

### ***Heritage Impact Assessments***

I should like to raise a number of points on the high level assessments produced to this meeting, and more generally on UDC's general lack of any other heritage impact studies, despite the clear advice from bodies such as Historic England.

This meeting has heritage impact assessments on just 3 of the potential 6 new settlement sites. All 3 were commissioned since the April PPWG meeting, and as can be seen they are very broad brush, and each recommends that a proper assessment be undertaken. To quote, *"It is strongly recommended that a full Heritage Impact Assessment be commissioned with regards to the proposed development if this site is to be recommended."*

The high level assessments on the other 3 potential new settlement sites haven't even been received yet, and aren't due to be seen by this Group until the 22 June PPWG meeting; yet according to the timetable tabled for the Plan, the draft Reg 18 Plan will be issued on 29 June. I don't see how it can be.

Even more significantly given the requirements of the NPPF, no other heritage impact assessments have ever been conducted by UDC in relation to the effects of any other potential development sites.

The adverse effects on listed buildings and the historic environment of for example increased traffic movements are well recognised, but the effect of the increased traffic from potential new developments in Saffron Walden has been completely ignored in the Local Plan process, as it was in the 2014 Local Plan.

I shouldn't need to remind you that the whole of central Saffron Walden is a conservation area, and the centre contains a greater concentration of listed buildings than almost anywhere in the country. Virtually all traffic from new developments in Saffron Walden must pass through this mediaeval street pattern, and will undoubtedly have a deleterious impact on the historic environment, as traffic has already.

According to the high level assessments produced to this meeting, Andrewsfield potentially impacts 14 listed buildings, Great Chesterford 5 listed buildings, and Easton Park 19, all grade 2, and very properly the impact on them is being assessed. By comparison, according to UDC's own Saffron Walden Conservation Area Appraisal, Saffron Walden has 320 listed buildings in the central conservation area, about 10% of the total for the whole of Uttlesford; it is a mediaeval town of *"exceptional interest"* and according to Essex County Council *"the town has the finest surviving collection of timber framed buildings in Essex"*. Development of Saffron Walden potentially impacts 4 grade 1 and 316 grade 2 listed buildings.

Yet despite this, UDC hasn't performed even a high level assessment of the effect that any potential development would have on the historic environment of Saffron Walden.

The NPPF specifically requires that a Local Plan should conserve and indeed enhance the historic environment, and contain a specific strategy for doing so. Yet there is nothing of the sort in the Evidence Base that UDC are producing.

I'd like to ask 3 questions:

- When are the full Heritage Impact Assessments that are strongly recommended for the 3 new settlement sites to be commissioned, when are they to be received and what is the impact on the Local Plan timetable?
- When UDC are proposing to commission a Heritage Impact Assessment on Saffron Walden to enable it to consider the impact of potential further development on the historic town centre;
- Where is the UDC strategy on enhancing and conserving the historic environment as required by the NPPF?

### ***Evidence Base***

When I spoke last month, I raised the apparent pre-determination by this Council of a spatial strategy long before the evidence base had been assembled, and the continued absence of the required Comparative Sustainability Assessment or prior consideration of any reasonable alternative spatial strategies as required by the NPPF.

At last month's meeting:

- Cllr Rolfe said that the information behind the June 2016 preferred strategy would be provided to me "in due course";
- The Assistant Director of Planning said that all background information on the sustainability appraisal would be put to today's PPWG meeting;
- Cllr Rolfe confirmed that the sustainability appraisal would be on the agenda for today's meeting.

You have now said that some of this was a mistake; however, at both the 22 February and 6 April meetings, it was agreed that the terms of reference of the Sustainability Appraisal and the Infrastructure Delivery Plan would be circulated – see minutes 44 and 58.

None of this has happened. Immediately after the 6 April PPWG I asked for a copy of the terms of reference and for the other documents this meeting requested be circulated. 5 weeks later and despite regular chasing, I have not received a single document.

This meeting has previously been told that there is nothing to hide, and that the Local Plan process is open and transparent, yet key documents remain permanently hidden. Can I ask why this meeting repeatedly asks that terms of reference be circulated, but they never are?

It is now just over a month until the Reg 18 document is scheduled to be published, yet still no reasonable alternative spatial strategies have been proposed for discussion or presented to this Group. This is despite the NPPF requirement that sustainability is embedded in the process, not just a look-back at the end, which is exactly what we are seeing now.

At the same time, the evidence base seems to be getting thinner and thinner. At the April PPWG it was agreed that an Air Quality Assessment would be commissioned for Saffron Walden, in recognition of the fact that the 2013 AQA showed that Essex Highway's plans to route more traffic through the town centre would worsen pollution in the AQMA. Yet the Evidence Base documents don't even refer to it. The Transport Study for Saffron Walden has now been deleted from the Evidence Base, and we heard earlier that UDC aren't doing any study themselves this time, even though the chair said that key evidence should be commissioned by UDC – why?

The 2013 Transport study showed the horrendous congestion proposed for Saffron Walden, even with mitigation measures if 800 more new homes were approved; of these 600 have already been approved. How can UDC possibly come to a decision on the sustainability of further development of Saffron Walden without commissioning its own Transport Assessment? I'm told that ECC Highways are preparing one, but no details are given, and no timescale. In the minutes of the 6 April PPWG, Cllr Barker said the 2014 inspector had found UDC's proposed site allocations "sound"; that statement was not true, as is obvious from his report. He identified major concerns about the traffic impact on Saffron Walden. Both he and the Secretary of State identified major traffic issues with the proposed expansion of Elsenham, but again no traffic study of Elsenham is proposed.

We've heard during this meeting that some sort of local road assessments will be prepared, probably by ECC, but they don't even feature on the Evidence Base. Can you clarify what local road assessments will be prepared and when they will be available?

There are many other evidence base documents which still haven't appeared, including fundamental documents like the Transport Study and the Infrastructure Delivery Plan, and nothing on sustainability or reasonable alternatives will even appear until 22 June; given the current situation I don't see how this council can possibly issue a Reg 18 document on 29 June which it can claim to be either evidence based, or the most sustainable when compared against the reasonable alternatives.