



# Uttlesford District Council

Chief Executive: John Mitchell

## Planning Policy Working Group

**Date:** Wednesday, 16 December 2015  
**Time:** 19:00  
**Venue:** Council Chamber  
**Address:** Council Offices, London Road, Saffron Walden, CB11 4ER

**Members:** Councillors Susan Barker, Paul Davies, Alan Dean, Stephanie Harris, John Lodge, Janice Loughlin, Alan Mills, Edward Oliver, Joanna Parry, H Rolfe.

### AGENDA

#### Open to Public and Press

- 1 Apologies for absence and declarations of interest.**  
To receive any apologies and declarations of interest
  
- 2 Minutes of previous meeting** 5 - 12  
To receive the minutes of the meeting on 26 November 2015
  
- 3 Matters Arising**  
To consider matters arising from the minutes
  
- 4 Green Belt Review** 13 - 68  
The Green Belt review item will include a presentation of the approach and methodology from the consultants ARUP
  
- 5 Call for Sites and Strategic Land Availability Assessment** 69 - 106  
To note the sites submitted under the call for sites and the proposed methodology for the interim assessment of the sites
  
- 6 Issues and Options Consultation** 107 - 110  
To provide information on the number of responses received in response to the recent consultation.

<b>7</b>	<b>Evidence Base Review and Work Plan</b>	111 - 114
	To receive an update on the status of the various studies which will underpin the Local Plan evidence base	
<b>8</b>	<b>Duty to Cooperate</b>	115 - 128
	To receive an update on recent Duty to Cooperate work	

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**PLANNING POLICY WORKING GROUP held at COUNCIL OFFICES  
LONDON ROAD SAFFRON WALDEN on 26 NOVEMBER 2015 at 7.00pm**

Present: Councillor H Rolfe – Chairman  
Councillor S Barker, P Davies, A Dean, S Harris, J Lodge, J  
Loughlin, A Mills, E Oliver, and J Parry.

Officers in attendance: M Cox (Democratic Services Officer), R Fox (Planning  
Policy Team Leader ), M Paine (Planning Policy Team Leader),  
A Taylor (Assistant Director Planning and Building Control).

**PP34 APOLOGIES FOR ABSENCE AND DECLARATION OF INTERESTS**

Councillor S Barker declared a non-pecuniary interest as a member of ECC.

**PP35 MINUTES**

The minutes of the meeting held on 29 September 2015 were received and signed by the Chairman as a correct record, subject to including the apologies from Councillor Loughlin, which had been received after the meeting.

**PP36 BUSINESS ARISING**

i) Minute PP28 – Issues and Options Consultation

Councillor Dean said that the debate at Full Council on 13 October 2015 had underlined the need for all councillors to be made aware of the reports and issues that had been considered by the working group to enable them to make an informed decision at future council meetings.

ii) Minute PP32 – Assessment of large scale proposals against garden city principles

Councillor Dean said he had attended a recent consultation event in Dunmow where he was aware that the public was still suspicious of decisions being made behind the scenes, particularly in relation to large site proposals. He said that although the current process was more transparent, the council had to regain public trust and it might be appropriate to issue a statement to clarify the position regarding meetings with developers.

**PP37 COUNCIL RESPONSE TO THE PLANNING ADVISORY SERVICE REVIEW  
OF THE 2014 SUBMISSION LOCAL PLAN**

The working group received the council's proposed response to the Planning Advisory Service (PAS) review of the 2014 submission plan. The Scrutiny

Committee had requested this independent review of the plan preparation process following the withdrawal of the plan after the examination in public in 2014. The response presented the lessons learnt and how these could be incorporated into the process going forward. The response included a clear summary table of the PAS comments and set out future action to be taken.

Councillor Dean, Chairman of the Scrutiny Committee welcomed the report and was satisfied that there was a plan to follow through the recommendations.

In order to ensure the successful progression of this process, members felt it was important to ensure that there was comprehensive communication, both external and internal and for frequent workshops to be arranged for UDC members to ensure they fully understood the process.

**Action:** The next member workshop to explain the criteria for the evaluation of sites to be arranged prior to a future council meeting.

It was clear that there were many aspects involved in the preparation of the plan and Members asked if all these elements were expected to come together in order to meet the plan timetable. It was explained that the target for the preferred options consultation was autumn next year but supportive evidence was required, and this was likely to drive the pace of the process.

In answer to a question, it was clarified that in relation to the transport assessment it was possible to expand the remit if necessary. It would also be possible for the working group to receive the interim results.

In relation to discussion around the Member duty to cooperate meetings, it was explained that each district appointed one representative from the Administration and for Uttlesford this was Councillor Susan Barker. Members said it would be helpful to have an earlier sight of the minutes of both member and officer meetings and to receive a programme of the various meetings taking place.

**Action:** To circulate a timetable of future duty to cooperate meetings to all members of the working group and ensure that the minutes of these meetings were reported as soon as they were available.

AGREED that the working group support the proposed council response to the independent review of the 2014 Submission Local Plan.

PP38

## **PREFERRED OPTIONS – GUIDELINES AND RECOMMENDATIONS**

The working group received a report that set out guidelines for the preferred options consultation, which was the next stage in the local plan preparation. This would involve the council making difficult decisions, particularly in relation to housing allocation. The report explained the requirements set out in the NPPF and Planning Practice Guidance (PPG) and set out ten recommendations on how they should be applied. The appendices included

further guidance in relation to balancing the options, the housing trajectory, the duty to cooperate and for considering large scale options.

The working group welcomed the document as a comprehensive reference for delivering the plan. It could be seen as a step to step guide and as such was an important document for all members to have sight of in advance of any decision taken at full council.

**Action:** To forward the document to all members of the council and consider whether press coverage would be appropriate.

Members discussed the document and raised questions around economic development, green belt issues and site deliverability.

It was explained that in advance of the proposed draft consultation in the autumn there were a number of matters to be considered. These included the report of representations from the recent consultation, the results of the green belt review, the final sieving document, discussion around a new settlement option and initial site assessments. The working group would receive the reports at its meeting and member workshops would also be held during this period.

Members said this was a complex process and it would be useful to understand the various interdependencies.

**Action:** To circulate a detailed timeline of the key stages and reports to members of the working group.

AGREED that the local plan preferred options: guidance and recommendations, together with the ATLAS guidance on deliverability be noted.

PP39

## **EVIDENCE BASE AND WORK PROGRAMME**

The working group received a report, which updated work on the evidence base and forward work plan. It was noted that the highway consultant had now been appointed. The green belt review had commenced and the stage 1 results would be reported to the December meeting.

PP40

## **ECONOMIC EVIDENCE – STANSTED SCENARIOS**

The working group considered a report on further work commissioned by the council on employment forecasting taking account of expansion plans at Stansted Airport. This would form part of the council's emerging local plan evidence base.

The report provided a district wide projection of employment by sectors up to 2033 based on high (45mppa) and low (35mppa) growth scenarios at Stansted Airport. This took account of the growth based on Manchester

Airport group's sustainable development plan. The expected number of jobs per annum were calculated and distributed across the four authorities.

### **Public speakers**

*Mike Young made a statement expressing concern about the figures and assumptions made in the report about the future employment figures, which he believed overstated the position.*

*Ken McDonald expressed concern about the robustness of the SHMA report, and especially the double counting and overstating of the influence of Stansted Airport on jobs and future housing need. He asked the PPWG to revisit the SHMA report.*

*A copy of these statements is attached to these minutes.*

The Chairman said that the SHMA had been prepared by recognised experts, the figures had been considered and agreed by the working group and were comparable to the number suggested by the Inspector. It was necessary to take account of employment at Stansted Airport and there was no need to redo this work.

The working group was informed that recent growth at the Airport had been above that projected and the sustainable development figures. The study had been prepared based on the airport's assumption but it was using the most up to date figures. The report set out the consultant's professional assessment but it was up to the council to decide how to use the evidence from the study.

Members said there might be some merit in looking at the issues raised by the speakers. In particular, the points raised about the allocation of the number of jobs and houses between the four districts, and also the effect of the Stansted Airport employment projections and their input into the SHMA.

**Action:** To consider the above issues in relation to the SHMA document at a future meeting of the working group.

AGREED that the working group note the published Stansted Scenarios summary paper and spreadsheet, and their adoption into the local plan.

PP41

### **DUTY TO COOPERATE UPDATE**

Members received an update on the duty to cooperate work. There was a lot of activity in this area with a prolific number of meetings being held with the various partners. In answer to a question, it was explained that the key areas of discussion were generally around the delivery of housing numbers, highways (cross boundary and national), the impact of Stansted Airport, and the impact of each district's distribution strategy, areas of search and site adoption.

There were many discussions taking place in relation to the promoted large sites in the district. This was in order to gather relevant information, which would be available when a decision was taken on which of these sites to take forward in the process. It was not appropriate for these discussions to be in

the public domain at this stage. There were many sites going through this process, which were all being treated in the same way.

The report was noted.

PP42            **HOUSING TRAJECTORY AND FIVE YEAR LAND SUPPLY STATEMENT**

The working group received a report, which updated the Housing Trajectory, and 5-Year Land Supply Statement to take account of the findings of the Strategic Housing Market Assessment (SHMA) published in September 2015 and recent appeal decisions where the Inspector had commented on the 5-year supply issues. It also explained why the council considered that it was only required to apply the standard 5% buffer. It was estimated that the district currently had between 5.1 – 5.3 years of supply depending on the housing target.

**Action:** recirculate the key housing figures contained within the recent consultation to clarify the number of units still to be identified and planned for.

The report was noted.

PP43            **WASTE STRATEGY ADDITIONAL CONSULTATION – NEWPORT QUARRY**

The working group had considered the consultation on the ECC Waste Replacement Plan in July 2015. During the consultation period, an additional site had been proposed at Newport Quarry and this site was now subject to further consultation.

Member agreed to endorse the officer comments but said that as this was an Essex wide plan it was not necessarily a requirement to have a site within Uttlesford.

Therefore it was AGREED to change the last para to read ‘ ECC is therefore asked to consider this site in the light of this review and consider if it is more preferable to greenfield sites elsewhere in the county’.

PP44            **ISSUE AND OPTIONS CONSULTATION DOCUMENT – MINOR AMENDMENTS**

Members received a table of the minor amendments that were made to the Local Plan issues and Options Consultation Document following the Full Council meeting on 13 October 2015.

It was emphasised that all members should have the opportunity to view and make changes to any proposed documents before a decision was taken by Full Council.

**OTHER BUSINESS**

The Chairman said Martin Paine, the current Planning Policy Team Leader would shortly be leaving the authority and this was his last meeting. The working Group thanked him for the significant contribution he had made during his time at the authority and wished him well in his future career.

The meeting ended at 9.25 pm

## Statement by Ken McDonald

Good evening.

My name is Ken McDonald. I am a resident of Stansted Mountfitchet.

I have asked to speak because I **care** about this area and because I would not want Uttlesford District Council to **sleep-walk** into another disastrous Examination in Public.

I have reviewed the “West Essex and East Hertfordshire Strategic Housing Market Assessment” (the “SHMA”) and have a number of areas of concern regarding its robustness - and its conclusion that Uttlesford should plan to build 568 houses per annum. The SHMA is a **key** element of this planning process, but I believe it is not at **all** robust and is likely to come under attack at an Examination in Public, not least for the fact that it **appears** not to have been subjected to any meaningful review by this Working Group **and** has not been consulted upon.

**One** of my specific concerns is the double counting and overstatement of Stansted Airport’s likely influence on jobs and future housing need. The Hardisty Jones figures that you have been invited this evening to note and **adopt** as part of the Local Plan seem to be the **main** source of this overstatement. It seems to be the **primary** justification for the blanket 20% uplift that was applied in the SHMA to arrive at the figure of 568.

I wholeheartedly support the concerns that Mike Young has just expressed. I echo his call for this Policy Working Group not to simply rubber-stamp the Hardisty Jones report, but to challenge it and refer it back. Once you have had an opportunity to **properly** consider it, I am fairly sure you will also see that it is unfounded, unreasonable and gives rise to a completely unnecessary **boost** to the SHMA’s housing need projection.

My allocated three minutes is insufficient to outline **all** my areas of concern about the SHMA, but I do ask that you consider the SHMA alongside **my** critique. I have already sent copies to Howard Rolfe, John Lodge and Alan Dean and have additional copies here if anyone would like one.

I probably just have time to mention two of the more **straightforward** areas that concern me in the SHMA – **both** of which seem to require further work and consideration.

Firstly, the SHMA’s lack of **evidence** and lack of **audit trail** for its calculations make it **far** from easy to follow. This aspect, **and** the fact that it has not been consulted upon, is unlikely to impress an inspector.

Secondly, the SHMA covers 4 districts, but concludes by **splitting** the overall housing need **between** those 4 districts, requiring Uttlesford to increase its housing stock by no less than **37%**, whilst the other districts are being asked to grow much less - between 16% and 28%. There appears to be **no** explanation for this disparity, so I fail to see how any **serious** reviewer could regard the recommendation as sound.

## Statement by Mike Young

I am asking that this report be withdrawn and a revised version be prepared. The reason for doing so is that it significantly overstates the likely employment growth at Stansted airport. The report before you is a summary of the more detailed report prepared by the consultants to which I will need to refer, although I appreciate that it is not in your papers.

Basically, it appears that the consultants prepared an interim report and were then asked to revise it to take into account the prospect of passenger growth at the airport getting to 45 million by 2033. The consultants state that they were not asked to test the validity of this figure. But they assumed that this level of growth would lead to an extra 10,000 jobs at the airport.

The figures of 45 million passengers and 10,000 jobs are taken from a report produced earlier this year by MAG, the airport's owners. These figures were not a forecast nor a prediction; they were simply used to show a possible scenario indicating how airport growth might affect the local economy.

The figure of 45 million passengers was used as an illustration of what might happen if the airport achieved maximum use of a single runway. However official forecasts of airport growth are available. These are produced regularly by the Department for Transport and more recently by the Airports Commission. These show passenger figures at Stansted of about 27 million in 2033, an increase over present numbers of 5 million rather than 23 million.

Turning now to job growth, airports and airlines are notorious for their optimistic projections. In this case it assumes that a doubling of passenger traffic would lead to an almost doubling of employee numbers.

Actually BAA, the previous owners, in their last planning application did some similar calculations. But they predicted a growth rate at about half of these rates. If you substitute the government's projected passenger numbers and include a realistic growth rate the figure of an extra 10,000 jobs reduces to about 1,000 of whom about 150 would be Uttlesford residents.

Unfortunately correcting this error is not as easy as simply deducting 9,000 from the figures. As the consultants point out job growth at Stansted would actually cause reductions in other parts of the SHMA area.

A full revision of the assessment is needed since this could have a very significant effect on the calculation of the housing requirement for the area.

**Committee: Planning Policy Working Group**

**Agenda Item**

**Date: 16 December 2015**

**4**

**Title: Green Belt Review**

**Author: Andrew Taylor, Assistant Director Planning and Building Control**

**Summary**

1. This report provides an update on the Green Belt Review and reports on the Phase 1 work.

**Recommendations**

- 2.To note the update and methodology.

**Financial Implications**

3. None

**Background Papers**

- 3.None

**Impact**

- 5.

Communication/Consultation	No formal consultation on this document although it is available as part of the committee papers.
Community Safety	N/A
Equalities	N/A
Health and Safety	N/A
Human Rights/Legal Implications	N/A
Sustainability	N/A
Ward-specific impacts	Those containing Green Belt
Workforce/Workplace	N/A

## Situation

6. The Working group received an update paper at its last meeting which explained that the Council had issued a brief for carrying out a Green Belt review on 12 October 2015 and that Arup had been appointed to carry out the work.
7. The work falls into two stages and the first stage is being reported now. This work has identified a series of parcels within the Green Belt which form logical areas to assess at stage two.
8. A workshop was conducted on 4 December to which representatives of surrounding local authorities (Chelmsford, East Herts, Epping Forest, Harlow, Essex County and Hertfordshire County Councils) were invited and their comments have been incorporated into the report.
9. The attached report explains the geographical extent of the parcels identified, highlights the methodology proposed to be studied and the policy context for Green Belt Reviews.

## Risk Analysis

Risk	Likelihood	Impact	Mitigating actions
That the Council prepares an unsound Plan.	1 – The Council is preparing a Plan which is positively prepared; justified; effective and consistent with national policy	2 – The adoption of the Plan is delayed whilst additional work is undertaken.	That the Council ensures that the Plan meets the requirements of the NPPF and is justified by evidence.

1 = Little or no risk or impact

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

3 = Significant risk or impact – action required

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

Uttlesford District Council  
**Uttlesford Green Belt Review**  
Methodology

246505-4-05-01

Draft 3 | 8 December 2015

Draft

This report takes into account the particular instructions and requirements of our client.

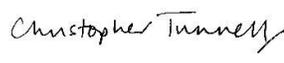
It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 246505-00

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# Document Verification

# ARUP

<b>Job title</b>		Uttlesford Green Belt Review		<b>Job number</b>	
				246505-00	
<b>Document title</b>		Methodology		<b>File reference</b>	
<b>Document ref</b>		246505-4-05-01			
<b>Revision</b>	<b>Date</b>	<b>Filename</b>	Uttlesford Green Belt Review Methodology DRAFT 2015 11 20.docx		
Draft 1	20 Nov 2015	<b>Description</b>	First draft		
			Prepared by	Checked by	Approved by
		Name	Lizey Williams	Andrew Barron	Christopher Tunnell
		Signature			
Draft 2	30 Nov 2015	<b>Filename</b>	Uttlesford Green Belt Review Methodology DRAFT 2 - 2015 11 30.docx		
		<b>Description</b>	Update following Client Meeting 27/11/15		
			Prepared by	Checked by	Approved by
		Name	Lizey Williams	Andrew Barron	Chris Tunnell
		Signature			
Draft 3	8 Dec 2015	<b>Filename</b>	Uttlesford Green Belt Review Methodology DRAFT 3 - 2015 12 08.docx		
		<b>Description</b>	Update following Stakeholder Workshop.		
			Prepared by	Checked by	Approved by
		Name	Elisabeth Williams	Andrew Barron	Chris Tunnell
		Signature			
		<b>Filename</b>			
		<b>Description</b>			
			Prepared by	Checked by	Approved by
		Name			
		Signature			
<b>Issue Document Verification with Document</b> <input checked="" type="checkbox"/>					

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## Appendices

### Appendix A

Glossary of Terms

### Appendix B

Pro-Forma

# 1 Introduction

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## 1.1 Background

Arup has been appointed by Uttlesford District Council to undertake a Green Belt Review as part of the evidence base to support the forthcoming Uttlesford Local Plan. The Green Belt Review will assess the Uttlesford Green Belt against the purposes of Green Belt as defined by the National Planning Policy Framework (NPPF).

## 1.2 Purpose of Review

The purpose of a Green Belt Review is to provide evidence of how different areas perform against the Green Belt purposes set out in national policy; planning authorities may then take this into account alongside other evidence in making decisions about possible changes to Green Belt boundaries. A boundary revision can take the form of an expansion or a contraction. However, equally a Green Belt Review may conclude that no changes are appropriate.

The Green Belt Review will provide an independent and objective appraisal of all existing Green Belt land in Uttlesford, as well as land outside the Green Belt boundaries which may be designated (if appropriate). This report has been undertaken in accordance with the Brief, which sets out the main aim of the study *‘to prepare an assessment of the District’s Green Belt against these five purposes [the NPPF purposes], in sufficient detail to enable the Council to make informed decisions, should it decide to amend the Green Belt through its new Local Plan. The study should clarify what is meant by each of the five purposes, and how they will be applied in practice’*.

## 2 Uttlesford Green Belt Review Context

### 2.1 History of the Green Belt

The concept of Green Belt dates back to the origins of the modern British planning system. Coined as a response to the impact of urban sprawl and the rapid change of rural areas around London, Green Belt policy is frequently cited as one of the planning system's most notable achievements.

During the late 19<sup>th</sup> and early 20<sup>th</sup> centuries, the rapid expansion of the railways suddenly brought once remote settlements within commuting distance of central London. The coining of the phrase *Metro-Land* in 1915 by the Metropolitan Railway Company and the subsequent waves of publicity containing evocative imagery of the historic villages and countryside areas north-west of London transformed previously isolated, rural areas into desirable locations for commuters, significantly increasing demand for housing.

During the post-war period, the urban area of London doubled in size and other settlements in the commuter belt, both villages and towns, also witnessed rapid growth. The arrival of the Great Eastern Railway in 1842 to Bishop's Stortford assisted in boosting the corn exchange and malting industry, and between 1841 and 1901 the population has significantly increased from 4,681 to over 7,000 reaffirming its place as an agricultural town as well as a commute district.<sup>1</sup> By 1844 the railway had reached Stansted Mountfitchet, with significant effects of replacing the coach services, bringing coal for fuel and slate for roofing, and enabling farm produce and livestock to be dispatched to London quickly for trade.<sup>2</sup>

Initially, the Metropolitan Green Belt, first suggested by Raymond Unwin in 1933 as a '*green girdle*' and defined by Patrick Abercrombie in the Greater London Plan of 1944 (later established in the Town and Country Planning Act of 1947), was designed to curtail the further unchecked growth of London's urban area, but was only 6 to 10 miles wide and was not able to restrict development in the wider commuter belt. Green Belt policy is frequently credited as one of the most notable achievements of the planning system, halting the outward '*urban sprawl*' of London into the countryside. Particularly after the Second World War, concerns were growing about the rapid change of rural areas around London.

### 2.2 Green Belt in Uttlesford

Between 1919 and 1939, thousands of acres of fertile inner-Essex market gardens were lost to development.<sup>3</sup> As early as the mid-1930s, inspired by Raymond Unwin's '*green girdle*' concept and empowered by a Green Belts '*loan scheme*'

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<sup>1</sup> A Brief History of Bishop's Stortford, Local Histories (<http://www.localhistories.org/bishops.html>)

<sup>2</sup> Stansted Mountfitchet Conservation Area Appraisal and Management Proposals, Uttlesford District Council, 2007 (<http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=1930&p=0>)

<sup>3</sup> Hamson, P. (1969) *The Green Belt Saga*

initiated by the London County Council in 1935<sup>4</sup>, Essex County Council was purchasing land at the edges of London to designate as Green Belt, thus protecting it from development.<sup>5</sup> While the imperative of protecting open land around London was further cemented by the creation of the first Metropolitan Green Belt by Patrick Abercrombie in the Greater London Plan of 1944, the impracticalities of local authorities purchasing large swathes of land were realised.

The Town and Country Planning Act of 1947 for the first time compelled County and Borough Councils to prepare twenty year development plans for their areas and enabled them to designate Green Belts to curtail the further unchecked growth of London's urban area. However, this original Green Belt's width of only 6 to 10 miles was not able to restrict development in the widening commuter belt.

Circular 42/55, released by government in 1955, encouraged local authorities to establish their own Green Belts. The Circular set out three main functions of the Green Belt: to check the growth of a large built-up area; to prevent neighbouring settlements from merging into one another; and to preserve the special character of a town. Following this, the draft Review of the Essex County Development, published in 1964 and approved by the Secretary of State in 1976, was the first plan to formally designate the boundaries of the Metropolitan Green Belt in Essex.<sup>6</sup> This was later replaced by the Essex County Structure Plan.

Uttlesford lies at the outer edge of the Metropolitan Green Belt. The Green Belt designation was extended further in the 1995 Uttlesford Local Plan in order to '*prevent the communities from merging into an urban sprawl from the south of Bishop's Stortford to the north of Stansted Mountfitchet*'.<sup>7</sup> The current Local Plan (2005) carries forward the Green Belt designation which featured in the previous 1995 Local Plan. The Uttlesford Green Belt covers 3,810 hectares, representing approximately 8% of the total area of the District. The Green Belt runs along the south-western edge of the District and comprises the very extremity of the Metropolitan Green Belt being the most northerly area of Green Belt in Essex.<sup>8</sup>

Current national policy set out in the NPPF upholds the spirit of the original Green Belt purposes and reaffirms the fundamental aim of Green Belt policy to prevent urban sprawl and maintain the openness of land. The NPPF goes on to advise that Local Planning Authorities should also plan positively to enhance the beneficial uses of the Green Belt. Within Uttlesford, the Green Belt offers protection to an area of attractive countryside, including a gently undulating arable farmland landscape occasionally punctuated by small villages and farmsteads, which covers much of the District, as well as the relatively unspoilt pasture and wetlands of the Stort Valley at the District's western edge.<sup>9</sup> However, it is important to recognise that Green Belt is not designated on the basis of environmental quality but on planning grounds; the Green Belt's core role in Uttlesford has been to maintain the historic settlement pattern and prevent the

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<sup>4</sup> London Borough of Redbridge (20XX), Green Belt Review – Stage 1: Background

<sup>5</sup> Powell, W.R. (1978) *A History of the County of Essex*

<sup>6</sup> Castle Point Borough Council (2013) *Green Belt Boundary Review*

<sup>7</sup> Uttlesford District Council (2011) *Green Belt Boundary Review Scoping Report*

<sup>8</sup> Uttlesford District Council (2011) *Green Belt Boundary Review Scoping Report*

<sup>9</sup> Chris Blandford Associates (2002) *Essex Landscape Character Assessment*

encroachment of unsuitable development into open countryside, in particular around Bishop's Stortford, Stansted Mountfitchet and Stansted Airport.

Following the withdrawal of the Submission Local Plan in January 2015, Uttlesford District Council have commenced work on a new Local Plan. In developing the new Local Plan, the Council will '*[give] equal consideration to all the options for development*', focussing growth options on a number of Areas of Search which include Great Dunmow, Saffron Walden, the villages, and new settlement options at locations with good access to the strategic transport network.<sup>10</sup> It is likely that Uttlesford will come under pressure to accommodate increasing numbers of homes to cope with housing growth in the East of England and, potentially, the challenges facing neighbouring districts in meeting their objectively assessed needs. The Green Belt designation may be viewed by some as a constraint to meeting such housing need.

## 2.3 Previous Green Belt Reviews

There have been no recent Green Belt Reviews within the Uttlesford area.

