



# Uttlesford District Council

Chief Executive: Dawn French

## Planning Policy Working Group

**Date:** Tuesday, 12 July 2016  
**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 for absence and declarations of interest.
  
- 2 Local Plan Development Strategy** 3 - 24  
To considered the Development Strategy for the Local Plan

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**Committee: Planning Policy Working Group**

**Agenda Item**

**Date: 12 July 2016**

**2**

**Title: Local Plan Development Strategy**

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

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### **Summary**

1. This report summarises five potential distribution strategies for the Local Plan and assesses their benefits and risks following an analysis of the evidence base. A hybrid option including a combination of development in new settlement(s), town and villages is recommended as a basis for allocations in the Plan. The report emphasises the need to prepare the Plan in a timely manner.

### **Recommendations**

2. That Planning Policy Working Group recommend to Cabinet that the preferred strategy for the Local Plan is Scenario 5 (Hybrid Distribution Strategy – New Settlement(s), Main Towns and Villages) as attached at the Appendix and that contingency is built into the Plan to allocate further homes if necessary.

### **Financial Implications**

3. The preparation of the Plan will be met from the existing planning budget. There are risks of intervention and costs if the plan is not completed on time and the potential implications of loss of New Homes Bonus if the Council does not produce a plan in timely fashion. There are also the costs of defending appeals against hostile planning applications that may be submitted there is no Plan and secure 5 year land supply in place.

### **Background Papers**

4. Inspector's Letter 19 December 2014  
Withdrawn Local Plan  
PPWG reports endorsing the evidence base

### **Impact**

- 5.

Communication/Consultation	There was extensive consultation on the Local Plan Issues and Options. Town and parish councils were consulted on the findings of the Strategic Land Availability Assessment. A summary of some responses is contained In the Appendix
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Community Safety	This is an underlying theme of the Local Plan e.g. planning out crime by design.
Equalities	The Plan will be subject of an equalities impact assessment.
Health and Safety	N/A
Human Rights/Legal Implications	The Local Plan will need to comply with planning legislation.
Sustainability	This is an underlying theme of the Local Plan e.g. ensuring homes and jobs are provided near to each other and minimising reliance on the private car
Ward-specific impacts	Some wards may be affected by site specific proposals but the overall distribution strategy for the Plan is a matter for all wards.
Workforce/Workplace	It is a Council Plan, to be contributed and owned by all staff, not just the planning policy team. The progress and approval of the plan is key to the delivery of the Council's objectives and work of all staff and because of the potential financial implications could impact on the size and shape of the workforce.

## Situation

6. The previous Local Plan was withdrawn in January 2015 following the Inspector's findings in December 2014. The principal concerns of the Inspector related to objectively assessed housing need (OAN) for the District and proposals for a major extension to the village of Elsenham. Since then the Council has undertaken an exhaustive evidence gathering exercise to underpin the preparation of the new Plan. This has included a "call for sites" during spring and summer of last year which attracted over 300 submissions and the Issues and Options consultation during late autumn which elicited approximately 7,000 responses from nearly 700 bodies. The findings of both exercises were summarised and reported to PPWG earlier this year.
7. Technical studies have been commissioned or undertaken in-house to cover the following areas:- Strategic Housing Market Assessment (SHMA), Strategic Land Availability Assessment,(SLAA), Strategic Flood Risk Assessment (SFRA), Green Belt Review, Transport, Employment Land, Retail and the Countryside Protection Zone.

8. The SHMA relates to the housing market area which covers East Herts, Epping Forest and Harlow as well as Uttlesford and sets out the overall Housing requirement between 2011- 2033. The total figure is approximately 49,000 homes of which Uttlesford's requirement is around 12,500. Taking into account completions and existing permissions means that the Council has to allocate approximately 4,600 homes in the Local Plan.
9. The SLAA is an assessment of sites for residential or employment use to determine whether they are deliverable. In making this assessment the Council will consider the "suitability", "achievability" and "availability" of a site.
10. The SFRA is a planning tool that will assist the Council in its selection and development of sustainable development sites away from vulnerable flood risk. The purpose of this SFRA is to provide an updated high level assessment and mapping of flood risk from all sources across the district.
11. The Green Belt Review and Countryside Protection Zone (CPZ) Review adopted similar methodologies by identifying specific parcels of land and then applying the purposes of the designation to those parcels. Both studies concluded that there were no fundamental changes required to the boundaries of either the green belt or CPZ.
12. Whilst most of these studies have been concluded some, notably Transport and Employment are ongoing, albeit interim findings have shaped thinking. The conclusions of this report must, therefore, be caveated as some final pieces of evidence are outstanding. The findings of those studies that have been concluded have all been endorsed at previous meetings of PPWG as underpinning the evidence base for the Plan and can be viewed on the Council's website. These studies will ensure that informed decisions are taken about the preparation of the Plan.
13. The Council adopted a revised Local Development Scheme (effectively the plan making programme) in February 2016. Given the Government pronouncements in July 2015 about potential intervention if plans were not "produced" by March 2017, the Council approved an accelerated programme for the preparation the Plan. The Council intends to "publish" the Plan in November 2016; there will be consultation on the draft Plan prior to formal submission. It is important at this juncture, therefore, that there is exposure and endorsement for the overarching strategy for the Plan; effectively it's "direction of travel". This will form the basis for the specific site allocations etc. which will be subject of the sustainability appraisal and further Member consideration and consultation later this year.
14. A key issue facing the Council is whether to consider the principle of a new settlement (or settlements) as part of the distribution strategy. A report to that effect was considered by PPWG, Cabinet and Full Council in March 2016. Council resolved "That a new settlement (or settlements) should continue to be investigated and analysed alongside all other possible options for housing and employment distribution and should not be dismissed at this stage from the potential options for inclusion in the Local Plan".

