the additional requirement the plan should still include allocation of ELS 5 and 6

Gladman are concerned about the ability of Uttlesford to deliver the additional housing due to the heavy reliance on a strategic extension at Elsenham to deliver around 78% of the proposed additional housing. The build rates and deliverability assessment in the SHLAA is unrealistic. The site is in a number of separate ownerships and there are technical constraints. Housing is unlikely to start being delivered on the site until 2019 at the earliest. In order to cover this shortfall the Local Planning Authority should allow for additional smaller sites to come forward, particularly within the first five year period and this should be reflected in the Local Plan strategy. Gladman consider that Policy 5 should be altered to significantly reduce the number of dwellings for the urban extension which will come forward later in the plan period and not during the first five years as suggested. We recommend that an additional policy is added which allows smaller sustainable sites to be brought forward which have a better chance of deliverability than reliance on one large site. To illustrate this point regarding delivery, Gladman represent a site in Thaxted, Uttlesford, which is capable of delivering 130 dwellings, and unlike the site at Elsenham, the site in Thaxted is in single ownership, is better integrated, has less environmental and landscape impacts and is available to be developed right away, assisting with the delivery of housing numbers and five year supply.

David Lock Associates on behalf of the Fairfield Partnership strongly supports the identification of land to the NE of Elsenham for 2,100 homes as the start of a new settlement. However, objection is raised at the failure to identify land west of Old Mead Road controlled by the Fairfield Partnership as part of this allocation, the omission on plan of an indication of access points to the development, and the requirement for a strategic landscape buffer to the west of the development. The refusal of the recent outline planning application UTT/13/0808/FUL for a mixed use development for 800 homes and supporting uses is not material to the consideration of the allocation of land through the Local Plan process which must be based upon government policy set out in the NPPF and evidence based assessments of the merits of the allocation. The Council's assessment of additional housing sites makes clear by reference to the SHLAA that there are insufficient "high scoring" and suitable sites existing within the market towns and key villages and that other options need to be considered. The conclusion that a revised settlement hierarchy approach is required is supported. The allocation of land north-east of Elsenham as the most appropriate strategy for meeting the growth pressures on Uttlesford District is soundly based and supported by evidence. The Fairfield Partnership strongly supports the identification of land to the NE of Elsenham for 2,100 homes. However there are a number of objections to detailed policy wording, the associated plan and the parts of the accompanying Sustainability Appraisal. The policy requires a strategic landscape buffer to the west, east and south of the development. The provision of extensive new open space in the form of a Green Ring forms a central part of the proposals and is reflected in the accompanying plan within the policy. The Green Ring will provide new open space provision for the new and existing communities, and will maintain the separate and distinct identities of Elsenham and Henham and will provide a verdant multi-functional landscape setting within which new growth can take place. A Landscape and Visual Appraisal has been undertaken by LDA

Design and is submitted as part of these representations demonstrating the manner in which the existing landscape has capacity to successfully absorb the proposed growth. Objection is raised to the detailed policy wording requiring a strategic landscape buffer to the west. The presence of the M11 motorway in an elevated position provides a clear demarcation of the land allocation and limits views into the west of the site. While there are other more distant views from the west across rising ground within the allocation to the east of the railway, a strategic landscape buffer to the west would not provide any meaningful screening or other landscape benefits. Land west of the railway is proposed to include retained agricultural uses and landscape features associated with localised screening of the proposed waste water treatment works, but this is not in our view a strategic landscape buffer. It is therefore suggested that the word west be deleted and the requirement should read: A strategic landscape buffer should be provided to the east and south of the development.

The policy requires a contribution towards a health centre as part of the provision of a local centre. It should be noted that it is intended that the Fairfield Partnership is committed to working with local health organisations to secure the delivery of a health centre on commercial terms, although it is acknowledged that this may take the form of a contribution. This is a significant benefit of the proposed allocation. It is suggested that policy wording should be strengthened to say “and the provision of or a contribution towards a health centre”.

The policy states “the link road and other access points may need to cross the strategic landscape buffer and they should be designed to reduce the impact on this as far as possible” Access points and the link road will cross the strategic buffer. The policy wording is objected to as it suggests that access may be derived without crossing the strategic buffer. It is suggested that the wording is amended to read: “the link road and other access points will need to cross the strategic landscape buffer and they should be designed to reduce the impact on this as far as possible” Arrows indicating the general location of the points of access should also be added to the proposals diagram.