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<sup>10</sup> Uttlesford District Council (2015) *Local Plan Update – Issue 1*

## 3 Policy, Guidance and Context

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### 3.1 National Context

At the national level, the NPPF, national Planning Practice Guidance and ministerial letters provide the policy and guidance context for the role and function of the Green Belt. The following sections summarise the current position.

#### 3.1.1 National Policy

The NPPF sets out the Government's planning policies for England and how these are expected to be applied. Central to the NPPF is the '*presumption in favour of sustainable development*' which for plan-making means that local planning authorities should positively seek opportunities to meet development needs and should meet objectively assessed needs unless specific policies of the NPPF (such as Green Belt policy) indicate that development should be restricted.

Protection of Green Belt around urban areas is a core planning principle of the NPPF. Policy for protecting Green Belt land is set out in section 9 of the Framework which emphasises the great importance that the Government attaches to Green Belts.

Circular 42/55 released by Government in 1955 highlighted the importance of checking unrestricted sprawl of built-up areas and of safeguarding countryside from encroachment. It set out three main functions of the Green Belt which are now upheld in the NPPF:

- To check the growth of a large built-up area;
- To prevent neighbouring settlements from merging into one another; and
- To preserve the special character of a town.

The NPPF advocates openness and permanence as essential characteristics of the Green Belt stating that '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open*' (paragraph 79). The NPPF details five purposes of the Green Belt:

1. '*To check the unrestricted sprawl of large built-up areas;*
2. '*To prevent neighbouring towns merging into one another;*
3. '*To assist in safeguarding the countryside from encroachment;*
4. '*To preserve the setting and special character of historic towns; and*
5. '*To assist in urban regeneration, by encouraging the recycling of derelict and other urban land*'. (paragraph 80)

For ease of reference in this Review, these purposes are referred to as NPPF Purposes 1 to 5, with the assigned number corresponding to the order in which the purposes appear in the NPPF, as above.

In addition to the purposes of the Green Belt, the NPPF advocates enhancement to existing Green Belts. Paragraph 81 states that *‘local planning authorities are required to plan positively to enhance the beneficial use of the Green Belt’* once Green Belt boundaries have been defined including looking for opportunities to:

- *‘Provide access;*
- *Provide opportunities for outdoor sport and recreation;*
- *Retain and enhance landscapes, visual amenity and biodiversity; or*
- *Improve damaged and derelict land’.*

Paragraph 83 states that *‘local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans’* and that *‘once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan’*. Importantly, the NPPF acknowledges the permanence of Green Belt boundaries and the need for Green Belt boundaries to endure beyond the plan period (paragraph 83). The need to promote sustainable patterns of development when reviewing the Green Belt boundaries is also acknowledged (paragraph 84).

The NPPF seeks to align Green Belt boundary review with sustainable patterns of development (paragraph 84). Local planning authorities are encouraged to *‘consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary’*.

Paragraph 85 states that *‘when defining boundaries, local planning authorities should:*

- *Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *Not include land which it is unnecessary to keep permanently open;*
- *Where necessary, identify in their plans areas of “safeguarded land” between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period;*
- *Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.’*

### 3.1.2 National Guidance

The national Planning Practice Guidance is intended to provide up-to-date, accessible and useful guidance on the requirements of the planning system. The Guidance was updated in October 2014, reiterating the importance of the Green Belt and acknowledging that Green Belt may restrain the ability to meet housing need. The following paragraphs are relevant to Green Belt Assessment:

- Paragraph 044 Do housing and economic needs override constraints on the use of land, such as Green Belt?** – *‘The NPPF should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole, or specific policies in the Framework indicate that development should be restricted’ (as it is with land designated as Green Belt). ‘The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.’*
- Paragraph 045 Do local planning authorities have to meet in full housing needs identified in needs assessments?** – *‘Assessing need is just the first stage in developing a local plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.’*

The national Planning Practice Guidance does not provide any specific guidance on conducting a Green Belt Assessment *per se*.

### 3.1.3 Ministerial Statements

Letters from ministers of the Department for Communities and Local Government (DCLG) to the Planning Inspectorate (PINS) or local government officers or general statements by ministers have clarified or re-affirmed aspects of Green Belt policy. During his time as Planning Minister, Nick Boles issued a series of Ministerial Statements on the Green Belt which, in general, continued to emphasise the protection of the Green Belt.

Perhaps the most significant statement came in March 2014 when correspondence between Nick Boles and PINS reaffirmed the importance and permanence of the Green Belt and that Green Belt may only be altered in *‘exceptional circumstances’* through the preparation or review of local plans<sup>11</sup>. The correspondence recognised the special role of the Green Belt in the framing of the

<sup>11</sup> Nick Boles / DCLG (2014) *Inspectors’ Reports on Local Plans*, [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/286882/140303\\_Letter\\_-\\_Sir\\_Michael\\_Pitt.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/286882/140303_Letter_-_Sir_Michael_Pitt.pdf)

presumption in favour of sustainable development, which sets out that local authorities should meet objectively assessed needs unless specific policies in the Framework indicate development should be restricted, with the Green Belt identified as one such policy.

This position was reaffirmed in October 2014 when the national Planning Practice Guidance was amended (see section 3.1.2).

### 3.1.4 Legal Cases – ‘Very Special Circumstances’ and ‘Exceptional Circumstances’

The NPPF sets out that ‘*very special circumstances*’ relates to the consideration of planning applications in the context of existing Green Belt. Paragraph 87 states that ‘*As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances*’. Paragraph 88 goes on to state that ‘*When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations*’. Paragraph 89 identifies those type of development within the Green Belt which may be considered as acceptable in the context of ‘*very special circumstances*’:

- Buildings for agricultural and forestry;
- Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

Paragraph 90 expands on the above list by identifying other forms of development that are also not inappropriate provided they ‘*preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt*’, namely:

- Mineral extraction;
- Engineering operations;

- Local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- The re-use of buildings provided that the buildings are of permanent and substantial construction; and
- Development brought forward under a Community Right to Build Order.

As set out in section 3.1.1 and 3.1.3, ‘*exceptional circumstances*’ relates to forward planning for Local Plans in the context of Green Belt boundaries. There is no definition of ‘*exceptional circumstances*’ provided in the NPPF. There is limited case history relating to decisions about the setting or change of Green Belt boundaries in local plans and the definition of ‘*exceptional circumstances*’. However, there are two recent relevant examples of note.

The first is the Solihull Local Plan (Solihull Metropolitan District Council). In this case, a developer’s sites in Tidbury Green were placed into the Green Belt by the Solihull Local Plan (SLP) adopted in December 2013. The developer challenged the SLP on three grounds: (i) that it was not supported by an objectively assessed figure for housing need; (ii) the Council has failed in its duty to cooperate; and (iii) the Council adopted a plan without regard to the proper test for revising Green Belt boundaries. The Claim succeeded at the High Court.

Solihull appealed against the decision, but the appeal was dismissed by the Court of Appeal. The Court held that the Inspector and Solihull had failed to identify a figure for the objective assessment of housing need as a separate and prior exercise, and that was an error of law. In addition, the Judge dismissed the Inspector’s reasons for returning the developer’s sites to the Green Belt, saying that:

*‘The fact that a particular site within a council’s area happens not to be suitable for housing development cannot be said without more to constitute an exceptional circumstance, justifying an alteration of the Green Belt by the allocation to it of the site in question’.*

More recently, in the case of Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council, this position was upheld. In this case, the Parish Council applied to the High Court to quash parts of the Aligned Core Strategies of the three authorities, arguing that: (i) it had failed to consider whether housing numbers should be reduced to prevent the release of green belt land; and (ii) it had failed to apply national policy in considering its release. However, the Claim was rejected.

In Paragraph 42 of the decision, referring to the earlier Solihull decision, the Judge stated:

*‘In the case where the issue is the converse, i.e. subtraction, the fact that Green Belt reasons may continue to exist cannot preclude the existence of countervailing exceptional circumstance – otherwise, it would be close to impossible to revise the boundary. These circumstances, if found to exist, must be logically capable of trumping the purposes of the Green Belt; but whether they should not in any given case must depend on the correct*

*identification of the circumstances said to be exceptional, and the strength of the Green Belt purposes’.*

While supporting the earlier Solihull case, the judgement also confirms that ‘*exceptional circumstances*’ may override the purposes set out in the NPPF, depending on the strength of these purposes. In determining what is exceptional, an authority should balance:

- The ‘*acuteness/intensity of the housing need*’;
- The ‘*constraints on the supply/availability of land...suitable for development*’;
- The ‘*difficulties in achieving sustainability without impinging on the green belt*’;
- The ‘*nature and extent of the harm to this green belt*’; and
- How far the impacts on green belt purposes could be reduced.<sup>12</sup>

In his decision, the Judge believed the Inspector had taken a ‘*sensible and appropriate*’ approach to adjudging the weight of exceptional circumstances versus the strength of the Green Belt purposes by weighing up the advantages and disadvantages of different alternative options for meeting housing need, including those which would not have involved Green Belt adjustments.

The need for a robust Green Belt Review is thus crucial in order to identify weak Green Belt, with this work feeding into the broader task of identifying what might constitute ‘*exceptional circumstances*’ within Uttlesford.

### 3.2 Local Context

At the local level, the adopted Uttlesford Local Plan (2005) provides the relevant context for Green Belt.

The Draft Local Plan (2014) was submitted for independent examination to the Secretary of State for Communities and Local Government via the Planning Inspectorate on 4<sup>th</sup> July 2014. Uttlesford District Council formally withdrew the Local Plan on 21<sup>st</sup> January 2015 over concerns of the soundness of the Plan. The Local Development Scheme (2015) estimates that the revised Local Plan will be submitted in August 2016, to be adopted in March 2017.

Planning Policy for Uttlesford is currently made up of the NPPF, the 2005 Uttlesford Local Plan and saved policies, and the Minerals Plan and Waste Plan prepared by Essex County Council. The Uttlesford Local Plan was adopted on 20<sup>th</sup> January 2005 and the policies in it were saved for three years. In July 2007 the Council applied to the Secretary of State to extend the time period for the saved policies. All the policies in the Uttlesford Local Plan, except Takeley Local

<sup>12</sup> Calverton Parish Council v Nottingham City Council & Ors (2015) EWHC 1078 (Admin) (21 April 2015).

Policies 1 and 2 (Land west of Hawthorn Close and Land off St Valery) have been saved.<sup>13</sup>

The purpose and requirements of the Metropolitan Green Belt are stated in the Uttlesford Local Plan as following that:

*‘A belt of countryside of countryside needs to be retained between Harlow, Bishop’s Stortford, Stansted Mountfitchet and Stansted Airport as part of the regional concept of containing the urban sprawl of London. Within the Green Belt development will only be permitted if it accords with national planning policy on green belts (PPG2) and Structure Plan Policy C2. Development permitted should preserve the openness of the Green Belt and its scale, design and siting should be such that the character of the countryside is not harmed.’*

Policy S6 (Metropolitan Green Belt) states that infilling, limited development, or redevelopment compatible with the character of the settlement and its setting will be permitted within the villages of Hatfield Heath, Leaden Roding, Little Hallingbury and White Roding. Development uses permitted included for educational or community uses, redevelopment for business uses, and operational development such as sewage treatment, but must be compatible with the countryside setting and purposes of the Green Belt.

Policy E5 (Re-Use of Rural Buildings) states that the re-use and adaptation of rural buildings for business uses, small scale retail uses or for tourist accommodation will be permitted within the Metropolitan Green Belt, subject to compliance with some criteria listed in the Local Plan (page 21).

Policy H9 (Affordable Housing) states that due to the scale of the affordable housing needs, the Council will exceptionally release suitable land to meet local housing needs. In Green Belt villages the need will have to represent special circumstances to justify an exception to Policy S6.

### 3.3 Other Context

The Planning Advisory Service (PAS) published guidance for Green Belt Assessment in 2015 in the context of the need to accommodate strategic housing (and employment) requirements. The guidance highlights that *‘the purpose of a review is for the identification of the most appropriate land to be used for development, through the local plan. Always being mindful of all of the other planning matters to be taken into account and most importantly, as part of an overall spatial strategy’*.

Emphasis is placed on the need for assessment against the five purposes of the Green Belt in the first instance. The guidance acknowledges that there are planning considerations, such as landscape quality, which cannot be a reason to designate an area as Green Belt, but that could be a planning consideration when seeking suitable locations for development.

<sup>13</sup> Local Development Scheme, Uttlesford District Council, February 2015  
<http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=3012&p=0>

The guidance outlines considerations to be made in relation to the five purposes as set out below:

- Purpose 1: to check the unrestricted sprawl of large built up areas – consider the meaning of sprawl compared to 1930s definition, and whether positively planned development through a local plan with good masterplanning would be defined as sprawl.
- Purpose 2: to prevent neighbouring towns from merging into one another – the purpose does not strictly suggest maintaining the separation of small settlements near to towns. The approach will be different for each case. The identity of a settlement would not be determined solely by the distance to another settlement; the character of the place and of the land in between must be taken into account. A ‘scale rule’ approach should be avoided. Landscape character assessment is a useful analytical tool for this type of assessment.
- Purpose 3: to assist in safeguarding the countryside from encroachment – seemingly, all Green Belt does this so distinguishing between the contributions of different areas to this purpose is difficult. The recommended approach is to look at the difference between land under the influence of the urban area and open countryside, and to favour open countryside when determining the land that should be attempted to be kept open, accounting for edges and boundaries.
- Purpose 4: to preserve the setting and special character of historic towns – it is accepted that in practice this purpose relates to very few settlements as a result of the envelopment of historic town centres by development.
- Purpose 5: to assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of potentially developable land within urban areas must have already been factored in before Green Belt land is identified. All Green Belt would achieve this purpose to the same extent, if it does achieve the purpose, and the value of land parcels is unlikely to be distinguishable on the basis of this purpose.

The PAS guidance additionally recognises the relevance of the Duty to Cooperate, as set out in the Localism Act 2011, and soundness tests of the NPPF to Green Belt consideration. The NPPF requires local planning authorities to ‘*work collaboratively with other bodies to ensure strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans*’ (paragraph 179). Additionally the level of housing that a local authority is required to plan for is also determined by whether there is an ‘unmet requirement’ from a neighbouring authority (paragraph 182).

The guidance recognises that Green Belt is a strategic policy and hence a strategic issue in terms of the Duty to Cooperate. Areas of Green Belt should therefore be assessed collectively by local authorities. This is important particularly for areas of Green Belt land that fall into different administrative areas, and the significance attached to that land.

## 3.4 Green Belt Experience

### 3.4.1 Neighbouring Authorities' Experience

Local planning authorities now hold the responsibility for strategic planning following the revocation of regional strategies as created in the Localism Act 2011. The national Planning Practice Guidance outlines the duty to cooperate as:

*'...a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.'*

This Review covers the areas of the Green Belt falling within the administrative boundary of Uttlesford District Council, as well as areas in neighbouring authorities where there is no defensible boundary feature which aligns with the District boundary. However, the methodology and proposed Green Belt parcels were shared with the neighbouring authorities and discussed at a workshop held on 4<sup>th</sup> December 2015. Comments received have been taken into account as the Review progresses (see section 4.2).

It is important to understand how each of the neighbouring local authorities are approaching Green Belt issues and the methodology employed in any reviews of the Green Belt they have undertaken. Green Belt in adjoining districts (Map 3.1) may achieve the purpose of checking unrestricted sprawl from the urban areas both within and outside Uttlesford. It may also play a role in protecting strategic gaps between urban areas and settlements both within and outside Uttlesford. The potential release of any Green Belt land within or outside Uttlesford may impact on settlement patterns and the role of the wider Metropolitan Green Belt.

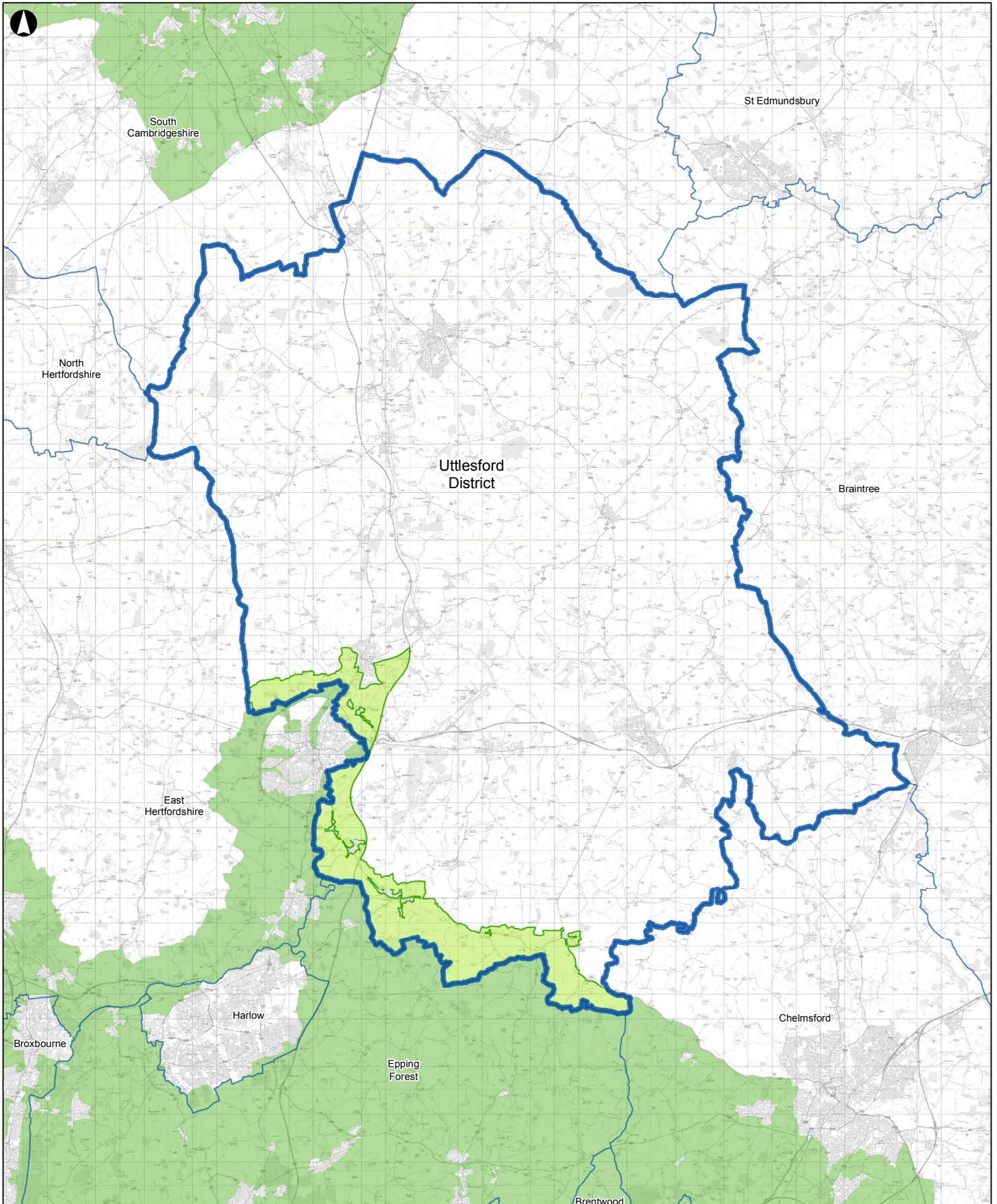
The approaches to Green Belt Boundary Reviews taken in neighbouring authorities have been summarised in Table 3.1. This table was shared with the authorities concerned for validation, verification of accuracy and to check the degree to which it matched current thinking within said authorities.

In summary:

- Over one third of Chelmsford is in Green Belt, and has checked the unrestricted growth of London and urban Chelmsford. However, there is no existing or planned Green Belt Assessment.
- Epping Forest have completed a Stage 1 Review, and have commissioned Stage 2 currently. The Stage 1 Review identified parcels along durable boundaries and the District boundary. Each land parcel was then assessed against purposes 1-4 against a set criteria, and was given a score from weak to strong. Purpose 5 was considered a strategic purpose so not assessed. This Review aligns very closely to the methodology set out in section 4 of this report, with the exception that the Epping Forest Stage 1 Review used an aggregated score. High level conclusions were reached about which parcels scored more or less highly against the purposes, for further consideration at a Stage 2 Review.

- East Hertfordshire has also completed a Green Belt Review, having already undertaken a Stage 1 and 2 Review in 2013. Original land parcels from the first Review were reassessed and amended, especially where parcels were large enough to make them smaller. Identifiable physical and visual features were used to define boundaries. Each parcel was then assessed from being '*fundamental*' to the purpose, to having limited or negligible importance to the purpose. An analysis of the land parcels was undertaken to indicate which parcels met the purposes the strongest and weakest. This would be considered further at Stage 2, also using objectively assessed housing needs.
- Harlow has undertaken a Stage 1 Review but the document has not been made publicly available.

Draft



**Legend**

- Uttlesford Green Belt
- Neighbouring Green Belt
- Neighbouring District Boundary
- Uttlesford District Boundary

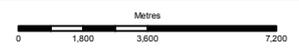
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Client  
**Uttlesford District Council**  
Job Title  
**Uttlesford Green Belt Boundary Review**



Map 3.1 Uttlesford and Neighbouring Authorities' Green Belt

Scale at A3  
**1:150,000**

Job No <b>000000-00</b>	Drawing Status <b>Issue</b>
Drawing No <b>x.x</b>	Issue <b>P1</b>

Table 3.1 Green Belt Approaches in Neighbouring Authorities

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
Chelmsford City Council	Chelmsford Council’s Core Strategy spans across two different documents: The Core Strategy and Development Control Policies 2008; and The Core Strategy and Development Control Policies Focused Review 2013.	Over one third of the City Council’s area falls within the Metropolitan Green Belt which has checked the unrestricted growth of London. It has also protected the expansion of urban Chelmsford towards the south-west and protected the countryside to the south and west of the A130 and A1060 roads. Core Strategy DC1 states that inappropriate development is harmful to the Green Belt. When considering any planning application, substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by inappropriateness, and any other harm, is clearly outweighed by other considerations.	No existing or planned Green Belt Assessment.	N/A
Epping Forest District Council	Epping Forest current policies are from the Adopted 1998 Local Plan and the Adopted 2006 Local Plan Alterations.	The Epping Forest Green Belt makes up over 92% of the District. There are 18 Green Belt policies which set out the conditions under which development will or will not be permitted. The development of land or the construction of new buildings will not be granted planning permission, unless it meets strict criteria including that is it only for the purpose of agriculture, horticulture or forestry; is for the purpose of outdoor participatory sport and recreation; is for other uses which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in the Green Belt; or is in accordance with another Green Belt policy.	Stage 1 Green Belt Review was completed in September 2015. Stage 2 Green Belt Review is currently underway.	The District’s Green Belt, as designated in the Local Plan was divided into parcels of land, generally following well-defined physical features and the outer boundary of the district. Each land parcel was given an appraisal on how they performed against each of the purposes, followed by an analysis of the aggregated score. Purpose 5 was excluded from the assessment as considered strategic in nature. In summary the criteria used for each purpose were:  (1) Contribution of the parcel as an effective barrier against sprawl or as part of a wider network against sprawl. Are there any defensible boundaries?  (2) Distance between settlements and whether the parcel provides a gap, and whether the reduction in the gap would visually and physically compromise the town separation.

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
				<p>(3) Does the parcel protect the countryside and prevent encroachment by built development or urbanising influences.</p> <p>(4) The extent to which the Green Belt contributes to the historic setting.</p> <p>The review concluded that a ‘relatively strong’ or ‘strong’ contribution was made to at least one of the Green Belt purposes in each parcel. It identified the parcels that made the highest score, but also indicated some areas of the district that did not perform as strongly in Green Belt terms as others. The information gathered will be taken forward for further assessment in Stage 2.</p>
<p>East Herts District Council</p>	<p>Current planning policies are set out in the Local Plan 2007 and ‘saved’ policies.</p>	<p>The District has identified the rural area as a key resource that needs to be conserved and where possible enhanced. It has secured the containment of settlements including Bishop’s Stortford, Hertford, Ware and Sawbridgeworth. There are 15 Green Belt and Countryside policies which detail in what circumstances development may or may not be accepted. These include if the land will developed for agriculture or outdoor sports, replacement dwellings, and small scale affordable housing for local needs.</p>	<p>The Council undertook a draft Green Belt Review in 2013 (parts 1 and 2) and identified a number of areas which could be removed from the Green Belt as development sites. Having initially commissioned a Critical Friend to appraise the Draft Review, the Council then decided to commission another full Green Belt Review, published in August 2015.</p>	<p>The review does not undertake an assessment of Purposes 5. The Green Belt Review identified the study area, then identified land parcels for development using physical and visual features. The land parcels were then assessed against the purposes for including land in the Green Belt, before finally identifying the sensitivity of these areas to development according to Green Belt Policy. The land parcels score from having ‘none’ contribution to the purpose, to having ‘paramount’ importance. In summary the criteria used for each purpose were:</p> <p>(1) Land where strategic level of development would conflict fundamentally with Green Belt purpose/ would have no impact on this purpose of Green Belt.</p> <p>(2) Land that is fundamental to physical separation of neighbouring towns/land does not lie between two towns or has limited contribution to separation.</p>

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
				<p>(3) Countryside that is fundamental to the purpose of retaining land within Green Belt from encroachment/countryside is not important on this purpose.</p> <p>(4) Land makes a fundamental contribution to the setting and/or special character of a historic town; or land makes no contribution to the setting and/or special character of a historic character of a historic town.</p> <p>The Review identifies those areas of the Green Belt which meet the purposes least well which should be further assessed against the Strategic Land Availability Assessment, noting that the requirement to meet the objectively assessed housing need can provide the exceptional circumstances for the release of land.</p>
Harlow Council	The Adopted Replacement Harlow Local Plan (July 2006) and Saved Policies for the current planning policies.	There is a general presumption against inappropriate in the Green Belt development except in exceptional circumstances. Any permitted development should preserve the openness of the Green Belt and should not conflict with any of the main purposes of including land within it. Development that is permitted must be of a scale, design and siting such as the character and appearance of the countryside is not harmed.	Harlow have undertaken a Stage 1 review but the document has not been made publically available yet.	N/A

### 3.4.2 Wider Experience

A brief examination of a selection of Green Belt Boundary Reviews carried out elsewhere in the country revealed the following key lessons in terms of methodology:

- A variety of approaches have been taken in assessing the functionality of Green Belt against the NPPF purposes. This partially reflects that each study has been undertaken in response to a specific brief and is tailored to the special local characteristics of the area in question.
- A two stage process has typically been used to firstly identify those Green Belt areas least sensitive to change and where development would be least damaging in principle, before moving onto a second stage to consider technical site constraints.
- For the purposes of assessment, authorities have primarily divided the Green Belt into land parcels for assessment using durable, significant and strong physical boundaries which are clearly defined in the methodology, though some have used grid squares of a defined size to identify the land parcels for assessment.
- Only those purposes deemed relevant to the local context have been used in reviews rather than necessarily using all five, while in some instances authorities have combined multiple purposes within their assessments.
- In terms of interpreting the national purposes, definition of terms (both within the purposes themselves and criteria applied) is of key importance to a successful and transparent assessment.
- Assessment criteria used to assess individual purposes have been tailored to local circumstances.
- Qualitative approaches are primarily used in assessments, although some authorities have used more quantitative measures. The approach to scoring in assessments varies from simplistic traffic light systems to more complex approaches to scoring.