15. Whilst the content of this report has a firm focus on housing provision it must be remembered that the Local Plan aims to realise sustainable development in Uttlesford and the three economic, social and environmental themes set out in the National Planning Policy Framework (NPPF). Specifically infrastructure such as roads, schools and health provision must be delivered in a timely manner to ensure sustainable growth. Equally, the Local Plan will need to reflect the aspirations of the Co-op Board for Sustainable Development, comprising the four Strategic Housing Market Area Authorities of Epping Forest, East Herts, Harlow and Uttlesford. It is anticipated that memoranda of understanding between the authorities relating to the geographical distribution of development across the overall Strategic Housing Market Area, transport and air quality will be signed. These memoranda will be submitted as evidence that the authorities have fulfilled their legal commitment under the Duty to Co – operate.
16. The SHMA commissioned by the four authorities has recommended that Uttlesford’s objectively assessed need is 580 dwellings per annum. However, there are outstanding issues facing the Council which may impact on the site specific allocations and draft plan to follow. These are: firstly; the outcome of two outstanding planning appeals at Elsenham and Dunmow which may have an impact on the overall housing land supply and the potential location of a new settlement; and secondly: that an Inspector at Local Plan Examination accepts the robustness of the Council’s housing figures. Whilst the latter has been tested on appeal and the Council is confident about the SHMA it is recommended that it is prudent to contingency plan to ensure that the Council achieves a “sound “Plan, giving it certainty and flexibility long term. (see paragraph 16).
17. The Issues and Options consultation included seven different development scenarios for housing growth; four based on the Council’s Objectively Assessed Housing Need (OAN) of 580 dwellings per annum and three on a higher figure of 750 dwellings, to test the implications of greater growth.
18. As there was some duplication of scenarios at that stage (i.e. the two options of new settlement or settlements and a hybrid were used for the lower and higher housing figure), for the purposes of analysing the endorsed evidence base this has been simplified to five. The five scenarios are:-
  - 1) All development allocated in new settlement(s)
  - 2) All development pepper potted in villages
  - 3) All development in the two main towns (Saffron Walden and Great Dunmow)
  - 4) Combination of development in main towns and villages
  - 5) Hybrid involving new settlement(s), main towns and villages
19. The Council now needs to decide in principle the overall distribution strategy for the Plan. The Issues and Options consultation proposed seven distribution strategies which were the subject of detailed analysis by statutory consultees and town and parish councils. Officers have now considered the distribution scenarios as to how they could deliver 4,600 dwellings and this is

summarised in the Appendix attached. There was a cross-party Member workshop on 28 June which considered the overall benefits and risks of the scenarios. These are summarised as follows:

20. The Council now needs to decide in principle the overall distribution strategy for the Plan. This has been the subject of detailed analysis by officers of the Council, statutory consultees, town and parish councils, external experts etc. and is summarised in the Appendix attached. There was a cross-party Member workshop on 28 June which considered the overall benefits and risks of the scenarios. These are summarised as follows:-

### **1) All development allocated in new settlement(s)**

#### Benefits

- Comprehensively plan the provision of infrastructure
- Critical mass to provide additional infrastructure
- Reduces development pressure on the historic settlements

#### Risks

- Relying on only 1 or 2 large sites to deliver the housing
- Deliverability within the Plan period
- Deprives other settlements of sustainable growth
- Negative impact on 5 year land supply

**Conclusion - not a sound distribution strategy.**

### **2) All development pepper potted in villages**

#### Benefits

- Sustains village vitality

#### Risks

- Scale of development is likely to have a detrimental impact on their character, the countryside and the highway network in many circumstances
- uncertainty that the scale of individual developments would provide the infrastructure required - Infrastructure deficit

**Conclusion - not a sound distribution strategy**

### **3) All development in the two main towns (Saffron Walden and Great Dunmow)**

#### Benefits

- Generally sustainable locations for development
- Supports existing services and facilities
- Help improve infrastructure deficit

Risks

- Significant impact on their historic character and landscape setting
- Restriction of the pooling of S106 for infrastructure.
- Insufficient deliverable sites

**Conclusion - not a sound distribution strategy.**

**4) Combination of development in main towns and villages**

Benefits

- Towns are generally sustainable locations for development,
- Sustains village vitality and diversity

