



Public Document Pack

Uttlesford District Council

Chief Executive: Peter Holt

SUPPLEMENTARY PACK

Cabinet

Date: Monday, 16th October, 2023

Time: 7.00 pm

Venue: Council Chamber - Council Offices, London Road, Saffron Walden,
CB11 4ER

Chairman: Councillor P Lees

Members: Councillors A Coote, J Evans, N Hargreaves (Vice-Chair), N Reeve
and M Sutton

ITEMS WITH SUPPLEMENTARY INFORMATION PART 1

Open to Public and Press

- | | | |
|----------|---|----------------|
| 4 | Draft Uttlesford Local Plan 2021 - 2041 (Regulation 18)
Consultation | 3 - 152 |
|----------|---|----------------|

To consider the Draft Uttlesford Local Plan 2021 – 2041 (Regulation 18) documentation. This supplementary pack includes:

- Annexes 3 and 4



Uttlesford District Council

Chief Executive: Peter Holt

For information about this meeting please contact Democratic Services

Telephone: 01799 510369, 510410, 510460 or 510548

Email: Committee@uttlesford.gov.uk

General Enquiries

Council Offices, London Road, Saffron Walden, CB11 4ER

Telephone: 01799 510510

Fax: 01799 510550

Email: uconnect@uttlesford.gov.uk

Website: www.uttlesford.gov.uk



Habitats Regulations Assessment Report to accompany the Draft Uttlesford Local Plan 2021-2040

Author: Durwyn Liley, Bernie Fleming and Emily Rush

FOOTPRINT ECOLOGY, FOREST OFFICE, BERE
ROAD, WAREHAM, DORSET BH20 7PA
WWW.FOOTPRINT-ECOLOGY.CO.UK
01929 552444



FOOTPRINT
ECOLOGY



Footprint Contract Reference: 645

Date: 6th October 2023

Version: HRA to accompany draft plan

Recommended Citation: Liley, D., Rush, E. & Fleming, B. (2023). Habitats Regulations Assessment Report to accompany the Draft Uttlesford Local Plan 2021-2040 Report by Footprint Ecology for Uttlesford District Council

Summary

The Conservation of Habitats and Species Regulations 2017 (as amended) require local authorities to assess the impact of their local plan on the internationally important sites for biodiversity in and around their administrative areas. Together, these Special Protection Areas, Special Areas of Conservation and Ramsar sites are known as European sites. The task is achieved by means of a Habitats Regulations Assessment (HRA).

An HRA asks very specific questions of a plan. Firstly, it 'screens' the plan to identify if there is a risk that certain policies or allocations may have a 'likely significant effect' on a European site, alone or (if necessary) in-combination with other plans and projects. If the risk of likely significant effects can be ruled out, then the plan may be adopted but if they cannot, the plan must be subjected to the greater scrutiny of an 'appropriate assessment' to find out if the plan will have an 'adverse effect on the integrity' of the European sites.

Following an appropriate assessment, a Plan may only be adopted if an adverse effect on the integrity of the site can be ruled out. If necessary, a plan should be amended to avoid or mitigate any likely conflicts. This usually means that some policies or allocations will need to be modified or, more unusually, may have to be removed altogether.

This HRA report has been produced alongside the Draft (Regulation 18) version of the Uttlesford Local Plan and is therefore produced at an early stage in the Plan. The HRA is iterative and will be updated at each public consultation stage in the plan making process and will be finalised at adoption.

We have screened this version of the Plan and identified likely significant effects in-combination with respect to the disposal of wastewater and for recreation. The relevant sites (for both impacts) are the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar.

Given the level and distribution of growth and the mitigation set out in the Plan, a conclusion of no adverse effects on integrity with respect to recreation impacts and the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar can be reached at this stage in the plan-making.

With respect to the disposal of wastewater, further checks are necessary on the capacity at the relevant sewage treatment works and the implications for the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar. These checks are necessary to inform the next iteration of the HRA. Given that much of the growth proposed lies within the Thames Water area (and therefore will not relate to the Essex Coast) and the large distances from Uttlesford to the coast, the risks are relatively low.

Contents

Summary	3
Contents.....	iv
Acknowledgements	v
1. Introduction	1
Overview	1
The Uttlesford Local Plan	1
Habitats Regulations Assessment process	1
<i>European sites</i>	<i>2</i>
<i>Role of the competent authority.....</i>	<i>3</i>
<i>Process.....</i>	<i>3</i>
<i>Definitions, references to case law and guidance.....</i>	<i>6</i>
2. European sites in and around Uttlesford	9
Overview of potentially relevant European sites	9
European sites to be considered in the screening of the plan and relevant impact pathways	13
<i>Recreation</i>	<i>17</i>
<i>Water Issues</i>	<i>17</i>
<i>Air pollution</i>	<i>18</i>
<i>Outcomes</i>	<i>20</i>
3. Screening the Local Plan for Likely Significant Effects	21
What constitutes a likely significant effect?	21
The screening	22
Screening conclusions.....	37
4. Appropriate Assessment Topic: Recreation.....	38
Relevant policies from LSE screening	38
Background	38
Disturbance to birds and the Essex Coast.....	39
<i>Bird disturbance.....</i>	<i>39</i>
<i>The Essex Coast and the RAMS</i>	<i>39</i>
<i>The Blackwater Estuary</i>	<i>40</i>
Impacts to SAC and non-avian Ramsar interest.....	41
Mitigation and policy wording	42
Conclusions	42
5. Appropriate Assessment Topic: Water Quality	45
Relevant policies from LSE screening	45
Impacts from wastewater	45

6. Conclusions	48
References	49
Appendix 1: Appendix 1: European Site Conservation Objectives	50
Appendix 2: Conservation Interest of European Sites.....	52

Acknowledgements

This report has been commissioned by Uttlesford District Council. Thanks to Andrew Maxted, Hayley Coles, Joanna Hill and Stephen Miles for their input and support.

1. Introduction

Overview

- 1.1 This report is a Habitats Regulations Assessment (HRA) report to accompany the Uttlesford Local Plan ('the Plan') and has been prepared by Footprint Ecology on behalf of Uttlesford District Council. An HRA assesses the implications of a plan for legally protected European sites.
- 1.2 The HRA will be updated at each stage of the Local Plan, at each public consultation stage. The HRA will be finalised at the point at which the Plan is ready for adoption. This report accompanies the Draft Local Plan (Regulation 18 version), and as such is produced at a relatively early stage in the plan making process.

The Uttlesford Local Plan

- 1.3 The District of Uttlesford extends across approximately 650km² of north-west Essex and has a population of just over 91,000. The two largest settlements are Saffron Walden to the north and Great Dunmow to the south. The district is predominantly rural, however it does support Stansted Airport and is situated along the M11 trunk road which runs from north to south and connects Cambridge and London.
- 1.4 The new Local Plan will replace the existing Adopted Local Plan 2005. It will set out the proposed strategy for meeting the district's social, economic and environmental needs up until 2041. It will set out the Spatial Vision and Strategic Objectives for addressing climate change and setting out the Council's Spatial Strategy for meeting future development needs, including proposed site allocations, design principles and development management policies by which planning applications will be judged.

Habitats Regulations Assessment process

- 1.5 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. Importantly, the most recent amendments (the Conservation of Habitats and

Species (amendment) (EU Exit) Regulations 2019¹) take account of the UK's departure from the EU.

- 1.6 Regulation 105 *et seq* addresses the assessment of local plans and determines the scope of this HRA alongside recent Government Guidance on the interpretation and application of the Regulations².

European sites

- 1.7 'European sites' are the cornerstone of UK nature conservation policy. Each forms part of a 'national network' of sites that are afforded the highest degree of protection in domestic policy and law. They comprise Special Protection Areas (SPA) classified under the 1979 Birds Directive and Special Areas of Conservation (SAC) designated under the 1992 Habitats Directive. As a matter of policy, potential SPAs (pSPAs), possible SACs (pSACs) and those providing formal compensation for losses to European sites, are also given the same protection³.
- 1.8 The network safeguards the most valuable and threatened habitats and species across the country and Europe. Prior to Brexit, this formed part of the EU-wide Natura 2000 network of SPAs and SACs to form the largest, coordinated network of protected areas in the world.
- 1.9 The designations made under the European Directives still apply and the term, 'European site' remains in use. The term Habitats site is also used and includes any site which would be included within the definition at regulation 8 of the Habitats Regulations. According to long-established Government

¹ The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. See Regulation 4, which also confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

² Habitats regulations assessments: protecting a European site. Defra and Natural England. 24 February 2021. <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

³ For the avoidance of doubt, the list of statutory European sites also comprises: A site submitted by the UK to the European Commission (EC) before Exit Day (a candidate SAC or cSAC) as eligible for selection as a Site of Community Importance (SCI) but not yet entered on the EC's list of SCI, until such time as the Appropriate Authority has designated the site or it has notified the statutory nature conservation body that it does not intend to designate the site. After Exit Day, no further cSACs will be submitted to the EU. Statutory European sites also include SCI included on a list of such sites by the European Commission from cSACs submitted by the UK before the UK left the EU, until such time as the UK designates the site when it will become a fully designated SAC.

policy⁴, European sites also comprise 'Wetlands of International Importance' (or Ramsar sites) although these do not form part of the national network.

- 1.10 The overarching objectives of the national network is to maintain, or where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a Favourable Conservation Status, and contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive.
- 1.11 The appropriate authorities must have regard to the importance of protected sites, coherence of the national site network and threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs.

Role of the competent authority

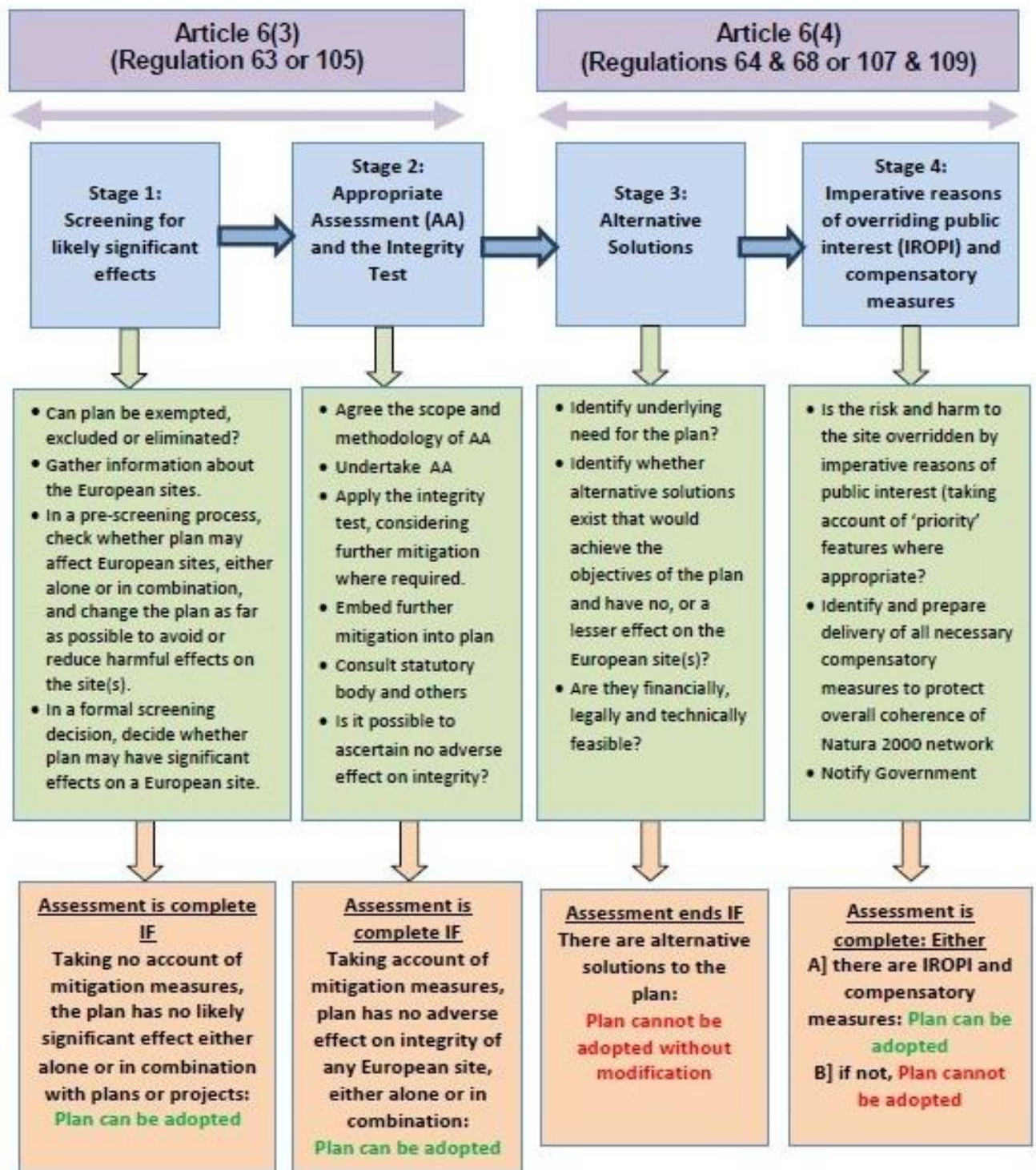
- 1.12 The finalised HRA will help the Council discharge its duties under the Habitats Regulations. However, the Council is the competent authority, and it must decide whether or not to accept the HRA. Further, it should be noted that the final HRA will have been prepared for the purposes of preparing and examining the Plan. Individual allocations will need to be reviewed when they become the subject of an individual planning application, to ensure that if further assessment under the Habitats Regulations is necessary, it is undertaken in accordance with the requirements of appropriate assessment.