### 3.5 Implications for the Review

National policy, as set out in the NPPF, emphasises the importance and permanence of Green Belt. The NPPF sets out clearly the five purposes that the Green Belt is intended to serve, highlights that the Local Plan process offers the only opportunity for the Green Belt boundaries to be reviewed and stresses that boundaries should be defined using permanent and recognisable physical features. Neither the NPPF, nor the supporting national PPG, provide guidance on how to conduct a Green Belt Assessment *per se*. The implied emphasis is thus on each authority to develop a methodology which is appropriate to the local context.

Crucial to the development of such a methodology is the establishment of satisfactory definitions for the key terms used in the NPPF purposes (yet not explicitly defined) – different interpretations of such terms would significantly alter how the Review is carried out. While a number of Green Belt Boundary

Reviews do not articulate clearly how terms have been defined, the Green Belt Boundary Review for Dacorum, St Albans and Welwyn Hatfield provided definitions based on a combination of legitimate sources (for example, the Oxford English Dictionary) as well as the known aspirations sought through national and local policy.

Some key definitions which were considered for this methodology include:

- *Large built-up areas* (Purpose 1): This originally referred to London for the Metropolitan Green Belt, but the scope of how this is interpreted has shifted over time to include other large settlements within the wider Green Belt area. The Dacorum, St Albans and Welwyn Hatfield review applied the term to London, Luton/Dunstable and Stevenage, though it is not immediately clear how this choice was reached. The Central Bedfordshire Green Belt Assessment applied the definition more broadly, considering any area deemed ‘urban’. When defining this term, the methodology for Uttlesford should consider the settlement structure across the District.
- *Sprawl* (Purpose 1): The definition of this term varies significantly. The PAS Guidance queries whether development that is masterplanned and promoted positively through a development plan would constitute sprawl, but this does not provide a specific and measurable definition which could be applied in a Green Belt Review, nor does it feel like an entirely satisfactory explanation of sprawl alone. Other Green Belt Reviews, for example the Guildford Green Belt and Countryside Study, have edged towards a more spatial definition, considering sprawl as the ‘*creeping advancement of development beyond a clear physical boundary of a settlement*’. Given sprawl is a multi-faceted concept, it would seem prudent to consider both of these spheres in the definition adopted in this methodology.
- *Neighbouring towns* (Purpose 2): The interpretation of ‘towns’ varies across previous Green Belt Boundary Reviews. While it tends to be aligned to the defined settlement hierarchy, as set out in the relevant development plan, some authorities have chosen to apply a more local purpose. For example, in Runcy, the threat of coalescence between many smaller settlements led to the Green Belt Boundary Review considering all settlements equally, including those ‘*washed over*’ in the Green Belt. Given that in Uttlesford the Green Belt boundaries are for the most part closely abutting the edge of settlements, it might be most appropriate to consider all non-Green Belt areas as the ‘towns’ to be considered in the assessment.
- *Countryside* (Purpose 3): The Dacorum, St Albans and Welwyn Hatfield Review adopted a ‘*functional*’ as opposed to ‘*political economy*’ definition of this term, centred on pastoral and primary land uses, while others adopted broader definitions which took countryside to mean any open land. Evidently, this interpretation is not appropriate in areas which are entirely semi-urban, where Green Belt may have been applied to areas which are open but not genuinely of a ‘*countryside*’ character. Given the significant contrast between urban and rural areas in and around Essex, in a similar fashion to areas of Buckinghamshire or Hertfordshire, a similar ‘*functional*’ definition may be the most appropriate.

In addition to other Green Belt Boundary Reviews, the PAS guidance on Green Belt Assessments is particularly helpful in setting out key parameters to consider when developing a Green Belt Assessment methodology. The key points to note are:

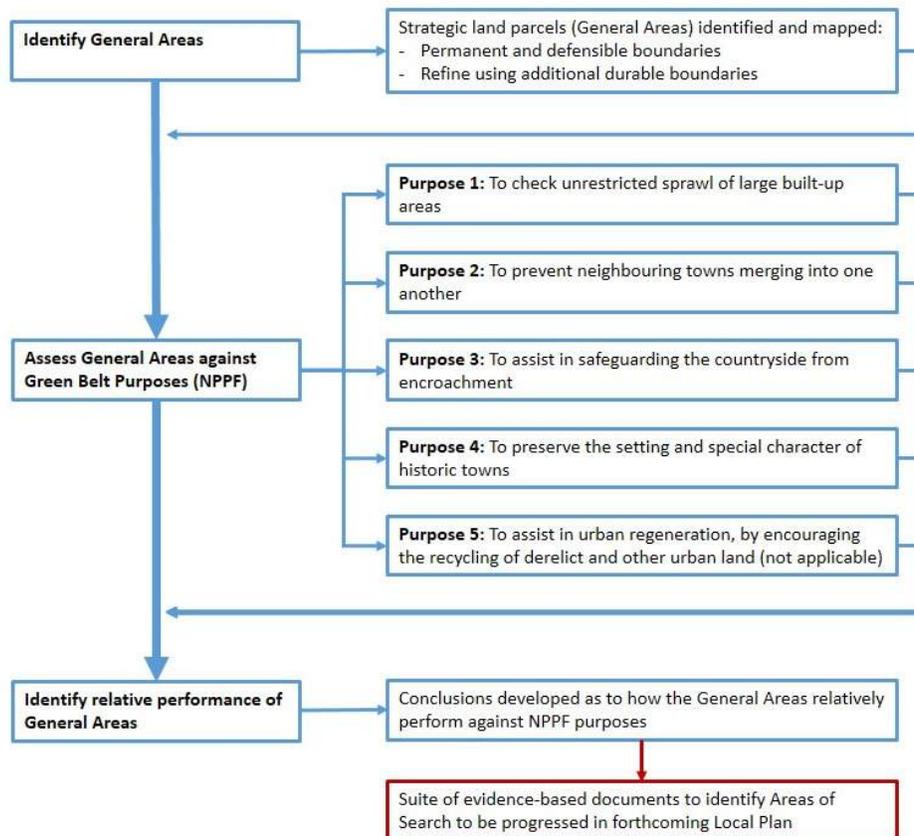
- A Green Belt Assessment is not an assessment of landscape quality, though elements of landscape assessment assist in assessing the Green Belt (for example, in identifying potential new boundaries or differentiating between areas of unspoilt countryside or semi-rural areas).
- The label '*historic towns*' applies to a select number of settlements and it is therefore accepted that the Purpose 4 assessment will only be relevant in very few instances. As set out in section 4 of this Methodology, it is considered that Purpose 4 is only relevant to the Uttlesford Green Belt Review in very limited locations.
- Purpose 5 is not helpful in terms of assessing relative value of land parcels and is therefore not relevant to the Uttlesford Green Belt Review.
- Green Belt is a strategic issue and should be considered collaboratively with neighbouring authorities under Duty to Cooperate, thus emphasising the importance of ongoing consultation with neighbouring stakeholders.

## 4 Methodology

### 4.1 Introduction and Aims

The following sections sets out the proposed methodology to be used for undertaking the Uttlesford Green Belt Review. An overview of the methodology is set out in Figure 4. 1.

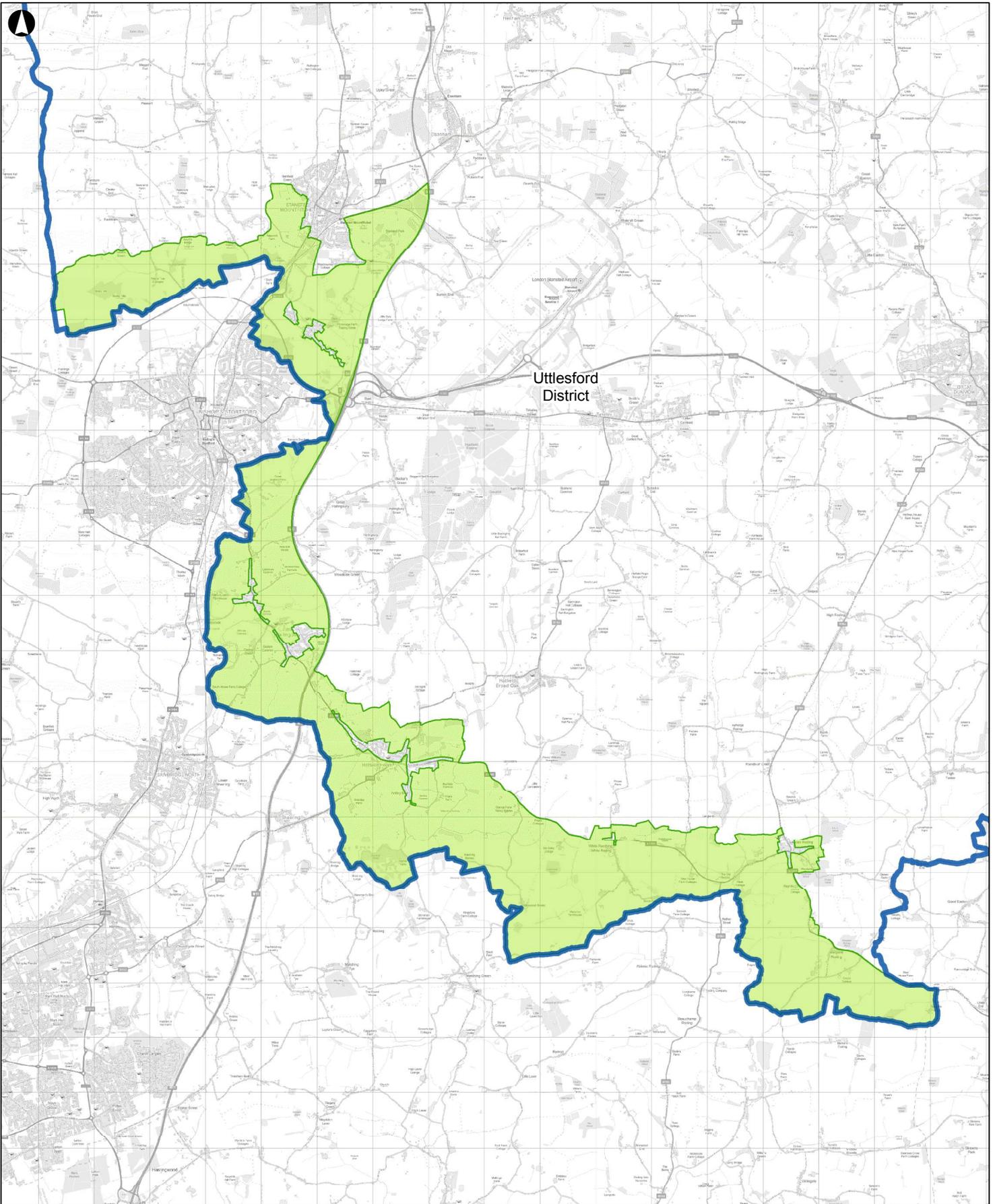
Figure 4. 1 Methodology Overview



While there is a focus in the Tender Brief on the Areas of Search, the Review will assess the whole of the Green Belt within Uttlesford and will seek to ascertain:

- Whether all the land designated fulfils clear Green Belt purposes;
- The degree of significance attached to various parts of the Green Belt in strategic terms; and
- The extent to which some development in the Green Belt could promote sustainable patterns of development without compromising its overall purpose.

The extent of the Uttlesford Green Belt is shown in Map 4.1.



**Legend**

- Uttlesford Green Belt
- Uttlesford District Boundary

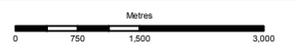
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**Map 4.1 Uttlesford Green Belt**

Scale at A3  
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Drawing No <b>4.1</b>	Issue <b>P1</b>

## 4.2 Consultation

Since the introduction of the Localism Act (2011), Local Authorities hold the responsibility for strategic planning and a clear duty to cooperate on strategic issues, such as Green Belt. The potential release of any Green Belt land within Uttlesford may also impact on the role of the Green Belt in adjoining authority areas as part of the wider London Green Belt (however, recommendations will only apply to Uttlesford and not to neighbouring authorities). As a result it will be important to engage with neighbouring authorities on the proposed methodology and Green Belt parcels for assessment.

A roundtable workshop was held with the following authorities on 4<sup>th</sup> December 2015 to discuss the methodology and proposed parcels for assessment:

- East Herts District Council;
- Epping Forest District Council;
- Harlow District Council; and
- Essex County Council.

Chelmsford City Council and Hertfordshire County Council were unable to attend the workshop, but were provided with the draft methodology separately for comment.

A summary of the comments and any alterations to the methodology and parcels is provided below:

- Further discussion of a number of General Areas adjacent to Bishop's Stortford. These will be considered during site visits when boundary features and land character differences will be assessed in more detail.
  - General Area 11 – Possible sub-division between the Golf Course and Birchanger Services. There are clear boundaries between the two, however the boundary is weaker on the southern edge.
  - General Areas 12 and 13 – May need to be amended if General Area 13's boundary extends to the M11 thus resulting in a different assessment for the northern extent of General Area 12.
  - General Area 14 – Suggested for sub-division as the southern extent has a different character to the rest of the parcel.
- Sawbridgeworth and Lower Sheering will be considered as a single Large Build-Up Area for Purpose 1 given their functional relationship, but identified separately when assessing for Purpose 2.
- Reference to 'Neighbouring Green Belt' on Map 4.2 needs to be removed as it does not include reference to this detail.
- Comment that clarity would be welcomed on Purposes 1 and 3. Methodology will be reviewed and amendments made accordingly. A diagram explaining Purpose 3 will be included.

The above authorities will be consulted on the emerging findings of the Review as the Review progresses.

## 4.3 Parcel Identification

### 4.3.1 Green Belt Parcels (General Areas)

Any potential alterations to the Green Belt must be based on a new permanent and defensible boundary; thus, permanent man-made and natural features have been selected as the basis of criteria for the identification of the General Areas. In particular, the boundaries of the General Areas are based on the following features (Map 4.2):

- Motorways;
- A and B Roads;
- Railway lines;
- Rivers (e.g. Stort, Roding)
- Brooks (e.g. Bourne, Stansted, Pincey, Parsonage).

Given the range of urban and rural conditions found in Uttlesford, from the semi-urban fringes of Bishop's Stortford in the north of the District's Green Belt area to the relatively unspoilt countryside in the south, a flexible approach to the identification of General Areas for assessment was deemed necessary. This will be achieved through consideration of further sub-division of General Areas during the site visits in and around the non-Green Belt settlements using additional durable boundary features if required, such as

- Unclassified public roads and private roads;
- Smaller water features, including streams, canals and other watercourses;
- Prominent physical features (e.g. ridgelines);
- Existing development with strongly established, regular or consistent boundaries;
- Protected woodland or hedgerows.

This process of sub-division will take account of the local context and will involve an element of professional judgement. Such additional boundary features have also been utilised in identifying General Areas in the south/south-east of the District where there is a largely rural character and flat topography.

In some cases, boundary features are located close together, for example where roads, rivers, and/or railway lines running closely parallel to each other. These features were taken together to form one boundary rather than separately which would lead to small slithers of Green Belt land which would not form logical parcels for assessment.

It was decided that, in cases where the Uttlesford District boundaries do not coincide with permanent and durable boundary features, General Areas will

overlap with Green Belt in neighbouring authority areas to align with the nearest durable feature. This approach will ensure a consistent approach to the assessment of Green Belt throughout Uttlesford and take into account the strategic, cross-boundary nature of the Metropolitan Green Belt. In cases where Green Belt at the edge of the District is not deemed to meet Green Belt purposes, this may have implications for its designation, not just within Uttlesford but also outside the District. However, it is important to note that this assessment will not directly influence the approaches to Green Belt in neighbouring authorities and no recommendations will ultimately be made beyond the boundaries of Uttlesford.

### 4.3.2 Non-Green Belt

As set out in section 1.2, Green Belt boundary revisions can take the form of an expansion as well as a contraction. For that reason, consideration of land that is not allocated as Green Belt for inclusion in the Green Belt is required. Based on previous experience of conducting Green Belt Reviews, the starting point for identifying non-Green Belt land was open land outside of the defined settlement limits set out in local development plans but not included in the Green Belt.

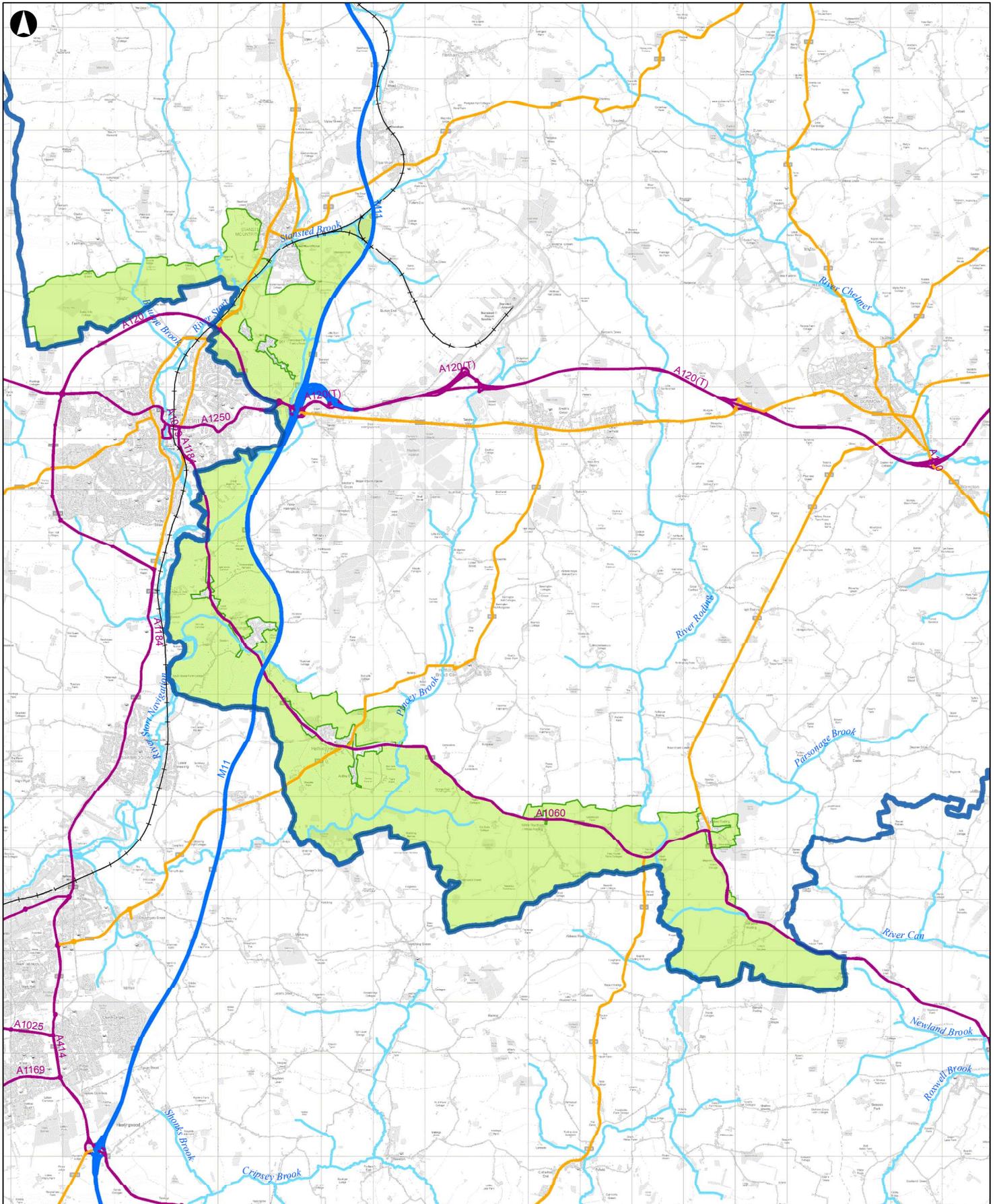
In general, following discussion with the Council, it was concluded that existing Green Belt boundaries are drawn sufficiently tightly to the built environment to negate any significant additional investigation within existing settlement limits. However, the methodology provides a flexible approach to allow for the identification of non-Green Belt land for assessment around the identified settlements during the assessment stage of the Review, in particular during site visits.

### 4.3.3 Proposed General Areas

The proposed General Areas to be used for the Review are provided in Map 4.3<sup>14</sup>. It is proposed that there is flexibility in the approach to ensure that adjustments to the General Areas can be undertaken during the site visits as required to respond to local circumstances that were not identified during the desk-based activities.

---

<sup>14</sup> These were confirmed with officers from the respective neighbouring authorities at a workshop held on 4<sup>th</sup> December 2015.



**Legend**

- Motorway
- +— Railway Line
- A Road
- B Road
- River
- Lake / Reservoir
- Uttlesford Green Belt
- Uttlesford District Boundary

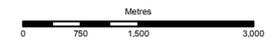
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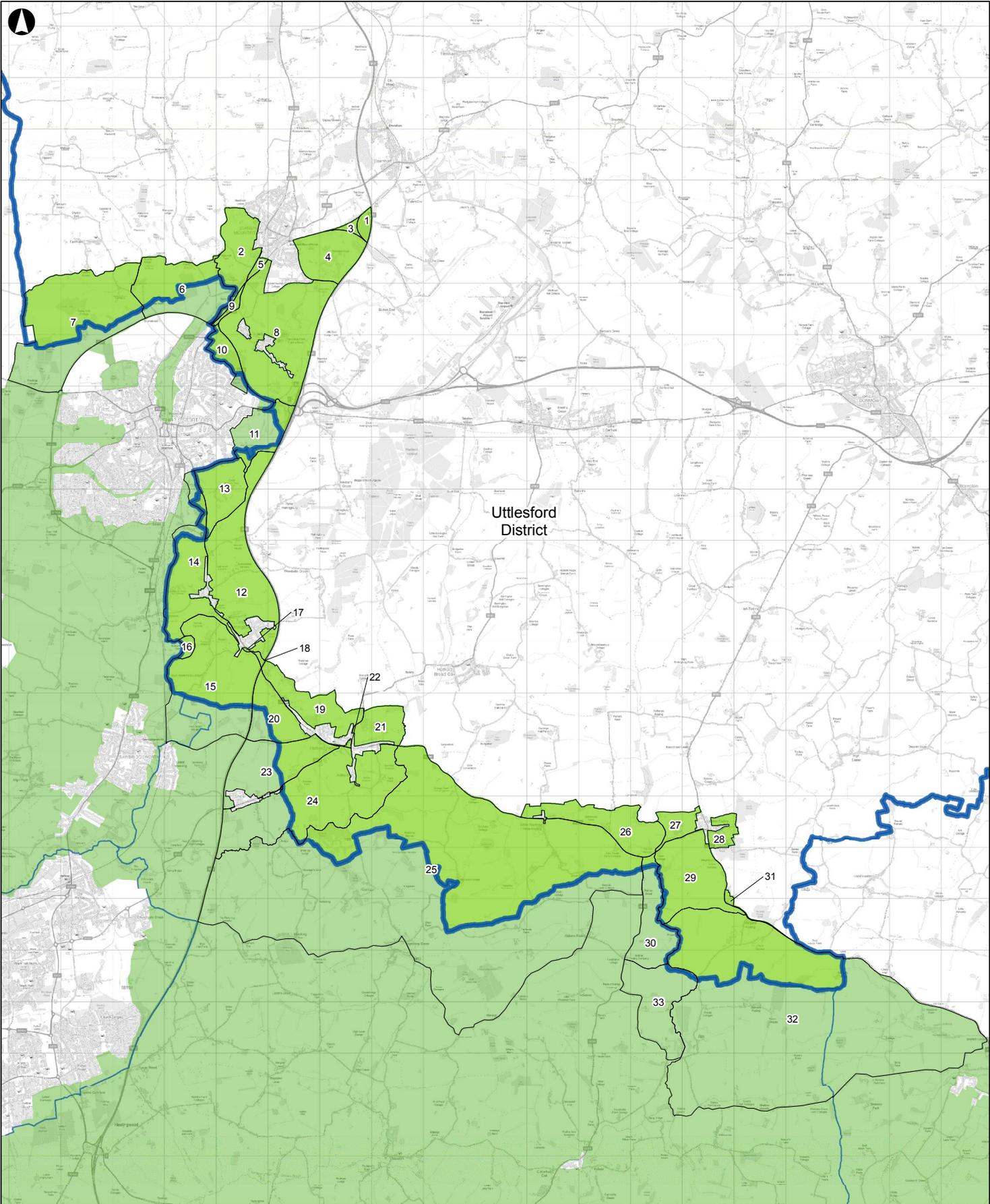
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**Map 4.2 Defining Features  
for General Areas**

Scale at A3  
**1:70,000**

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Drawing No <b>4.1</b>		



**Legend**

- General Areas
- Uttlesford Green Belt
- Neighbouring Green Belt
- Uttlesford District Boundary
- Neighbouring District Boundary

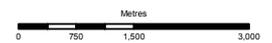
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**Map 4.3 General Areas**

Scale at A3  
**1:70,000**

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Drawing No <b>4.3</b>	Issue <b>P1</b>

## 4.4 General Area Assessment

Each of the General Areas identified in section 4.3.3 and Map 4.3 will be assessed against the NPPF purposes for Green Belt. There is no national guidance, which establishes exactly how such an assessment should be undertaken. The PAS guidance, recent examples and previous experience reiterates the need to respect local circumstances and the unique characteristics that affect the way that the NPPF purposes of the Green Belt are appraised.