Land west of the railway line is proposed as the location of a waste water treatment works to serve the proposed development and possibly the wider community. This forms an integral part of the proposed development promoted through an outline planning application and likewise would be required to serve the proposed allocation. Site Allocation Policy 5 and the associated diagram should make clear reference to the provision of a waste water treatment works as part of the proposal in this location and delete reference to this part of the site being a development area.

Areas of the Fairfield Partnerships land control have been omitted which have the potential to contribute to the allocation; land west of Old Mead Road which can provide additional development area, and land at the corner of Old Mead Road and Old Mead Lane can make further green space provision. Furthermore, if it is accepted by the local planning authority that additional housing is required to meet objectively assessed housing needs land north of Old Mead Lane within the control of the Fairfield Partnership (identified within the Strategic Housing Land Availability Assessment as site ELS 8) should be allocated for housing growth.

Land to the north of Old Mead Lane under the control of the Fairfield Partnership might be identified as a location for future growth either within the plan period in response to any increased housing requirement (see our representation regarding the objectively assessed housing number) or alternatively in the longer term beyond the plan period.

Comments in relation to Policy 6 Safeguarded Land for Future School Use

The allocations document makes provision for safeguarding land to the east of Old Mead Lane for a potential further secondary education use. This is supported. A secondary school on land North-East of Elsenham would offer the potential for a long term solution to secondary school capacity within Uttlesford.

Secondary schooling is an issue of major relevance to the Local Plan. The Commissioning School Places in Essex 2012-2017 states: "The overall total of pupil numbers in the district is set to rise further as a result of the housing developments at Great Dunmow, Little Dunmow, Stansted and Takeley. Demand for secondary school places will be monitored and proposals will be developed with the Uttlesford secondary schools about a way forward to address the level of growth expected from around 2017 onwards.

The level of growth within the Local Plan of 10,460 homes between 2011 and 2031 represents a significant requirement for new secondary school provision across the District. The Commissioning School Places in Essex report takes account of 1,385 "qualifying units" anticipated to be built in Uttlesford District over the period 2012-17. The assumptions regarding qualifying units are significantly short of the annualised housing requirement within the District of 523 homes per annum which require that 2,615 homes would come forward in the five year period nearly double the amount assessed in the Commissioning School Places Report. There is therefore likely to be further pressure on secondary school places in the short term up to 2017.

Beyond this across the remainder of the plan period there is also the pupil product of a further 9,000+ homes to be taken account of. Using standard multipliers employed by Essex County Council this could be in the order of 1,800 pupils to be accommodated in addition to those required taken account of in the Commissioning School Places in Essex report.

In looking to 2017 Commissioning School Places predicts a net surplus of 161 secondary school places across Uttlesford District. This is well short of the secondary school places required over the whole plan period and it is vital that the plan recognises the need for further secondary school places to be provided.

The location of secondary school capacity is also relevant to the spatial distribution of growth. A significant deficit is predicted at Saffron Walden County High, with modest surpluses in other schools. The largest single forecast surplus of secondary places is at the Mountfitchet Mathematics and Computing College (now the Forest Hall School) which is predicted to have a surplus of 246 places in 2016/17. It is therefore appropriate that growth is provided within the catchment of Forest Hall School to make use of existing spare capacity. Growth within this area will also offer opportunities to rebalance secondary school provision across the District and take pressure away from secondary schools at Saffron Walden, Great Dunmow and Newport over the longer term, whether through a new school at Elsenham and/or expansion of Forest Hall School. School provision in this area might also

assist in reducing the number of children from this part of Uttlesford that attend school in Hertfordshire.

Land North-East of Elsenham is unique in offering the opportunity for a new secondary school (rather than a replacement secondary school) alongside new homes. No other site under active consideration offers the potential for a long term solution to the lack of secondary school capacity within the district, while supporting sustainable strategic growth. The identification and safeguarding of land to the east of Old Mead Lane for a potential further secondary education use is therefore supported.

Mabb Planning whilst Elsenham has the benefit of a main line station, this does not mean that a major expansion of housing at this location is 'sustainable'. The Local Plan must allocate sufficient housing and other related development in order to meet the projected housing needs of the district. New housing at Elsenham would primarily be highly attractive to London commuters, and hence encourage further out-commuting and in-migration. The already over-subscribed and overcrowded commuter trains would be further strained. The result would be to exacerbate a highly unsustainable travel pattern, which is not supported by the NPPF, would not be aimed at local people needing to be housed, and is therefore diametrically opposed to the purpose of the current public consultation. The location is environmentally sensitive, has significant infrastructural constraints, and has already been demonstrably and comprehensively rejected by the local communities and by the majority of Members of the Council. It is therefore ingenuous to continue to propose this location, and we are incredulous that Officers and Members have not yet fully acknowledged the District's proven environmentally least sensitive location for a large-scale residential development around the former Andrewsfield WW2 airfield east of Dunmow and west of Great Saling.