Process

- 1.13 The step-by-step process of HRA is summarised in Figure 1.

⁴ ODPM Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (16 August 2005), to be read in conjunction with the current NPPF, other Government guidance and the current version of the Habitats Regulations.

Outline of the four-stage approach to the assessment of plans under the Habitats Regulations



Extract from *The Habitats Regulations Assessment Handbook*, www.dtapublications.co.uk
 © DTA Publications Limited (October 2018) all rights reserved
 This work is registered with the UK Copyright Service

Figure 1: Outline of the assessment of plans under the Habitat Regulations

- 1.14 Throughout all stages, there is a continual consideration of the options available to avoid and mitigate any identified potential impacts. A competent authority may consider that there is a need to undertake further levels of evidence gathering and evaluation at the appropriate assessment stage in order to provide the necessary certainty. At this point the competent authority may identify the need to add to or modify the plan in order to adequately protect the European site, and these mitigation measures may be added through the imposition of particular restrictions and conditions.
- 1.15 For plans, the stages of HRA are often quite fluid, with the plan normally being prepared by the competent authority itself. This gives the competent authority the opportunity to repeatedly explore options to prevent impacts, refine the plan and rescreen it to demonstrate that all potential risks to European sites have been successfully dealt with.
- 1.16 When preparing a plan, a competent authority may therefore go through a continued assessment as the plan develops, enabling the assessment to inform the development of the plan. For example, a competent authority may choose to pursue an amended or different option where impacts can be avoided, rather than continue to assess an option that has the potential to significantly affect European site interest features.
- 1.17 After completing an assessment, a competent authority should only adopt a plan where it can be ascertained that there will not be an adverse effect on the integrity of the European site(s) in question. In order to reach this conclusion, the competent authority may have made changes to the plan, or modified the project with restrictions or conditions, in light of their Appropriate Assessment findings.
- 1.18 Where adverse effects cannot be ruled out, further exceptional tests are set out in Regulation 107. In exceptional cases, this allows a plan to be taken forward where there are no 'alternative solutions', where 'imperative reasons of overriding public interest' apply and where compensation can be delivered. It should be noted that meeting these tests is a rare last resort and ordinarily, competent authorities seek to ensure that a plan or project is fully mitigated for, or it does not proceed.
- 1.19 In such circumstances where a competent authority considers that a plan should proceed under Regulations 107, they must notify the relevant Secretary of State. Normally, planning decisions and competent authority duties are then transferred, becoming the responsibility of the Secretary of State, unless on considering the information, the planning authority is

directed by the Secretary of State to make their own decision on the plan or project at the local level. The decision maker, whether the Secretary of State or the planning authority, should give full consideration to any proposed 'overriding reasons' for which a plan or project should proceed despite being unable to rule out adverse effects on European site interest features, and ensure that those reasons are in the public interest and are such that they override the potential harm. The decision maker will also need to secure any necessary compensatory measures, to ensure the continued overall coherence of the European site network if such a plan or project is allowed to proceed. However, it is understood that the Council would not wish to pursue these derogations.

Definitions, references to case law and guidance

- 1.20 This HRA follows principles of case law, both UK and EU. It also refers as appropriate to the Habitats Regulations Assessment Handbook (Tyldesley & Chapman, 2021), to which Footprint Ecology subscribes. We also follow relevant government guidance.
- 1.21 Drawing on the Handbook, other relevant guidance and case law, we clarify the following terms used in the flow chart (Figure 1):
- 1.22 In Stage 1, A '**likely significant effect**' following Waddenzee⁵, is a '*possible significant effect; one whose occurrence cannot be excluded on the basis of objective information*'. It is a low threshold and simply means that there is a risk or doubt regarding such an effect. The screening stage is a preliminary examination, sometimes described as a coarse filter, or following Sweetman, '*a trigger for the obligation to carry out an appropriate assessment*'. There should however be credible evidence to show that there is a real rather than a hypothetical risk of effects that could undermine a site's conservation objectives. This was amplified in the Bagmoor Wind⁶ case where '*if the absence of risk... can only be demonstrated after a detailed investigation, or expert opinion, [then] the authority must move from preliminary examination to appropriate assessment*'.

⁵ Waddenzee: European Courts C-127/02 Waddenzee 7th September 2004, reference for a preliminary ruling from the Raad van State.

⁶ Bagmoor Wind: UK courts Bagmoor Wind v The Scottish Ministers, Court of Session [2012] CSIH 93

- 1.23 Following the People Over Wind judgement⁷, when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account any mitigation measures.
- 1.24 Stage 2 involves the **appropriate assessment and integrity test**. Here a plan can only be adopted if the competent authority can demonstrate that it will not adversely affect the integrity of the European site. This is precautionary approach and means it is necessary to show the absence of harm.
- 1.25 Following Champion⁸ **'appropriate'** is not a technical term but simply indicates that the assessment needs to be appropriate to the task in hand.
- 1.26 The **integrity** of a European site has been described as the 'coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified⁹. An alternative definition, after Sweetman¹⁰, is 'the lasting preservation of the constitutive characteristics of the site'.
- 1.27 In terms of the burden of proof, the HRA of development plans was first made a requirement in the UK following a ruling by the European Court of Justice in EC v UK¹¹. However, the judgement¹² recognised that any assessment had to reflect the actual stage in the strategic planning process and the level of evidence that might or might not be available. This was given expression in the High Court (Feeney)¹³ which stated: "*Each ... assessment ... cannot do more than the level of detail of the strategy at that stage permits*".
- 1.28 The need to consider possible **in-combination** effects arises at stage 1 – the screening and also at stage 2 – the appropriate assessment and integrity test. The effects of the plan in-combination with other plans or projects are the cumulative effects which will or might arise from the addition of the

⁷ People Over Wind: European Court Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta 12 April 2018

⁸ Champion: UK Supreme Court [2015] UKSC 52 22nd July 2015

⁹ Para 20 of the ODPM Circ. 06/2005

¹⁰ Sweetman: European Court C – 258/11 Sweetman 11th April 2013, reference for a preliminary ruling from the Supreme Court of Ireland

¹¹ Commission v UK (C-6/04) [2005] ECR I-9017

¹² Commission of the European Communities v UK Opinion of Advocate General Kokott

¹³ Feeney: Feeney v Oxford City Council [2011] EWHC 2699 (Admin) . 24th October 2011

effects of other relevant plans or projects alongside the plan under consideration. If during the stage 1 screening it is found the subject plan would have no likely effect alone, but might have such an effect in-combination then the appropriate assessment at stage 2 will proceed to consider cumulative effects. Where a plan is screened as having a likely significant effect alone, the appropriate assessment should initially concentrate on its effects alone. Exceptionally, the Wealden decision¹⁴ requires the impacts of air pollution to be considered alone and in-combination.

¹⁴ Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and the South Downs National Park Authority (Defendants) and Natural England (Interested Party) [2017] EWHC 351 (Admin).

2. European sites in and around Uttlesford

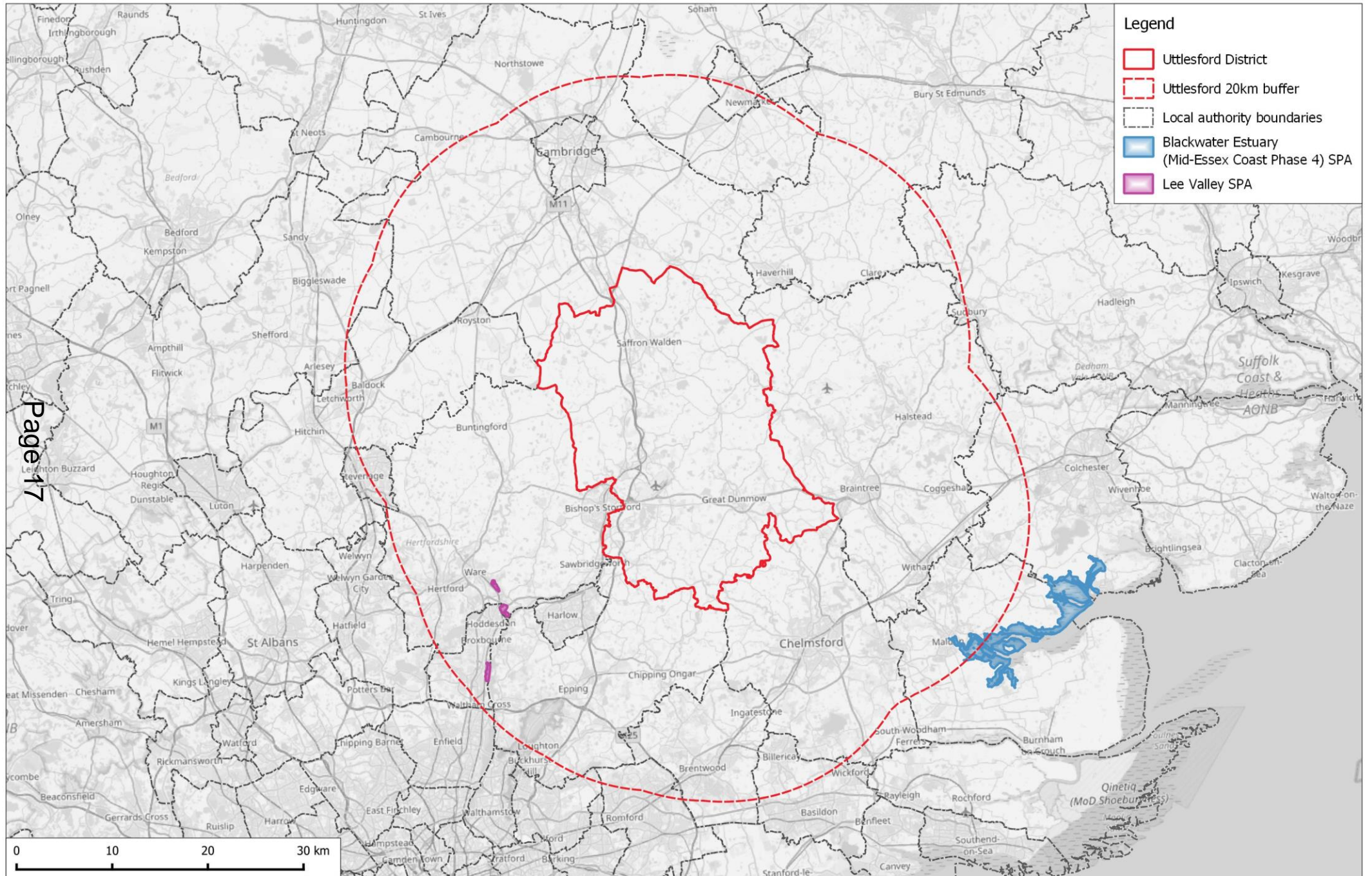
Overview of potentially relevant European sites

- 2.1 We have used 20km from the District boundary as an initial area of search (20km providing a precautionary area of search within which policies could possibly be considered to generate measurable effects).
- 2.2 European sites within 20km are listed in Table 1 and shown in Map 1 (SPAs), Map 2 (SACs) and Map 3 (Ramsar sites).