The purpose of the assessment is to establish any differentiation in terms of how the General Areas in the existing Green Belt function and fulfil the purposes of the Green Belt. For those General Areas outside of the current Green Belt the assessment will consider how these land parcels might fulfil the purpose if designated.

For each purpose, one or more criteria have been developed using both qualitative and quantitative measures. A score out of five will be attributed for each criterion (Figure 4.2). If a General Area is considered to have no contribution to a specific purpose, in addition to the detailed analysis undertaken, a statement will be added to the pro-forma to this effect and no score will be attributed.

It is important to note that each of the NPPF purposes is considered equally significant, thus no weighting or aggregation of scores across the purposes will be undertaken. As such, a composite judgement will be necessary to determine whether, overall, General Areas are meeting Green Belt purposes strongly or weakly. The assessment will also consider in more detail the presence of small-scale sub-areas within General Areas which might be less sensitive and thus able to accommodate change. In these cases, a further assessment will consider the potential for Green Belt boundaries to be adjusted without significantly reducing ability to meet NPPF purposes. A General Area fulfilling the criteria relatively weakly, weakly or very weakly (1 or 2) across all purposes will be deemed to be weaker Green Belt. These recommendations will be taken forward to inform any decisions taken on amending the Green Belt boundaries following further assessment work (outside the scope of this Review).

Figure 4.2 Criterion Scores

Overall Strength of General Area against criterion	Score	Equivalent Wording
	1	Meets Criterion Weakly or Very Weakly
	2	Meets Criterion Relatively Weakly
	3	Meets Criterion
	4	Meets Criterion Relatively Strongly
	5	Meets Criterion Strongly or Very Strongly

The following sections examine the definition of each of the five purposes of the Green Belt in relation to local objectives and role of the Green Belt in terms of achieving its purpose locally; and set out the criteria and associated scoring applied.

## 4.4.1 Purpose 1

### ***Purpose 1: To check unrestricted sprawl of large built-up areas.***

The original strategic purpose of the Metropolitan Green Belt was to check the sprawl of London. However, given the Uttlesford Green Belt is not directly adjacent to Greater London, this assessment also considers the role of General Areas in restricting the sprawl of large built-up areas across the District and within neighbouring local authorities. Large built-up areas for the purpose of this Review have generally been defined to correspond to the Tier 1 settlements (or equivalent) identified in the respective Local Plans for each authority or used in recent Green Belt studies, both within and outside Uttlesford, to ensure a robust and evidence-based approach to the assessment (see Map 4.4; Table 4.1)<sup>15</sup>. For Uttlesford, large built-up areas are defined as the Market Towns identified in the withdrawn Uttlesford Local Plan (2014). Although withdrawn, it is understood that this settlement hierarchy will be utilised in the forthcoming Local Plan and is therefore appropriate for this Review. In addition, Stansted Airport is also considered a large built-up area given the size and scale of the built-form that the area covers, which is comparative to the extent of other large built-up areas that have been included in the Review. Similarly, Stansted Mountfitchet has been defined as a large built-up area in the Review, contrary to its identification as a ‘*key village*’ in the withdrawn Uttlesford Local Plan 2014. Stansted Mountfitchet has a different scale and character to other identified key villages and is considered to be more comparable in scale to other large built-up areas that have been considered for assessment, notably Sawbridgeworth which occupies a similar geographical area.

Although ‘*sprawl*’ is a multi-faceted concept and thus has a variety of different definitions, this Review has adopted a simple definition, considering sprawl as ‘*the outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way*’. In order to appraise the extent to which the Green Belt keeps this in check, it is necessary to consider:

- a) Whether the General Area falls at the edge of one or more distinct large built-up area(s);
- b) The degree to which the General Area is contained by built-form, and the nature of this physical containment, as well as the linkage to the wider Green Belt; and
- c) The extent to which the edge of the built-up area has a strongly defined, regular or consistent boundary.

---

<sup>15</sup> These were confirmed with officers from the respective neighbouring authorities at a workshop held on 4<sup>th</sup> December 2015.

Table 4.1 Large Built-Up Areas Considered in Purpose 1 Assessment

Uttlesford <sup>16</sup>	Neighbouring Local Authorities <sup>17, 18</sup>
Stansted Airport <sup>19</sup> Stansted Mountfitchet	Bishop's Stortford (East Herts) Chelmsford Urban Area (Chelmsford) Harlow (Harlow) Sawbridgeworth (East Herts) / Lower Sheering (Epping) <sup>20</sup>

There are two stage in this assessment:

### Assessment 1(a)

Firstly, a General Area must be at the edge of one of more distinct large built-up areas in order to prevent development which would constitute sprawl. This criterion must therefore be met for Purpose 1 to be fulfilled and will be applied on a *Pass/Fail* basis.

### Assessment 1(b)

As stated at Assessment 1(a), Green Belt should function to protect open land at the edge of large built-up area(s) (Table 4.1). However, the extent to which a General Area prevents sprawl is dependent on its relationship with the respective built-up area(s).

Assessment 1(b) will initially focus on the degree to which Green Belt abuts or is contained by the built-up area(s), the nature of this relationship and links to the wider Green Belt. The following criteria area used for assessment (see Figure 4.3):

- A General Area predominantly surrounded or enclosed by two or more distinct areas of built form and that also retains a strong link to the wider Green Belt, would play a particularly important role in preventing sprawl. For the purpose of this assessment, this is referred to as '*contiguous*'.
- A General Area displaying a low level of containment by a large-built area, such as if it was simply abutting a large-built area, may prevent sprawl but to a

<sup>16</sup> While Saffron Walden and Great Dunmow are identified as Market Towns, it was considered that they are located sufficiently far from the Uttlesford Green Belt so as to make them not relevant for this Review.

<sup>17</sup> Large built-up areas within East Herts have been defined as the six 'main towns' and the one large 'Group 1' village (Watton-at-Stone) identified for consideration under Purpose 1 in the East Herts Green Belt Review (August 2015). However, it was considered that the following large built-up areas are located sufficiently far from the Uttlesford Green Belt so as to make them not relevant for this Review: Hertford, Ware, Stanstead Abbots, St Margarets, Watton-at-Stone.

<sup>18</sup> Large built-up areas within Chelmsford have been defined using the Settlement Hierarchy contained in the adopted Core Strategy and Development Control Policies (February 2008). However, it was considered that the South Woodham Ferrers Urban Area is located sufficiently far away from the Uttlesford Green Belt so as to make it not relevant for this Review.

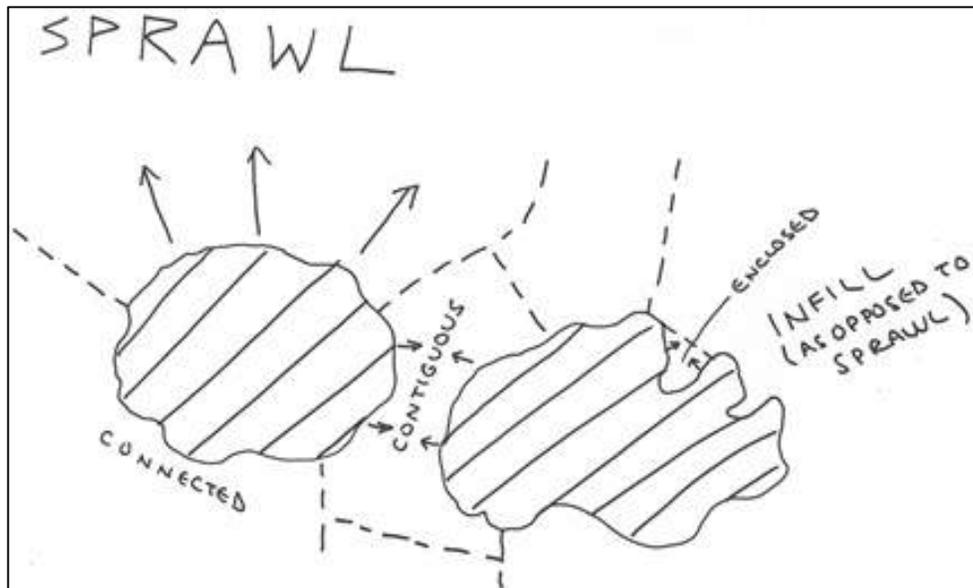
<sup>19</sup> The boundaries of the Stansted Airport large built-up area are defined by the Countryside Protection Zone.

<sup>20</sup> Sawbridgeworth / Lower Sheering are considered to act as a single functional settlement with regard to Purpose 1, as discussed and agreed at the workshop on 4<sup>th</sup> December 2015.

lesser extent. This assessment refers to such areas as ‘*connected*’ with a large built-up area.

- A General Area almost entirely contained or surrounded by built development which forms part of a single built-up area and has limited connections to the wider Green Belt, would only prevent sprawl to a limited extent (rather, potential development would likely be classified as infill), is referred to here as ‘*enclosed*’ by a single built-up area.

Figure 4. 3 Diagram illustrating the relationship between large-built areas and land parcels, and whether the General Areas are contiguous, connected or enclosed.



This initial assessment will be supplemented by additional analysis on the role of Green Belt in preventing sprawl which would not otherwise be restricted by another barrier. The NPPF states that Local Authorities should ‘*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent*’ (paragraph 85). Boundary identification reflected this, based on the following definitions:

- Examples of durable features (likely to be permanent):
  - Infrastructure: motorway; public and made road; railway line; river.
  - Landform: stream, canal or other watercourse; prominent physical feature (e.g. ridgeline); protected woodland/hedge; existing development with strongly established, regular or consistent boundaries.
- Examples of features lacking in durability (soft boundaries):
  - Infrastructure: private/unmade road; bridleway/footpath; power line.
  - Natural: field boundary; tree line.

Where sprawl would not otherwise have been restricted by a durable boundary feature, the extent to which the existing built form had strongly established or recognisable boundaries will be assessed based on the following definitions:

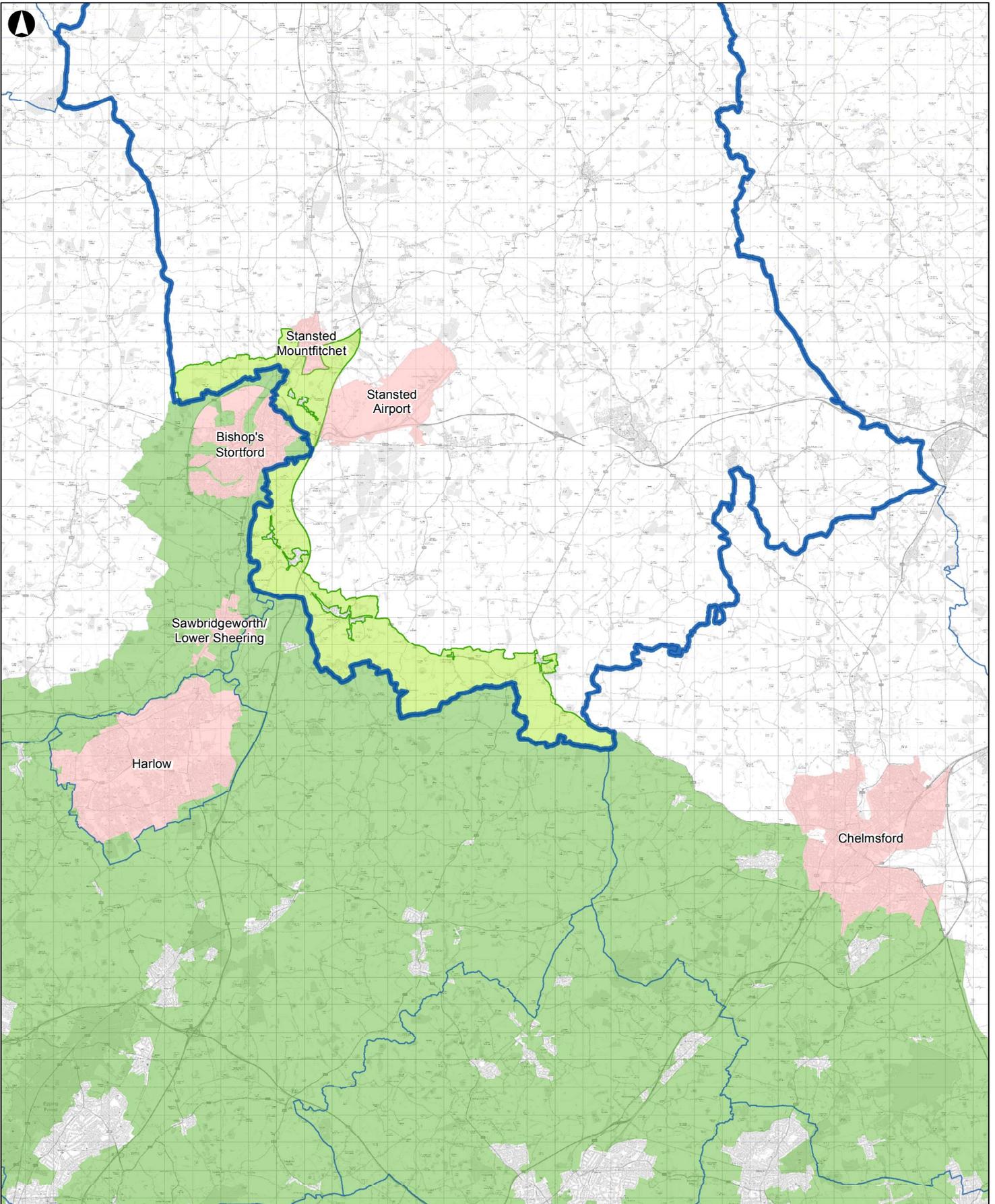
- ‘Regular’ or ‘Consistent’ built form comprising well-defined or rectilinear built-form edges, which would restrict development in the Green Belt.
- ‘Irregular’ or ‘Inconsistent’ built-form comprising imprecise or softer edges, which would not restrict growth within the Green Belt.

### Purpose 1 Assessment Criteria

The criteria used to assess the General Areas against Purpose 1 are set out below. Ordnance Survey base maps and aerial photography, together with observations during the site visits, will be used to undertake this assessment.

#### Purpose 1 Assessment Criteria

Purpose	Criteria	Score
To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more large built-up areas.	PASS: General Area meets Purpose 1. FAIL: General Area does not meet Purpose 1 and will score 0 for Criteria (b).
	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.	5+: General Area is contiguous with two or more large built-up areas which are predominantly bordered by features lacking in durability or permanence.
		5: General Area is contiguous with two or more large built-up areas which are predominantly bordered by prominent, permanent and consistent boundary features.
		3+: General Area is connected to one or more large built-up area(s) which is/are predominantly bordered by features lacking in durability or permanence.
		3: General Area is connected to one or more large built-up area(s) which is/are predominantly bordered by prominent, permanent and consistent boundary features.
		1+: General Area is enclosed by one large built-up area which is predominantly bordered by features lacking in durability or permanence.
		1: General Area is enclosed by one large built-up area which is predominantly bordered by prominent, permanent and consistent boundary features.
	<b>Score</b>	<b>xx/5</b>



- Legend**
- Large Built-Up Areas
  - Uttlesford Green Belt
  - Neighbouring Green Belt
  - Neighbouring District Boundary
  - Uttlesford District Boundary

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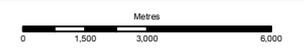
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Map 4.4 Large Built-Up  
Areas Considered in Purpose 1  
Assessment

Scale at A3

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Drawing No <b>4.4</b>	Issue <b>P1</b>

## 4.4.2 Purpose 2

***Purpose 2: To prevent neighbouring towns merging into one another.***

In addition to the clear function of this purpose in preventing towns from merging and therefore protecting existing gaps between towns, it also forms the basis for maintaining the existing settlement pattern. National policy provides no guidance over what might constitute ‘towns’ and whether this purpose should also take into consideration the gaps between smaller settlements.

Given the general concentration of development outside of the Green Belt in Uttlesford, the assessment of General Areas considers gaps between all non-Green Belt settlements, together with relevant Key Villages beyond the boundaries of the Green Belt identified in the withdrawn Uttlesford Local Plan (2014). Although withdrawn, it is understood that this settlement hierarchy will be utilised in the forthcoming Local Plan and is therefore appropriate for this Review. Settlements in neighbouring local authority areas adjacent to areas of Green Belt in Uttlesford were identified as being all non-Green Belt settlements, together settlements identified in respective Green Belt Review and using relevant local plans (Map 4.5; Table 4.2)<sup>21</sup>.

Table 4.2 Settlements Considered in Purpose 2 Assessment

Uttlesford	Neighbouring Local Authorities
Birchanger	Bishop’s Stortford (East Herts)
Elsenham	Chelmsford Urban Area (Chelmsford)
Hatfield Heath	Fyfield (Epping Forest)
Leaden Roding	Harlow (Harlow)
Little Hallingbury	Lower Sheering (Epping Forest)
Stansted Airport	Roxwell (Chelmsford)
Stansted Mountfitchet	Sawbridgeworth (East Herts)
Takeley	Sheering (Epping Forest)
Wright’s Green	Writtle (Chelmsford)
White Roding	

The extent to which an area of Green Belt protects a land gap will be assessed using the following definitions:

- ‘*Essential gaps*’, where development would significant reduce the perceived or actual distance between settlements.
- ‘*Wider gaps*’, where limited development may be possible without coalescence between settlements.
- ‘*Less essential gaps*’, where development is likely to be possible without any risk of coalescence of settlements.

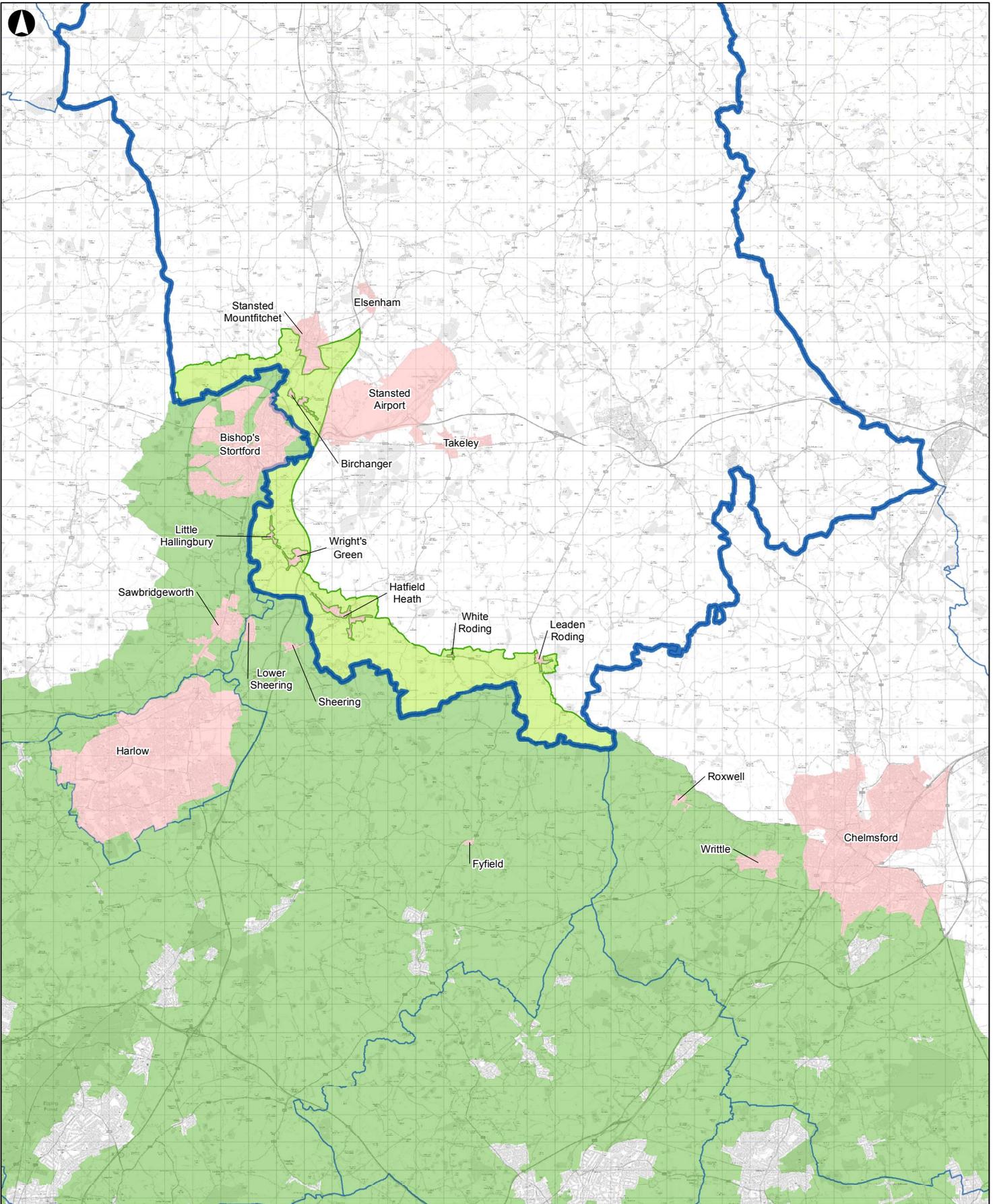
<sup>21</sup> These were confirmed with officers from the respective neighbouring authorities at a workshop held on 4<sup>th</sup> December 2015.

## Purpose 2 Assessment Criteria

The criteria used to assess the General Areas against Purpose 2 are set out below.

### Purpose 2 Assessment Criteria

Purpose	Criteria	Score
<b>To prevent neighbouring towns from merging</b>	Prevents development that would result in merging of, or significant erosion of, gap(s) between neighbouring settlements, including ribbon development along transport corridors that link settlements.	5: An essential gap between non-Green Belt settlements, where development would significantly visually or physically reduce the perceived or actual distance between them.
		3: A wider gap between non-Green Belt settlements where there may be scope for some development, but where the overall openness and the scale of the gap is important to restricting merging.
		1: A less essential gap between non-Green Belt settlements, which is of sufficient scale and character that development is unlikely to cause merging of settlements.
		0: General Area does not provide a gap between any settlements and makes no discernable contribution to separation.
<b>Score</b>		<b>xx/5</b>



- Legend**
- Settlement
  - Uttlesford Green Belt
  - Neighbouring Green Belt
  - Neighbouring District Boundary
  - Uttlesford District Boundary

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Map 4.5 Settlements Considered in Purpose 2 Assessment

Scale at A3  
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Job No <b>000000-00</b>	Drawing Status <b>Draft</b>
Drawing No <b>4.5</b>	Issue <b>P1</b>

### 4.4.3 Purpose 3

#### *Purpose 3: To assist in safeguarding the countryside from encroachment*

This purpose seeks to safeguard the countryside from encroachment, or a gradual advancement of urbanising influences through physical development or land use change. The assessment will consider openness and the extent to which the Green Belt can be characterised as ‘*countryside*’, thus resisting encroachment from development. Openness refers to the extent to which Green Belt land could be considered open from an absence of built development rather than from a landscape character perspective, where openness might be characterised through topography and presence or otherwise of woodland and hedgerow cover.

Historic open land uses associated with the urban fringe and urban characteristics as well as the countryside exist in the Uttlesford and include, but are not limited to public utilities, motorways and their intersections, educational institutions, hotels and some small areas of residential development. Some of these semi-urban uses will have an impact on the ‘*openness*’ of the Green Belt as identified in the assessment.

#### Purpose 3 Assessment Criterion

The criterion used to assess the General Areas against Purpose 3 is set out below. Ordnance Survey base maps and aerial photography will be reviewed in order to undertake the openness assessment. The percentage of built form within a General Area will be calculated using GIS tools based on the land area of features that are classified as manmade (constructed) within the Ordnance Survey MasterMap data, excluding roads and railway lines. The data includes buildings, surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures.

The score attributed to a Local Area will initially be determined on the basis of the percentage built form. Scores will be considered further in light of qualitative assessments of character, undertaken through site visits and revised as judged appropriate<sup>22</sup>. This assessment will consider, in particular, the extent to which Local Areas might be reasonably identified as ‘*countryside*’ / ‘*rural*’ (in line with the NPPF). In order to differentiate between different areas, broad categorisation was developed encompassing assessments of land use (including agricultural use), morphology, context, scale and links to the wider Green Belt:

- ‘*Strong unspoilt rural character*’ was defined as land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.

<sup>22</sup> For example, General Areas with a relatively low level of built form (i.e. between 10-15%) and a largely rural character would score 3; however a General Area with a relatively low level of built form (i.e. between 10-15%) but with an urban character (such as formal open space designation covering the entire General Area) would score 1. This allows for adjustments to the score as appropriate in situations where the character and the percentage of built form are not aligned.

- ‘*Largely rural character*’ was defined as land with a general absence of built development, largely characterised by rural land uses and landscapes but with some other sporadic developments and man-made structures.
- ‘*Semi-urban character*’ was defined as land which begins on the edge of the fully built-up area and contains a mix of urban and rural land uses before giving way to the wider countryside. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).
- ‘*Urban character*’ was defined as land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.