Phase 2 Planning on behalf of clients The proposed allocation to Elsenham is entirely disproportionate to the hierarchical approach set within the emerging plan, particularly given the number of dwellings already granted on the edge of the settlement for example on the Crown land and Charles Church site. As a consequence, we object to the proposed allocation at north east Elsenham and suggest land at Bardfield Road in Thaxted. The Council will be aware that the western part of this site was identified as THA14 where it scored highly and gained the support of the Parish Council. Thaxted is a key village at the centre of the district and has a wider range of shops and services than Elsenham, and is more accessible. The proposed alternative should therefore be allocated to meet in part the increase in housing numbers.

Phase 2 Planning on behalf of clients The proposed allocation to Elsenham is entirely disproportionate to the hierarchical approach set within the emerging plan, particularly given the number of dwellings already granted on the edge of the settlement for example on the Crown land and Charles Church site. In particular, the recent assessment of the methodology for selecting housing sites (Working Party report 1st November) noted that in the Draft Plan Stansted only had allocations for 49 units, and that notwithstanding the Green Belt designation to the south of the village, this is relatively low when compared with the other key villages. It went on to state that Stansted has a range of shops and facilities, local employment and access to the railway line. There is capacity at the secondary school and a scale of development which would deliver additional primary school capacity could be appropriate. It has a far greater range of facilities and services than Elsenham, is more

accessible to a range of transport modes, and indeed is far larger than Elsenham having been acknowledged that it is the third largest settlement in the District. As a consequence, we object to the proposed allocation at north east Elsenham. Our client's land is outside of the green belt, is closer to higher order shops and services, and is well related to existing development, in addition to being well screened from wider viewpoints. A pre-application has recently taken place and the site is able to deliver quickly.

Springfield Planning on behalf of clients The council's plan is too reliant upon this site. The council needs to be ready to have a contingency plan in the event of failure or slow progress in delivery. A wider dispersal strategy should be considered. Key Settlements, such as Newport provide part of an alternative and/or fallback strategy. One such site includes land east of Chalk Farm Lane, Newport.

Strutt and Parker on behalf of Audley End Estate, Strutt and Parker Farms and other clients the proposal is a significant variation to the previously proposed spatial distribution. Involving loss of greenfield land with major negative impacts on the natural landscape. The site is within the CPZ and includes areas at risk of flooding. The scale of growth is not enough to deliver services, facilities, employment opportunities and a sense of place that could be achieved through a new town – housing needs would be better met through a lower level of growth at Elsenham and much greater growth in other settlements.

Sworders on behalf of clients object to the allocation of the entire remaining figure of 2,100 to Elsenham. We do not consider this approach sound. Firstly, it implies a trajectory for the site which is unlikely to be deliverable within the plan period. Developers will not wish to saturate the market if other sites are delivering in the vicinity. As a result, construction activity would take place at a single location within the site. It is very unlikely that construction would achieve in excess of 150 dwellings pa from any single location, and it is entirely possible that this figure would be very much lower. This is evidenced by long term delivery rates from other sites in the district including Rochford Nurseries and Woodlands Park in Dunmow. In terms of a start on site, it is unlikely that development would be underway within 4 years of the adoption of the plan. However, for the sake of this analysis, if a start on site in 2019 is assumed, together with a development rate increasing to 150 dwellings pa over 3 years (50 dwellings in the first year, 100 in the second and 150 in the third and thereafter) 1800 dwellings would be delivered in the plan period, leaving a shortfall of some 300. This assumes that a build out rate of 150 dwellings pa is achievable, which in itself is very optimistic given the performance of other sites in the district. When this shortfall is added to the shortfall created by the unjustifiable assumptions regarding windfalls and the shortfall in housing provision in 2010/2011 the total shortfall equates to 759 dwellings. It is clear that further sites must be allocated within the district. As a result we consider that alternative sites should be allocated to accommodate housing need in the district including in Type A villages. Sites are suggested in Clavering, Takeley and Great Dunmow.