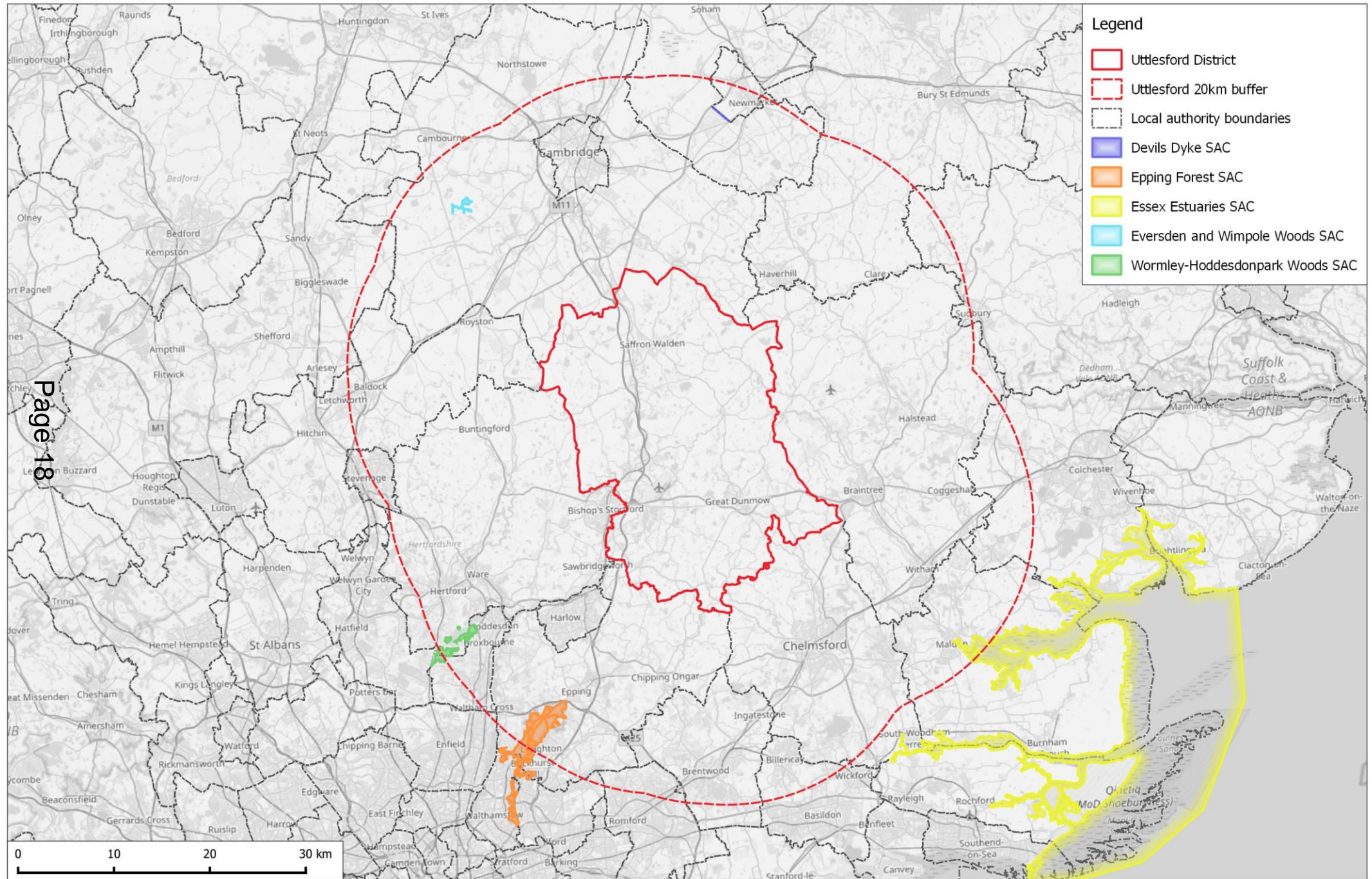
Table 1: European Sites within a 20km radius

SAC	SPA	Ramsar
Devil's Dyke SAC	Blackwater Estuary (Mid Essex Coast Phase 4) SPA	Blackwater Estuary (Mid Essex Coast Phase 4) Ramsar
Epping Forest SAC	Lee Valley SPA	Lee Valley Ramsar
Essex Estuaries SAC		
Eversden & Wimpole Woods SAC		
Wormley – Hoddesdonpark Woods SAC		

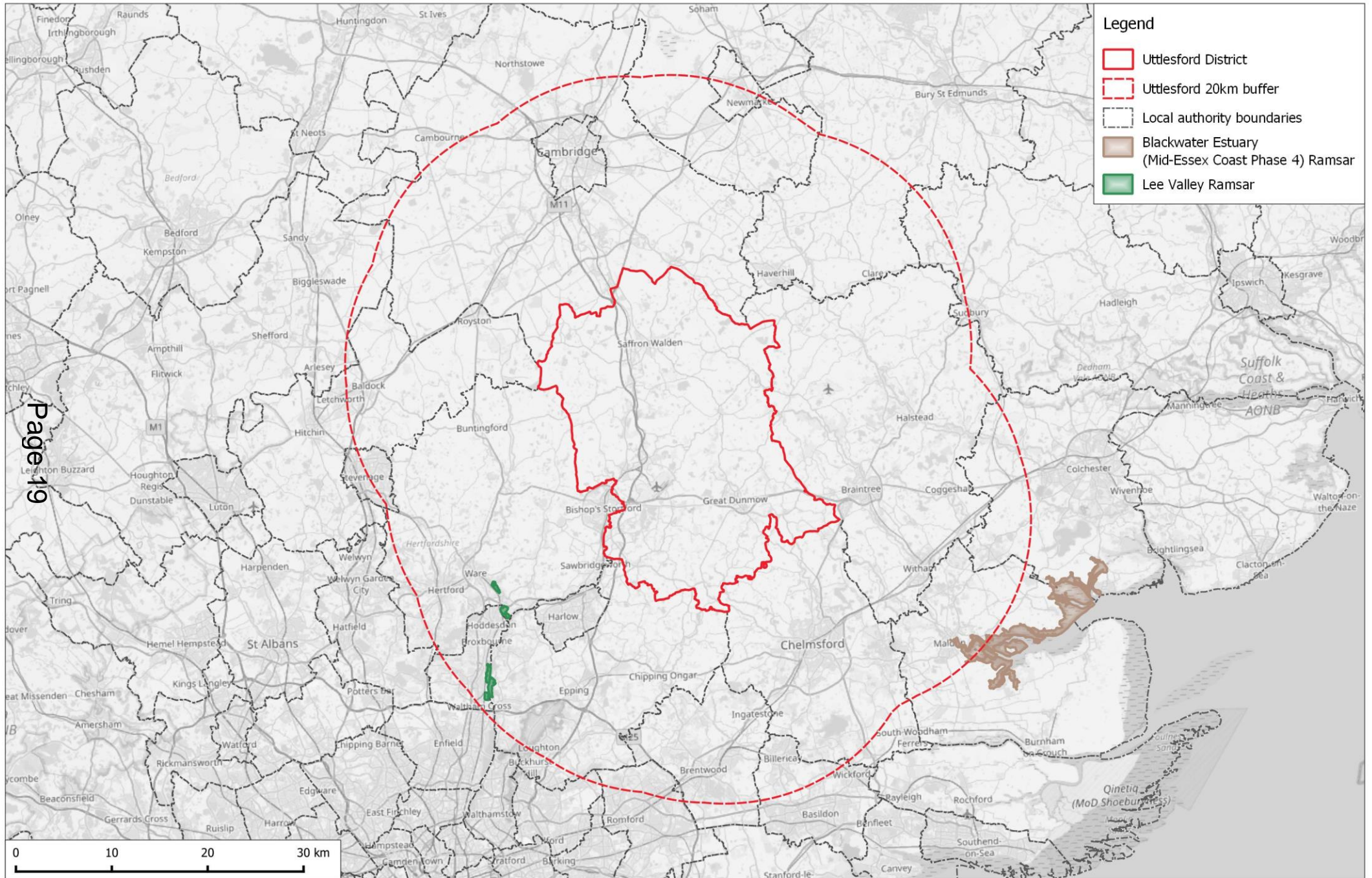
Map 1: Special Protection Areas



Map 2: Special Areas of Conservation



Map 3: Ramsar sites



Legend

- Uttlesford District
- Uttlesford 20km buffer
- Local authority boundaries
- Blackwater Estuary (Mid-Essex Coast Phase 4) Ramsar
- Lee Valley Ramsar

Page 19

- 2.3 In assessing the implications of any plan or project on European sites, it is essential to fully understand the ecology and sensitivity of the sites, in order to identify how they may be affected. Appendix 1 summarises the generic conservation objectives for European sites and Appendix 2 provides detail of the relevant sites (as listed in Table 1), listing their qualifying features, describing the sites and providing links to the relevant detailed conservation advice from Natural England.

European sites to be considered in the screening of the plan and relevant impact pathways

- 2.4 Drawing on previous HRA work and the relative sensitivities of the European sites we can identify the European sites and possible impact pathways that could be relevant when formal screening is undertaken. These are set out in Table 2. This takes a precautionary approach but also seeks to be pragmatic and reflect anticipated trends within the Plan, such as the likelihood that new housing numbers will be concentrated around the major settlements. Further information on the nature of these potential impacts is given in section 2.5 et seq.

Table 2: Summary of European sites within 20km, potentially relevant impact pathways for those sites and those that can be eliminated from further consideration (grey shading).

European site	Approx. distance (km) from District	Recreation	Water issues	Air quality	Notes and for grey shaded rows, reasons for elimination from rest of plan
SACs					
Debs Dyke SAC Page 21	16km	✓		✓	<p>A popular walking route and so potentially at risk though 16km from the district boundary. May justify screening but given additional distance to larger settlements, the risk of meaningful increases in visitor numbers is considered low and significant effects unlikely.</p> <p>Though lying in proximity to a major road, it is considered unlikely that large increases in traffic will arise given the distance from residential allocations. While potentially vulnerable to damage from recreation use, recent visitor survey work at the site by Footprint Ecology indicate recreational use is relatively local and does not extend to Uttlesford.</p> <p>Given the absence of ‘water-dependent qualifying features’, it is considered unlikely that significant effects will arise from an increased use of water resources or the disposal of wastewater.</p>
Epping Forest SAC	12km	✓		✓	<p>A very popular destination for outdoor recreation however visitor surveys (Caals & Liley, 2023; Liley, 2020) indicate visitor use does not extend as far as Uttlesford and the majority (75% of interviewees) lived within a 7km distance of the interview location. As such recreation impacts are not relevant as a pathway.</p> <p>Though lying in proximity to major roads, and despite its sensitivity to air pollution, it is considered unlikely that large increases in traffic will arise given the distance from residential allocations.</p> <p>It is considered unlikely that significant effects will arise from an increased use of water resources or the disposal of wastewater.</p>

European site	Approx. distance (km) from District	Recreation	Water issues	Air quality	Notes and for grey shaded rows, reasons for elimination from rest of plan
Essex Estuaries SAC	16km	✓	✓		<p>Very popular destination for outdoor recreation. Visitor data for the Blackwater Estuary supports a 22km zone of influence which just clips the southern part of the District. So, the issue may justify screening though dependent on location of new dwellings.</p> <p>It is considered unlikely that significant effects will arise from an increased use of water resources though screening will be required to assess the impact of the disposal of wastewater associated with the projected increase in the residential population.</p>
Eversden & Wimpole Woods SAC	14km	✓			<p>A popular destination for recreation and so potentially at risk, however as it lies some 14km from the district boundary, meaningful increases in visitor numbers is considered low and significant effects unlikely.</p> <p>It is considered unlikely that large increases in traffic will arise given the distance from residential allocations.</p> <p>It is considered unlikely that significant effects will arise from an increased use of water resources or the disposal of wastewater.</p>
Wormley – Hoddesdonpark Woods SAC	16km			✓	<p>Understood to be a less popular visitor destination. Given its distance from the district boundary (and settlements) the risk of significant issues arising is low.</p> <p>Though lying in proximity to a major road, it is considered unlikely that large increases in traffic will arise given the distance from residential allocations.</p> <p>Given the absence of ‘water-dependent qualifying features’, it is considered unlikely that significant effects will arise from an increased use of water resources or the disposal of wastewater.</p>
SPAs					

European site	Approx. distance (km) from District	Recreation	Water issues	Air quality	Notes and for grey shaded rows, reasons for elimination from rest of plan
Blackwater Estuary (Mid Essex Coast Phase 4) SPA	16km	✓	✓		See Essex Estuaries SAC above.
Lee Valley SPA	11km	✓		✓	A popular destination for outdoor recreation but this complex of artificial wetlands is managed to accommodate both its ecological interest and large numbers of visitors without conflict. Given the distance from the district and potentially relatively low levels of recreation use from Uttlesford, meaningful impacts from development in the district can be ruled out. Though adjacent to busy roads, it is considered unlikely that large increases in traffic will arise given the distance from residential allocations.
Ramsar sites					
Blackwater Estuary (Mid Essex Coast Phase 4) Ramsar	16km	✓	✓		See Essex Estuaries SAC above.
Lee Valley Ramsar	11km	✓		✓	See Lee Valley SPA above.