**Purpose 3 Assessment Criteria**

Purpose	Criteria	Score
<b>Assist in safeguarding the countryside from encroachment</b>	Protects the openness of the countryside and is least covered by development.	5. Contains less than 5% built form <b>and</b> possesses a strong unspoilt rural character.
		4. Contains less than 10% built form <b>and</b> possesses a largely rural character.
		3. Contains between 10% and 15% built form <b>and/or</b> possesses a largely rural character.
		2. Contains more than 15% built form <b>and/or</b> possesses a semi-urban character.
		1. Contains less than 20% built form <b>and</b> possesses an urban character.
		0. Contains more than 20% built form <b>and</b> possesses an urban character.
<b>Score</b>		<b>xx/5</b>

**4.4.4 Purpose 4**

***Purpose 4: To preserve the setting and special character of historic towns.***

This purpose serves to protect the setting of historic settlements by retaining the surrounding open land or by retaining the landscape context for historic centres. As outlined in the advice note published by PAS<sup>23</sup>, the assessment of this purpose relates to very few settlements in practice, due largely to the pattern of modern development that often envelopes historic towns today. Cambridge is a good example of a settlement where the setting of the historic centre is contextualised by rural features, where the views across the ‘backs’ retain a special status in planning terms.

Following discussions with the Council at the project inception meeting, it was determined that there are no instances where the Uttlesford Green Belt directly abuts, or plays a function role in the setting of, historic towns/cores within the

<sup>23</sup> PAS (2015) *Planning on the Doorstep: The Big Issues – Green Belt.*

District. However, examination of Green Belt studies undertaken by neighbouring authorities, together with the Essex Historic Towns SPG (1999), identified the following settlements as being of possible relevance to Purpose 4:

- East Herts (East Herts Green Belt Review (2015):
  - Bishop’s Stortford – Some ‘inner’ parts of the Bishop’s Stortford green wedges identified.
  - Sawbridgeworth – In particular the north-east side which is identified in the East Herts Green Belt Review as having a noticeable historical character that extends to the edge of the settlement. The settlement as a whole is also identified in the Epping Forest Green Belt Review Stage 1 (September 2015).
  - Watton-at-Stone.
- Epping Forest (Epping Forest Green Belt Review Stage 1 (September 2015) and the Essex Historic Towns SPG (1999)):
  - Epping.
  - Chipping Ongar.
  - Waltham Abbey.
- Chelmsford (Essex Historic Towns SPG (1999):
  - Chelmsford.
  - Pleshey.

Table 4.3 sets out those settlements from the above listed which were considered relevant to the Review on the basis of their functional relation with the Uttlesford Green Belt. General Areas directly adjoining these will be subject to assessment for Purpose 4, for which two aspects are of particular importance:

- The role of the General Area in providing immediate context for the historic settlement (along the boundary between the settlement and the Green Belt); and
- Contribution to views or vistas between the historic settlement and the surrounding countryside, looking both inwards and outwards where public viewpoints exist.

Table 4.3 Historic Settlements Considered in Purpose 4 Assessment

Uttlesford	Neighbouring Local Authorities
N/A	Sawbridgeworth (East Herts)

### Purpose 4 Assessment Criteria

The relative importance of particular landforms or landscape features to the setting and special character of an identified historic town will be adjudged using published landscape character studies and conservation area assessments (where applicable), Ordnance Survey maps and observations during the site visits.

**Purpose 4 Assessment Criteria**

Purpose	Criteria	Score
To preserve the setting and special character of historic towns	Protects land which provides immediate and wider context for a historic settlement, including views and vistas between the settlement and the surrounding countryside.	5: Land parcel plays an important role in maintaining the unique setting of a historic settlement by providing unspoilt vistas of surrounding countryside from within the settlement or unbroken vistas into the settlement from afar, and protects open land which has a strong connection with the historic core, contributing to its immediate historic setting.
		3: Land parcel plays an important role in maintaining the unique setting of a historic settlement by providing unspoilt vistas of surrounding countryside from within the settlement or unbroken vistas into the settlement from afar, <b>or</b> protects open land which has a strong connection with the historic core, contributing to its immediate historic setting.
		1: Land parcel makes limited contribution to the broader setting of a historic town by providing a countryside setting for a historic core which is inward facing, and has a weak relationship with the surrounding countryside.
		0: Land parcel does not abut an identified historic settlement core.
<b>Score</b>		<b>xx/5</b>

**4.4.5 Purpose 5**

*Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Purpose 5 focuses on assisting urban regeneration through the recycling of derelict and other urban land. As outlined in Section 3, the advice note issued by PAS suggests that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. Therefore, assessment of Green Belt against this purpose will not enable a distinction between General Areas as all Green Belt achieves the purpose to the same extent.

Furthermore, during engagement with the Council, it was confirmed that there are no planned urban regeneration schemes that were being inhibited by Green Belt designations.

As a result, Purpose 5 will be excluded from the Review.

**4.4.6 Pro-Forma**

A pro forma has been prepared to capture the assessments against each criterion for the General Areas. A copy can be found in Appendix B.

## 4.5 Recommendations

Following completion of the General Area assessments, the criterion scores for Purposes 1-4 will be collated and tabulated across all of the General Areas, to highlight those areas meeting the purposes to a lesser or greater extent. General Areas which meet the Green Belt purposes strongly will be deemed unsuitable for release in their entirety.

Weaker performing General Areas, as well as small-scale sub areas within General Areas which might be less sensitive and thus able to accommodate change, will be identified and listed with a view to possible further detailed assessment beyond this Review.

It is understood that the outcome and recommendations from the Review will form part of the Council's suite of evidence-based studies to determine which of the identified Areas of Search should be progressed in its forthcoming plan making (and conversely, which to rule out). It is this suite of documents which will demonstrate any '*exceptional circumstances*' to justify an amendment to the Green Belt boundaries through the Local Plan process.

## Appendix A

### Glossary of Terms

Draft

<b>Term</b>	<b>Definition</b>
Connected	Displaying a low level of containment and rather simply adjoining the urban area.
Contiguous	Predominantly surrounded by built form (from at least two large built-up areas) but also retaining a strong link to the wider Green Belt.
Duty to Cooperate	A legislative requirement in the Localism Act 2011 which places a duty on local planning authorities and county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.
Enclosed	Almost entirely contained or surrounded by built development.
Encroachment	A gradual advancement of urbanising influences through physical development or land use change.
Essential Gap	A gap between settlements where development would significantly reduce the perceived or actual distance between them.
General Area	Green Belt land parcel defined by permanent and defensible boundaries, for use during the Green Belt assessment.
Large Built-Up Area	Areas defined to correspond to the major settlements identified in the respective Local Plans for each local authority, both within and outside Uttlesford, and used in the NPPF Purpose 1 assessment.
Largely Rural Character	Land with a general absence of built development, largely characterised by rural land uses and landscapes but with some other sporadic developments and man-made structures.
Less Essential Gap	A gap between settlements where development is likely to be possible without any risk of coalescence between them.
Neighbouring Town	Refers to settlements within Uttlesford, as well as settlements in neighbouring authorities immediately adjacent to Uttlesford's Green Belt, for the assessment against NPPF Purpose 2.
Open Land	Open land refers to land that is lacking in built development.
Openness	Openness refers to the extent to which Green Belt land could be considered open from an absence of built development.
Semi-Urban Character	Land which begins on the edge of the fully built up area and contains a mix of urban and rural land uses before giving way to the wider countryside. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).
Sprawl	The outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way.
Strong Unspoilt Rural Character	Land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.

Term	Definition
Urban Character	Land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.
Wider Gap	A gap between settlements where limited development may be possible without coalescence between them.

Draft

## Appendix B

### Pro-Forma

Draft

Draft

General Area			
Area (ha)			
Local Authority			
Location Plan			
Description			
<b>Purpose</b>	<b>Criteria</b>	<b>Assessment</b>	<b>Score</b>
(1) To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas.		
	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.		
<b>Purpose 1: Total Score</b>			<b>/5</b>
(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements.		
<b>Purpose 2: Total Score</b>			<b>/5</b>
(3) Assist in safeguarding	Protects the openness of the countryside and is		

the countryside from encroachment	least covered by development.		
<b>Purpose 3: Total Score</b>			<b>/5</b>
(4) To preserved the setting and special character of historic towns	Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside.		
<b>Purpose 4: Total Score</b>			<b>/5</b>

Site Photos

Photograph 1:

Photograph 2:

Photograph 3:



**Committee: Planning Policy Working Group**

**Agenda Item**

**Date: 16 December 2015**

**5**

**Title: Call for Sites and Strategic Land Availability Assessment**

**Author Sarah Nicholas, Senior Planning Officer,  
01799 510454**

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## Summary

1. Following the Call for Sites in April and May 2015, details of the sites submitted have been published on the Council website. The Council is currently assessing each of these sites as part of the Strategic Land Availability Assessment (SLAA). The methodology for the SLAA was subject to consultation in August and September. Details of that consultation and the final methodology are attached.

## Recommendations

2. That Members note that the maps of the sites submitted under the call for sites have been published on the Council website and that an assessment of the sites will be published early 2016.

## Financial Implications

3. None

## Background Papers

None

## Impact

- 4.

Communication/Consultation	The sites submitted under the Call for Sites and the interim SLAA are/will be published on the website.
Community Safety	N/A
Equalities	N/A
Health and Safety	N/A
Human Rights/Legal Implications	N/A
Sustainability	The assessment of the sites includes

	consideration of the sustainability of the site.
Ward-specific impacts	ALL
Workforce/Workplace	N/A

## Situation

5. A Call for Sites took place between 1 April and 1 June 2015. The 'Call for Sites' is an opportunity for developers, landowners, individuals and other interested parties to suggest residential and employment sites within Uttlesford District for development. The suggested sites will be used to inform the preparation of the site allocations within the Local Plan. The call for sites exercise will not in itself determine whether a site should be allocated for development.
6. Details of the sites submitted through the Call for Sites are available on the website at [www.uttlesford.gov.uk/callforsites](http://www.uttlesford.gov.uk/callforsites). There is an interactive map showing all the sites. There is also a PDF document for each parish where sites have been submitted which shows a map of the parish with the sites identified; a list of the sites with their address and details of the type of development being proposed; and a map for each site.
7. The Council is no longer accepting sites through the Call for Sites process.
8. The Council is not yet in a position to take a view on the suitability or otherwise of any of the sites. The Council will prepare an interim assessment of each site based on the criteria set out in the Strategic Land Availability Assessment (SLAA) Methodology. All the interim assessments will be posted on the Council's website and Town and Parish Councils and site promoters asked to comment on matters of fact. Any factual errors will be amended and any comments noted on the site assessment form.
9. The interim SLAA considers sites from a range of sources as set out in the methodology. The first phase of assessments will deal with sites submitted through the call for sites with sites from other sources to follow. The finalised Strategic Land Availability Assessment will then be published later in 2016.
10. The Draft Strategic Land Availability Assessment methodology was published for consultation on 21 August and closed on 2 October. Representations were received from 15 organisations. A summary of the comments received on the draft methodology and officer responses is appended to this report, as is the final methodology statement.
11. In assessing the development potential of a site, the Council needs to assess the "suitability", "availability" and "achievability" of a site.
12. In considering the suitability of the site, the site's location will be considered against the following issues - policy constraint, flood risk, noise, pollution, natural environment, historic environment, accessibility, and land uses on the site.

13. A site is considered available if, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners.
14. A site is considered to be achievable if there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and whether there are any costs or constraints which may affect the viability of the site.
15. These assessments will provide the information on which a judgment can be made whether a site can be considered “deliverable”, “developable” or not currently developable. To be considered
  - “deliverable” – a site is available now, offers a suitable location for housing or employment development now and there is reasonable prospect that development will be delivered on site within 5 years from the date of adoption of the plan, and
  - “developable” – a site should be in a suitable location for housing or employment development, and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time i.e. it is achievable.
  - A site ‘not currently developable’ is a site considered neither deliverable nor developable as defined above.

## Risk Analysis

16.

Risk	Likelihood	Impact	Mitigating actions
That the Council does not have an adequate supply of deliverable and developable sites	1. Little or no risk or impact	The Council would be unable to allocate sufficient land to meet its housing target in the Local Plan and be subject to speculative planning applications	Work with the landowners or their agents, consultees and any other relevant partners to overcome constraints on sites identified as not currently developable

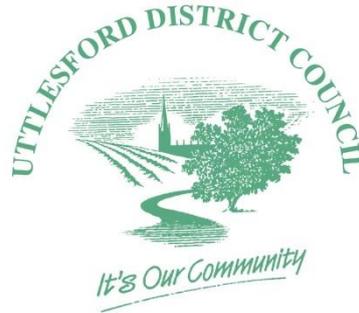
1 = Little or no risk or impact

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

3 = Significant risk or impact – action required

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





## **STRATEGIC LAND AVAILABILITY ASSESSMENT 2015**

### **Housing and Employment Land**

**Summary of comments received on  
Draft Methodology and officer response.**

**December 2015**

## Introduction

The SLAA methodology was published for consultation on 21 August and closed on 2 October 2015.

All town and parish councils/meetings were consulted as well as 66 organisations comprising chambers of commerce, housing associations, land promoters, adjoining local authorities, neighbourhood plan steering groups, local enterprise partnerships, statutory consultees, Sustainable Uttlesford and Essex Wildlife Trust.

Representations were received from 15 organisations:-

Highways England	Little Easton Parish Council	Andrew Martin Planning on behalf of Chater Homes and Home Group
Natural England	Saffron Walden Town Council	Gladman Developments
Environment Agency	Takeley Parish Council	David Lock Associations on behalf of Fairfield (Elsenham) Ltd
Historic England	Thaxted Parish Council	Barton Wilmore on behalf of Land Securities
Essex County Council	Felsted Neighbourhood Plan Group	
	Sustainable Uttlesford	
	WeAreResidents.org	

The following summarises the comments received for each stage of the methodology along with officer comments and any proposed changes.

## General

### Highways England

Content with the proposed methodology

**Natural England** is not available to provide bespoke advice on SLAAs and so provide the following generic advice on key natural considerations for use in producing or revising SLAAs. Impacts of new housing upon landscape; international, national and locally designated sites of importance for biodiversity; may be positive or negative, direct or indirect, short or long term and reversible or irreversible. Cumulative impacts may also occur as a result of the combined effects of more than one housing development.

### Little Easton Parish Council and Felsted Neighbourhood Plan Group

No comment to make at this time

### Officer Comment

The SLAA is only one piece of evidence in a suite of evidence documents which will be used by the Council in deciding which sites to allocate. The Sustainability Appraisal in particular considers significant and temporal effects, secondary, cumulative and synergistic effects. It is considered more appropriate to rename the document a Strategic Land Availability Assessment (SLAA) as it considers land for both housing and employment development.

## **STAGE 1**

### 1.1 Assessment area

**Saffron Walden Town Council, Sustainable Uttlesford and WeAreResidents.org** raised concerns that the SLAA relates to the District and does not take into account the SHMA area identified in the LCB East SHMA update 2012, or the influence of Cambridgeshire, Chelmsford and Braintree. There is concern that the choice of the housing market area with Epping Forest, Harlow and East Herts will concentrate the search for the development sites in the south of the District. Concern was also expressed that the other west Essex/East Hertfordshire authorities have based their SLAA on the 2007 guidance.

#### **Officer Comment**

There are negligible differences between the 2007 and 2014 methodologies and the Council has considered the SLAA's undertaken by the other authorities and are happy that a consistent approach has been taken by each authority.

The 2012 SHMA has now been replaced by the 2015 SHMA which concludes that the East Hertfordshire, Epping Forest, Harlow and Uttlesford represent the most appropriate "best fit" for the Housing Market Area. The SHMA does note that Uttlesford should maintain dialogue with Chelmsford as well as Braintree, South Cambridgeshire and Cambridge and that all four authorities will need to maintain dialogue with each of the boroughs to the north and east of London as well as with the Mayor of London through the Greater London Authority.

The SLAA considers all sites from across the District equally and does not bias deliverability towards one particular geographical area. Furthermore, in selecting the development strategy the Council is undertaking an Issues and Options consultation on Areas of Search which looks across the whole district.

### 1.2 Involvement of key stakeholders

The **land promoters** seek to be included in the 'fact checking' of the draft SLAA at the same time as the town and parish councils. One promoter considered it good practice to discuss a basket of site assessments, once the draft assessments have been undertaken, with a panel of stakeholders. This ensures that the methodology has been followed effectively and that the assumptions have been consistently applied.

On a general point **Takeley PC** advocated more consultation and involvement with parishes regarding the Council's discussions/meetings with developers about proposed developments

#### **Officer comment**

It is the Council's intention to publish the draft SLAA on the website and notify both the town and parish councils and those who submitted sites of its publication. Section 1.2 of the methodology will be amended to include reference to those who submitted sites.

As the draft SLAA will be public, this will enable a checking of the assessments by parish councils and site promoters, it is not considered necessary to undertake an assessment of sample sites with a panel. Any comments received will be noted on each site assessment

sheet. The Deliverability Assessments will be changed if new evidence is submitted affecting the suitability, availability, or achievability of the site.

### 1.3 Sites to be assessed

**Saffron Walden Town Council and WeAreResidents.org** request that the sources of sites include sites that have not been put forward but are considered to be sustainable locations for development.

#### **Officer Comments**

The Sources of Sites reflects the Planning Practice Guidance. For sites not currently in the planning process, many of the sources are not through the Call for Sites but from other sources as listed in the table in the methodology. The SLAA should consider all sites irrespective of whether they are considered to be in a sustainable location. The Areas of Search identified for the Issues and Options October 2015 consultation which are not “developer led” could in theory be included as a source of information and be appraised. However this would not be a particularly useful exercise as they are broad areas and their availability and achievability would be unknown and it would provide no more information than that provided through the Sustainability Appraisal of the Areas of Search. Should the Issues and Options consultation lead to additional sites within the areas of search being suggested for development these can be included in the SLAA.

## **STAGE 2**

### 2.1 site capacity

**Saffron Walden Town Council** considers that it may be preferable for UDC to determine the most appropriate density rather than developers increasing the density to maximise their profits. **Takeley Parish Council** wishes the density to differentiate between urban and rural locations. **WeAreResidents.org** consider that there is no obvious reasons why there should be a difference between the densities for extension to the towns compared to new settlements; and indeed the flexibility provided by new settlements arguably should allow for a greater minimum density.

The **site promoters** generally consider that the lower end densities do not reflect that developers are increasingly building at lower densities, with a move away from flatted developments towards larger family homes, larger gardens and greater off road parking provision. On average about 10 dph less is suggested. Concern is also raised in relation to the gross to net ratios with a particular issue being the larger, settlement scale schemes where it is suggested that for sites of 15ha or more the gross to net ratio should be in the order of 60%.

#### **Officer Comments**

The individual site appraisal forms note both the developers/agents capacity and the capacity using the SLAA methodology. The final deliverability Assessment will use capacity provided by the site promoter as this is considered to represent the most realistic figure. If no capacity is provided then the SLAA methodology will be used. This density is only a guide. The House Type Density is based on the density of existing and well established

developments. In determining the range of densities for New Settlements, developments such as South Woodham Ferrers and Cambourne were used.

It is considered appropriate to include an additional gross to net ratio standard for larger scale developments of 60%.

### 2.2.1 Suitability

See the section on appendix 2 for responses to specific representations on the site criteria.

**Saffron Walden Town Council** express caution over the use of colour coding in Appendix 2 and that all assessment criteria are given exactly the same amount of weighting in that there is no distinction between them. Given the difficulties in determining relative weighting a more qualitative assessment is proposed. **Sustainable Uttlesford** and one of the **Site Promoters** consider that some criteria are more important than others and weightings should be applied. **WeAreResidents.org** and one of the **Site Promoters** are concerned that the criteria make no distinction between New Settlement Sites and other sites. One of the **Site Promoters** considers that the Sustainability Appraisal (SA) Site Proforma and SLAA Assessment of Suitability Methodology, should be identical and in this regard the SA Site Proforma is considered to be a more sophisticated and robust tool.

**Sustainable Uttlesford** consider it is unclear how the proposed methodology will assess the cumulative environmental impacts of any proposed development sites on adjoining areas eg the impact on air quality caused by traffic generated by any development at junctions in town and village centres.

**WeAreResidents.org** consider that a new set of criteria needs to be developed for potential new settlement sites, and the existing criteria needs to be rethought completely, tested against real world examples of potential development sites, and drafted accordingly, so that they will accurately distinguish between sites which are and which are not sustainable.

#### Officer Comments

Because different people/groups/organisations will give a different weighting to different criteria it is considered more robust to treat each criterion with the same weight and then a judgement can be made when considering all the evidence in deciding the sites to allocate.

Cumulative impacts are assessed in the Sustainability Appraisal.

The methodology recognises that the SLAA is not the most appropriate method to assess settlement scale developments. The approach the Council is taking in relation to settlement scale developments is to assess them against Garden City Principles. The Council has retained the services of Garden City Developments CIC to advise and support officers in the appraisal of the submissions. An assessment of each scheme will be published as additional material on the SLAA.

In light of the comments above and those in relation to the site criteria in Appendix 2 it is proposed to amend the suitability criteria. Because the SLAA does not have the evidence to make judgements based on the proximity of the site from a zone or designation or a facility it is proposed to remove the positive and negative scores and just note where the site is in relation to it without making any judgement. This will be followed by a conclusion on the suitability which will be a narrative including any issue specific to that site and explaining the key issues influencing the assessment of the site. Therefore when the Council has to make

a decision as to which sites to allocated, the evidence of the SLAA can be considered alongside other evidence.

A revised Appendix 2 can be found at the end of this document.

#### 2.2.2 Availability

No comments received

#### 2.2.3 Achievability

**Saffron Walden Town Council** raises the issue of the suitability of the SLAA for determining the suitability of settlement scale developments. However, they consider it is more important to identify the best sites irrespective of whether they are put forward by landowners or not. One of the **site promoters** agree that a bespoke approach is likely to ensure that sufficient informed consideration is given to the more complex technical matters raised by developments of this scale to assess the achievability of settlement scale developments.

#### Officer Comments

The approach the Council is taking in relation to settlement scale developments is to assess them against Garden City Principles. The Council has retained the services of Garden City Developments CIC to advise and support officers in the appraisal of the submissions. An assessment of each scheme will be published as additional material on the SLAA. The text will be amended to refer to this.

#### 2.3 overcoming constraints

**Takeley PC** asks that Local communities should be involved at this stage and this should be incorporated into the process/methodology.

#### Officer Comments

Parish Councils will have the opportunity to comment on the Draft SLAA and can respond to any of the constraints identified as to how they could be overcome.

### **STAGE 3**

#### Windfall

**Sustainable Uttlesford** considers that the windfall allowance should be increased to reflect the average of 80 dwellings per year built and the changes in the GDPO making it easier to convert buildings to residential uses. One of the **site promoters** considers it essential that the windfall allowance is robust and justified not only reflecting historic levels but also the prospect that they will continue to come forward in the future. Other **site promoters** consider that the windfall allowance should be reduced significantly or not relied upon at all in the delivery of housing.

### **Officer Comments**

The windfall allowance was tested at the examination in the Local Plan and found to be a sound figure.

It has been pointed out that the last sentence of Paragraph 4 appears to be incomplete. It is not incomplete but it is proposed to amend the sentence to make it clear

“...the remaining 34 would be other sites which were not technically windfall under the criteria used and neither were they specifically identified as available in the Local Plan process.”

## **STAGE 4**

### **4.1 assessment review**

**Saffron Walden Town Council** would be concerned if this involved ignoring the initial objective assessment for a large number of sites. However they do recognise that this is what the guidance states.

One of the **site promoters** considers that this stage of the process should be undertaken through Local Plan preparation rather than forming part of the SLAA process. Another **site promoter** wishes to amend the methodology to make it clear as to whether the review is to ensure sufficient sites to meet the needs of Uttlesford or of the housing market area; and reference should be made to meet the need arising from London.

### **Officer Comment**

The SLAA is one piece of evidence in the preparation of the draft Local Plan. It is correct that it is through other stages in the Local Plan preparation that the housing target is decided but it is the role of the SLAA to assist in the allocation of deliverable sites. However, in line with government guidance some assessments may need to be reviewed, in order to find sufficient deliverable sites. The final housing target for Uttlesford along with the target for the other local authorities in the housing market area will ensure that the overall housing need of the housing market area is met.

### **4.2 keeping the assessment up to date**

A **site promoter** welcomes the commitment to review the SLAA annually. It should be clarified that updates to the SLAA will also be reported where the assessment relating to parts of sites, as well as to whole sites, has changed.

### **Officer comments**

Noted

## **STAGE 5**

No comments received on Stage 5

## Appendix 1

### Summary of comments received:-

#### Policy Constraint

- Criterion should not be used to artificially remove sites from consideration as suitable sites for development as these policy issues are simply matters which should be weighed-up in the planning balance exercise, as it is likely that land affected by the criteria will be required to meet the housing needs of the district.

#### Development Limits

- Development has been permitted beyond development limits and therefore settlement limits are in many cases out of date and irrelevant.

#### Green Belt

- Because the SLAA process will have insufficient information to assess sites in the context of the very special or exceptional circumstances, where a site is located in the Green Belt a Major Negative rating should be applied

#### Countryside Protection Zone

- A 'Positive' rating should be applied where development of part of the site within the CPZ would not include new buildings and would be limited to uses which would not offend the policy objectives of the CPZ

#### Flood risk

- Should include a criteria of whether the site is at risk from surface water or ground water flooding
- The criteria should provide sufficient acknowledgement of the potential for flood risk to be mitigated and for master planning to avoid the development in flood zones 2 and 3.

#### Noise

- The criteria should provide sufficient acknowledgement of the potential for mitigation measures such as development being set back and boundary planting.
- Public Safety Zone is more appropriately considered as a policy constraint

#### Pollution

##### Air Quality Management Area

- Criteria need to recognise that sites not in the AQMA could still affect an AQMA because the site's location would lead to traffic driving through the AQMA. Criteria should include "Proximate to, or likely to affect, an AQMA, or to contribute additional pollution into an AQMA".

##### Ground Water Protection Zone

- It is not clear why a 'Major Positive' rating would not be applied to a site located outside of a ground water protection zone
- The criteria should provide sufficient acknowledgement of the potential for mitigation

measures.