Risks

- Some villages are more constrained than others – could result in disproportionate growth
- Uncertainty that the scale of individual developments would provide the infrastructure required - Infrastructure deficit

**Conclusion – potentially a sound option but not recommended**

**5) Hybrid involving new settlement(s), main towns and villages**

Benefits

- Towns are generally sustainable locations for development,
- Provides an opportunity for some growth to sustain village vitality in the most sustainable locations
- New settlements allows us to provide for the highest level of infrastructure demands and comprehensively meet development needs
- Reduces development pressure on the historic settlements
- Helps to maintain a 5 year supply of housing
- It can lessen the impact on the highway network

Risks

- Similar to scenarios 1-4 but to a lesser degree
- Loss of countryside
- Development may have detrimental impact on historic character of existing settlements

**Conclusion – Preferred distribution strategy**

21. Additional unidentified housing referred to earlier in this report can be met in a number of ways; these include future proofing by an early review of the Plan. This will not delay the Plan and is an accepted approach by the Planning

Inspectorate (PINS). There is also the potential for allocating contingency sites which can be brought forward into the Plan period if required.

22. Overall it is recommended that the hybrid distribution strategy represents the best option for a “sound” plan, being sustainable, deliverable and accommodating potential contingency growth.

23. The Council needs to move into the next stages of plan preparation. Critically, this involves the finalisation of the evidence base referred to above; sustainability appraisal of specific site allocations; and, further dialogue with the community in taking the Plan forward. PPWG are recommended to endorse the overall development strategy set out in the report at this stage as the preferred way forward for the Plan which will be considered by Cabinet and Council.

### Risk Analysis

6)

Risk	Likelihood	Impact	Mitigating actions
The Council fails to adopt a “sound” Plan	2 – Unlikely..	3 – Will result in the Local Plan being found unsound. Significant impact on planning policy and planning applications.	The Council has an adopted SHMA, undertaken a review of the evidence base, appraised the development scenarios and will undertake a sustainability appraisal of allocations. Duty to Co-operate discussions are nearing conclusion. The Council continues to monitor the outcome of other examinations, legal challenges and receives advice from critical friends.

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

### Scenario 1) new settlement(s)

#### Response from Issues and Options Consultation

##### Historic England

Positive and/or negative impacts depending on its location and how it alleviates pressure for growth in existing settlements.

##### Anglian Water Services

The implications of this scenario would be dependent upon the location of any new settlement. Therefore we are unable to comment further at this stage.

##### Essex County Council

A new settlement is considered sustainable as it enables the infrastructure necessary to support a new community to be delivered effectively

##### Highways England

There could be some advantages in a new settlement it gives the opportunity to design in sustainable transport objectives from the start rather than try to retro fit something. The difficulty always comes with trying to ensure that services and infrastructure comes on stream at the correct time to soak up the generated demand.

##### Natural England

Natural England considers that new settlements may be preferable to the over- development of existing settlements, which may place excessive strain on their infrastructure. However any new settlement needs to incorporate the full range of supporting infrastructure (including green infrastructure) and, crucially, this infrastructure must be put into place at a very early stage). Include consideration of potential increase in recreational pressures on Hatfield Forest SSSI and NNR and also the potential impacts of traffic-derived air pollution upon nearby designated sites.

##### Others (Town & Parish Councils (T & PC), developers, individuals)

- × Slow delivery / unable to deliver 5 year supply of houses
- × Vulnerable on deliverability and viability
- × Not compatible with rural character of district
- × Lack of choice in where to live
- × Deprives remainder of district from sustainable growth/ does not respond to smaller local development needs
- × Not release enough funding at early enough stages to secure the provision of educational, health and other facilities at the time necessary for new communities to function and existing communities not to see increased pressure on their services and facilities.
- ✓ Opportunities for well-planned sustainable growth/garden city design principles
- ✓ Critical mass to support comprehensive infrastructure delivery
- ✓ Avoids piecemeal development
- ✓ Minimises impact on intrinsic character of existing towns and villages.

## **Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) of Scenarios in Issues and Options consultation**

### Potential issues to overcome

- It may be likely that any mitigation or potential remedial work could hinder the assumed delivery rate of 300 dwellings per year and affect the maintenance of a 5 year housing supply throughout the plan period.
- It is likely that there would be negative impacts on the landscape associated with the growth of Greenfield land although it should be acknowledged that such issues will be inevitable under all scenarios
- Scenario 1) would likely have some negative impacts associated with sustainable and inclusive housing growth in the District, through a focus on a single settlement. The scenario would not meet the needs that exist within individual established settlements.
- This assumed delivery rate is substantially below the 580 per year endorsed by the Local Plan inspector in the examination of the withdrawn Local Plan in 2014. The target of 580 dwellings per annum would not be achievable in the latter stages of the plan period assuming extant permissions and windfall sites have been developed to meet this target prior to the new settlement being developed (from the above assumption this would be in 2023).
- There would be interim uncertainties as to the capacity of existing infrastructure in the settlement's wider location that may have to support initial phases of housing delivery.