Recreation

- 2.5 Harmful ecological effects from recreational pressure relate to increased numbers of people living nearby and using sites for recreation. Issues can relate to a range of activities. While activities such as dog walking tend to occur widely, many activities (such as watersports) tend to occur at very specific locations. Impacts vary according to the site, the habitats and species present, the types of recreation use and the volume of visitors. Impacts include trampling, vegetation wear, erosion, increased fire risk (barbeques etc), dog fouling and disturbance.
- 2.6 The most popular destinations can draw in visitors in great numbers from considerable distances. Less popular sites, or those with fewer facilities, have a smaller catchment, fewer visitors and the issue is typically less problematic or at least more localised. Alternatively, some sites managed specifically to encourage large numbers of visitors may be able to tolerate these pressures without experiencing significant harm.
- 2.7 Importantly, whilst individual allocations, unless large and in close proximity to a fragile European site, rarely result in likely significant effects alone from recreation, a number may have a cumulative effect that can result in likely significant effects in-combination. Given the particular draw of the coast, it is the Essex Coast that is the only relevant site with respect to Uttlesford.

Water Issues

- 2.8 Water issues include water quality and water quantity (i.e. water availability), and flood management. Run-off, outflow from sewage treatments and overflow from septic tanks can result in increased nutrient loads and contamination of water courses. Abstraction and land management can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in the flow. Such impacts particularly relate to aquatic and wetland habitats. Accordingly, at a broad level, all European sites are potentially at risk.
- 2.9 Water supply in and around Uttlesford is provided by Affinity Water which has a statutory duty to provide adequate water for a range of purposes. The impact of increased demand for water on European sites has already been addressed by its Water Resources Management Plan (WRMP) which assessed predicted growth to 2080. Even though all the European sites at risk, except Devil's Dyke and Wormley-Hoddesdonpark Woods, support 'water dependent'

qualifying features¹⁵, the WRMP HRA¹⁶ concluded that adequate water supplies were available to allow likely significant effects to be ruled out alone or in-combination on all European sites in question. There is no reason to doubt this conclusion and, therefore, there is no need for any further scrutiny in this HRA (guidance is clear that a competent authority can adopt the reasoning, conclusions or assessment of another competent authority where appropriate; see Tyldesley & Chapman, 2021 for details).

- 2.10 It should be noted, however, that WRMPs are reviewed every five years and Affinity Water is currently undertaking a consultation exercise on the latest edition of its new WRMP. It is anticipated that the production of the WRMP and its HRA will run concurrently with Uttlesford's local plan. Therefore, dependent on the findings of the WRMP HRA, it is possible that this matter will have to be re-visited before the Regulation 19 submission.
- 2.11 Within Uttlesford, the disposal of water is the responsibility of two water companies, Anglian Water and Thames Water. Whilst neither Devil's Dyke nor Wormley - Hoddesdenpark Woods SACs support water-dependent qualifying features, and so can be ruled out of further scrutiny in this HRA, the same cannot be said for Epping Forest, Eversden & Wimpole Woods the Lee Valley and Essex Coast.
- 2.12 However, with the exception of the Essex coast, all proposed development and, it is presumed, all associated wastewater treatment works, appear to lie in catchments separated from these European sites so ruling out the possibility of any harmful impacts from any development associated with the Plan. Consequently, given the local geography, the only European site remaining at risk where likely significant effects cannot be ruled out is the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar. Whilst impacts from each allocation alone can be considered unlikely, it is the risk from the cumulative level of growth (i.e. in-combination) that likely significant effects might be triggered.

Air pollution

- 2.13 Development is typically associated with increased traffic and emissions which can increase the airborne concentration of nitrogen oxides (NO_x) and

¹⁵ UK Technical Advisory Group on the Water Framework Directive (2003). Guidance on the Identification of Natura Protected Areas (Final). TAG Work Programme Task 4. A – Identification of Natura Protected Areas. 1 – 20.

¹⁶ Affinity Water (2019). Draft Final Water Resources Management Plan 2020-2080. Technical Report: 4.12 Habitats Regulations Assessment.

ammonia (NH₃), and the subsequent rate of nitrogen deposition from the atmosphere. This can lead to the nutrient enrichment and acidification of soils, encouraging more tolerant ruderal species at the expense of sensitive plant, lower plant and invertebrate communities. In high concentrations, ammonia can result in direct toxic effects on vegetation, a factor which may also be true of NO_x. Furthermore, it can exacerbate the effects of other factors such as climate change or pathogens, for example. In contrast, larger animals, such as small mammals and birds are considered immune to direct effects but can be vulnerable to change in their supporting habitats.

2.14 However, levels of nitrogen deposition fall quickly in the first few metres from the roadside before gradually levelling out; beyond 200m, they become difficult to distinguish from background levels. In other words, impacts at 10m, 50m or 200m can be very different from those at the roadside. Importantly, and building on case law in Sussex (the Wealden case)¹⁷, the assessment of air pollution must be undertaken in-combination with plans and projects in neighbouring authorities and further afield.

2.15 It can be seen, therefore, that the additional contributions that might arise from increased traffic are only likely to be significant where a European site lies within 200m of a road which is expected to experience an increase of traffic, and where a feature is known to be sensitive to such effects. Such relatively simple tests essentially represent the scope of a screening assessment leaving more detailed analysis and its relationship to the ecological characteristics of the European sites at risk to the appropriate assessment, should any European sites fall into the above categories.

2.16 Table 4 (Appendix 3) shows that all allocations lie a minimum of 20.7km from Devil's Dyke, 23.5km from Epping Forest 27km from the Essex Estuaries, 24.5km from Eversden & Wimpole Woods, 23.1km from Wormley - Hoddesdonpark Woods and 18.5km from the Lee Valley. Therefore, it can be seen that all lie a considerable distance, a minimum of 18.5km from any development associated with the Plan.

2.17 Measurable air quality impacts at the local plan level are considered to be restricted to a 10km radius from their source (Chapman & Kite, 2021). Therefore, given the distances involved, it is considered there is no credible risk that the conservation objectives of the European sites could be

¹⁷ Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and the South Downs National Park Authority (Defendants) and Natural England (Interested Party) [2017] EWHC 351 (Admin).

undermined and, therefore, there is no risk of harmful impacts. Therefore, there is no need for screening and no need for any further scrutiny in this HRA.

- 2.18 In saying this, account has been taken of the potential vulnerability of Epping Forest SAC to road traffic emissions. However, confidence in this outcome can be drawn from Natural England's evidence to Epping Forest District Council local plan Examination in Public that the threat posed by air pollution is likely to be generated from within Epping Forest District and not adjacent authorities.

Outcomes

- 2.19 Mindful of these limitations, it is considered potentially harmful impacts from air pollution and the use of water resources can be ruled out prior to the need for screening. In contrast, the impact of recreational pressure on the complex of European sites along the Essex coast will require screening. The latter may also be vulnerable to the disposal of wastewater associated with the growing population of the district.

3. Screening the Local Plan for Likely Significant Effects

- 3.1 This section documents the screening stage of HRA (stage 1 of the 4 stage 'process), where the plan is screened for likely significant effects.
- 3.2 The screening for likely significant effects of a plan involves checking all aspects of the plan and identifying any areas of potential concern, which are then examined in more detail in the appropriate assessment (stage 2) of the HRA. The check for likely significant effects provides an initial test of the plan. It is undertaken to enable the plan maker as competent authority to do two things. Firstly, it narrows down and highlights those elements of the plan that may pose a risk to European sites. Secondly, where an option poses a risk but is a desired element of the plan, the screening exercise identifies where further assessment is necessary in order to determine the nature and magnitude of potential impacts on European sites and what could be done to avoid, cancel, reduce or eliminate those risks. Further assessment and evidence gathering after early screening may include, for example, the commissioning of additional survey work, modelling, researching scientific literature or setting out justifications in accordance with expert opinion.

What constitutes a likely significant effect?

- 3.3 Where the screening identifies risks that cannot be avoided with simple clarifications, corrections or instructions for project level HRA, a more detailed assessment is undertaken to gather more information about the likely significant effects and give the necessary scrutiny to potential mitigation measures. This is the appropriate assessment stage of HRA.
- 3.4 A likely significant effect could be concluded on the basis of clear evidence of risk to European site interest, or there could be a scientific and plausible justification for concluding that a risk is present, even in the absence of direct evidence. The latter is an example of the precautionary approach, which is embedded through the HRA process. The precautionary principle should be applied at all stages in the HRA process and follows the principles established in domestic and EU case law.

- 3.5 The screening in this report looks at policies prior to any avoidance/reduction/mitigation measures in line with People Over Wind¹⁸; mitigation can only be considered at Appropriate Assessment stage. People Over Wind clarified the need to carefully explain actions taken at each HRA stage, particularly at the screening for likely significant effects stage. The Judgment highlights the need for clear distinction between the stages of HRA, and good practice in recognising the function of each. The screening for likely significant effects stage should function as a screening or checking stage (regardless of avoidance, reduction/mitigation measures), to determine whether further assessment is required. Assessing the nature and extent of potential impacts on European site interest features, and the robustness of mitigation options, should be done at the appropriate assessment stage.

The screening

- 3.6 Map 4 shows the likely allocations within the Plan.
- 3.7 The screening for likely significant effects within Table 3 below provides the screening at this stage in the plan-making. The screening covers the whole plan. Where risks are highlighted and there is a possibility of significant effects on European sites, further and more detailed appropriate assessment will be required. Inevitably there will be precaution in screening elements of the plan, as the purpose of screening for likely significant effects is to identify where there is either no possibility of an effect, or where there are uncertainties.
- 3.8 Appendix 3 summarises the distances from each allocation site to European sites, providing further context and background on the distances involved.