#### Minerals Safeguarding Area

- Identify sites within a Minerals Safeguarding Area that are 5ha or more for sand and gravel, 3ha or more for chalk and greater than 1 dwelling for brickearth or brick clay;
- Identify sites which lie with a Minerals Consultation Area which would unnecessarily sterilise mineral resources or conflict with the effective workings of permitted minerals development, Preferred or Reserve Mineral Site allocations.
- The criteria should include the provision whether ECC has agreed whether prior extractions is or is not required

#### Natural environment

- The assessment of potential housing sites should be informed by the landscape character approach.
- Criteria should include impact upon the landscape. Any such assessment would warrant some degree of analysis, however, by considering the potential impact in the short-medium term and with/without adequate, appropriate and effective landscaping
- The SLAA should consider the availability of Green Infrastructure (GI) and opportunities to enhance GI networks when considering sites for development.
- Indirect impacts on ecological sites may be experience several kilometres distant from housing sites. The key to assessing these is to understand the potential impact pathways that may exist between the development and sensitive sites.
- It may also be necessary to undertake a basic ecological survey in order to appraise the biodiversity value of any potential development site.
- Accessible natural greenspace should be provided as an integral part of development
- The criteria should include local geological sites. Housing development may present opportunities for the enhancement of geological sites e.g. exposure sites in road cuttings.
- Not all Agricultural land has been surveyed in detail and more detailed field survey may be required to inform decisions about specific sites
- There should not be any loss of arable land.
- Criteria should identify sites which impacts on National Trails and networks of public rights of way and opportunities should be considered to maintain and enhance networks and to add links to existing rights of way networks including National Trails.
- Criteria should identify sites which impact on public rights of way and access
- Criteria should include Biodiversity Action Plan (BAP) habitats and species.
- The criteria should provide sufficient acknowledgement that development provides an opportunity to potentially enhance assets such as Local Wildlife Sites.
- The criteria should provide sufficient acknowledgement that through master planning and the location of development, the impact on assets can be mitigated
- Criteria do not consider impact of proposed development sites on biodiversity at a local level eg on special verges, protected and quiet lanes.
- Criteria should consider whether proposed development sites have access to open space and countryside.

#### Historic environment

- Criteria using a proximity test can be arbitrary and could lead to misleading results.
- Criteria should include other non- designated heritage assets such as archaeology.
- The SLAA methodology should follow the SA Framework approach.
- Scheduled Ancient Monuments are not graded

- The criteria should provide sufficient acknowledgement that development provides an opportunity to potentially enhance assets such as Registered Parks and Gardens.
- The criteria should provide sufficient acknowledgement that through master planning and the location of development, the impact on assets can be mitigated

#### Accessibility

- Distances to primary and secondary schools reflects the free school travel policy of the County with the aim of locating development which reduces the need for transport and associated costs - Within 2 miles if below the age of 8; Within 3 miles if aged between 8 and 16.
- Regard should be had not just to the proximity to existing facilities, but also the scope to deliver new facilities on-site. It is proposed that in the Major Positive column the following test is applied “new (facility) proposed on site to serve both existing and new residents”.
- It is not clear why a site located within 800m of an existing primary school/ convenience shopping/ GP surgery would not receive a ‘Major Positive’ rating.
- Criteria do not consider transport links, access to main roads, existing congestion etc. There should be a form of differentiation between major and minor road routes.
- Criteria do not consider ease of access to significant employment sites, or consideration of site in relation to the main sources of employment within the district.
- there is no point satisfying a criterion for proximity to a secondary school if that school is full and effectively incapable of practical expansion;

#### Loss of land use

- No scoring criteria provided for Loss of Employment Land
- Criteria should be amended to consider if there will be a net loss of recreational / employment / retail land
- It is not clear why development proposing to include retail uses does not receive a ‘Major Positive’ rating.
- The criteria are inconsistent in that sites including new retail proposals attract a positive assessment whereas the SLAA process makes no such provision for other new and beneficial supporting infrastructure commonly promoted as part of large-scale proposals such as health provision, employment, schools or community facilities. There would be merit in adding a further category regarding the ability of large-scale proposals to provide new supporting infrastructure.

## Appendix 2

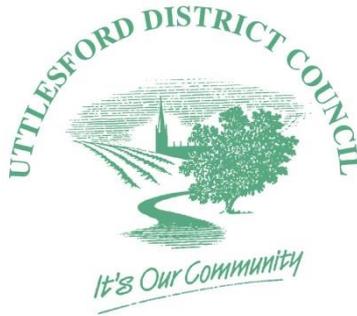
### Suitability Assessment Criteria

Site Criteria	Guide to Range of answers
<b>Policy Constraint</b>	
Is the site greenfield or brownfield?	Greenfield / brownfield / both
Is the site within, adjoining or beyond the Adopted Development Limits?	Within / adjoining / separate / adjoining a site with PP for development
Is the site located within the Greenbelt?	Yes / No / partial
Is the site located within the Countryside Protection Zone (CPZ)?	Yes / no / partial / potential for development to avoid partial land within CPZ
Is the site within a Public Safety Zone?	Yes / no / partial
<b>Flooding</b>	
Which flood risk zone(s) does the site lie in?	Zone 1; 2 and/or 3 / potential for development to avoid high risk zones
Does the site lie within surface water or ground water flooding zones?	1 in 30 / 1 in 100 / 1 in 1000 / potential for development to avoid high risk zones
<b>Pollution</b>	
Which aircraft noise contour does the site lie within?	Beyond 54 / between 54-57 / within 57 dB(A)leg
Is the site within the AQMA or area otherwise identified as of poor air quality?	Yes / no / partial
Is the site located such that traffic to/from the site could drive through the AQMA?	Yes / no
Which ground water source protection zone does the site lie within?	Zone 1 / 2 / 3
Minerals Safeguarding Areas (MSA) Is site 5ha or more and within MSA for sand and gravel or Is site 3ha or more and within MSA for chalk or is site within MSA for brick earth or brick clay?	Within MSA for Sand & Gravel / Chalk / Brick earth or Brick clay
Does the site lie within the Waste Consultation Area?	Yes / no / partial
<b>Natural environment</b>	
Proximity of SSSIs (including Impact Risk Zones (IRZ))	Within / adjacent / beyond
Proximity of NNRs	Within / <100 / 100-500m / 500-1000m / >1000m
Proximity of Local Wildlife Site(s)	Within / <100 / 100-500m / 500-1000m / >1000m

<b>Site Criteria</b>	<b>Guide to Range of answers</b>
Proximity of Ancient Woodland(s)	Within / <100 / 100-500m / 500-1000m / >1000m
Proximity to Local Geological Site(s)	Within / <100 / 100-500m / 500-1000m / >1000m
Proximity to National Trails and public rights of way networks	Traverse site / along site boundary / <100m / over 100m
Will the site be located in an area noted for its high sensitivity to change (from Uttlesford Landscape Character Assessment)?	Name of Landscape character Area; High / moderate to high / moderate / low to moderate sensitivity to change
Does site lie within area noted in the Historic Settlement Character Assessment?	Brief description of assessment
Are there any Tree Preservation Orders (TPOs) on the site?	Yes / No
What is the agricultural land value of the site	2 / 3 / 4 / non-agricultural / urban
<b>Historic Environment</b>	
Distance from scheduled ancient monument	<100 / 100-500m / 500-1000m / >1000m
Distance from Listed Building	Within site / <100 / 100-500m / 500-1000m / >1000m
Distance from Conservation Area	Within / <100 / 100-500m / 500-1000m / >1000m
Distance from Registered Park and Garden	Name Park or Garden Within / <100 / 100-500m / 500-1000m / >1000m
Distance from Historic Park or Garden identified by Uttlesford DC	Name Park or Garden Within / <100 / 100-500m / 500-1000m / >1000m
Will a new site access be created on to a protected lane?	Yes / No
<b>Accessibility</b>	
Is the site within 800 metres walking and cycling distance of an existing public transport node?	Yes / No. Include any comments about ease of walking eg is there a pavement or not?
Will the site be located within 800 metres of a primary school or is a new primary school being provided on site or within 800m of site?	Yes / No. Include any comments about ease of walking eg is there a pavement or not?
Is the site within 800 metres walking and cycling distance of convenience shopping or are new convenience shopping facilities being provided on site or within 800m of site?	Yes / No. Include any comments about ease of walking eg is there a pavement or not?

<b>Site Criteria</b>	<b>Guide to Range of answers</b>
Will the site be located within 800 metres walking and cycling distance of a GP surgery (NHS Primary Healthcare Facility) or are new health facilities being provided on site or within 800m of site?	Yes / No. Include any comments about ease of walking eg is there a pavement or not?
Will the site be located within 4.8km of a secondary school or is a new secondary school being provided on site or within 800m of site?	Yes / No. Include any comments about ease of walking eg is there a pavement or not?
Is there a viable route from the site to the principle or strategic road network – B roads, A roads and M11)	Yes / no. Brief description of road network
<b>Other land uses</b>	
Will there be a net loss of land designated for recreational use?	Recreational land lost and not replaced / lost and replaced with more or less / not known if to be replaced
Will there be a net loss of employment land?	Employment land lost and not replaced / lost and replaced with more or less / not known if to be replaced
Will there be a net loss of retail provision?	Retail provision lost and not replaced / lost and replaced with more or less / not known if to be replaced
If known, are any additional uses/ infrastructure (including green infrastructure) being provided on site?	List





## **STRATEGIC LAND AVAILABILITY ASSESSMENT 2015**

### **Housing and Employment Land**

#### **Methodology**

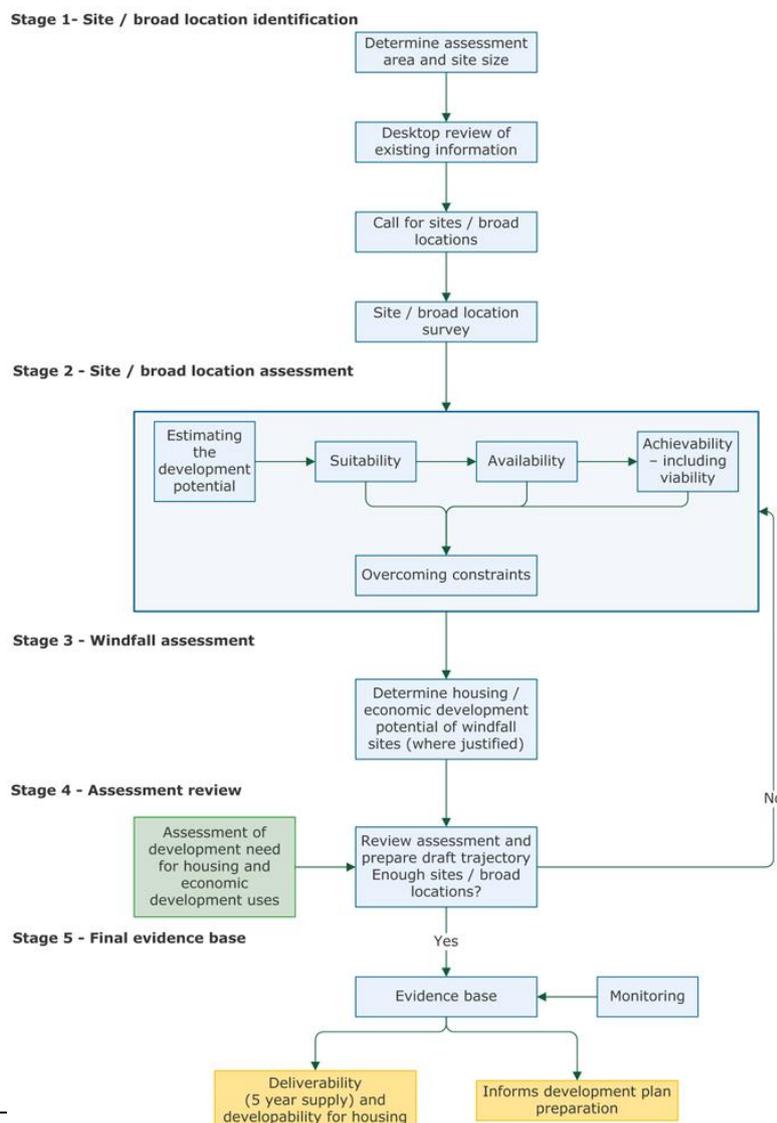
**December 2015**

## Strategic Land Availability Assessment 2015: Housing and Employment Land Methodology

### Introduction

The Council first prepared a Strategic Housing Land Availability Assessment (SHLAA) in 2008 and the methodology was based on the Practice Guidance produced by the Department of Communities and Local Government (DCLG) in July 2007. National guidance on SHLAA has since been amended and is now set out in the Planning Practice Guidance (PPG) on 'Housing and economic land availability assessment'.<sup>1</sup> The methodology is very similar to that set out in 2007. The draft methodology was subject to consultation with house builders/agents and property agents, Essex County Council and neighbouring local authorities, social landlords, town and parish councils and national agencies. The results of the consultation and this final methodology were presented to the Planning Policy Working Group on 16 December 2015.

The methodology set out in the Planning Practice Guidance is as follows.



<sup>1</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>

## **Stage 1 – Site / broad locations identification**

### **Determine assessment area and site size**

#### 1.1 Assessment Area

Although Planning Practice Guidance is that the assessment should cover the housing market area, the area selected for this assessment is the district area. Uttlesford lies within a housing market area made up of Epping Forest, Harlow, East Herts District Councils and ourselves. The other authorities in the housing market area all have a published SHLAA<sup>2</sup> and the methodology used is based on the DCLG Practice Guidance July 2007, so together there is an assessment which covers the housing market area.

#### 1.2 Involvement of Key Stakeholders

The Council will consult with the following bodies on the methodology of preparing SLAA as required by the PPG at paragraph 008. Appendix 1 lists the bodies and groups consulted.

Developers	Housing Associations
Land promoters	Essex County Council
Local property agents	Environment Agency
Town and Parish Councils	Highways England
Chambers of Commerce	Historic England
Other authorities in the Housing Market Area	Natural England
Neighbourhood Plan Steering Groups	

The assessment of the sites will be undertaken by officers.

The SLAA is a technical study rather than a decision-making document and therefore no public consultation on SLAA sites will be held. However, it is proposed that the draft SLAA assessments will be sent to the relevant Parish or Town Council and Neighbourhood Plan Steering Groups and site promoters for comment as part of the fact-checking and quality control exercise.

#### 1.3 Sites to be assessed

The assessment will consider all sites and broad locations capable of delivering five or more dwellings.

The SLAA will cover the sources of sites set out below and the databases and documents used to identify the sites. .

No types of existing land use will be specifically excluded from the SLAA

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<sup>2</sup> Epping Forest District Council published a SHLAA in 2012. <http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/107-methodology>

Harlow Council published a SHLAA in 2014

<http://www.harlow.gov.uk/sites/harlow.gov.uk/files/Strategic%20Housing%20Land%20Availability%20Assessment%202014.pdf>

East Herts District council published an initial report on the SHLAA in 2012

<http://www.eastherts.gov.uk/index.jsp?articleid=26553>

Source of Sites	Source of Information
<b>Sites in planning process</b>	
Existing housing development allocations and site development briefs not yet with planning permission	Annual residential land availability survey
Planning permissions for housing development that are unimplemented or under construction	Annual residential land availability survey
Planning applications which have been refused or withdrawn	Planning application records
<b>Sites not currently in planning process</b>	
Land in the local authority's ownership	Review of UDC garage sites Land Terrier (record of our land and property holding)
Surplus and likely to become surplus public sector land	Register of Surplus Public Sector Land.
Vacant and derelict land and buildings	National Land Use Database Valuation Office database LPA vacant property registers
Additional opportunities in established uses (eg making productive use of under-utilised facilities such as garage blocks).	Review of UDC garage sites
Sites in rural locations	Call for Sites
Additional housing opportunities adjacent established residential areas.	Call for Sites
Large scale redevelopment and redesign of existing residential or economic areas	Development Opportunity Sites Neighbourhood Plans
Sites in and adjoining villages or rural settlements and rural exception sites	Call for Sites Housing Associations/ Uttlesford Housing Enabling Officer Parish Plans Neighbourhood Plans
Potential Urban Extensions and new freestanding settlements	Call for Sites

The Council undertook a Call for Sites between April and June 2015, The 'Call for Sites' was an opportunity for developers, landowners, individuals and other interested parties to suggest sites within Uttlesford District for development. Details on the Call for Sites can be found at [www.uttlesford.gov.uk/callforsites](http://www.uttlesford.gov.uk/callforsites)

Having identified the sites to be assessed a desktop review will be undertaken reviewing information on current policy restrictions; environmental conditions such as

flooding and air noise; impact on biodiversity, landscape, historic environment and resources; access to services, physical problems or limitations and existing uses on the site which would be lost. These are listed in more detail in the next stage.

**Stage 2 – Site/broad location assessment**  
**Estimating the development potential of each site/broad location**

2.1 Site Capacity

Where provided, the site capacity suggested by the owner/agent will be used; otherwise the residential capacity of the site will be calculated as set out below. If the capacity of a site is shown as a range between two figures, the lower figure of the range will be used in calculating the final deliverability or developability of a site to ensure that overall, sufficient sites are identified to meet the Council’s requirement.

When the Council undertook the Urban Capacity Study in 2002 it looked at the density of various generic housing types, the character of the area of the settlement and applied the relevant density assumption. The ranges of densities applied in the Urban Capacity Study are shown in the table below.

Housing Type	Lowest Density	Highest Density
Low density detached, linked and semi detached	30	32
Terraced housing	35	67
Flats	60	122
Mixed flats and houses	50	66

Although the study was undertaken some time ago it is considered that the above table presents a tried and tested methodology which can be applied to the SLAA. The density standards set out in the following table have therefore been applied. Although there is no minimum density set by Government, the density standards reflect existing local densities and it is considered appropriate that they are applied for the purposes of the SLAA as a guide only and to ensure that the capacity of sites can be assessed equally.

Location	Density Dwlg/ha (net)	Justification
Within Saffron Walden or Great Dunmow	35-67	Allows for a mix of housing types of houses, terraces and flats
Within a village	30-50	Respects the rural character of Uttlesford
Adjacent to any settlement	30-50	Respects the rural character of Uttlesford
New settlement	30-67	Allows for a mix of housing types of houses, terraces and flats

The estimation of housing potential will be based on the net developable area of each identified site. Smaller sites will typically make use of existing roads and facilities, potentially enabling up to 100% of the site area to be developed for housing. However, the area for housing development on larger sites may be reduced through the provision of internal access roads and strategic open space or landscaping.

It is proposed to apply the following gross to net ratios in calculating the net developable area for sites identified in the SLAA. These ratios were used for Regional Annual Monitoring Report, which although no longer produced are considered a sound approach. It includes an additional ratio for larger sites to reflect the additional land uses provided within such sites.

Site size	Gross to net ratio standards
Up to 0.4 hectare	100%
0.4 to 2 hectares	90%
2 to 15 hectares	75%
15 hectares and above	60%

Where the capacity of employment development is not provided this will be estimated at a plot ratio of 40% (i.e. 4000m<sup>2</sup> of floorspace per hectare), which is based on the figure used in the Employment Land Review (UDC April 2011).

## 2.2 Assessment of suitability; availability and achievability

In assessing the development potential of a site, the Council needs to assess the “suitability”, “availability” and “achievability” of a site. This will provide the information on which a judgment can be made whether a site can be considered “deliverable”, “developable” or not currently developable. To be considered

- “deliverable” – a site is available now, offers a suitable location for housing development now and there is reasonable prospect that housing will be delivered on site within 5 years from the date of adoption of the plan, and

- "developable" – a site should be in a suitable location for housing development, and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time i.e. it is achievable.<sup>3</sup>
- A site 'not currently developable' is a site considered neither deliverable nor developable as defined above.

Although these definitions apply to residential development a similar assessment will be made for employment development.

### 2.2.1 Suitability

The council will assess the suitability of each site by considering its location against the following factors. This is a factual assessment and Appendix 2 sets out the questions, the answers to which will be used to assess the suitability of the site. The questions deal with the following areas:-

- Policy constraint
- Flood risk
- Noise
- Pollution
- Natural environment
- Historic environment
- Accessibility
- Other land uses on the site

### 2.2.2 Availability

A site is considered available if, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners.

The call for sites form requested information on the ownership of the site and evidence to demonstrate that the land is available such as a signed statement from all the landowners. Any information on legal or ownership issues was also requested.

### 2.2.3 Achievability

A site is considered to be achievable if there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the capacity of the developer to deliver the site.

Historically, viability has not been a significant barrier to housing delivery in Uttlesford District. This is underpinned by the high residential values achieved in the District. The current housebuilding seen in the District indicates that the recent recession has not impacted on housebuilding in Uttlesford.

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▪ <sup>3</sup> Source: NPPF Footnotes 11 and 12 and paragraph 47.

The call for sites form requested information on whether there were any constraints which need to be overcome which may prejudice availability. A judgement will be made as whether there are-

- any constraints for example flooding, noise, physical features which need to be overcome and where cost of mitigation measures may prejudice viability; or
- any site preparation costs associated with, for example, topography, contamination or existing buildings or uses which may prejudice viability; or
- any specific infrastructure requirements which need to be provided which may prejudice viability

Using the SLAA to assess whether settlement scale developments are developable is more difficult and possibly not the most appropriate method. Garden City Developments CIC are meeting with the developers promoting new settlement scale developments and a detailed assessment of the submission in relation to garden city principles will be published. The sites will also be subject to a Sustainability Appraisal. Members and Officers will need to carefully consider the documents accompanying the call for sites submission. The technical nature of the documents may require the commissioning of specialists (for example in ecology, transport, flood risk, and financial viability) to provide an assessment.

### 2.3 Overcoming Constraints

The SLAA is a 'live' document and the Local Authority will look at any identified constraints to development on suitable sites i.e. those found to be not currently developable, and consider whether there are ways to overcome them. The Local Authority will work with the landowners or their agents, consultees and any other relevant partners to determine the potential to overcome these constraints. The SLAA will be updated annually with any information obtained during the year as part of the Monitoring Report.

### **Stage 3: Windfall Sites**

#### **Determining the housing potential of windfall sites where justified**

The Council applies a windfall allowance of 50 dwellings per year. The evidence on its windfall allowance is set out in 'Consideration of a windfall allowance for Uttlesford June 2014' which can be found at [www.uttlesford.gov.uk/backgroundstudies](http://www.uttlesford.gov.uk/backgroundstudies)

The council has taken evidence from historic windfall delivery rates over the last 13 years which demonstrates that windfall sites have consistently become available, and more importantly, have been developed, over a considerable time period. The average number of windfall dwellings completed annually is 46.

The council's policies on housing and the presumption in favour of sustainable development set by the National Planning Policy Framework positively encourage windfall development indicating that they will continue to provide a reliable source of supply. In addition, there have been the recent changes to the General Development Permitted Order allowing conversion to residential of agricultural buildings, retail uses (A1 and A2) and offices with only the need for prior notification.

Paragraph 7 of the Windfall Allowance paper lists those sites which historically are not included as windfall sites. This definition used by Essex County Council is more stringent than the definition used in the NPPF. These criteria apply a strict definition of sites not to be considered as windfall, for instance by excluding appeal decisions; and superseded applications even where the original application would have been considered a windfall site. There will therefore be a number of homes built which are not classed under this definition as windfall but are not identified in the local plan either. Paragraph 15 of the Windfall allowance paper shows that an average of 80 dwellings per annum has been built on sites of 5 or less dwellings. An average of 46 of these would have been windfall sites as shown by paragraph 8, the remaining 34 would be other sites which were not technically windfall under the criteria used were and neither were they specifically identified as available in the Local Plan process.

With an annual average completion rate of 46 dwellings on windfall sites and 80 dwellings on all small sites, a windfall allowance of 50 dwellings based on rounding the windfall completion rate is considered conservative but realistic.

The windfall allowance will be reviewed annually.

## **Stage 4: Assessment Review**

### 4.1 Assessment Review

Once all the sites and broad locations have been assessed, the development potential of all the sites can be collected and an assessment made as to whether there are sufficient or insufficient sites/broad locations to meet objectively assessed needs.

If there are insufficient sites the council will need to reconsider its assessment of sites, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements. If, following this review there are still insufficient sites, then it will be necessary to investigate how this shortfall should best be planned for. If there is clear evidence that the needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas in accordance with the duty to cooperate.

### 4.2 Keeping the assessment up-to-date

The SLAA will be annually updated with information on whether sites are now being developed and what progress has been made, whether applications have been submitted or approved on sites, progress on removing constraints and whether a site is now considered deliverable or developable; or whether unforeseen constraints which have since emerged. Any information provided on overcoming constraints will be considered and the deliverability of sites amended accordingly.

## **Stage 5: Final Evidence Base**

The SLAA will first assess the sites submitted through the Call for Sites, followed by the assessment of sites from other sources.

### 5.1 Core Outputs

The Council will create a page on the website for the SLAA [www.uttlesford.gov.uk/sl原因](http://www.uttlesford.gov.uk/sl原因) which will contain the following information:-

### 5.2 Summary Table and maps

The findings of the detailed site assessments will be summarised and the outcome of the assessment of suitability, availability and achievability for each site will be provided. This will include an indicative trajectory of each site's development indicating the amount of housing deliverable in the first five years, years 5-10 and years 10-15. Site maps will also be produced by settlement. Separate summary tables will be provided for residential development and for employment development.

### 5.3 Site Appraisal Information

For each site the Council will produce a form setting out the following information. A copy of the form is at Appendix 3.

- Site location plan
- Current land use
- Land use of the surrounding area
- Total site area and developable area
- Area of search in which the site is located, if any
- Potential uses
- An assessment of the site in terms of its suitability for development, availability and achievability as described in Stage 2 above.
- An overall conclusion as to whether the site can be considered deliverable (i.e. available now with a realistic prospect that housing will be built within 5 years) or developable (i.e. that there is a reasonable prospect that the site could be viably developed at the point envisaged) or not currently developable for housing; and how any barriers to delivery could be overcome and when.
- An indicative trajectory of the site's development indicating the amount of housing deliverable in the first five years, years 5-10 and years 10-15.