Terence O'Rourke on behalf of Countryside Properties consider there to be cause for serious doubt that the catalogue of problems highlighted in the SHLAA, and raised by the Parish Council could be solved to allow a major expansion of this modest sized settlement to be delivered and in a sustainable way within the plan period. Countryside Properties has taken advice from Highways and Transportation consultant Odyssey Markides and we believe that the following matters demonstrate that concentrating growth at Elsenham is not

sustainable and that the District Plan, as drafted, is not sound: The level of traffic that would be generated by the proposed additional houses cannot be accommodated on the local highway network. The proposed assignment strategy is not sustainable as it focuses on one route (Hall Road) and would be in jeopardy if the airport perimeter road is were closed to general traffic. The proposed capacity enhancements on the highway and at junctions would only succeed in the short-term. Network Rail are unlikely to increase the frequency of trains stopping at Elsenham station, limiting the ability of trains to provide a realistic alternative to the car. The proposed number of houses would require a significant step change in quality and frequency of bus service, to offset the impact of development traffic. The site is remote from the regional and national cycle network and would require significant investment to connect it for cycling to be seen as a realistic alternative mode of transport. The infrastructure costs and timescales for implementation raise serious doubt as to the viability of the proposal.

URS on behalf of Galliard Homes suggest an alternative location of Boxted Wood which is well placed to accommodate housing growth and mix of other uses to create a sustainable and balanced community. It's strategic location means it can support economic growth and help meet the housing requirements of both Uttlesford and Braintree.

Cllr Alan Dean These latest proposals, including the reinstatement of a new settlement at Elsenham/Henham which the council is now dishonestly calling a village extension are a knee-jerk reaction to a shameful process driven more by party politics than by good planning principles. It should be rejected. The council has failed for many years to ignore the needs for growth of many of the district's smaller villages. These are being preserved in aspic for reasons of party political prejudice so that they will eventually become wealthy middle class enclaves with distorted population profiles. The council should stand back and examine which villages need more housing. It should also examine sites along the A120 corridor which have good access. If it really can justify a new settlement, it should carry out a comparability study of locations which have better access than Elsenham, such as Great Chesterford. Only by doing this can the council regain any credibility for its Local Plan with the people of Uttlesford District.

910 **individuals** objected to the inclusion of this site in the Local Plan. Many people submitted a standard response raising similar points to the representations submitted by Elsenham and Henham Parish Councils reproduced above. Key concerns include, traffic and lack of infrastructure. A number of people are concerned about the cumulative impact of this development alongside development around Bishops Stortford being promoted by East Herts and the likely traffic impacts arising from this. Some people have suggested that the impact of the 500 recently approved should be assessed before any further development is proposed.

Sustainability Appraisal November 2013

Development of the site will have the following predominant effects:

Sustainability Objective	Impacts	Issues Highlighted
1) Retain, enhance and conserve the biodiversity and character of the	Negative	The site is in Broxted Farmland Plateau which has moderate to high

Sustainability Objective	Impacts	Issues Highlighted
landscape		<p>sensitivity to change. Small part of the site in within the CPZ Loss of high quality agricultural land Disruption to field boundaries Construction on a large expanse to greenfield land that may have major negative impacts on the natural landscape.</p>
2) To maintain and enhance the district's cultural heritage, assets and their surroundings	Positive	
3) To reduce contributions to climate change	Uncertain	<p>Not known whether renewables on site No details on energy efficiency</p>
4) Reduce and control pollution	Positive	Issues with water quality.
5) To reduce the risk of flooding	Negative	Part of site in Flood Risk Zones 2 and 3. Site level SFRA required.
6) To promote and encourage the use of sustainable methods of travel	Positive	
7) Promote accessibility	Uncertain	Site is not within a town centre. Access not safe but site policy addresses this and by developer contributions.
8) To improve the population's health and	Positive	

Sustainability Objective	Impacts	Issues Highlighted
promote social inclusion		
9) Provide housing to meet existing and future needs	Positive	
10) To promote the efficient use of resources and ensure the necessary infrastructure to support sustainable development	Uncertain	Not known whether existing water supply can support new development. Transport infrastructure to be delivered as part of scheme. No capacity in nearby schools to support development but will provide primary school and land safeguarded for secondary school. Contributions to healthcare will be sought. Issues with Water Cycle Study, water quality. Site level flood risk assessment will be required.
11) To improve the education and skills of the population	Positive	
12) To support sustainable employment provision and economic growth	Positive	

Officer Comments

The Water Cycle Study prepared as part of the evidence base for the Local Plan has shown that there are significant constraints which will need to be overcome in relation to disposal of foul water from the site. AWS have confirmed that sustainable options are available and discussions are ongoing with the developers as to how these can be achieved.

Policies in the plan will ensure that landscape character and heritage assets like such as listed building and archaeological deposits are taken into account in the planning application process.