¹⁸ People Over Wind: European Court Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta 12 April 2018

Map 4 - Allocations

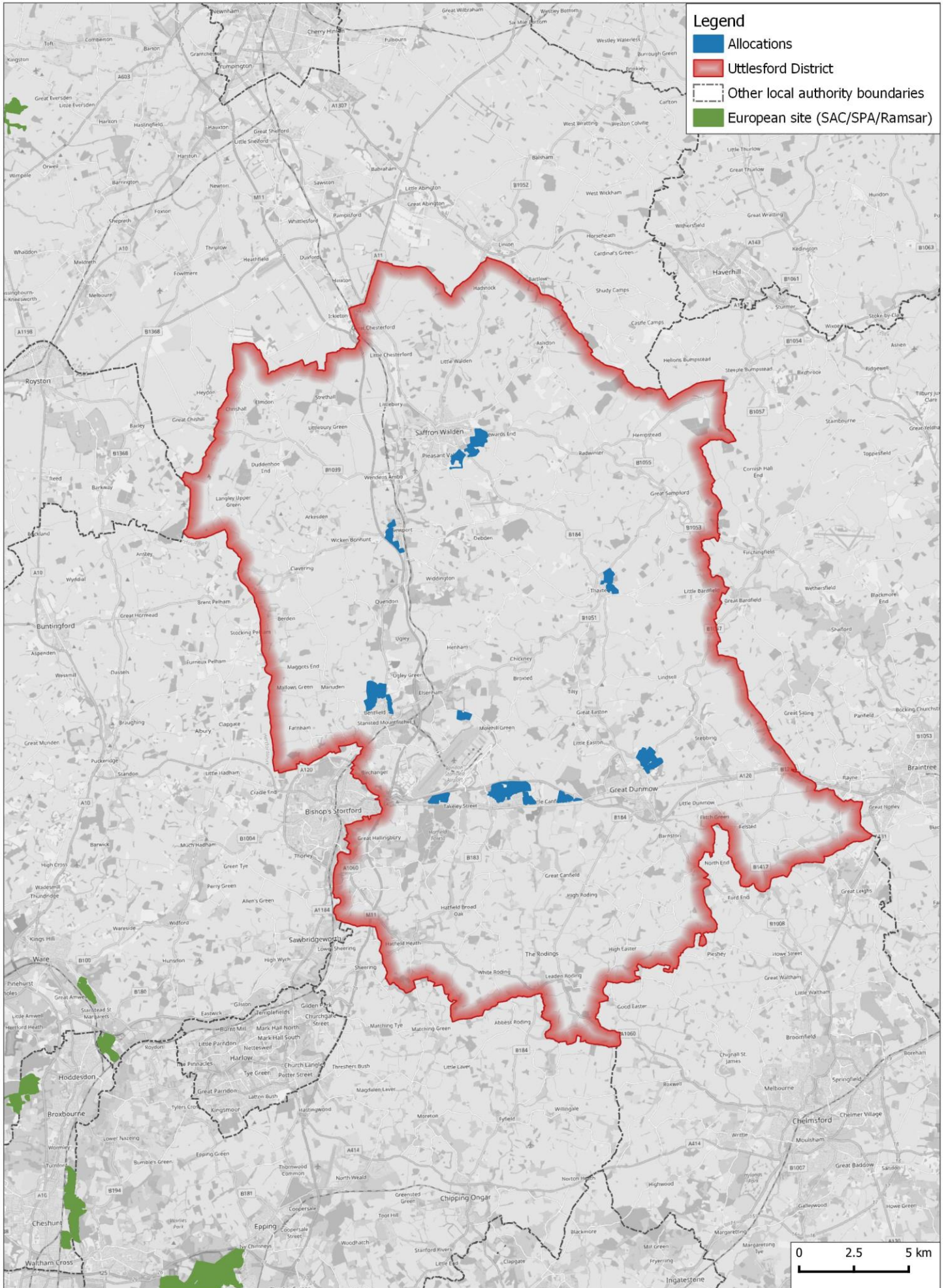


Table 3: Initial screening of the Uttlesford District Plan for likely significant effects. Orange shaded rows with bold text indicates policies that are screened in alone or in-combination. Grey shading indicates chapter headings/sections.

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Chapter 1: Introduction	Introductory text and outline of the plan.	Introductory text. No LSE.		
Chapter 2: Spatial Portrait	Outlines the current characteristics of the district and overarching vision for future developments.	Introductory text. No LSE.		
Chapter 3: Spatial Vision and Strategic Objectives	States the environmental, economic and community/social objectives of the local plan.	Strategic text. No LSE.		
Chapter 4: Spatial Strategy	States the characteristics and broad objectives of future development by area.	Strategic text. No LSE.		
Core Policy 1: Addressing Climate Change	General criteria for developments to support an overall reduction in greenhouse gases.	General criteria for development proposals. No LSE.		
Core Policy 2: Meeting Our Housing Needs	Allocations.	LSE. Screened in.	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA)	Exact housing delivery estimated to total 14,356 new dwellings. Likely significant effects in-combination cannot be ruled out.
Core Policy 3: Settlement Hierarchy	Describes the classification of settlements, according to the character, services, employment opportunities and facilities of that community.	General policy. No LSE.		
Core Policy 4: Meeting Business and Employment needs	Allocations.	LSE. Screened in.	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar)	A total of 33ha of land has been provided for business and employment development. Likely significant effects in-

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
				combination cannot be ruled out.
Core Policy 5: Providing Supporting Infrastructure and Services	New developments will be required to contribute to the delivery of new infrastructure where appropriate.	General policy. No LSE.		
Chapter 5: North Area Strategy	Introductory text about the current and future needs for housing, education and business development in the North Uttlesford area.	Strategic text. No LSE.		
Core Policy 6: North Uttlesford Area Strategy	Allocations.	LSE. Screened in.	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar)	1,692 new dwellings to be delivered at allocated sites near both Newport and Saffron Waldon. Likely significant effects in-combination cannot be ruled out.
Core Policy 7: Delivery of Transport Schemes within the North Uttlesford Area	Policy to enhance existing public transport routes, active travel routes and highway infrastructure.	General policy. No LSE.		Policy likely to be supported by Local Transport and Connectivity Plan developed by Essex County Council.
Core Policy 8: Safeguarding of Land for Strategic Transport Schemes in the North Uttlesford Area	Proposals for development will consider the delivery of transport schemes and will only be granted where construction or operation of transport scheme will not be affected.	General criteria for development proposals. No LSE.		
Core Policy 9: Green and Blue Infrastructure in the North Uttlesford Area	Development proposals must support the enhancement of green and blue infrastructure projects.	General policy that could not lead to development. No LSE.		
Chapter 6: South Area Strategy	Introduction to the housing and economic needs of South Uttlesford.	Strategic text. No LSE.		

Page 32

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 10: South Uttlesford Area Strategy	Allocations.	LSE. Screened in.	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar)	A total of 2,895 dwellings have been allocated across Takeley/Little Canfield, Stansted Mountfitchet and Great Dunmow. Likely significant effects in-combination cannot be ruled out.
Core Policy 11: London Stansted Airport	Policy states that continued use of the airport will be supported. Any development will not impact aircraft safety and will have suitable mitigation measures in place (e.g., noise, air, health) if in close proximity.	General policy. No LSE.		Increased air traffic could have implications for some European sites such as Epping Forest, However, policy is general and no specific allocations or increases in aircraft traffic referred to.
Core Policy 12: Stansted Airport Countryside Protection Zone	Policy states that development around the airport is restricted to protect rural character, with few exceptions.	General policy that could not lead to development. No LSE.		
Core Policy 13: Delivery of Transport Schemes within the South Uttlesford Area	Policy focuses on enhancing public transport network in addition to development of more active travel routes.	General policy. No LSE.		
Core Policy 14: Safeguarding of Land for Strategic Transport Schemes in the South Uttlesford Area	Policy to ensure land is safeguarded for the delivery of transport schemes in South Uttlesford, ensuring development proposals do not prejudice construction or operation of such schemes.	General criteria for development proposals. No LSE.		
Core Policy 15: Green and Blue Infrastructure in the South Uttlesford Area	Policy to protect the green and blue infrastructure projects in the South Uttlesford area and identifies	General policy that could not lead to development. No LSE.		

Uttlesford District Draft Local Plan 2041 HRA Report

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
	projects for which the Council are responsible.			
Chapter 7: Thaxted Area Strategy	Introductory text outlining Thaxted's position as a thriving Rural Centre, and the housing and economic needs of the area.	Strategic text. No LSE.		
Core Policy 16: Thaxted Area Strategy	Allocations.	LSE. Screened in.	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar)	A total of 489 dwellings have been allocated in the town. Likely significant effects in-combination cannot be ruled out.
Core Policy 17: Delivery of Transport Schemes in the Thaxted Area	Policy stating that active travel routes will be upgraded and access to public transport enhanced.	General criteria for development proposals. No LSE.		
Core Policy 18: Delivery of Green and Blue Infrastructure in the Thaxted Area	Strategic text for developments to support the delivery of green and blue infrastructure. Outline of such projects by Council in the Thaxted area.	General policy that could not lead to development. No LSE.		
Chapter 8: Rural Area Strategy	Strategic text on the settlement hierarchy across Uttlesford's rural areas.	Strategic text. No LSE.		
Core Policy 19: Rural Area Housing Requirement Figures	Outlines the distribution of housing requirements across the rural village centres.	LSE. Screened in	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar)	Larger villages includes Felsted which is within the zone of influence for the Blackwater Estuary.
Core Policy 20: Affordable Housing on Rural Exception Sites	Policy outlines the criteria for affordable housing developments to be permitted.	General criteria for development proposals. No LSE.		

Uttlesford District Draft Local Plan 2041 HRA Report

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Development Policy 1: New Dwellings in the Countryside	Criteria for new dwellings in rural settlements, to ensure they will be in accordance with character, setting and design of the settlement.	General criteria for development proposals. No LSE.		
Development Policy 2: Replacement of a Dwelling in the Countryside	Criteria for replacement dwellings in rural settlements.	General criteria for development proposals. No LSE.		
Development Policy 3: Agricultural/Rural Workers' Dwellings in the Countryside	Criteria to support the development of rural workers' dwellings to assist the running of businesses.	General criteria for development proposals. No LSE.		
Development Policy 4: Extensions to Dwellings in the Countryside	Policy that generally supports the extensions of dwellings in the countryside, however, outlines criteria in which proposals would not be supported.	General criteria for development proposals. No LSE.		
Development Policy 5: Change of Use of Agricultural Land to Domestic Gardens	Policy stating that change of agricultural land to domestic gardens would likely be supported.	General policy that could not lead to development. No LSE.		
Core Policy 21: Rural Diversification	Criteria to determine when proposals for economic activity that bring about rural diversification shall be permitted	General criteria for development proposals. No LSE		
Chapter 9: Climate, Environment and Transport	Introductory text that explains the requirement of local authorities to address climate change.	Strategic text. No LSE.		

U t t l e s f o r d D i s t r i c t D r a f t L o c a l P l a n 2 0 4 1 H R A R e p o r t

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 22: Net Zero Operational Carbon Development	Policy stating the renewable energy requirements for new developments.	General policy that could not lead to development. No LSE.		
Core Policy 23: Overheating	States the need for developers to produce a Climate Change and Sustainability Statement.	General criteria for development proposals. No LSE.		
Core Policy 24: Embodied Carbon	Policy sets out targets for Whole Life Carbon Assessment, to be undertaken by developers.	General criteria for development proposals. No LSE.		
Core Policy 25: Renewable Energy Infrastructure	Policy states that the Council will support renewable energy network development, provided any adverse effects are addressed.	General criteria for development proposals. No LSE.		
Core Policy 26: Providing for Sustainable Transport and Connectivity	Criteria for developments to support the Essex Local Transport Plan, improving existing transport infrastructure and promoting active travel.	General criteria for development proposals. No LSE.		
Core Policy 27: Assessing the impact of Development on Transport Infrastructure	Policy stating developments will be required to produce a Travel Plan, considering access to public transport and sustainable travel following these criteria.	General criteria for development proposals. No LSE.		
Core Policy 28: Active Travel – Walking and Cycling	Development should be planned around active travel routes, using the criteria outlined in this policy.	General criteria for development proposals. No LSE.		
Core Policy 29: Electric and Low Emission Vehicles	Responsibility of the developers to maximise provision of electric	General policy that could not lead to development. No LSE.		