## **Appendix 1**

List of organisations consulted on methodology

### **Chambers of Commerce**

Dunmow and District Chamber of Trade and Commerce

Essex Chambers of Commerce

Federation of Small Businesses

### **Housing Associations**

Chelmer Housing Partnership

Home Group

East Thames Housing Association

Homes and Communities Agency

Greenfields Community Housing Ltd

Moat Housing Group

Hastoe Housing Association

Swan Housing Group

### **Developers / Land Promoters/ Property and Planning Agents**

Andrew Martin Planning

Gladman Developments

Arkwright & Co

Go Planning Ltd

ASP

Home Builders Federation

Audley End Estate

Indigo Planning

Barton Willmore

John Martin Associates

Bidwells

Melville Dunbar Associates

Boyer Planning Ltd

Montague Evans

brian christian building surveyor

NHS Property Services Ltd

Capital Property and Infrastructure

Pegasus Planning Group

Cheffins (Planning and Development)

Persimmon Homes Essex

Chelmsford Diocese Board of Finance c/o  
Partner Strutt & Parker

Phase 2 Planning and Development Ltd

Church Commissioners

Robert Crawford Associates

David Lock Associates

RPS Planning and Development

Donald Purkiss Associates LLP

Savills

Edward Gittins & Associates

Springfield Planning and Development

Framptons

Strutt & Parker

Sworders

### **Adjoining Local Authorities**

Braintree District Council

Chelmsford City Council

East Hertfordshire District Council

Epping Forest District Council  
Harlow Council  
North Hertfordshire District Council  
South Cambridgeshire District Council  
St Edmundsbury Borough Council

**Neighbourhood Plan Steering Groups**

Great Dunmow  
The Chesterfords  
Stansted Mountfitchet  
Felsted

**Town and Parish Councils/Meetings in Uttlesford**

**Local Enterprise Partnerships**

Greater Cambridge and Greater Peterborough Local Enterprise Partnership  
London Stansted Cambridge Consortium  
South East Local Enterprise Partnership

**Statutory Consultees**

Essex County Council Environment, Sustainability and Highways  
Environment Agency  
Highways England  
Historic England  
Natural England

**Others**

Sustainable Uttlesford  
Essex Wildlife Trust

**Appendix 2**  
**SLAA methodology: Assessment of Suitability**

<b>Site Criteria</b>	<b>Guide to Range of answers</b>
<b>Policy Constraint</b>	
Is the site greenfield or brownfield?	Greenfield / brownfield / both
Is the site within, adjoining or beyond the Adopted Development Limits?	Within / adjoining / separate / adjoining a site with PP for development
Is the site located within the Greenbelt?	Yes / No / partial
Is the site located within the Countryside Protection Zone (CPZ)?	Yes / no / partial / potential for development to avoid partial land within CPZ
Is the site within a Public Safety Zone?	Yes / no / partial
<b>Flooding</b>	
Which flood risk zone(s) does the site lie in?	Zone 1; 2 and/or 3 / potential for development to avoid high risk zones
Does the site lie within surface water or ground water flooding zones?	1 in 30 / 1 in 100 / 1 in 1000 / potential for development to avoid high risk zones
<b>Pollution</b>	
Which aircraft noise contour does the site lie within?	Beyond 54 / between 54-57 / within 57 dB(A)leg
Is the site within the AQMA or area otherwise identified as of poor air quality?	Yes / no / partial
Is the site located such that traffic to/from the site could drive through the AQMA?	Yes / no
Which ground water source protection zone does the site lie within?	Zone 1 / 2 / 3
Minerals Safeguarding Areas (MSA) Is site 5ha or more and within MSA for sand and gravel or Is site 3ha or more and within MSA for chalk or is site within MSA for brick earth or brick clay?	Within MSA for Sand & Gravel / Chalk / Brick earth or Brick clay
Does the site lie within the Waste Consultation Area?	Yes / no / partial
<b>Natural environment</b>	
Proximity of SSSIs (including Impact Risk Zones (IRZ))	Within / adjacent / beyond
Proximity of NNRs	Within / <100 / 100-500m / 500-1000m / >1000m
Proximity of Local Wildlife Site(s)	Within / <100 / 100-500m / 500-1000m / >1000m
Proximity of Ancient Woodland(s)	Within / <100 / 100-500m / 500-1000m / >1000m

<b>Site Criteria</b>	<b>Guide to Range of answers</b>
Proximity to Local Geological Site(s)	Within / <100 / 100-500m / 500-1000m / >1000m
Proximity to National Trails and public rights of way networks	Traverse site / along site boundary / <100m / over 100m
Will the site be located in an area noted for its high sensitivity to change (from Uttlesford Landscape Character Assessment)?	Name of Landscape character Area; High / moderate to high / moderate / low to moderate sensitivity to change
Does site lie within area noted in the Historic Settlement Character Assessment?	Brief description of assessment
Are there any Tree Preservation Orders (TPOs) on the site?	Yes / No
What is the agricultural land value of the site	2 / 3 / 4 / non-agricultural / urban
<b>Historic Environment</b>	
Distance from scheduled ancient monument	<100 / 100-500m / 500-1000m / >1000m
Distance from Listed Building	Within site / <100 / 100-500m / 500-1000m / >1000m
Distance from Conservation Area	Within / <100 / 100-500m / 500-1000m / >1000m
Distance from Registered Park and Garden	Name Park or Garden Within / <100 / 100-500m / 500-1000m / >1000m
Distance from Historic Park or Garden identified by Uttlesford DC	Name Park or Garden Within / <100 / 100-500m / 500-1000m / >1000m
Will a new site access be created on to a protected lane?	Yes / No
<b>Accessibility</b>	
Is the site within 800 metres walking and cycling distance of an existing public transport node?	Yes / No. Include any comments about ease of walking eg is there a pavement or not?
Will the site be located within 800 metres of a primary school or is a new primary school being provided on site or within 800m of site?	Yes / No. Include any comments about ease of walking eg is there a pavement or not?
Is the site within 800 metres walking and cycling distance of convenience shopping or are new convenience shopping facilities being provided on site or within 800m of site?	Yes / No. Include any comments about ease of walking eg is there a pavement or not?

<b>Site Criteria</b>	<b>Guide to Range of answers</b>
Will the site be located within 800 metres walking and cycling distance of a GP surgery (NHS Primary Healthcare Facility) or are new health facilities being provided on site or within 800m of site?	Yes / No. Include any comments about ease of walking eg is there a pavement or not?
Will the site be located within 4.8km of a secondary school or is a new secondary school being provided on site or within 800m of site?	Yes / No. Include any comments about ease of walking eg is there a pavement or not?
Is there a viable route from the site to the principle or strategic road network – B roads, A roads and M11)	Yes / no. Brief description of road network
<b>Other land uses</b>	
Will there be a net loss of land designated for recreational use?	Recreational land lost and not replaced / lost and replaced with more or less / not known if to be replaced
Will there be a net loss of employment land?	Employment land lost and not replaced / lost and replaced with more or less / not known if to be replaced
Will there be a net loss of retail provision?	Retail provision lost and not replaced / lost and replaced with more or less / not known if to be replaced
If known, are any additional uses/ infrastructure (including green infrastructure) being provided on site?	List

### Appendix 3 – Site Assessment Form

<b>Reference No.</b>	<b>Site Address:</b>
<b>Current use</b>	
<b>Any use(s) to be re-provided elsewhere</b>	
<b>Total Site Area (ha)</b>	
<b>Developable Site Area (ha)</b>	
<b>No of Houses based on SLAA methodology</b>	
<b>Surrounding Land uses</b>	North - East - South - West -
<b>Source of Site</b>	
<b>Area of Search</b>	

#### Site Location Plan

UDC © Crown Copyright and database rights 2014 Ordnance Survey 0100018688



Potential uses	Details (no. of houses proposed, employment floorspace m2 etc)
Market Housing	
Affordable Housing	
Self-Build / Custom Build	
Housing for older people (use class C3)	
Residential care home, nursing home (use class C2)	
Gypsy or Traveller pitch	
Employment (use class B1)	
Employment (use class B2)	
Employment (use class B8)	
Employment (use class other)	

Site Criteria	
<b>Policy Constraint</b>	
Is the site greenfield or brownfield?	
Is the site within, adjoining or beyond the Adopted Development Limits?	
Is the site located within the Greenbelt?	
Is the site located within the Countryside Protection Zone (CPZ)?	
Is the site within a Public Safety Zone?	
<b>Flooding</b>	
Which flood risk zone(s) does the site lie in?	
Does the site lie within surface water or ground water flooding zones?	
<b>Pollution</b>	
Which aircraft noise contour does the site lie within?	
Is the site within the AQMA or area otherwise identified as of poor air quality?	
Is the site located such that traffic to/from the site could drive through the AQMA?	
Which ground water source protection zone does the site lie within?	
Minerals Safeguarding Areas (MSA) Is site 5ha or more and within MSA for sand and gravel or Is site 3ha or more and within MSA for chalk or is site within MSA for brick earth or brick clay?	
Does the site lie within the Waste Consultation Area?	
<b>Natural environment</b>	
Proximity of SSSIs (including Impact Risk Zones (IRZ))	
Proximity of NNRs	
Proximity of Local Wildlife Site(s)	
Proximity of Ancient Woodland(s)	
Proximity to Local Geological Site(s)	
Proximity to National Trails and public rights of way networks	
Will the site be located in an area noted for its high sensitivity to change (from Uttlesford Landscape Character Assessment)?	

<b>Site Criteria</b>	
Does site lie within area noted in the Historic Settlement Character Assessment?	
Are there any Tree Preservation Orders (TPOs) on the site?	
What is the agricultural land value of the site	
<b>Historic Environment</b>	
Distance from scheduled ancient monument	
Distance from Listed Building	
Distance from Conservation Area	
Distance from Registered Park and Garden	
Distance from Historic Park or Garden identified by Uttlesford DC	
Will a new site access be created on to a protected lane?	
<b>Accessibility</b>	
Is the site within 800 metres walking and cycling distance of an existing public transport node?	
Will the site be located within 800 metres of a primary school or is a new primary school being provided on site or within 800m of site?	
Is the site within 800 metres walking and cycling distance of convenience shopping or are new convenience shopping facilities being provided on site or within 800m of site?	
Will the site be located within 800 metres walking and cycling distance of a GP surgery (NHS Primary Healthcare Facility) or are new health facilities being provided on site or within 800m of site?	
Will the site be located within 4.8km of a secondary school or is a new secondary school being provided on site or within 800m of site?	
Is there a viable route from the site to the principle or strategic road network – B roads, A roads and M11)	
<b>Other land uses</b>	
Will there be a net loss of land designated for recreational use?	
Will there be a net loss of employment land?	

Site Criteria	
Will there be a net loss of retail provision?	
If known, are any additional uses/ infrastructure (including green infrastructure) being provided on site?	

Suitability Conclusions

Assessment of Achievability	
What is the market strength of the locality? What is the attractiveness of the locality and potential market demand?	
Are there any constraints for example flooding, noise, physical features which need to be overcome and where cost of mitigation measures may prejudice viability?	
Are there any site preparation costs associated with, for example, topography, contamination or existing buildings or uses which may prejudice viability?	
Are there any specific infrastructure requirements which need to be provided which may prejudice viability?	

Achievability Conclusions

What additional evidence has been submitted?	
Flood Risk:	
Contamination	
Viability	
Transport	

Assessment of Availability	
Ownership	
Sole owner	
Multiple owners	
Availability confirmed by owner(s)	
Legal or ownership issues	
Availability	
Before end of March 2017	
Within a period of 1-5 years ie 2017 - 2022	

Within a period of 5 – 10 years ie 2022 - 2027	
Within a period of 10-15 years ie 2027 – 2033	
After 15 years ie after 2033	
	number of dwellings or floorspace
Before the end of March 2017	
Between April 2017 and March 2018	
Between April 2018 and March 2019	
Between April 2019 and March 2020	
Between April 2020 and March 2021	
After March 2021	
Number of years to develop the site?	
Average annual completion rate for the development (i.e. dwellings or floorspace constructed per year).	

<b>Availability Conclusions</b>

<b>Conclusions 2015</b>

<b>Deliverability Assessment</b>								
Reference	Suitable Y/N/?	Achievable Y/N/?	Available Y/N/?	Deliverable Capacity Prior to year 1	Deliverable Capacity Years 1-5	Developable Capacity Years 5-10	Developable Capacity years 10-15	Capacity not currently developable

**Committee: Planning Policy Working Group**

**Agenda Item**

**Date: 16 December 2015**

**6**

**Title: Local Plan Issues and Options  
Consultation update**

**Author: Hannah Hayden Planning Officer**

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### **Summary**

1. The Local Plan Issues and Options consultation started on Thursday 22<sup>nd</sup> October and closed on Friday 4<sup>th</sup> December 2015.
2. The attached report gives a brief update on the number of responses received.

### **Recommendations**

3. To note the update report.

### **Financial Implications**

4. None

### **Background Papers**

5. None

### **Impact**

- 6.

Communication/Consultation	Consultation of the document is being undertaken by ECC
Community Safety	N/A
Equalities	N/A
Health and Safety	N/A
Human Rights/Legal Implications	N/A
Sustainability	A sustainability appraisal accompanies the Local Plan
Ward-specific impacts	All
Workforce/Workplace	N/A

## Situation

7. At the start of the Issues and Options consultation letters and emails were sent to everyone who is registered on the Council's consultation database. Parish and Town Councils were sent hard copies of the document and comment forms and were asked to display posters. The document was available at the libraries, information centres and on the Council's website. Comments could have been made on-line, via the comments form, letter or email.
8. As of Monday 7<sup>th</sup> December (am) 2,355 comments have been processed on the Council's consultation portal, from 286 consultees.
9. There are a number of representations still to be processed and made live, these consist of roughly 400 emails and 25 letters. Once all of the comments have been inputted onto the consultation portal officers will prepare a report of representations and report it to the Local Plan Working Group early next year.

## Risk Analysis

10.

Risk	Likelihood	Impact	Mitigating actions
The Council submits an unsound Plan is the consultation process has not been carried out in accordance with the regulations and the SCI	1. The SCI and the regulations have been followed	3. If the Plan is found unsound this will cause delay and uncertainty	Ensure that comments are carried out in accordance with the regulations and SCI. Ensure that members are involved through the process and plan preparation.

1 = Little or no risk or impact

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

3 = Significant risk or impact – action required

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

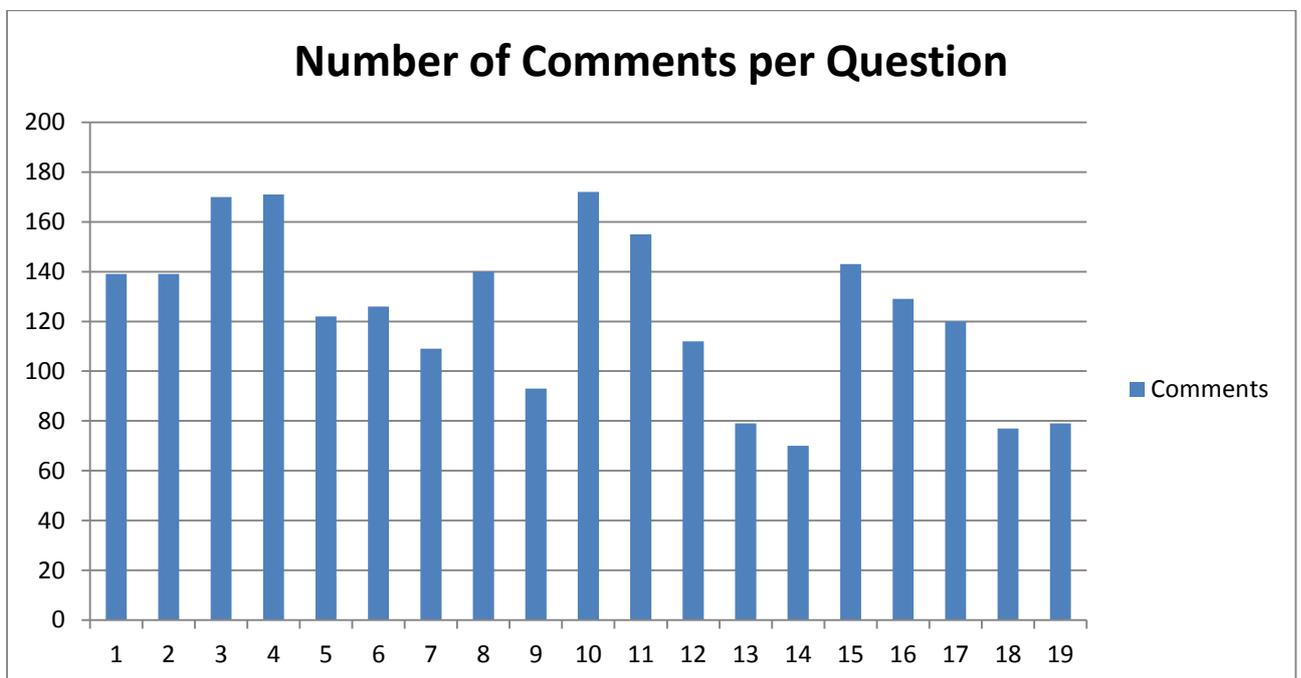
# LOCAL PLAN ISSUES AND OPTIONS CONSULTATION

## UPDATE

As of Monday 7<sup>th</sup> December (am) 2015 2,355 comments have been processed on the Council's consultation portal, from 286 consultees.

There are roughly 400 emails and 25 letters which still need to be processed and made live on the consultation portal.

The chart below shows the number of responses processed and made live so far against the questions in the consultation document.

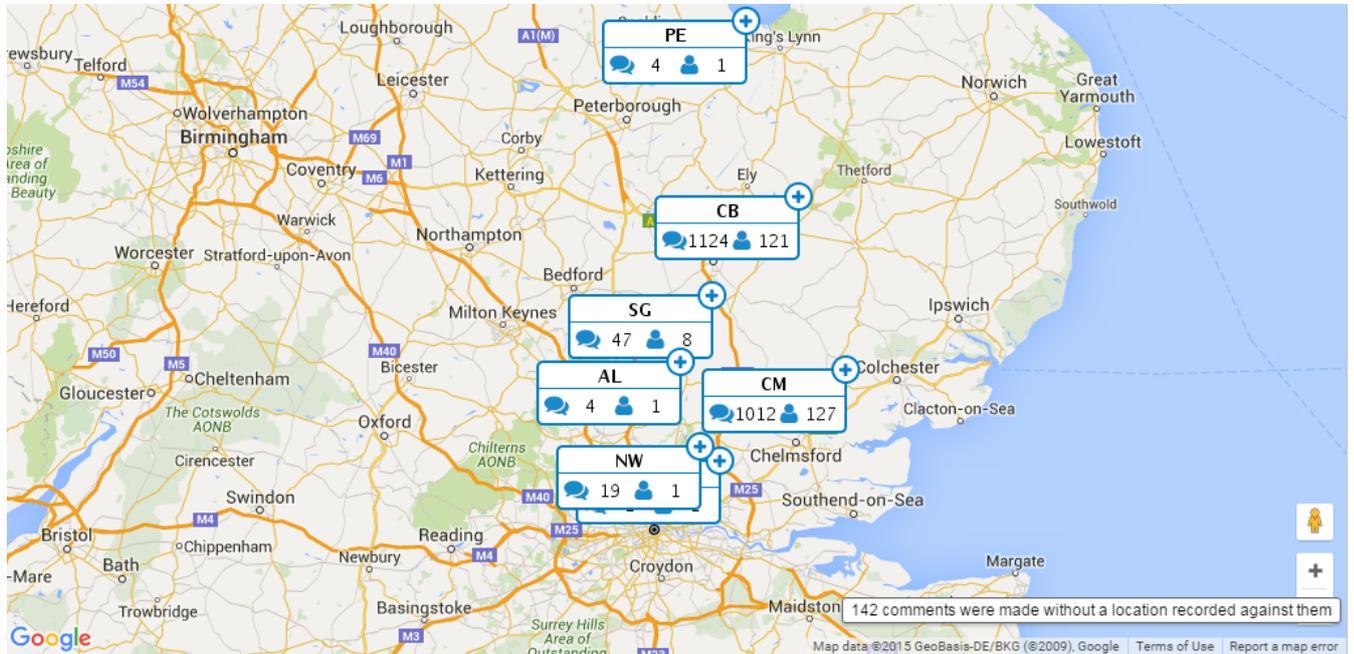


### Town and Parish Councils

We have noted receipt of the following Town/Parish Councils responses (other Town and Parish Councils may have responded but their emails/letters are pending)

- Arkesden Parish Council
- Elmdon and Wendens Loft Parish Council
- Felsted Parish Council
- Great Easton and Tilty Parish Council
- Great Hallingbury Parish Council
- Great Dunmow Town Council
- Great Chesterford Parish Council
- Henham, Elsenham, Ugley and Widdington joint Parish Councils response
- Ickleton Parish Council
- Little Hallingbury Parish Council
- Little Chesterford Parish Council
- Newport Parish Council
- Saffron Walden Town Council
- Stebbing Parish Council
- Wendens Ambo Parish Council

## Comments by Postcode:



WC (London) Postcode – 1 comment

CW (Crewe) Postcode – 1 comment

BH (Bournemouth) Postcode – 1 comment

### Next Steps

A report of representations will be written and reported to the Local Plan Working Group early next year.

**Committee:** Planning Policy Working Group

**Agenda Item**

**Date:** 16 December 2016

**7**

**Title:** Evidence Base Review and Work Programme

**Author:** Richard Fox, Planning Policy Team Leader

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### Summary

1. This report sets out the current status of various studies which will underpin the evidence base for the Local Plan.

### Recommendations

2. To note the officer update.

### Financial Implications

3. All commissioned reports can be met from the Planning Policy budget and if necessary from the Planning Reserve.

### Background Papers

4. None

### Impact

- 5.

Communication/Consultation	No formal consultation on this document although it is available as part of the committee papers.
Community Safety	N/A
Equalities	N/A
Health and Safety	N/A
Human Rights/Legal Implications	N/A
Sustainability	N/A
Ward-specific impacts	All
Workforce/Workplace	N/A

## **Situation**

6. This report outlines progression on the various reports and studies which were summarised at the Working Group Meeting of 26 November. It also sets out the main findings of the Commercial Workspace Review.

## **Strategic Flood Risk Assessment**

7. The Council has appointed JBA consulting to undertake a Level 1 Strategic Flood Risk Assessment (SFRA) refresh of their original study of 2008. The study will reflect changes in policy and legislation, bring the planning context and flood risk information up to date and aid the development of the Local Plan. It will also provide specific flood risk information and advice for each of the areas of search under consideration in the Issues and Options Paper
8. A draft report has been received and a meeting held with the consultants, the Environment Agency and Essex County Council, as lead Local Flood Authority, to comment upon it. It is anticipated that a final version of the report will be received by the end of this month. Its findings will be presented to the next meeting of this Group.

## **Green Belt Review**

9. Arup have been appointed to carry out this work. The review is subject to a separate item on this agenda.

## **Transport Assessment**

10. An inception meeting has been held with the consultants WYG to agree the parameters of the study.

## **Employment Land Review**

11. AECOM have been appointed to undertake the Employment Land Review.

## **Commercial Workspace Study**

12. The Commercial Workspace Study was commissioned to provide insight into the supply and demand for commercial workspace in Uttlesford from 2015 to 2020. The objectives of the study were to Identify the existing and potential demand in commercial workspace from Uttlesford based businesses; sectors that the District could attract and; to Identify any existing and forecast gaps in the supply of commercial workspace.

### **Key study findings**

13. The study has found that employment stock in Uttlesford is generally of a small to medium scale and tightly held. There is very limited workplace stock currently being marketed, with a particular shortage of industrial space. The local economy is characterised by small to medium enterprises servicing the needs of the local market.
14. The consultation with the local commercial agents corroborated the findings of a tight commercial market. Agents were generally of the view that further stock

in Uttlesford is required to meet market demands and that growth was being constrained due to a lack of supply. The industrial markets in Saffron Walden and Great Dunmow were considered particularly tight.

15. Surveying the local businesses found those businesses that did express a desire to relocate had reported difficulties in finding adequate premises.
16. There are some significant projects that have been approved in Uttlesford, including TriSail Towers, Ashdon Road Commercial Centre and Mantle Estates at Great Dunmow, which if developed would increase choice and capacity in the market.

#### Recommendations

17. Drawing upon and updating the analysis of the Employment Land Review (2011), this study has found that the most pressing concern with regards to further workspace coming available over the next 5 years is not the lack of supply of employment land but rather the delivery of approved employment projects in a timely manner.
18. Further stock is likely to be required that would become available to the market in the medium term to meet further needs of these district.
19. It is recommended that Council continues with the policy outlined in the Draft Local Plan with regard to the restrictions upon non-aviation uses on Stansted Airport Land. That is, the North Side commercial area should have the restrictions relaxed to enable a wider range of regional operators to locate close to the airport, but the restrictions remain in place elsewhere on airport land.
20. It is not recommended that further dedicated research space be developed outside of the Chesterford Research Park site. It is considered that this site is well positioned for such operators wishing to locate to Uttlesford and that there is sufficient capacity in this location to cater for future needs for the foreseeable future.
21. Start-up space is recommended for Saffron Walden and Stansted Mountfitchet.

#### Review of the Countryside Protection Zone

22. The Council is preparing to commission a review of the current Countryside Protection Zone. The policy has been in existence for some time and it is opportune to review the boundaries of the Zone to ensure that they are robust and still fit for the intended purpose.

Risk	Likelihood	Impact	Mitigating actions
That the Council prepares an unsound plan	1 – The Council is preparing a Plan which is	2 – The adoption of the Plan is delayed whilst	That the Council ensures that the Plan meets the requirements of the

	positively prepared; justified; effective and consistent with national policy	additional work is undertaken.	NPPF and is justified by evidence.
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1 = Little or no risk or impact

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

3 = Significant risk or impact – action required

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

**Committee: Planning Policy Working Group**

**Agenda Item**

**Date: 16 December 2015**

**8**

**Title: Duty to Cooperate**

**Author: Andrew Taylor, Assistant Director Planning and Building Control**

### **Summary**

1. This report updates members on the Duty to Cooperate work.

### **Recommendations**

2. To note the report.

### **Financial Implications**

3. None

### **Background Papers**

4. None

### **Impact**

- 5.