### Summary of likely benefits

- There are likely to be minimal cumulative impacts on ecology under this scenario with the potential for them to be mitigated maximised in a single scheme
- It is likely to be the case that a focus on a new settlement would have less cumulative environmental impacts than a more dispersed distribution
- A new settlement of 10,000 homes has the ability to be built in accordance with high quality design features and 'garden settlement' principles
- The required scale would maximise the potential of wider gains in terms of serving existing communities
- The focus on a new settlement would alleviate the development pressures on the District's largely historic towns and villages
- The scale would maximise the possibility for, and viability of, the inclusion of renewable energy sources within the proposal
- The scale would reduce the likelihood of flood risk being a significant constraint, due to the possibility of developing in areas of Flood Zone 1 and / or factoring waterbodies into the design of development.
- Dependant on location to the strategic road and rail network and also the distance to existing settlements, a focus on a single new settlement would maximise the possibility of supporting sustainable transport methods to be fully integrated.
- The focus on a single new settlement and its possible scale would likely ensure that supporting open space and recreational facilities would be viable as part of the wider development. It is also possible that new healthcare facilities would be provided. This would likely offer benefits to the wider communities of surrounding existing villages.
- A focus on a new settlement will offer the largest possibility of sustainable self-contained development to be delivered
- This scenario would maximise the possibility of primary and secondary schools to be delivered on site.
- The focus on a new settlement will offer the largest possibility of sustainable self-contained development to be delivered, including the development of employment opportunities on site.

**Conclusion**

Although there are many benefits to new settlements namely the ability to comprehensively plan the provision of infrastructure and that it reduces development pressure on the historic settlements, there are concerns about relying on only 1 or 2 large sites to deliver the housing and the ability for them to provide a 5 year supply of housing. It is this latter point which leads to the conclusion that this is not a sound development strategy.

## **Scenario 2) - Villages**

### **Response from Issues and Options consultation**

#### Historic England

Implications for many of the district's historic villages, although the edge of Bishop's Stortford is less constrained in terms of heritage assets. Need to consider the possible impacts on the significance of heritage assets and their setting.

#### Anglian Water Services

Need to consider impact on Water Recycling Centres which serve villages within Anglian Water's area of responsibility.

#### Essex County Council

ECC is concerned that this scenario would promote greater volumes of traffic growth on the district's rural road network; detailed considerations needs to be given to the availability of school places at the existing primary schools, whether the scale of development is sufficient to warrant a new school, whether the development would enable children to walk or cycle to school.

The gradual encircling of development within village locations may have detrimental impact of the historic cores

#### Others (T&PC, developers, individuals)

- × Scale of increase would have detrimental impact on villages and their heritage
- × Uncertain whether scale of development would provide the necessary infrastructure in the settlements.
- × Includes less sustainable locations such as small villages and excludes more sustainable locations such as the towns.
- ✓ Early delivery of sites / 5 year supply of houses
- ✓ Sustain existing services and facilities
- ✓ Allows proportional growth of villages

### **Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) of Scenarios in Issues and Options consultation**

#### Potential issues to overcome

- The cumulative impacts of allocations in the District's villages, in addition to any extant permissions and windfall sites within them, would likely have locally significant impacts on a number of environmental sustainability objectives, including biodiversity. There is a possibility that this could also extend to the water environment in the District.
- Cumulatively, dispersal to the District's villages at the scale required could be seen to have negative impacts on green infrastructure and networks generally throughout the District
- There are likely to be Green Belt implications that may limit growth in some villages. This in turn may exacerbate issues in other villages, which would presumably have to accommodate more than proportionate growth.
- There would be a large amount of isolated and potentially cumulatively significant impacts on landscape in a number of the District's villages. It is likely that landscape constraints and coalescence issues will exist within large areas of land
- It is possible that a significantly lower proportion of previously developed land will be developed than if a proportion of growth was directed to the District's existing towns
- Development under this scenario is unlikely to respond well to the sustainable use of land, where density requirements are likely to be lower than development under other

scenarios with one or more larger allocations.

- Dispersal to the District's villages would have a strong possibility of negative impacts on numerous cultural heritage assets located in historic settlements. Conservation Areas exist in the majority of the District's Villages and numerous have Scheduled Monuments located in close proximity.
- A potential secondary impact of this scenario could be a disproportionate amount of growth dispersed to some villages with fewer constraints
- The scale of developments in each village and the focus on a larger number of small allocations would reduce the possibility for, and viability of, renewable energy sources within proposals.
- The ability to mitigate, or for proposals to be designed to factor in areas that have a risk of flooding, would be less viable than in larger scale allocations
- These settlements, aside from those that have links to the strategic rail network, currently have poor public transport services and a small amount of services and facilities in walking and cycling distance.
- It can be expected that the expected scale of development distributed to each village would not be sufficient to meet thresholds for accompanying services, facilities and infrastructure to be provided. It is also unlikely that public transport providers would extend services to more remote parts of the District.
- This dispersal would not be without a number of significant social implications, particular regarding the cohesion of existing villages and any forthcoming developments that could potentially correspond to their significant expansion
- The scenario is unlikely, as a spatial strategy, to meet future needs and requirements in the District beyond the plan period.
- There will likely be pressure on local infrastructure and schools, with a potential scenario of no single development being of the scale to meet infrastructure thresholds or ensure their viability.
- It is unlikely that any single development, or cumulative amount of growth in any one settlement under this scenario, would stimulate the need for additional schools to be provided.
- Under this scenario it would be difficult to ensure the allocation and delivery of employment development in the District strategically in reflection of existing jobs and a desire to minimise travelling distances.
- It is likely that there would exist a situation where those villages in closer proximity to existing employment opportunities would be vastly more sustainable than those that are more isolated.