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
	transport vehicles, by access to both home and public charging facilities.			
Core Policy 30: Public Rights of Way	Development sites close to a Public Right of Way network must demonstrate how the development will enhance or protect it.	General policy that could not lead to development. No LSE.		
Core Policy 31: Parking Standards	Development proposals will consider the latest Essex Parking Standards and Uttlesford Design Code.	General policy that could not lead to development. No LSE.		
Core Policy 32: The Movement and Management of Freight	Development proposals should consider the impact, management and mitigation of freight movement, home deliveries and servicing.	General policy that could not lead to development. No LSE.		
Page 37 Core Policy 33: Managing Waste	The Local Authority will consider the schemes within this policy to meet waste reduction and recycling targets. Policy states that new developments will include adequate recycling facilities.	General policy that could not lead to development. No LSE.		
Core Policy 34: Water Supply And Protection Of Water Resources	Policy requires development proposals to demonstrate how they will maximise water efficiency, contribute positively to the surface and groundwater sources and will not contaminate these water bodies.	General policy that could not lead to development. No LSE.		
Core Policy 35: Chalk Streams Protection and Enhancement	Development will not be permitted within the buffer zone of the chalk streams identified in this policy.	General criteria for development proposals. No LSE.		
Core Policy 36: Flood Risk	Describes how development proposals should address flood risk	General criteria for development proposals. No LSE		

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
	including requirements for new development			
Core Policy 37: Sustainable Drainage Systems	Policy required all major development to use SuDS and sets out details of requirements	General criteria for development proposals. No LSE		
Core Policy 38: The Natural Environment	Describes protection for the Natural Environment including requirements for mitigation	LSE. Screened in.	Policy describes mitigation requirements for the Essex Coast with respect to recreation.	In line with People vs Wind, mitigation measures need to be considered as part of appropriate assessment
Core Policy 39: Green and Blue Infrastructure	Policy outlines criteria to consider green and blue infrastructure in development.	General criteria for development proposals. No LSE		
Core Policy 40: Biodiversity	Development proposals will adhere to the 20% net gain in biodiversity and must conserve or enhance ecological networks.	General policy that could not lead to development. No LSE.		
Core Policy 41: Landscape Character	Development proposals should enhance and preserve the landscape character and appearance and be supported by a Landscape and Visual Impact Assessment.	General policy that could not lead to development. No LSE.		
Core Policy 42: Pollution and Contamination	Development proposals must consider the potential impacts of pollutants. Permission will be granted where there is no threat to the public health and safety, or adverse impact to local ground and surface water.	General criteria for development proposals. No LSE.		
Core Policy 43: Air Quality	Development proposals will complete an air quality assessment to ensure the criteria outlined within	General criteria for development proposals. No LSE.		

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
	this policy are met, to ensure there are no significant adverse effects from emissions to air.			
Core Policy 44: Noise	Policy outlines how noise should be managed, reduced and mitigated against by development proposals.	General policy that could not lead to development. No LSE.		
Chapter 10: Employment and Retail	Outlines the policies within this chapter.	Strategic text. No LSE.		
Core Policy 45: Protection of Existing Employment Space	Criteria for development of employment land in the district. Existing employment space will be safeguarded.	General criteria for development proposals. No LSE.		
Core Policy 46: Development at Allocated Employment Sites	All sites identified for employment will be safeguarded unless demonstrated otherwise in a district wide Employment Land Review.	General policy that could not lead to development. No LSE.		
Core Policy 47: Ancillary Uses on Existing or Allocated Employment Sites	Criteria for permissive alternative use of allocated employment sites.	General policy that could not lead to development. No LSE.		
Core Policy 48: New Employment Development on Unallocated Sites	Policy states the criteria for development proposals on unallocated employment sites, in Key Settlements, Local Rural Centres, Larger Villages and Small Villages.	General criteria for development proposals. No LSE.		
Core Policy 49: Employment and Training	Policy states that the Council will support employment and training schemes and requires large-scale developments to include an Employment and Skills Plan that is site-specific.	General criteria for development proposals. No LSE.		

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 50: Retail and Main Town Centre Uses Hierarchy	The Council will support the long-term vitality and viability of its existing Town Centre's.	General statement of policy. No LSE		
Development Policy 6: Hot Food Takeaways	Policy states that hot food takeaway proposals will not be supported unless supported by a Health impact Assessment.	General criteria for development proposals. No LSE.		
Development Policy 7: New Shops or Cafes in Smaller Settlements	Policy sets out criteria for extensions or development to small shops/cafes within small settlements.	General criteria for development proposals. No LSE.		
Core Policy 51: Tourism and the Visitor Economy	Developments that advance the tourism and visitor economy will be encouraged.	General criteria for development proposals. No LSE.		
Development Policy 8: Tourist Accommodation	Policy states criteria for permitting self-catering tourist accommodation.	General criteria for development proposals. No LSE.		
Chapter 11: Building Healthy and Sustainable Communities	Outlines the policies within this chapter.	Strategic text. No LSE.		
Core Policy 52: Good Design Outcomes and Process	Policy outlines the need for development proposals to adhere to the design principles and guidance set out in national policy.	General criteria for development proposals. No LSE.		
Development Policy 9: Public Art	Major developments are expected to contribute to public art projects that benefit the local community.	Strategic text. No LSE.		
Core Policy 53: Standards for New Residential Development	Strategic policy that states the need for a mix of housing in communities.	General policy that could not lead to development. No LSE.		

Uttlesford District Draft Local Plan 2041 HRA Report

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 54: Specialist Housing	Specialist housing will be in suitable locations, with access to community facilities and public transport.	General criteria for development proposals. No LSE.		
Core Policy 55: Residential Space Standards	New dwellings will comply with national residential space requirements (internal and external).	General policy that could not lead to development. No LSE.		
Core Policy 56: Affordable Dwellings	New residential developments should provide affordable dwellings, distributed throughout the development.	General criteria for development proposals. No LSE.		
Core Policy 57: Sub-Division of Dwellings and Homes in Multiple Ownership	Policy states criteria for supporting multiple occupancy homes in development.	General criteria for development proposals. No LSE.		
Core Policy 58: Custom and Self-Build Housing	Policy outlines the criteria for self-build custom plots.	General criteria for development proposals. No LSE.		
Core Policy 59: The Metropolitan Green Belt	The Metropolitan Green belt will be maintained, and development within the green belt will be assessed in accordance government policy.	General policy that could not lead to development. No LSE.		
Core Policy 60: The Travelling Community	Criteria for accommodation proposals for the Gypsy, Traveller and Travelling Show people community.	General criteria for development proposals. No LSE.		Note that the policy numbering is incorrect within the Chapter from this point onwards (Jumps from 59 to 61). Numbers given are consistent with Excel sheet shared from UDC.
Core Policy 61: Transit Sites	Outlines the criteria to approve proposals of transit sites.	General criteria for development proposals. No LSE.		

Uttlesford District Draft Local Plan 2041 HRA Report

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 62: The Historic Environment	All development proposals should conserve and enhance the character of Uttlesford’s historic environment.	General criteria for development proposals. No LSE.		
Core Policy 63: Design of Development Within Conservation Areas	Criteria stating that developments within a Conservation Area must conserve or enhance the site-specific interest, setting or character.	General criteria for development proposals. No LSE.		
Core Policy 64: Development Affecting Listed Buildings	Policy states criteria for changes to listed buildings would be permitted.	General criteria for development proposals. No LSE.		
Core Policy 65: Non-Designated Heritage Assets of Local Importance	Developments that have adverse effects to heritage assets of local interest will be refused, only permitting those in keeping with the character and local significance.	General criteria for development proposals. No LSE.		
Core Policy 66: Planning of Health	Policy sets out how proposals will be expected to reduce health inequalities, promote healthier lifestyles and improve the health and wellbeing of communities	General criteria for development proposals. No LSE.		
Core Policy 67: Open Space	Policy sets out requirements and standards for the provision of open space for sport and recreation	General criteria for development proposals. No LSE.		
Core Policy 68: Community Uses	Policy provides the basis for the protection of existing community uses and the requirements to provide additional community uses in tandem with new development.	General criteria for development proposals. No LSE.		
Core Policy 69: New Cemeteries and Burial Space	Policy sets criteria for proposals for new cemeteries and burial grounds	General criteria for development proposals. No LSE.		

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 70: Communications Infrastructure	Policy requires proposals will to demonstrate how high-speed broadband infrastructure, and other communications infrastructure, will be provided in time for occupation of the development.	General criteria for development proposals. No LSE.		
Chapter 12: Monitoring	States the responsibility of the Council to successfully implement the Plan and policies, including the provision of land to meet development demand.	General policy. No LSE.		
Core Policy 66: Monitoring and Implementation	A monitoring report will be produced annually to ensure the Plan and Monitoring Framework are being executed effectively.	General policy. No LSE.		

Screening conclusions

- 3.9 The initial screening of the draft plan has identified potential risks relating to the disposal of wastewater and for recreation. Likely significant effects were identified in-combination for the Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar in relation to both the disposal of wastewater and for recreation and the following policies:
- Core Policy 2: Meeting Our Housing Needs
 - Core Policy 4: Meeting Business and Employment needs
 - Core Policy 6: North Uttlesford Area Strategy
 - Core Policy 10 South Uttlesford Area Strategy
 - Core Policy 16: Thaxted Area Strategy
- 3.10 In addition, Core Policy 37 sets out mitigation requirements with respect to recreation and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar.
- 3.11 These policies will need to be considered in detail at appropriate assessment and later stages of the document set out the current understanding and highlight further evidence that will need to be gathered as the Plan progresses. The Regulation 19 version of the Plan will be subject to a complete rescreening and updated appropriate assessment.

4. Appropriate Assessment Topic: Recreation

Relevant policies from LSE screening

4.1 Screening identified likely significant effects in relation to recreation impacts and the Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar for the following policies in-combination with other elements of plan and other plans/projects:

- Core Policy 2: Meeting Our Housing Needs;
- Core Policy 4: Meeting Business and Employment needs;
- Core Policy 6: North Uttlesford Area Strategy;
- Core Policy 10 South Uttlesford Area Strategy;
- Core Policy 16: Thaxted Area Strategy;
- Core Policy 19: Rural Area Housing Requirement Figures.

4.2 Policies were screened in the absence of mitigation and mitigation measures are set out in the following policy, which in accordance with People vs Wind need to be considered at appropriate assessment:

- Core Policy 38: the Natural Environment

Background

4.3 In the UK there is considerable overlap between nature conservation and recreation. Many of our most important nature conservation sites have legal rights of access, for example through Public Rights of Way or Open Access through the Countryside and Rights of Way Act (CRoW) 2000. People are often drawn to sites that are important for nature conservation as they are large, scenic and often few other alternatives exist. Recreation use can include a variety of activities, ranging from the daily dog walks to competitive adventure and endurance sports. There can be a difficult balancing act between providing for an increasing demand for access without compromising the integrity of protected wildlife sites.

4.4 There is now a strong body of evidence showing how increasing levels of access can have negative impacts on wildlife. Visits to the natural environment have shown a significant increase in England as a result of the increase in population and a trend to visit more (O'Neill, 2019). The issues are particularly acute in southern England, where population density is highest. Issues are varied and include disturbance, increased fire risk, contamination and damage (for general

reviews see: Liley et al., 2010; Lowen et al., 2008; Ross et al., 2014; Underhill-Day, 2005).

- 4.5 The issues are not however straightforward. It is now increasingly recognised that access to the countryside is crucial to the long term success of nature conservation projects, for example through enforcing pro-environmental behaviours and a greater respect for the world around us (Richardson et al., 2016). Access also brings wider benefits to society that include benefits to mental/physical health (Keniger et al., 2013; Lee & Maheswaran, 2011; Pretty et al., 2005) and economic benefits (ICF GHK, 2013; ICRT, 2011; Keniger et al., 2013; The Land Trust, 2018). Nature conservation bodies are trying to encourage people to spend more time outside and government policy is also promoting countryside access in general (e.g. through enhancing coastal access).

Disturbance to birds and the Essex Coast

Bird disturbance

- 4.6 Disturbance has been identified by Natural England as a generic issue across many SPAs (see Coyle & Wiggins, 2010), and can be an issue for a range of species.
- 4.7 Disturbance to wintering and passage waterfowl can result in:
- A reduction in the time spent feeding due to repeated flushing/increased vigilance (Bright et al., 2003; Fitzpatrick & Bouchez, 1998; Stillman & Goss-Custard, 2002; Thomas et al., 2003; Yasué, 2005)
 - Increased energetic costs (Nolet et al., 2002; Stock & Hofeditz, 1997)
 - Avoidance of areas of otherwise suitable habitat, potentially using poorer quality feeding/roosting sites instead (N. H. Burton et al., 2002; N. H. K. Burton et al., 2002; Cryer et al., 1987; Gill, 1996)
 - Increased stress (Regel & Putz, 1997; Thiel et al., 2011; Walker et al., 2006; Weimerskirch et al., 2002).
- 4.8 Disturbance can have additional impacts for breeding birds and for breeding gulls and terns, impacts of recreation can include reduced breeding success (Medeiros et al., 2007; Robert & Ralph, 1975; Sandvik H & Barrett, 2001).