The Highways Assessment does take account of the cumulative impact on M11 Junction 8 and UDC has been working with East Hertfordshire DC, Hertfordshire County Council and

other local authorities on this issue. Additional Highways assessments are currently being undertaken to assess the impact of the additional sites proposed. The report is expected at the end of the February and will be reported to Members in due course. Any implications arising from this study will need to be considered before the plan can be progressed.

NHS property services comments will be taken into account at the planning application stage. Amendments to the policy wording are suggested.

In relation to the provision of school places there is some secondary capacity in the short term. Additional secondary capacity will need to be provided and a suitable site is identified as safeguarded for this use. The Council has had no discussions with landowners about safeguarding land adjacent to the current Forest Hall School or bringing the site forward and this would need to be discussed further. The cross boundary movement of pupils between Essex and East Herts and the need for financial contributions towards the provision of school places in Hertfordshire will need to be the subject of further discussion between the relevant authorities. However the focus for the District and Essex County Council will be to provide sufficient schooling for pupils within Essex and the contributions allocated accordingly. Contributions towards early years and child care places will be sought as part of the development.

Throughout the plan preparation process various options have been tested and retested. An assessment of all the sites in the SHLAA was undertaken in the Technical Paper on Additional Sites published in October 2013. Many of the sites in the Draft Local Plan now have planning permission or have been approved subject to the satisfactory completion of a Legal Obligation. All the additional sites have been subject to an SA/SEA, this demonstrates that in relation to Elsenham there are a number of positive impacts. Negative impacts which have been identified through the SA/SEA process are the same issues which are being highlighted by key stakeholders and which will need to be addressed but there are relevant policies in the plan to make sure that this is done through the planning process. The issue with spreading development around smaller communities is that the scale of development likely to be acceptable will not deliver the required infrastructure. Policy does not preclude development in villages. It has been suggested that land at Great Chesterford should be allocated in preference to Elsenham because it has highway access to the M11; however there is no commitment from any landowner in Great Chesterford to be able to deliver this scale of development, making delivery uncertain within the plan period.

There is a difference between the planning application process and the long term allocation of a site in a Local Plan as part of the housing strategy. Just because a planning application was recently refused this does not mean that this is not a suitable location for a Local Plan housing allocation as demonstrated by the SA/SEA.

Support from Chelmsford City Council is noted.

In response to David Lock Associates request for changes there is no reason why the land west of the railway should not contribute towards the function of a landscape buffer. The site is unlikely to be attractive as agricultural land.

In view of the comments from NHS property services it is suggested that some changes are made to the wording of the policy to give some flexibility.

If the Council were to allocate the land for the WWTW this would not be consistent with other site allocation policies in the Local Plan. Development will be implemented in accordance with a master plan which will show the various land uses in more detail.

The land allocated is sufficient to deliver current requirements. The supporting text indicates potential to expand in the future to meet housing requirements beyond the current plan period.

Officers Recommendation

The following wording changes are proposed to Site Allocation Policy 5 – Land North East of Elsenham. Final recommendations will be made when the Highways Impact Assessment work has been completed. No changes are proposed to the Site Allocation Policy 6 – Land to the east of Old Mead Lane.

Land North East of Elsenham

The land to the north east of Elsenham is allocated for 2100 homes.

The following criteria must be met:

- The development provides for a mixed and balanced community to include:
 - At least 5% older person's and 1 and 2 bed bungalows across tenure
- It provides for improvements to the railway crossing at Elsenham Station
- It provides for recreation open space within the development to include informal recreations areas, the provision of children's play spaces (LAPS LEAPS and NEAP) playing pitches and allotments. A strategic landscape buffer should be provided to the west, east and south of the development.
- It provides as part of education contributions 3ha land for a 3 form entry pre/primary school.
- It provides a local centre within the development including provision for retail, employment, community buildings, and **the provision of or** a contribution towards a health centre.
- It provides a contribution to public transport.
- It provides a transport interchange adjacent to the station and makes a contribution to highways improvements and traffic management measures required to mitigate the impact of the development.
- It provides a link road from Henham Road to Hall Road, avoiding Elsenham Cross. This link road and other access points to the development ~~may~~ **will** need to cross the strategic landscape buffer and they should be designed to reduce the impact on this as far as possible.
- It provides 4ha of employment land.
- The development is designed to mitigate adverse effects upon existing residential and community interests and may be required by legal obligation to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact.

The application should be accompanied by a Transport Assessment and Drainage Strategy and other required documents and any recommended improvements/remedial works will be controlled through the legal obligation.

Development will need to be implemented in accordance with the Master Plan and design guidance approved by the Council and other Development Management policies. Implementation of the Master Plan proposals will be regulated by legal obligation in association with the grant of planning permissions.