#### Summary of likely benefits

- This dispersal scenario may limit the significance of any loss of the best and most versatile agricultural land in the District.
- A focus on the District's villages would offer a dispersed distribution of development. This would respond well to meeting the District's identified existing housing needs

#### **Conclusion**

The sustainability appraisal shows that there are numerous sustainability issues arising from this scenario especially the necessary scale of development required in the villages which is likely to have a detrimental impact on their character, the countryside and the highway network, with the uncertainty that the scale of individual developments would provide the infrastructure required. It is therefore concluded that this is not a sound distribution strategy.

### **Scenario 3) - Towns – Saffron Walden and Great Dunmow**

#### **Response from Issues and Options consultation**

##### Historic England

Diminish the sense of place and local distinctiveness of Saffron Walden and Great Dunmow plus impact on transport movements, although it would depend on site locations

##### Anglian Water Services

Need to consider impact on Saffron Walden and Great Dunmow Water Recycling Centres.

##### Essex County Council

In Saffron Walden this would generate sufficient demand for a new primary school. In relation to secondary schooling in Saffron Walden, in the long term this would lead to fewer pupils from outside the school's priority admissions area but in the medium term is likely to lead to the displacement of some pupils from within the priority admission area. Any children displaced from SWCHS would need to be accommodated at The Joyce Frankland Academy. In Great Dunmow this would generate sufficient demand for a new primary school. In relation to secondary schooling in Great Dunmow, if the existing school is relocated as previously proposed, work would need to be undertaken to ascertain if it could accommodate additional pupils or whether any adjustments to the school's paa could lead to another new school accommodating some of the additional pupils that would be generated by the additional housing.

##### Others (T&PC, developers, individuals)

- × Limitations of towns for edge of town growth –impact on heritage/transport
- × Already significant commitments
- × Uncertain that infrastructure can be provided to accommodate growth.
- × Not meet needs of rural areas
  
- ✓ Focus on towns as sustainable locations with access to services, facilities and infrastructure
- ✓ Early delivery of sites / 5 year supply of houses

#### **Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) of Scenarios in Issues and Options consultation**

##### Summary of potential issues to overcome

- There are a number of Local Wildlife Sites and one SSSI surrounding Great Dunmow, which may limit the suitability of extensions in certain locations.
- Regarding water quality there is the potential for negative cumulative effects arising from a number of urban extensions in the same town.
- This scenario would largely have negative landscape implications, where it can be assumed that a significant proportion of development directed to the towns would have to be accommodated through one or a number of relatively large urban extensions.
- Saffron Walden is surrounded by the best and most versatile soil in the District (Grade 2 Agricultural Land).
- Both Saffron Walden and Great Dunmow have historic cores protected as conservation areas and it is likely that there would be wider implications on character
- Specific to Saffron Walden, a significant constraint exists to the east with Audley End House and its registered historic park and garden
- It should be noted that an AQMA exists in Saffron Walden and any impacts on air quality will be magnified in this area

- Flood Risk Zones 2 and 3 are both prevalent on the edge of both towns.
- Neither town has rail links within existing development boundaries
- Significant growth would likely exacerbate transport pressures in Saffron Walden.
- The distribution of growth would not extend to meeting those needs of more rural areas.
- The distribution would be unlikely, as a spatial strategy, to meet future needs and requirements in the District beyond the plan period where further expansion of the towns should not be solely relied upon as a future strategy in line with existing constraints.
- There are likely to be concerns regarding infrastructure capacities
- Growth under this scenario would not stimulate the requirement for a new secondary school in the District
- There could be considered a discrepancy between provision in the towns and wider employment needs in the District. New employment opportunities should be well related to existing employment opportunities within the District in order for opportunities to be inclusive across a range of sectors.