The Essex Coast and the RAMS

- 4.9 The Mid-Essex Coast comprises an extensive complex of estuaries and intertidal sand and silt flats, including several islands, shingle and shell beaches and extensive areas of saltmarsh. There are 5 Mid-Essex Coast SPAs, classified in a phased approach to recognise the ecological linkages between them. These SPAs

support a diverse range of species that include internationally important populations of breeding birds, as well as internationally important assemblages of wintering waterfowl, present in both nationally and internationally important numbers. Each individual site has its own conservation objectives and conservation advice package.

- 4.10 In recognition of the issues relating to increased recreation from local housing growth and impacts to the Essex Coast, relevant local planning authorities have produced a Supplementary Planning Document (SPD). The SPD focuses on the mitigation that is necessary to protect the birds of the Essex coast and their habitats from the increased visitor pressure associated with new residential development. It accompanies the strategic approach to mitigation which is set out in the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (the 'RAMS').
- 4.11 The RAMS highlights the relevant zones of influence for the different SPA sites along the Essex Coast, with these zones reflecting the areas where additional residential housing growth will have likely significant effects. The zone for the Blackwater Estuary SPA/Ramsar extends to 22km from the European site boundary (see Map 5) and this clips the Uttlesford District Boundary. None of the other estuary-specific zones extend as far as Uttlesford and as such The Blackwater Estuary SPA/Ramsar is the only relevant site that needs to be considered.

The Blackwater Estuary

- 4.12 The Blackwater Estuary (Mid Essex Coast Phase 4) SPA is classified for:
- Dark-bellied brent goose (non-breeding);
 - Common pochard (breeding);
 - Hen harrier (non-breeding);
 - Ringed plover (breeding);
 - Grey Plover (non-breeding);
 - Dunlin (non-breeding);
 - Black-tailed godwit (non-breeding);
 - Little tern (breeding);
 - Waterbird assemblage (non-breeding).
- 4.13 The Blackwater Estuary Ramsar (Mid Essex Coast Phase 4) is listed for some of the same bird species (Dark-bellied Brent Goose, Grey Plover, Dunlin and Black-tailed Godwit and the wintering waterbird assemblage)

4.14 The supplementary conservation advice for the SPA¹⁹ sets a range of targets relating to disturbance from human activity. For example, for the non-breeding waterbird assemblage there is a target to “restrict the frequency, duration and / or intensity of disturbance affecting roosting, foraging, feeding, moulting and/or loafing birds so that they are not significantly disturbed.” The target is set to reduce (rather than restrict) for some species such as breeding Ringed Plover and Little Tern, reflecting the particular pressures these species are under (e.g. Liley et al., 2021). Clearly increased recreation use has the potential to undermine the conservation objectives. The issues are strategic in that it is the in-combination effects of housing growth over a wide area that are relevant.

Impacts to SAC and non-avian Ramsar interest

4.15 The Essex Estuaries SAC qualifies for the following habitats:

- Estuaries;
- Mudflats and sandflats not covered by seawater at low tide;
- Salicornia and other annuals colonising mud and sand;
- Spartina swards (*Spartinion maritimae*).

4.16 The Blackwater Estuary Ramsar (Mid Essex Coast Phase 4) is listed for the following non-avian interest:

- Saltmarsh;
- Wetland invertebrate assemblage;
- Wetland plant assemblage.

4.17 The SAC and Ramsar interest therefore relates to habitats that are largely inaccessible and on-the whole difficult to access. The wetland plants and invertebrates are likewise associated with terrain that is unlikely to be the focus for recreation. There is no specific mention of trampling damage, damage from boat traffic or similar in the supplementary conservation advice²⁰ and as such the risks are low. The only potential pathways by which recreation could undermine the

¹⁹ See

[https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK9009245&SiteName=blackwater&SiteNameDisplay=Blackwater+Estuary+\(Mid-Essex+Coast+Phase+4\)+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAAra=&NumMarineSeasonality=8](https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK9009245&SiteName=blackwater&SiteNameDisplay=Blackwater+Estuary+(Mid-Essex+Coast+Phase+4)+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAAra=&NumMarineSeasonality=8)

²⁰ See

<https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK0013690&SiteName=essex&SiteNameDisplay=Essex+Estuaries+SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAAra=&NumMarineSeasonality=>

conservation objectives would relate to the spread of invasive species (for which the supplementary advice sets a restore target) and/or trampling damage to saltmarshes. These pathways are not relevant given their nature (only a very small proportion of recreational users will directly access saltmarsh or spread non-native species), the distance from Uttlesford and the scale of growth that falls in the relevant visitor catchment.

Mitigation and policy wording

- 4.18 The RAMS is implemented through the Bird Aware Essex Coast project²¹. This has been established in-line with Bird Aware Solent, a sister project that is long-running and established. This has meant Bird Aware Essex has been able to build on the experience and expertise established on the Solent.
- 4.19 Only a small area of Uttlesford falls within the zone of influence (see Map 5) and there are no allocations within this zone. Core Policy 37 on the Natural Environment ensures compliance with the SPD. Contributions will be secured from development towards mitigation in accordance with the SPD, with the tariff will be applied to net additional dwellings, including Permitted Development as relevant. The zone is shown on the Policies Map and the supporting text highlights the zone of influence may change with time, potentially reflecting changing patterns of recreation use. This ensures there is flexibility if new evidence emerges.

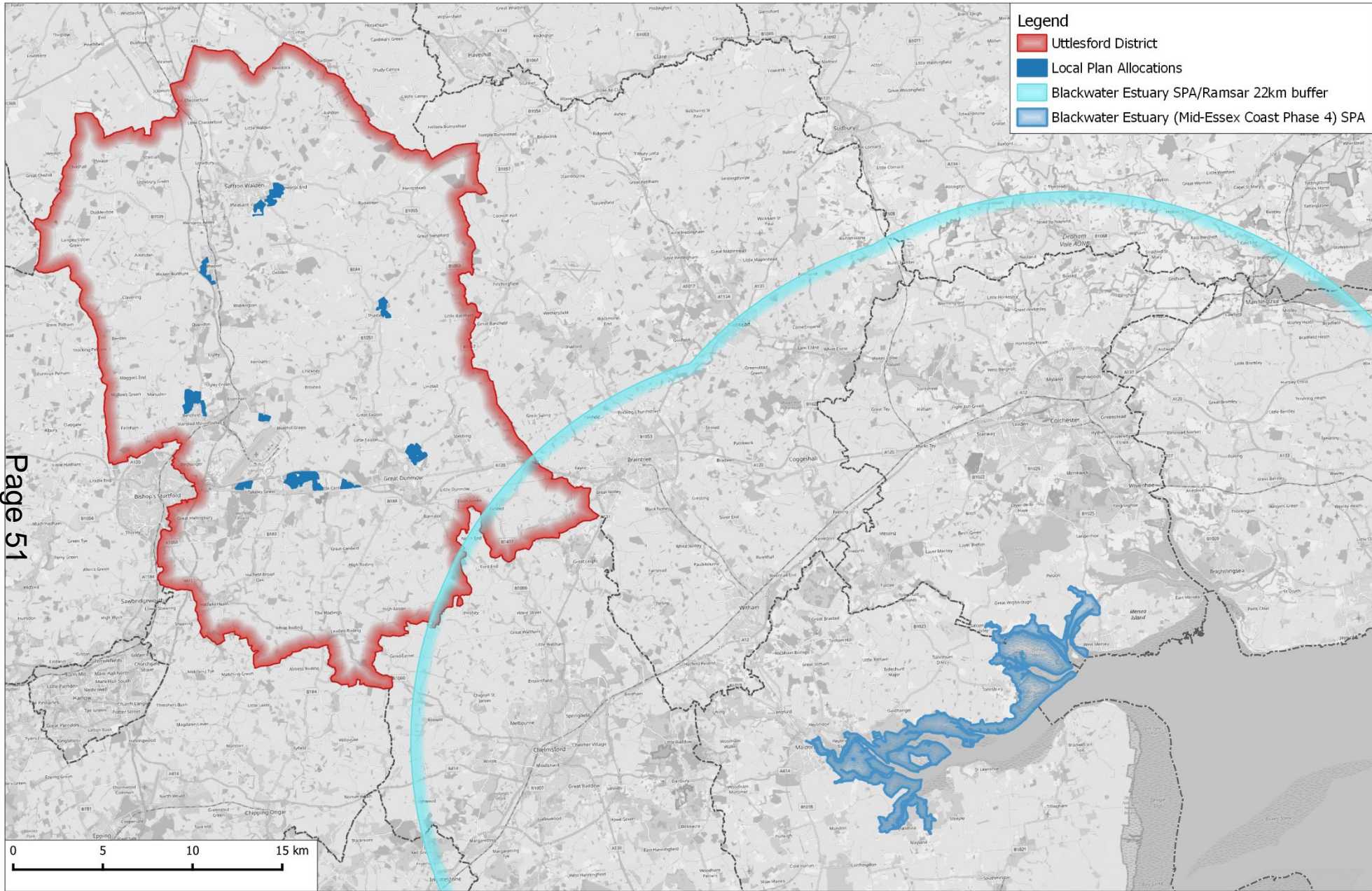
Conclusions

- 4.20 A strategic mitigation approach is now established to address impacts from bird disturbance; the approach is adopted as an SPD and contributions secured through policy. As such, it is possible at this iteration of the HRA to identify that necessary measures are in place to be able to rule out adverse effects on integrity from recreation for Blackwater Estuary (Mid Essex Coast Phase 4) SPA and the bird interest of the Blackwater Estuary (Mid Essex Coast Phase 4) Ramsar, alone or in-combination. Risks to the Essex Estuaries SAC and non-avian features of the Ramsar can be ruled out given the distances involved, the scale of growth proposed in the respective visitor catchment and the respective vulnerability of the interest. This conclusion would not change as a result of any in-combination assessment and as such, adverse effects to the Essex Estuaries SAC and non-avian features of the Ramsar can be ruled out alone or in-combination. These findings should be checked with Natural England and reviewed at the Regulation 19 stage

²¹ <https://birdaware.org/essex/>

of the Plan to check that there is no further evidence, revision to the zone boundaries or changes in the distribution of housing growth that might change the outcome.

Map 5: Blackwater Estuary SPA/Ramsar and 22km zone



Page 51

Contains Ordnance Survey data © Crown copyright and Database Right 2020. Contains map data © OpenStreetMap contributors. Terms: www.openstreetmap.org/copyright Designated site boundaries download from the Natural England website © Natural England.

5. Appropriate Assessment Topic: Water Quality

Relevant policies from LSE screening

5.1 Screening identified likely significant effects in relation to the disposal of wastewater and the Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar for the following policies in-combination with other elements of plan and other plans/projects:

- Core Policy 2: Meeting Our Housing Needs;
- Core Policy 4: Meeting Business and Employment needs;
- Core Policy 6: North Uttlesford Area Strategy;
- Core Policy 10 South Uttlesford Area Strategy;
- Core Policy 16: Thaxted Area Strategy;
- Core Policy 19: Rural Area Housing Requirement Figures.

Impacts from wastewater

5.2 Wastewater or sewage can be very damaging to water bodies as it can contain large amounts of nutrients (such as phosphorus and nitrates), ammonia, bacteria, harmful chemicals and other damaging substances. Issues arise where sewage treatment technology to adequately reduce levels of phosphorus and harmful chemicals is not in place, where leakages occur from privately owned septic tanks and, in wet weather, storm overflows can discharge untreated sewage. Poorly installed domestic washing machines and even washing cars at home can, in places, also add to the pollution load. Outcomes can include increased turbidity, algal blooms, reduced dissolved oxygen and an overall increase in the nutrient status of receiving waterbodies. Simply, increases in housing increase pressure on the sewage network and the volume of wastewater.

