



UTTLESFORD DISTRICT COUNCIL

Identification of Reasonable Alternatives for the Uttlesford Local Plan 2011-2033 - Topic Paper

April 2017

Summary

1. This Topic Paper has been prepared by Troy Planning on behalf of the Council and summarises the content of a Member Workshop held on the 1st February 2017. The subject of the Workshop was to identify 'Reasonable Alternatives for Housing' for the Uttlesford Local Plan. The objectives of the workshop were:
 - a. Identify the scope for testing options as part of preparing the Local Plan, as required through the Sustainability Appraisal;
 - b. Set out all possible combinations of options that can be reasonably identified; and
 - c. Provide initial outputs against Local Plan requirements for further analysis and refinement of options.
2. A need to undertake further work to identify and assess reasonable alternatives is evidenced by a wide range of advice recently obtained by the Council to inform the next steps of the Local Plan process, following the pause in the programme for the Local Plan. This includes an advisory visit from the Planning Inspectorate, along with the PAS / IPE Review of the Local Plan process to-date and the views of Counsel for the Council Michael Bedford QC.
3. This advice included ensuring that the Plan is supported by a comprehensive Sustainability Appraisal and tests a housing requirement of 14,100, based on the emerging findings of the 2016 update of the Strategic Housing Market Assessment. It also included a need to demonstrate a clear understanding of the *different spatial distributions* and *different possible configurations of proposed sites* from the options available to the Council. This should inform the reasoning for the Preferred Strategy the Council adopts and assist in setting out reasons to reject other alternatives.
4. Holding the Workshop at an early stage following the pause has allowed the advice obtained to be evaluated against the wider Local Plan process. The scope for testing options takes into account the substantial amount of existing work and extensive emerging evidence available to support preparation of the Local Plan. The starting point is the identification of Reasonable Alternatives within the Council's existing commitments to explore a 'hybrid' strategy that may include a new settlement or new settlements.
5. The key questions to answer include:
 - 'how much' development is required;
 - the form this development may take;
 - where development could be delivered; and
 - when delivery might take place.
6. The answers to these questions essentially inform the scope for plan-making.
7. The Council also has an extensive emerging evidence base to apply against each of the above questions. Where 'New Settlement' options exist against these questions that would meet the objectives of a plan but could give rise to different effects for sustainable development; they can be regarded as 'reasonable alternatives' – provided that those options are realistic and deliverable.
8. Testing demonstrates that two 'New Settlement' options may not meet housing need in most cases. The increase in requirements in challenging – this would be exaggerated by unrealistic assumptions for housing delivery rates and 'start dates' from any individual



option. These circumstances and a lack of flexibility could be more pronounced in a strategy comprising only two New Settlement Options.

9. However, the wider evidence base for the Local Plan provides limited grounds to increase land allocations elsewhere or put additional pressure on other towns and villages. A spatial strategy that incorporates 'New Settlement' options remains achievable and could achieve the 14,100 dwelling requirement over the plan period. The recommendation to the Workshop was that this would most realistically be achieved based on an option identifying delivery from up to three New Settlement Options within the plan period.
10. Increasing the number of New Settlements that may form part of the preferred strategy in the Local Plan does not, in itself, mean that any one location becomes relatively more or less sustainable. In order to fully assess the implications for this adjustment to the scope of the 'hybrid' approach, the Council has committed to identify a comprehensive range of all combinations that comprise two or three 'New Settlement' Options. This is the first step to fully assess a wide range of factors such as where New Settlements could provide the critical mass and thresholds to stimulate new infrastructure provision, set against the impacts and resource implications to manage growth at this scale and the ability to meet development requirements.
11. Identifying alternatives was undertaken within the context of options for development already known to the Council. A flexible definition was applied to determine the scope of locations that might be regarded as 'New Settlement' Options. Assumptions were applied to govern realistic expectations for housing delivery and the phasing of development. In addition to making judgements for these specific locations, the work has regard to the other components of the plan, in terms of past housing completions, existing planning commitments and potential levels for further allocations outside of 'New Settlement' Options.
12. Taken together, the outputs of the work mean that up to three new settlements may be considered necessary to achieve a revised housing requirement of 14,100 dwellings; this however would remain compatible with the Council's desire to explore a 'hybrid' spatial strategy.

Next Steps

13. All material presented at the 1st February 2017 workshop were based on working assumptions prepared by the Council and drawn from the evidence base at that time. Recognition of a potential range of combinations provides the basis to ensure that they are fully tested and explored by the evidence base for the Local Plan. However, the process up to and including the Workshop cannot itself be used to make conclusions on a preferred spatial strategy or combination of sites or to provide final views about the suitability for development at any individual location.
14. To ensure a more detailed understanding for 'New Settlement' options, the Council has undertaken a series of 'Promoter's Sessions'. It was anticipated that these may provide additional or more up-to-date evidence and may lead to assumptions being revised to inform the Council's decision-making process. These events have only recently concluded and feedback from all presentations has not yet been evaluated. There may be a need for a final reconciliation between the promoters' positions and the Council's work on evidence streams, such as the Infrastructure Delivery Plan



15. A revised set of Growth Scenario assumptions will be prepared as a result of the latest information. This may affect (and in likelihood narrow) the range of Reasonable Alternatives identified but is not materially expected to change the scope of testing outlined at the Workshop and summarised in this Topic Paper.
16. Details of the Growth Scenarios tested as Reasonable Alternatives, along with the reasons for rejecting any individual options, will be put in the public domain alongside the material published with the Council's Preferred Strategy (Regulation 18) Local Plan consultation.