#### Summary of likely benefits

- It is possible that a significantly higher proportion of previously developed land could be developed under this scenario than other options
- Development under this scenario is likely to respond well to the sustainable use of land, where density requirements are likely to be higher commensurate to urban locations
- Great Dunmow is largely surrounded by Grade 3 Agricultural Land
- It is possible that, supported by relevant infrastructure improvements, there would be less transport emissions resulting from expansion to the District's towns through accessibility to services
- Both towns have a good range of services and facilities, including frequent bus services to and from their centres
- Directing growth to the towns would correspond to the most socially inclusive scenario in that extensions to the existing settlements would benefit from the largest concentration of existing community facilities in the District commensurate to their status in the settlement hierarchy
- Expansion of the towns at the scale specified would require additional provision of open space, recreation and healthcare facilities. It is possible that the provision of such facilities would benefit the existing communities, dependant on scale and accessibility.
- A focus on the District's towns would direct growth to the centres of the largest population, responding well to identified housing needs in the District
- A focus on the District's main towns of Saffron Walden and Great Dunmow would see housing growth developed in what can be considered the District's most sustainable settlements in terms of existing infrastructure, jobs and services
- It is probable that the amount of growth in both settlements under this scenario would stimulate the need for additional primary schools to be provided
- The distribution of growth under this scenario would direct new housing to those settlements with existing secondary schools and their expansion would likely be required
- This scenario would see employment provision directed to those settlements with the highest population in the District

#### **Conclusion**

Towns with their range of services and facilities are generally sustainable locations for development, however a distribution strategy which directs all development to the District's two towns would have a significant impact on their historic character and landscape setting yet the scale of development may not deliver some key infrastructure. It is important to note that an assessment of the call for sites indicates that there are insufficient deliverable sites to support this distribution scenario. It is therefore concluded that this is not a sound distribution strategy.

## Scenario 4) - Towns and Villages

### Response from Issues and Options consultation

Historic England

Potential negative implications for the historic environment depending on location.

Anglian Water Services

Need to consider impact on Saffron Walden/Great Dunmow Water Recycling Centres and water recycling centres which serve villages within Anglian Waters area of responsibility.

Essex County Council

Concern about growth being spread throughout UDC as may not facilitate appropriate highway mitigation.

Others (T&PC, developers, individuals)

- × Harm character and integrity of market towns and villages
- × Includes less sustainable village locations
- × Unlikely to support new infrastructure

- ✓ Focus on towns as sustainable locations with access to services, facilities and infrastructure
- ✓ All take a share of the growth/lessens impacts fairest solution
- ✓ Towns and villages are sustainable locations for growth
- ✓ Less reliance/risk on just one or two sites which have potential to stall.
- ✓ Proportional growth of the villages
- ✓ Sustain existing services and facilities
- ✓ Early delivery of sites/deliver 5 year supply.

### Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) of Scenarios in Issues and Options consultation

Summary of potential issues to overcome

- The cumulative impacts of allocations under this scenario, in addition to any extant permissions and windfall sites within the District, would likely have locally significant impacts on a number of environmental sustainability objectives, including biodiversity. Cumulatively, this level of dispersal at the scale required could be seen to have negative impacts on green infrastructure and networks generally throughout the District.
- There is a possibility that this could also extend to the water environment in the District, with dispersal potentially affecting a larger number of water bodies than a reliance on fewer larger development allocations that have enhanced potential to mitigate any impacts on site
- There are a number of Local Wildlife Sites and one SSSI surrounding Great Dunmow, which may limit the suitability of extensions in certain locations.
- There are likely to be Green Belt implications that may limit growth in some villages. This in turn may exacerbate issues in other villages, which would presumably have to accommodate more than proportionate growth.
- There is the potential for negative impacts to be realised on water quality through the cumulative effects of a number of urban extensions in the same town. This may arise, for example, to the east of Great Dunmow, where extensions could be located in the Upper Chelmer River Valley, and to the south of Saffron Walden regarding the Fulfen Slade.
- There would be a large amount of isolated and potentially cumulatively significant

impacts on landscape in a number of the District's villages and any extensions of the District's towns.