Communication/Consultation	Communication and consultation form the bedrock of cooperating. This paper is published on the website.
Community Safety	The Duty to Cooperate will include all factors.
Equalities	The Duty to Cooperate will include all factors.
Health and Safety	The Duty to Cooperate will include all factors.
Human Rights/Legal Implications	The Duty to Cooperate will include all factors. Failure to comply would result in the Local Plan being found unsound.
Sustainability	The Duty to Cooperate will include all factors.
Ward-specific impacts	Affects all wards equally.
Workforce/Workplace	This will involve Councillors, officers from the Planning Policy Team and others as necessary.

### **Situation**

6. This report seeks to update members on the Duty to Cooperate which forms part of Section 110 of the Localism Act 2011. The Duty requires local planning authorities, public bodies and others to engage constructively, actively and on an ongoing basis in relation to the planning of sustainable development.

## Update

7. The Coop Officers Group met on 16 October 2015. The notes are attached at **Appendix 1**. Board met on 4 December 2015 and discussed the recent LSCC Visioning Workshop (see below), Crossrail 2, Enfield ENGAP baseline study and highways update and transport modelling. The minutes of the previous meeting of 26 October 2015 were approved and are attached as **Appendix 2**. Officers also meet regularly and recently met on 26 November and discussed a protocol for meeting and working with developers, implications of the recent changes to Gypsy and Traveller definitions and the need for further evidence, joint response to the Crossrail consultation, LSCC workshop on 2 December and post SHMA work to ensure needs are being delivered.
8. The Council has continued to actively engage as part of the **Strategic Spatial Planning Officer Liaison Group** (SSPOLG) and attended the recent meeting on 30 December 2015. This meeting discussed in detail the forthcoming Wider South East Councillors meeting on 11 December 2015. This meeting will receive presentations and proposals from East of England, South East and Greater London and determine the structure for future discussions.
9. The Council continues to participate in meetings with **Stansted Airport** and neighbouring authorities. Regular meetings are held to oversee the transport strategy, the delivery of the Sustainable Development Plan, ongoing S106 obligation monitoring and discussions regarding future development at the site.
10. Regular meetings of the **London Stansted Cambridge Consortium** Board (LSCC) have continued most recently on 27 November 2015 to continue the work of delivering cross border sustainable growth and development. Additional officer meetings are held to proceed the Board and also for specific task and finish groups. As a result of this work the Assistant Director has been appointed to the **West Anglia Taskforce – Working Group** to support the work of the Taskforce examining the West Anglia mainline. He attended the recent meeting on 1 December 2015 where the discussion focused around the economic case for four tracking and the physical challenges which would be required to be overcome. The meeting agreed a way forward to be presented to the Taskforce.
11. The Portfolio Holder and Director of Public Services attended a meeting organised by LSCC on 2 December 2015 along with representatives of Broxbourne, East Herts, Epping, Harlow, Essex County and Hertfordshire County Councils to discuss a vision for the LSCC Core Area. This was a facilitated discussion to consider the growth potential of the area, potential locations for growth and to encourage and support further joint working.
12. Officers have continued joint meetings with **South Cambridgeshire Council** most recently on 20 November 2015. This was a very helpful meeting to understand the current status of the joint South Cambridgeshire/Cambridge City Local Plan and key sites close to the border of the district such as the Wellcome Trust. Minutes of this meeting are attached as **Appendix 3**. A Councillor meeting was held on 24 November 2015 and the minutes are being finalised.

13. A recent Councillor and Officer meeting was held with **Braintree District Council** on 7 December 2015. This specifically focussed on how to deal with assessing cross border sites and future Local Plan consultations. The minutes are being finalised.

14. A number of future meetings have been arranged and are set out below. In addition further meetings will be required with surrounding Councils and other agencies as the plan progresses.

15. Agreed meeting dates:

**LSCC:**

9 March 2016

24 May 2016

13 September 2016

**Coop Board:**

18 January 2016

7 March 2016

19 April 2016

**Coop Officers Group:**

Tuesday 12 January 2016

Thursday 11 February 2016

Monday 21 March 2016

**Conclusion**

16. Work with other Councils and organisations continues as part of the integrated work of the Planning Policy Team. As part of the development of the revised plan there are some important Duty to Cooperate meetings to be held and decision to be made. Councillors will be aware that some of these decisions will be difficult and involve a significant amount of discussion and negotiation before an outcome can be secured.

**Risk Analysis**

Risk	Likelihood	Impact	Mitigating actions
Failure to comply with and demonstrate the Duty to Cooperate	2 – Some Council's have been found lacking in this Duty by Inspectors. Therefore need to ensure that we capture as many groups, issues and outcomes as possible to present a full picture of our work.	3 – Will result in the Local Plan being found unsound. Significant impact on planning policy and planning applications.	Cooperate closely with current organisations and continue to do this through the plan making process. Identify any gaps in cooperation and work closely with those bodies to rectify situation.

1 = Little or no risk or impact

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

3 = Significant risk or impact – action required

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

# Appendix 1

## Co-operation for Sustainable Development (Officers') Group - note

Friday 16 October 2015 - Epping Forest District Council

### Attendance

▪ Broxbourne BC	▪ Douglas Cooper, Amy Tempest
▪ City of London ▪ (Conservators of Epping Forest)	▪ Jeremy Dagley
▪ East Herts DC	▪ Claire Sime
▪ Epping Forest DC	▪ Derek Macnab (Chair), John Houston, Amanda Thorn, Sarah King
▪ Essex CC	▪ David Sprunt, Zhanine Smith
▪ Harlow DC	▪ Paul MacBride, Graeme Bloomer
▪ Herts CC	▪ Roger Flowerday
▪ LSCC	▪ John McGill
▪ Southend BC	▪ Bob Preston
▪ Uttlesford DC	▪ Andrew Taylor, Martin Paine

### \* Actions are in bold

#### 1. Apologies

Brentwood BC, Chelmsford CC, Glen Chipp, Ken Bean & Alison Blom-Cooper (Epping Forest DC), LB Enfield, LB Havering, LB Redbridge, LB Waltham Forest.

#### 2. Draft notes of meeting 18 September 2015 – including review of action points

The notes were agreed as circulated.

Action points from the notes were all for Sarah King, to:

- circulate agreed notes of previous meetings for others to check - done
- circulate the SHMA/Economic reports in time for the 22nd Sept. Member Board - done
- circulate Corp. of London's presentation on Epping Forest – Jeremy Dagley needs to update this before I send it but hasn't been able to yet
- invite John McGill (LSCC) to the next Co-op. officer meeting - done
- circulate the note from John McGill to everyone in the Co-op. Officer group. - done
- invoice the other 3 West Essex/East Herts authorities for Co-op. admin. support – ongoing

#### 3. Update on other cross-boundary/strategic matters:

##### a. Essex and Southend Waste Local Plan – Zhanine Smith & Bob Preston

Zhanine Smith explained that an additional site had been proposed at Newport Quarry, Newport, Uttlesford, and that this was being consulted on until 26 November 2015. The details are here -

[http://consult.essexcc.gov.uk/portal/replacement\\_waste\\_local\\_plan/rwlp\\_additional\\_site\\_consultation\\_-\\_newport\\_quarry](http://consult.essexcc.gov.uk/portal/replacement_waste_local_plan/rwlp_additional_site_consultation_-_newport_quarry). Zhanine added that Essex CC is currently

analysing responses to the Revised Preferred Approach consultation, and although the methodology was unlikely to change, the scores for particular sites might change as a result of the responses. The Pre-Submission Plan should be produced in spring 2016, then there will be a public consultation.

Bob Preston (consultant assisting Essex CC/Southend BC) explained that the recent email going out to Councils asking for information about existing employment sites etc., had been sent as the Planning Inspectorate had queried at a recent meeting why other sources of land (like PDL) had not been considered. Although it was thought unlikely that any sites would come forward in this way, Essex CC requested the data from Councils to make sure – Councils should reply to this by the end of October please. Essex CC will prepare a short topic paper on this to accompany the Waste Plan.

Amanda Thorn asked about employment land potentially being used for waste purposes – it was felt that those suggested within Epping Forest DC were in existing uses and were not appropriate for waste uses. Bob explained that there may be Districts with no areas of search within them, he knew of another District within Essex which was like that.

John McGill noted that the North London Waste Plan had run into significant problems by not adequately co-operating with neighbouring authorities. Bob Preston explained that Essex CC were well aware of this and that Alethea Evans at Essex CC had been liaising closely with North London Boroughs.

**b. Transport modelling - A414 capacity, M11 junctions 7 & 7A**

- **Junction 7/7A**

David Sprunt explained that Essex CC officers were currently running modelling for junction 7A incorporating a median growth figure for areas in and around Harlow, which is similar to that in the initial modelling run for the West Essex & East Herts work on Strategic OAN with ATLAS and AECOM. David noted that Essex CC are meeting Highways England (HE) regularly re: J7 and 7A. HE asked Essex CC to put work on J7A (currently at stage 2 to 3 of 7 stage process) on hold, in order to enable HE to catch up with work on J7 (currently at stage 0). Essex CC officers explained the importance of continuing work with J7A, and their modelling includes J7 as well so it makes sense to continue.

Graeme Bloomer raised his concern that at the Herts LEP recently, it was noted that the £50m which he thought was assigned for J7/J7A last week was actually a non-guaranteed 'tranche' of 'between £1m to £50m' and is time limited. David Sprunt explained that although money had been earmarked for J7/J7A there was no guarantee as Highways schemes are often over budget and HE has to balance all of the projects. David noted the need to lobby HE to make sure the J7 work is completed, and to put in a bid for RIS 2 in 2017 for J7A, then we can discuss with HE which project is best to contrast first. By the time the funding for RIS2 is in place, in about 2020-21, both schemes will be ready to go.

Paul MacBride noted the critical importance of improvements to J7, and the establishment of J7A to the Local Plan process for all of the relevant local authorities and that it would be essential to be able to show how they would be provided when at EiP stage. All agreed that this was of strategic importance. John McGill recommended making a strong case for the transport interventions, and advised that the authorities should lobby the Treasury and other groups, and ask the local MPs to lobby.

There was a brief discussion about how Public Health England jobs being moved to Harlow could affect the transport modelling. It was noted that the site the old GlaxoSmithKline site, was PDL and as some transport movements occurred from that site in the recent past, it isn't all a 'gross' gain. David

Sprunt noted that the model included an allowance of about 1,000 extra jobs for the Public Health England move at present, as there was very little data to go on. This of course could be amended when more details are known.

- **A414 capacity**

Claire Sime referred to the report which East Herts officers were taking to their Members on 22 October 2015 re: A414 capacity issues. The report, plus other correspondence between East Herts and Herts CC, has been shared with West Essex/East Herts authorities and East Herts' site promoters already. The East Herts report does not reach any conclusion at this stage but will make the issue public, and it has already raised some concerns among site promoters. Claire will report back on East Herts Members' comments at the next Co-op. officer group. There are discussions ongoing with both Herts & Essex County Councils, Claire would like to agree a clear programme of work that matches the Herts CC 'COMET' transport model and vision timetable in order to move forward. Roger Flowerday noted that the county-wide COMET model was on track for completion in 2016 and will enable a better understanding of wider impacts on the A414 particularly though Hertford.

**Sarah King to add transport matters to agenda for next Co-op. Member Board.**

- c. **Strategic OAN options work around Harlow**

David Sprunt noted that the outputs from the initial modelling run were expected around mid-November. It was agreed that **Sarah King would look for a date in late-ish November for the next Strategic OAN meeting (now arranged for 26 November 2015).**

- d. **Green Belt Reviews (all)**

- Epping Forest DC – has appointed LUC, has had the inception meeting and the project is on track for completion by the end of February next year
- Harlow DC – an in-house GBR study is underway, Council officers will liaise with Epping Forest DC to ensure ongoing engagement
- Uttlesford DC – expecting to appoint a consultant soon. The tender (as shared) has a similar methodology to those of Epping Forest DC/Harlow DC/East Herts DC
- East Herts DC – GBR is complete and within evidence base
- Broxbourne BC – an in-house GBR has been drafted and will be shared shortly

- e. **London Stansted Cambridge Corridor – Growth Commission (John McGill)**

John McGill explained that the LSCC had been in existence for about 3 years, it engages with a broad range of organisations and people in the private sector, and can help make the case for strategic road infrastructure. John noted that this required a strong evidence base.

The LSCC set up the growth commission as a group of independent people with a reputation in their area, to help promote growth, to form a coherent proposition for the corridor. The commission would like to work on a vision for the corridor for the next 20-30 years to guide growth. Details on the commission and its aims and mission are available in a paper which **John will provide to Sarah King to circulate.**

The commission will hold 4 'hearings' to gather evidence (see details on John McGill's paper). The hearings will be open to the public (but not publicly

advertised) and of course open to Leaders, Chief Executives, officers, LEPs etc. The commission will then produce an interim report in March 2016 with the final report being launched in June 2016. Then the LSCC consortium will consider the report and its recommendations (which are likely to be 3 to 4 large scale collaborative projects such as 4 tracking of the West Anglia Main Line – one of these could be growth in 'LSCC Central' (i.e. the greater West Essex/East Herts area).

John McGill also noted 2 taskforces which the Co-op. group should be aware of:

- The West Anglia taskforce – which comprises County & Borough Leaders, Stansted representatives etc. and is making the case for the 4 tracking of the West Anglia Main Line, and other projects in future. It will report next year and it is hoped that the recommendations will feed into the rail industry planning process (4 tracking is likely to cost £2-4bn so it will have to appeal to the wider government as well). It is suggested that the 4 tracking would start in 2022-3 with completion by 2025
- The Crossrail 2 commission – which is gathering an economic case for Crossrail 2, looking at funding options etc. This commission will be engaging with Broxbourne, Harlow etc. (as Crossrail 2 would require 4 tracking across the Lea Valley rail line). It is suggested that Crossrail 2 building would start in mid 2020s, with completion by 2030. John noted that the autumn statement announcements would be key to all for this.

**f. Feedback from Lee Valley Food Taskforce workshop 13 October 2015**

John Houston explained that there had been a good turnout to the workshop from local authorities in Essex/Herts/London boroughs. It was chaired by the Lea Valley Trust, and considered how to create a joined up plan for growth in the glasshouse industry, looking at what the barriers are, what policies could be agreed across the board etc. The workshop attendees will meet again in about 4 weeks after having discussions in their own authorities.

**g. Broxbourne Local Plan**

Douglas Cooper introduced the Broxbourne BC Duty to Co-operate document (as shared in hard copy with the group). It would be considered by Broxbourne's Cabinet next Tuesday (20 October 2015) and would be formally shared electronically after that, and officers will make arrangements to meet other authorities through the Duty to Cooperate.

The document explained the direction of travel for Broxbourne, including scale of housing – Broxbourne intend to plan for 6,000 dwellings up to 2031; the updated OAHN to 2014 base date is circa 7,000 dwellings. Douglas explained that Broxbourne BC does not plan to meet its OAHN within its boundaries and will be speaking to neighbouring authorities about this. Providing 6,000 dwellings will mean releasing circa 11% of the current Green Belt (combined with an urban capacity of circa 2,700), and it is felt that no more GBR should be released. Lots of Broxbourne Borough is also within the Lea Valley Regional Park.

Douglas noted that Broxbourne welcomed input into their Local Plan process from the Co-op. group, and that they would be having dialogue on an individual basis with partners probably in November. Derek Macnab noted that from Epping Forest DC's perspective individual discussions were fine but the Co-op. group would likely want to bring those conversations together to take a holistic view.

Douglas Cooper to present to the next Co-op. Member Board on Broxbourne BC's Duty to Co-operate document.

**4. Draft notes from Co-op. Member Board 22 September 2015**

Sarah King shared paper copies of the draft note which she would then circulate electronically.

**5. Member Co-op. Board on 26 October 2015**

There was some discussion as to whether there were any items to go to this meeting. However several were identified, so it was decided that the Member Board on 26 October 2015 would go ahead, and the agenda would include the following items –

- LSCC – growth commission/future workshop (John McGill)
- Highways update/Highways England's approach to funding junction 7/7A (David Sprunt)
- West Essex/East Herts growth & Strategic Options work around Harlow – how to approach apportionment discussions (Paul MacBride & Alison Blom-Cooper)
- Uttlesford DC's Issues & Options consultation (Andrew Taylor)
- Broxbourne BC Duty to Co-operate document (Douglas Cooper)

**6. A.O.B**

- Notes of Co-op. Officer and Member Board meetings – It was agreed that the notes from both meetings would be placed on Epping Forest DC's website. Sarah King reminded **all attendees to check the final notes sent out recently before they are published.**

**7. Future Co-op. Officer meeting dates (as previously arranged):**

- Thursday 26 November (2:30pm, Epping Forest DC)
- Tuesday 12 January 2016 (2:30pm, Epping Forest DC)
- Thursday 11 February 2016 (10.30am, Epping Forest DC)
- Monday 21 March 2016 (2:30pm, Epping Forest DC)

## Appendix 2

### Co-operation for Sustainable Development Member Board 26 October 2015 - Civic Centre, Harlow

#### Attendance

##### Members

▪ Broxbourne BC	▪ Cllr Jim Metcalfe
▪ East Herts DC	▪ Cllr Gary Jones, Cllr Linda Haysey
▪ Epping Forest DC	▪ Cllr John Philip (Chair)
▪ Essex CC	▪ Cllr Kay Twitchen
▪ Harlow DC	▪ Cllr Tony Durcan, Cllr Jon Clempner
▪ Uttlesford DC	▪ Cllr Susan Barker
▪ Redbridge	▪ Cllr Helen Coomb

##### Officers/others

▪ East Herts DC	▪ Kevin Steptoe
▪ Epping Forest DC	▪ Alison Blom-Cooper
▪ Essex CC	▪ Zhanine Smith, David Sprunt
▪ Harlow DC	▪ Paul MacBride, Vicky Forgione
▪ Herts CC	▪ Paul Donovan
▪ Uttlesford DC	▪ Andrew Taylor
▪ LSCC	▪ John McGill
▪ Broxbourne BC	▪ Douglas Cooper

#### 8. Apologies

- Epping Forest DC – Cllr Whitbread, Cllr Bassett
- Brentwood BC - Cllr William Trump
- Herts CC - Cllr Ashley

#### 9. Draft notes of meeting of 22 September 2015 – including review of action points

- Notes were agreed.

##### Matters arising:

- None

#### 10. London Stansted Cambridge Consortium – growth commission/future workshop

- **Growth Commission**

A short briefing note was circulated by John McGill. A Growth Commission has been established – this consists of a group of independent minded people to look at the corridor between London, Stansted, Cambridge and Peterborough to consider whether there is economic growth potential. Evidence gathering and hearings will be held by the

Commission this year and early next and will be open to the public although not publicly advertised. Report to be launched at conference next June.

- **LSCC Central** (Harlow, Epping Forest, East Herts and Uttlesford Districts)

Proposal to hold a workshop to look at the vision for this part of the area for Leaders and Chief Executives – date now set for 2 December 2015 – aim is to get senior officers, members and LEPs to look at the vision and the potential infrastructure needs for the area to deliver any growth

- Other work ongoing through the West Anglia Task Force, Crossrail 2 Task Force and Outer London Commission – although focus on rail also looking at road case.
- Broxbourne questioned why they were not part of the workshop – John explained that this was because they were not part of the core SHMA area
- East Herts expressed concern that any work undertaken as part of the LSCC should not affect their timescale for preparation of the Local Plan and also officers should not be deflected from the main task of preparing the plan

■

## 11. Highways update/Highways England's approach to funding for junction 7/7a

- David Sprunt reported that there had been some progress – had further discussions with Highways England re the £50million allocation. It is now clear that this is for Junction 7. Highways England now have a 5 year plan (RIS1) and have only just started looking at improvement works at Junction 7 and currently at Stage 0 so somewhat behind where Essex CC are with proposals for junction 7a which is at Stage 2/ 3. Essex CC have made the case to Highways England that they should continue to progress Junction 7a and there is full commitment at the County to do that. The key issue is the funding of Junction 7a – bid to SELEP is a possibility but won't allocate until we have received agreement at the planning stage – this is about a year away. Potentially we could also secure some contribution from developers. However this is likely to leave a potential funding gap which would require some forward funding. So ECC looking to Highways England for funding – would want to get in bid for November 2017 for RIS 2 funding. It was felt that there should be some form of coordinated lobbying from all the local authorities affected in order to push for funding from RIS 2. Essex CC happy to lead this.
- Not clear what capacity improvements to Junction 7 will give in terms of future growth prior to bringing Junction 7a on stream. Uttlesford wanted Junction 8 to be included in the discussion. Essex CC have concerns around whether it would be better to bring 7a forward first – clear that need both improvements to J7 as well as 7a. It is not clear yet from the modelling what growth improvements to J7 alone would support. For the modelling work ECC have used the SHMA figures as a starting point for testing and made certain suppositions as to where growth could go from the evidence base. Can run further scenarios when we have completed the first run and seen the outputs.
- Officer group will meet to discuss outputs from the modelling work being undertaken to consider strategic options around Harlow (being facilitated by AECOM) towards the end of November and will then bring that back to the next meeting of the Board.
- ***The Board agreed that there should be a coordinated sign up to the same message from the Board and others and important that the £50 million funding from RIS 1 is used to best effect.*** To be looked at further at a future meeting

## 12. West Essex/East Herts growth and Strategic Options work around Harlow

- Officers are continuing to work together and with ATLAS to consider and test various options around Harlow for growth. The Board had previously discussed and agreed the appointment of a strategic sites co-ordinator via funding from DCLG at its meeting on 3 June 2015. This has now been advertised and the closing date is Friday 30 October. It is hoped that there will be sufficient interest in order to make an appointment, but otherwise alternatives will need to be sort.

- East Herts DC are proposing to take options to members in Spring 2016 based on evidence collected and wouldn't want this work to hold up the process.

### **13. Uttlesford DC's Issues and Options consultation**

- Uttlesford are currently consulting on their issues and options with comments invited by 4 December 2015. The consultation sets 19 questions around issues and options and focuses on areas of search/scenarios – policy off in terms of approach. There are 9 scenarios; testing at SHMA levels and 750 per year. – some have come forward through call to sites and others not.
- Green Belt review – submissions received today for this work and consultants to be appointed
- Highways consultant and Employment Land Reviews are also about to be commissioned.
- Two outstanding appeals have been with the Planning Inspectorate for a year – one in Dunmow and one in Elsenham with no time lines for decision.

### **14. Broxbourne BC Duty to Co-operate document**

- Douglas Cooper explained that on 20 October 2015 the Cabinet approved the framework for the future development of the Borough which shows the Council's proposed direction of travel. The Local Plan in preparation will not include DM policies, CIL or IDP which will come later. The current timetable is that the Draft Local Plan is due to go to Cabinet in January 2016 and then out for a Regulation 18 consultation for 2 months.
- The Council completed their SHMA in 2013 and this has since been updated to provide the current OAN – number is around 7,000. Have a draft GB review which will be completed shortly and published with draft local plan. Employment evidence is in preparation and retail evidence is now completed and on website. Transport assessment completed in draft and can share – options assessment mostly completed.
- Level of growth proposed is for 6,000 new homes and 7,500 new jobs, new shops at Brookfield and leisure, one secondary and eight primary schools. So 1,000 short in terms of homes – so want to discuss with the Co-op authorities whether or not this group of authorities can help to meet this shortfall. Urban area capacity 2,760 homes, Green Belt around 3,300 new homes and Green Belt also main area for employment allocations. Proposed to allocate 11% of current GB – can't yet share GB review. 89% GB retained.
- Number of strategic development sites included in the framework
- Consultation – revised document will be circulated this week following changes made by Cabinet and the Council propose to hold individual discussions with authorities. Need to discuss housing provision and gypsy/traveller provision through duty to cooperate discussions. Will be looking at current needs assessment to see whether it needs to be refreshed in the light of new guidance.

### **15. A.O.B.**

None

### **16. Dates of next meetings (already booked):**

- 4 December 2015 – 6.30pm Harlow DC – agreed that authorities would be consulted as to whether this date is practical and if so should the start time be brought forward.
- 18 January 2016 - 6.30pm Harlow DC
- 7 March 2016 - 6.30pm Harlow DC
- 19 April 2016 - 6.30pm Harlow DC

## Appendix 3

### South Cambs and Uttlesford meeting

**Attendance: Jo Mills, Director of Planning and New Communities and Caroline Hunt Planning Policy Manager South Cambridgeshire District Council**

Andrew Taylor, Assistant Director of Planning and Building Control and Sarah Nicholas, Senior Planning Officer Uttlesford District Council.

#### Update on South Cambs Local Plan process

- The councils have responded to the Inspectors questions by putting together a range of additional evidence including on Green Belt and transport infrastructure and consider that the new settlement approach remains the appropriate focus for additional new development.
- Expect that Full Council at end of November will agree the proposed modifications and evidence base for public consultation in early December through till late January. Expect to then go back to members in March 2016 with results of consultation. Expect to submit to Inspector i late March 2016. No formal programme from Inspector for the next stage as yet.
- Expecting adoption in 2017. Need to go through examination process again to review the new evidence.

#### Update on Uttlesford Local Plan process

- Currently out to Issues and Options consultation which runs to 4 December 2015. Will then release Call for Sites submissions on website. Plan to publish Council comments on Call for Sites and also the Report of Reps at end of January 2016.
- Planning for a sieving/staging document next April/May time leading to a draft Local Plan in Autumn 2016 for formal consultation.
- Need to ensure any published evidence base is considered in detail to assess the relationship with the South Cambs evidence base.

#### Cross border issues

- Genome Campus/Wellcome - are developing a 20 year vision for future development. Important international site. Councils need to work together to assess impacts and benefits.
- Potential need for a Transport Assessment commissioned and completed by Essex and Cambridgeshire CC to consider the development of the Wellcome Institute with their 20 yr vision together with other potential development within the area.

#### Councillor meeting:

- Update on Local Plans and timescale.
- Highway Assessment - joint cross border working.
- Employment Land study - interrelationship of various science parks in this area.
- Future joint working and consultation.