National Policy and Legislative Background

17. The process for identifying 'Reasonable Alternatives' in the context of the Member Workshop (and as reported in this Topic Paper) is underpinned by relevant legislation and policy. Procedures governing the process of preparing a Local Plan and undertaking Sustainability Appraisal / Strategic Environmental Assessment (SA / SEA) are particularly relevant to the evidence that informed the Workshop.
18. The initial workshop specifically related to considering the definition of 'reasonable alternatives' within Uttlesford. The specific characteristics of a reasonable alternative are not prescribed by legislation. However, for the purposes of plan-making the key questions to be addressed are in relation to how much development is required, the locations of development, what form this should take and when development may take place ('how much, what, where and when?'). Essentially a reasonable alternative indicates "a different way of fulfilling the objectives of the plan". The questions may be related – for example how much development needs to take place and where may vary interdependently depending on the overall housing requirement.
19. The process to-date does not represent any formal element of the requirements of a Sustainability Appraisal. The identification of reasonable alternatives is not specifically intended to provide commentary on any of the likely significant effects arising out of the 'draft plan' as a whole.
20. Planning Practice Guidance explains that reasonable alternatives comprise "the different realistic options considered by the plan-maker in developing the policies in its plan. **They must be sufficiently distinct to highlight the different sustainability implications** of each so that meaningful comparisons can be made. **The alternatives must be realistic and deliverable**" (ID: 11-018-20140306, Officer emphasis).
21. All reasonable alternatives must be assessed in the same level of detail. This is important to allow the assessment arising from the Sustainability Appraisal to outline the reason why a preferred approach has been selected in light of the alternatives not taken forward as well as documenting the overall sustainability of all the different alternatives identified.

Background to Assessing Reasonable Alternatives in Uttlesford

22. The work and approach outlined in this Topic Paper is not a formal step or component of the suite of documents required to prepare a legally compliant Sustainability Appraisal. It represents an interim stage that has allowed the Council to fully identify the Reasonable Alternatives that may represent options for development in the District. It is necessary to



set this stage in the wider context of the Sustainability Appraisal alongside preparation of the Local Plan.

23. It is important to note that although the Council is now exploring a higher level of housing need and identifies that a 'hybrid' option to accommodate these requirements may include up to three New Settlement Options, the process required to assess the effects arising from development is essentially unchanged.
24. The assessment of 'New Garden Settlement Options' in Uttlesford District has previously explored up to 7 potential locations for development. These were most recently set out in an emerging Interim Appraisal of New Settlement Options (in 'draft' at the time of the pause in October 2016).
25. It is important to emphasise that the Local Plan is strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further on in the planning regime (i.e. through the planning application process). The strategic nature of the Plan is reflected in the scope of the Sustainability Appraisal (SA). For the purposes of the Local Plan and the accompanying SA Environmental Report, it should be noted that specific policies and allocations for new settlements will be subject to different sustainability criteria than those of the 'Site Pro Forma' of other proposed allocations, commensurate to their scale.
26. Sustainability Appraisal is an ongoing iterative process to support the preparation of the Local Plan. Emerging appraisal of any option has been assessed on a largely qualitative basis in line with the strategic nature of each option and the level of information available for each option at the present time. It should be noted and acknowledged that the level of information will continue to grow in line with the detail required of proposals of this scale; this is likely to surpass the timeline of the Local Plan process and form the detail required of a masterplan or planning application later in the plan period.
27. Sustainability Appraisal therefore exists as a high-level tool to assist in the selection of New Settlements across the wider area. It should be acknowledged that at this stage, each option is therefore only broadly comparable.
28. It should also be noted that in the appraisal of options, judgements have been made in line with the eventual scope and scale of each proposal. To that effect, what would constitute a significant constraint for a smaller or non-strategic site may represent a significant opportunity at the scale of an effective New Settlement. This is particularly relevant for infrastructure requirements and it should be acknowledged that New Settlements can often meet the necessary thresholds to deliver and stimulate infrastructure provision to the benefit of the new and wider existing communities.
29. Taking forward work from providing an indicative assessment of locations on a standalone basis to look at the appraisal of sites, in combination, represents the logical progression of the process of identifying alternatives. A single location for a New Settlement would offer extremely limited flexibility or contingency in delivering housing requirements.
30. The Council has previously considered recommendations for a 'Distribution Strategy' in previous meetings. These sessions identified that a '**Hybrid involving new settlement(s), main towns and villages option**' may represent a preferred distribution



strategy, relative to alternatives of **All development allocated in new settlement(s); All development pepper potted in villages; All development in the two main towns (Saffron Walden and Great Dunmow);** and a **Combination of development in main towns and villages.**