- It is likely that landscape constraints and coalescence issues will exist and could be significant within large areas of land contiguous with development boundaries and it will be difficult to consistently determine which pressures are more acceptable than others in the allocation of land in all locations and in consideration of their unique characteristics
- Assuming that a significant proportion of development directed to the towns would have to be accommodated through one or a number of relatively large urban extensions; the cumulative impacts with extant permissions, particularly to the west of Great Dunmow would be significantly negative
- Development in the District's villages is unlikely to respond well to the sustainable use of land, where density requirements are likely to be lower than development under other scenarios with one or more larger allocations. This in turn may have viability issues surrounding the delivery of a mix of housing without increasing the scales of development with resulting associated impacts on the environment
- There would likely be significant negative impacts on the historic environment through development of the scale proposed in this Scenario. Both Saffron Walden and Great Dunmow have historic cores protected as conservation areas, numerous also exist in the District's villages, and although development would be unlikely to be located within or adjacent to these designations, it is likely that there would be wider implications on character and potential loss of amenity through increased traffic to these centres for services
- Specific to Saffron Walden, a significant constraint exists to the east with Audley End House and its Registered Historic Park and Garden
- Dispersal to the District's Villages at the scale required would have a strong possibility of negative impacts on numerous cultural heritage assets located in historic settlements. Conservation Areas exist in the majority of the District's Villages and numerous have Scheduled Monuments located in close proximity
- It should be noted that an AQMA exists in Saffron Walden and air quality impacts will be magnified
- The ability to mitigate, or for proposals to be designed to factor in areas that have a risk of flooding, would be less viable in smaller scale allocations
- Mitigation of flood risk may affect housing densities should extensive mitigation be required.
- Neither town in the District has rail links within existing development boundaries; the nearest train station Saffron Walden can benefit from is Audley End station in Wendens Ambo, approximately a mile and a half from Saffron Walden to the south west
- Outside the main towns it should also be noted that adequate sustainable transport infrastructure is unlikely to exist to support development in many instances in terms of both suitability and capacity. It is also unlikely that public transport providers would extend services to more remote parts of the District. Rail links only exist in the villages of Stansted Mountfitchet, Elsenham, Newport, Wendens Ambo and Great Chesterford.
- Significant growth would however likely exacerbate transport pressures in Saffron Walden
- It is also unlikely that any significant improvements to the road network would be feasible through any one development, or those in accumulation in any settlement.
- Dispersal across the District's villages would not be without a number of significant social implications, particular regarding the cohesion of existing villages and developments that could possibly correspond to their significant expansion
- Directing growth to the towns would correspond to the most socially inclusive scenario in that extensions to the existing settlements would benefit from the largest concentration of existing community facilities in the District commensurate to their status in the settlement hierarchy
- This Scenario is unlikely, as a spatial strategy, to meet needs and requirements in the

#### District beyond the plan period

- There are likely to be concerns regarding infrastructure capacities, particularly in response to a significant amount of extant permissions and windfall sites being within / extensions of these settlements
- The cumulative impacts of allocations in the villages would be a likely pressure on local infrastructure and schools, with a potential scenario of no single development being of the scale to meet infrastructure thresholds or ensure their viability.
- Under this scenario it would be difficult to ensure the allocation and delivery of employment development strategically in terms of suitability, and also in reflection of existing jobs and employment land with a desire to minimise travelling distances.
- There would exist a situation where those villages in closer proximity to existing employment opportunities would be vastly more sustainable than those that are more isolated.

#### Summary of likely Benefits

- This dispersal scenario may however limit the significance of any loss of the best and most versatile agricultural land in the District, should development proposals be appropriate at a smaller scale commensurate with acceptable expansion of existing settlements
- It is possible that, supported by relevant infrastructure improvements, there would be less transport emissions resulting from expansion to the District's towns with better access to services
- The size of proposals, with the potential for one or a number of relatively large extensions forming the growth specified in this scenario, may have the potential for, and viability of, the inclusion of renewable energy sources within proposals.
- The ability to mitigate, or for proposals to be designed to factor in areas that have a risk of flooding, is likely to be more relevant on larger sites.
- Both towns however have a good range of services and facilities, including frequent bus services to and from their centres
- Expansion of the towns at the scale specified would require additional provision of open space, recreation and healthcare facilities. It is possible that the provision of such facilities would benefit existing and surrounding communities, dependant on scale and accessibility
- This Scenario would have positive impacts associated with a dispersed distribution of development. This would respond well to meeting the District's identified existing housing needs
- A focus on the District's main towns of Saffron Walden and Great Dunmow would see housing growth developed in what can be considered the District's most sustainable settlements in terms of existing infrastructure
- In the towns there is increased scope for a single development to meet the threshold for a new primary school(s) under this scenario, should this be forthcoming and allocated in preference to a larger amount of smaller urban extensions.

#### **Conclusion**

This scenario combines the benefits and disbenefits of the previous two scenarios. It directs development to the towns which are generally sustainable locations for development and to the villages helping to sustain their vitality. However, significant constraints in some of the towns and villages will result in other settlements having to accommodate more than proportionate growth exacerbating issues in these settlements. It is therefore considered that this is a potentially sound option but it is not the recommended option.

## Scenario 5)- Hybrid – New settlement / towns / key villages / Type A villages

### Response from Issues and Options consultation

Historic England  
Mixture of the above effects

Anglian Water Services  
Need to consider impact on Water Recycling Centres which serve villages within Anglian Water's area of responsibility

Essex County Council  
From a highways and transportation perspective this is the least sustainable option, as it would make the deliverability of sustainable transportation challenging, and also accommodating development within the more remote rural locations throughout UDC would require intervention. It is also the least sustainable for delivery of future education services and facilities as relatively small scale housing development is unlikely to fund anything other than the expansion of an existing school which can be difficult and/or expensive.

*[Note: this comment was made in response to a scenario D in the Issues and Options Consultation of 500 in each of the towns, 500 in the key villages and 500 in the Type A villages and 500 in a new settlement; and scenario G which is 1000 in each of the towns, 1000 in the key villages and 1000 in Type A villages.]*

Others (T&PC, developers, individuals)

- × May not deliver infrastructure
- × Detrimental impact on towns and villages
- × Too piecemeal
  
- ✓ Spreads development around district fairest option
- ✓ Potential for organic growth
- ✓ Minimises impact on intrinsic character of existing towns and villages.
- ✓ Gives maximum flexibility for settlements of all sizes to respond to their own development needs.
- ✓ Provides a variety of development types.
- ✓ Spread of delivery of sites/deliver 5 year supply.
- ✓ Need to ensure new settlement is of sufficient size to provide all necessary infrastructure, services and facilities.

### Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) of Scenarios in Issues and Options consultation

Summary of potential issues to overcome:

- The impacts of dispersal as specified in this scenario would likely have negative impacts on a number of environmental sustainability objectives at the local and site specific level, including biodiversity. Cumulatively, dispersal at this level could be seen to have negative impacts on green infrastructure and networks generally throughout the District.
- There is a possibility that this could also extend to the water environment in the District, with dispersal potentially affecting a larger number of water bodies than a reliance on fewer larger development allocations that have enhanced potential to mitigate any impacts on site.
- There would be a relatively large amount of isolated and potentially cumulatively significant impacts on landscape in a number of the District's villages. There is a

possibility that the distribution could lead to more significant impacts in those smaller settlements where development would represent a larger proportionate expansion, with less scope for allocating land for development in less sensitive locations in regard to landscape character.

- It would be difficult to consistently determine which landscape pressures are more acceptable than others in the allocation of land in all villages and in consideration of their unique characteristics.
- There are likely to be Green Belt implications that may limit growth in some villages. This in turn may exacerbate issues in other villages, which would presumably have to accommodate more than proportionate growth.
- Development under this scenario is unlikely to respond well to the sustainable use of land, with little supplementary benefits arising from any one development in the District
- Conservation Areas exist in the majority of the District's villages and numerous have Scheduled Monuments located in close proximity
- The scale of distribution and the focus on a larger number of small allocations would reduce the possibility for, and viability of, the inclusion of renewable energy sources within proposals
- Should development at the existing towns be promoted in the form of a single urban extension in each instance, impacts relevant to pollution should also be considered in any selection criteria, particularly regarding the impact on the AQMA in Saffron Walden
- The ability to mitigate, or for proposals to be designed to factor in areas that have a risk of flooding, would be more viable in larger scale allocations forming the new settlement element of the scenario, or any single large urban extension to meet the growth distribution on the District's towns
- The villages, aside from those that have links to the strategic rail network, currently have poor public transport services and a small amount of services and facilities in walking and cycling distance. It can be expected that the expected scale of development distributed to each village would not be sufficient to meet thresholds for accompanying services, facilities and infrastructure to be provided. It is also unlikely that public transport providers would extend services to more remote parts of the District.
- It is uncertain at this stage what level of services and facilities could be expected from a new settlement at the specified scale, and the sustainability implications of this scenario, would depend on any upper limit that this new settlement could eventually reach beyond the plan period
- This dispersal would not be without a number of significant social implications, particular regarding the cohesion of existing villages and any forthcoming developments that could potentially correspond to their significant expansion under this scenario
- It is possible that there will be significant localised pressure on existing healthcare facilities under this scenario, with potentially no single development being of a larger enough size to stimulate additional provision.
- There would be some concern however, whether such a distribution would be adequate to stimulate infrastructure improvements, particularly regarding schools and transport, with a potential scenario of no single allocated development being of the scale to meet infrastructure thresholds or ensure their viability in the plan period. The distribution of development is under the threshold for a new primary school to be provided to serve any new development
- The distribution would not respond well to the location of existing employment opportunities in the District. This distribution scenario would also lead to difficulties in ensuring the allocation and delivery of employment development in the District strategically in terms of suitability, and also in reflection of existing jobs and a desire to minimise travelling distances.

#### Summary of likely benefits:

- This dispersal scenario may limit the significance of any loss of the best and most versatile agricultural land in the District, should development proposals be appropriate at a smaller scale commensurate with acceptable expansion of existing settlements
- Although no rail links exist specifically at the towns, there are available a good existing level of services and facilities and public transport links exist in centres.
- The distribution of growth across the District would most likely be proportionate to the size of existing settlements should the scale and location of extant permissions and potential windfall sites additionally be considered. This ensures that new development has a reasonable level of accessibility to services.
- Distribution of development to the District's towns and to a new settlement would require open space and recreational provision that would be comparatively more easily delivered; particularly should development in the towns come forward as a single urban extension in each instance
- The hybrid option of delivery would be seen as offering the most dispersed distribution of development of all the scenarios. This would respond well to meeting the District's identified existing housing needs
- The start of a new settlement would seek to meet the future needs and requirements of the District.
- This hybrid scenario would respond well to the delivery rate of 580 dwellings per annum and adhere better to the maintenance of a 5 year housing supply over the plan period in the District than Scenario A; the only other Scenario that explores a new settlement at this delivery rate.

#### **Conclusion**

A distribution strategy based on a hybrid of the previous scenarios has the advantage of the benefits of each of the scenarios yet can distribute the scale of development in settlements so as to remove or reduce the disbenefits. This flexibility can overcome some of the concerns raised by the County Council, statutory consultees and others.