31. The Council's Sustainability Appraisal Framework will continue to provide a thorough assessment of these wider distribution strategies as well as the specific 'Growth Scenarios' set out through the approach outlined in this Topic Paper. Until such time as a Preferred Strategy is formally published, the Council's conclusions on the overall distribution strategy may change. The Council must also be mindful that notwithstanding the 'New Settlement' Options comprised in any growth scenario, the relationship with the wider distribution strategy is also relative to the other components of the plan. Put simply, regardless of the New Settlement Options included in any scenario, if the other proposed allocations within the plan were highly restricted the distribution strategy may not be regarded as a 'hybrid' approach.
32. Nevertheless, for the purposes of this Topic Paper and based on the working assumptions for other elements of the Local Plan (including existing commitments and completions), plus the delivery expectations of New Settlements within the plan period, the Council regards 'Growth Scenarios' comprising up to three new settlements as maintaining a 'hybrid' distribution. 'Growth Scenario' and 'Combination of New Settlement Options' can be read interchangeably in this Topic Paper.
33. It should also be noted that within the testing process, identifying any Reasonable Alternatives does not commit the Council to any particular course of action such as a Growth Scenario comprising three New Settlement Options. It may still be possible to achieve the plan and housing requirements with two (or fewer) New Settlement Options. However, working assumptions indicate that Growth Scenarios comprising two New Settlements would have significantly less flexibility and contingency to meet overall requirements.

The 'New Settlement' Options

34. Seven potential new settlement sites were submitted by promoters under the 'Call for Sites' exercise. These were at (with SLAA reference number):
 - Easton Park (06LtEas15)
 - Great Chesterford (10Gte15)
 - West of Braintree (05Ste15 & 06Ste15)
 - Takeley (11Tak15)
 - Elsenham (07Els15)
 - Birchanger (05Bir15)
 - Chelmer Mead (03LtDun14)
35. It has not been necessary to identify any additional potential growth locations for the purposes of this stage of work. Each of these sites will be the subject of detailed standalone assessment in the Sustainability Appraisal of New Settlement Options.
36. A broad threshold for inclusion was based on the Prospectus for "Locally-Led Garden Villages, Towns and Cities" issued by the Department for Communities and Local Government (CLG, March 2016). This sought expression of interest for 'Garden Villages'

comprising at least 1,500 homes. Proposals are likely to comprise Garden Towns or Cities where they exceed 10,000 homes. These capacity benchmarks provide a threshold for identifying Reasonable Alternatives under the header of 'New Settlement Options'. The Council adopts these thresholds as indicative of the scale of development in locations most likely to meet the necessary thresholds to deliver and stimulate infrastructure provision to the benefit of the new and wider existing communities and provide a critical mass for development in accordance with Garden City Principles.

37. Providing that the lower threshold of 1,500 homes could be met locations may be termed as 'New Settlement' or 'Garden Settlement' Options. The term is not used prescriptively and it is acknowledged that some of the locations are not 'free standing' but relate to existing settlements. However, as this has not prevented the locations being broadly explored in other aspects of the Local Plan evidence base it was not felt necessary to reasonably exclude sites that are not 'free standing' from the scope of this work.
38. This threshold has been applied flexibly in the circumstances where it may not be possible to provide c.1,500 homes by 2033 but where there is a clear indication of additional capacity beyond the plan period. Initial expectations for housing delivery from each location, based on development assumptions set out in housing trajectories, have been prepared for each combination.
39. With regards the criteria for Green Belt release, the Council has previously stated that *exceptional circumstances* do not exist to consider allocations for housing. Given the range of options available it is not anticipated that this position will need to change, although it is kept under review.

Conclusions and Next Steps

40. It is not the role of this Topic Paper to set out further conclusions on the Preferred Spatial Strategy or a specific combination of sites. The Topic Paper updates the scope and rationale for how the Council is looking to identify and assess Reasonable Alternatives against the requirements and objectives of the Local Plan, having regard to its emerging evidence base and other advice received.
41. In considering a housing requirement of 14,100 dwellings, this scope extends a need to identify all Reasonable Alternatives based on delivery from *two or three* New Settlement options as part of exploring a 'hybrid' strategy. This scope would not restrict the Council in exploring alternative distribution strategies or other development requirements, which will remain fully assessed within the formal Sustainability Appraisal process.
42. The review of the scope for identifying Reasonable Alternatives also confirms how the Council will assess all spatial distributions for growth and different configurations of the proposed 'New Settlement' sites.. To this extent, the scope for identifying Reasonable Alternatives must assess these factors irrespective of the overall housing requirement on the basis that any combination comprising two or more new settlements could give rise to different effects.
43. The Council is continuing to work with Essex Places Services who will prepare the formal Sustainability Appraisal for the Local Plan. A methodology has been developed to assess any significant effects arising from Growth Scenarios comprising two or three New Settlement Options as defined by this Topic Paper. This will be employed as part of assessing the Council's Preferred Strategy for the Regulation 18 Draft Local Plan consultation as well as the reasons for rejecting any other Reasonable Alternatives.