5.3 The pollution of inland and coastal waters has received greater recognition in recent years and the significance of such potential impacts and the need to mitigate has been given emphasis by Natural England's demands that new development affecting vulnerable water bodies must achieve 'nutrient neutrality', ie avoid any net increase in nitrate and phosphate pollution. Whilst this relates primarily to the disposal of foul water, run-off from hard surfaces can also be a factor. This reflects contemporary case law (the Dutch case) which makes clear that where water quality targets of European sites are not being met, further inputs of pollutants should not be allowed.

- 5.4 For the avoidance of doubt, the Essex coast European sites are not currently subject to these measures, but a range of other statutory and policy drivers still apply.
- 5.5 The Anglian and Thames water companies both provide wastewater treatment for new development within Uttlesford which are typically delivered by ensuring there is adequate capacity or headroom within the wastewater treatment system.
- 5.6 Whilst it should be expected that all existing wastewater treatment works that lie within the catchment of the Essex coast European sites operate within their licensed conditions and that all have capacity to accommodate predicted levels of growth, this is not known to the Council for certain. On the other hand, licenses for all wastewater treatment works and any changes to these would have been subjected to project-level HRAs and would not be permitted to operate if adverse effects could not be ruled out.
- 5.7 Furthermore, both water companies have recently produced their first Drainage and Wastewater Management Plan (DWMP)²². DWMPs provide the basis for integrated long-term planning relating to drainage, flooding and protection of the environment. These will inform the approach to wastewater management over the next twenty-five years (2025-2050).
- 5.8 Given their particular knowledge of and responsibilities for the water environment, the water companies and the Environment Agency are the competent authorities best placed to assess the impact of the disposal and the subsequent management of foul water, not the Council. The DWMPs and their accompanying assessment can therefore be expected to play an important role in the shape, content and direction of the Local Plan.
- 5.9 The Thames Water DWMP was subject to HRA²³. That HRA took the approach of identifying likely significant effects where sewage treatment works were within 10km of a European site. Overall, the HRA concluded that it was unlikely that the DWMP would have an adverse effect on the integrity of the European sites either alone or in-combination with other plans and projects. Much of the development

²² For Thames Water see: <https://www.thameswater.co.uk/about-us/regulation/drainage-and-wastewater-management/our-dwmp>. For Anglian Water see: <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drainage-wastewater-management-plan/>

²³ <https://www.thameswater.co.uk/media-library/home/about-us/regulation/drainage-and-wastewater/appendix-l-habitats-regulations-assessment.pdf>

within the Uttlesford Local Plan falls within the Thames Water area, including sites at Takeley and towards Bishops Stortford.

- 5.10 By contrast no HRA has been conducted for the Anglian Water DWMP. It is the Anglian Water part of the sewage network which relates to the Essex Coast and as such there is no formal HRA that Uttlesford District Council can rely on. Without this information or an updated water cycle study to reflect the growth proposed in the plan, it would be premature to speculate on whether adverse effects can or cannot be ruled out for the Essex Coast. The risk relates to a wide area (multiple local authorities) and the Council can look to the Environment Agency and Anglian Water company for reassurance that the necessary checks and capacity is in place. Prior to the next iteration of the Local Plan HRA (at Regulation 19) further checks will be necessary with Anglian Water and further evidence gathering will be required in order to clarify the relevant water treatment works for the growth proposed, the available headroom/capacity at those works and any risks to the Essex Coast sites.

6. Conclusions

- 6.1 This HRA report has been produced alongside the Draft (Regulation 18) version of the Uttlesford Local Plan. The HRA will be updated at each public consultation stage in the plan making process and will be finalised at adoption. As such the HRA is iterative and this report is produced at an early stage in the Plan.
- 6.2 We have screened this version of the Plan and identified Likely Significant Effects relating to the disposal of wastewater and for recreation. Risks were identified for both pathways in-combination for the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar.
- 6.3 There is a strategic mitigation scheme established to address recreation impacts to birds on the Essex Coast. This is referred to in policy and mitigation requirements set out in detail within an adopted SPD. The evidence demonstrates that only a very small portion of Uttlesford District lies within the relevant zone of influence and none of the allocations within the Plan fall within the zone. Given the level and distribution of growth and the mitigation scheme in place, a conclusion of no adverse effects on integrity with respect to recreation impacts and the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar can be reached at this stage in the plan making.
- 6.4 With respect to the disposal of wastewater, further checks are necessary on the capacity at the relevant sewage treatment works and the implications for the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar. These checks are necessary to inform the next iteration of the HRA. Given that much of the growth proposed lies within the Thames Water area (and therefore will not relate to the Essex Coast) and the large distances from Uttlesford to the coast, the risks are relatively low.
- 6.5 These conclusions should be revisited as the Plan progresses and checked with Natural England. The conclusions may need to be updated and revised according to any new evidence, further information or advice from Natural England.

References

Caals, Z., & Liley, D. (2023). *Epping Forest Visitor Survey 2022* (710). Footprint Ecology / London Borough of Waltham Forest.

Chapman, C., & Kite, B. (2021). *Guidance on decision-making thresholds for air pollution* (JNCC Report 696). JNCC.

Liley, D. (2020). *Epping Forest Visitor Survey (2019)* (Unpublished Report for Epping Forest DC 562). Footprint Ecology / Epping Forest DC.

Tyldesley, D., & Chapman, C. (2021). *The Habitats Regulations Handbook*. DTA Publications.
<https://www.dtapublications.co.uk/handbook/>

Appendix 1: Appendix 1: European Site Conservation Objectives

As required by the Directives, 'Conservation Objectives' have been established by Natural England and these define the required ecologically robust state for each European site interest feature. All sites should be meeting their conservation objectives.

When being fully met, each site will be adequately contributing to the overall favourable conservation status of the species or habitat interest feature across its natural range. Where conservation objectives are not being met at a site level, and the interest feature is therefore not contributing to overall favourable conservation status of the species or habitat, plans should be in place for adequate restoration.

Natural England has embarked on a project to renew all European site Conservation Objectives, in order to ensure that they are up to date, comprehensive and easier for developers and consultants to use to inform project level Habitats Regulations Assessments in a consistent way. In 2012, Natural England issued a set of generic European site Conservation Objectives, which should be applied to each interest feature of each European site.

The generic Conservation Objectives for each European site include an overarching objective, followed by a list of attributes that are essential for the achievement of the overarching objective. Whilst the generic objectives are standardised, they are to be applied to each interest feature of each European site, and the application and achievement of those objectives will therefore be site specific and dependant on the nature and characteristics of the site. The more detailed site-specific information to underpin these generic objectives, provides much more site-specific information, and this detail plays a fundamental role in informing HRA, and importantly gives greater clarity to what might constitute an adverse effect on a site interest feature.

For SPAs the overarching objective is to:

'Avoid the deterioration of the habitats of qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.'

This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the habitats of the qualifying features.
- The structure and function of the habitats of the qualifying features.
- The supporting processes on which the habitats of the qualifying features rely.
- The populations of the qualifying features.
- The distribution of the qualifying features within the site.

For SACs the overarching objective is to:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of qualifying natural habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site

Conservation objectives inform any HRA of a plan or project, by identifying what the interest features for the site should be achieving, and what impacts may be significant for the site in terms of undermining the site's ability to meet its conservation objectives.

Appendix 2: Conservation Interest of European Sites

Links in the table cross-reference to the Natural England website and the relevant page with the site’s conservation objectives. In the qualifying features column, for SPAs NB denotes non-breeding and B breeding features. For SACs, # denotes features for which the UK has a special responsibility. The descriptive text is adapted from Natural England’s site improvement plan (SIP) for the relevant site. Pressures and threats are also from the site improvement plan (with “P” and “T” used to define which are current pressures and which are threats. For Ramsar sites, the qualifying features are taken from the Natural England designated site view for the relevant site²⁴, and the link cross-references to the relevant page.

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)	Site description (from relevant SIP)
Page 59 Epping Forest SAC	H4010. Northern Atlantic wet heaths with <i>Erica tetralix</i> ; Wet heathland with cross-leaved heath H4030. European dry heaths H9120. Atlantic acidophilous beech forests with <i>Ilex</i> sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>); Beech forests on acid soils	Air pollution (P) Undergrazing (P) Public access/Disturbance (P) Changes in species distributions (T) Inappropriate water levels (T) Water pollution (T) Invasive species (T) Disease (T) Invasive species (P/T)	Epping Forest is a large ancient wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathland and scattered wetland. The semi-natural woodland is particularly extensive but the forest plains are also a major feature and contain a variety of unimproved acid grasslands.

²⁴ <https://designatedsites.naturalengland.org.uk/>

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)	Site description (from relevant SIP)
<p>Blackwater Estuary (Mid Essex Coast Phase 4) SPA</p> <p style="text-align: center; font-size: 2em;">Page 60</p>	<p>A046a <i>Branta bernicula</i>: Dark-bellied brent goose (non-breeding)</p> <p>A059 <i>Aythya ferina</i>; Common pochard (breeding)</p> <p>A082 <i>Circus cyaneus</i>; Hen harrier (non-breeding)</p> <p>A137 <i>Charadrius hiaticula</i> Ringed plover (breeding)</p> <p>A141 <i>Pluvialis squatarola</i> (grey plover) (non-breeding)</p> <p>A149 <i>Calidris alpina alpina</i>; Dunlin (non-breeding)</p> <p>A156 <i>Limosa limosa islandica</i>; Black-tailed godwit (non-breeding)</p> <p>A195 <i>Sterna albifrons</i>: Little tern (breeding)</p> <p>Waterbird assemblage</p>	<p>Coastal squeeze (P/T)</p> <p>Public access/Disturbance (P/T)</p> <p>Fisheries: Commercial marine and estuarine (P/T)</p> <p>Planning permission: general(P)</p> <p>Changes in species distributions (T)</p> <p>Invasive species (P/T)</p> <p>Fisheries; Recreational marine and estuarine (P)</p> <p>Invasive species (P)</p> <p>Air pollution: risk of atmospheric nitrogen deposition (P)</p>	<p>The Essex Estuaries SIP covers the Essex Estuaries SAC and five mid-Essex coast SPAs (Blackwater Estuary, Colne Estuary, Crouch and Roach Estuaries, Dengie and Foulness).</p> <p>The area is a typical, undeveloped, coastal plain estuarine system with associated open coast mudflats and sandbanks. Sub-tidal areas have a rich invertebrate fauna and there are extensive intertidal mudflats and sandflats.</p> <p>Four different saltmarsh features of European importance are represented as well as large areas of grazing marsh. The site is one of the most important areas for overwintering waterbirds in the UK and is of international importance for several breeding bird species.</p>
<p>Blackwater Estuary (Mid Essex Coast Phase 4) Ramsar</p>	<p>Black-tailed godwit, <i>Limosa limosa</i> - Wintering</p> <p>Dark-bellied brent goose, <i>Branta bernicla</i> - Wintering</p> <p>Dunlin, <i>Calidris alpina</i> - Wintering</p> <p>Grey plover, <i>Pluvialis squatarola</i> - Wintering</p> <p>Saltmarsh</p> <p>Waterbird assemblage - Wintering</p> <p>Wetland invertebrate assemblage</p> <p>Wetland plant assemblage</p>	<p>See above.</p>	<p>See above.</p>

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)	Site description (from relevant SIP)
Essex Estuaries SAC	H1130. Estuaries H1140. Mudflats and sandflats not covered by seawater at low tide H1310. Salicornia and other annuals colonising mud and sand H1320. Spartina swards (<i>Spartinion maritimae</i>)	See above.	See above.
Page 61 Devil's Dyke SAC	H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia)	Inappropriate scrub control (P/T) Air pollution (T)	Devil's Dyke holds one of the best and most extensive areas of species-rich chalk grassland in Cambridgeshire. The grassland is of a type characteristic to chalklands of south, central and eastern England and represents a habitat type now very restricted in distribution and extent throughout its British range. The Dyke is an ancient linear earthwork comprising a deep ditch and high bank, originally colonised by plants from adjacent calcareous grassland. For this reason the Dyke is important as one of the few remaining areas still supporting these relict chalkland vegetation communities, once traditionally maintained by sheep grazing
Eversden & Wimpole Woods SAC	S1308 Barbastelle bat, <i>Barbastella barbastellus</i>	Feature location/extent/condition unknown (P/T) Offsite habitat availability/management (P/T) Forestry and woodland management (T)	Eversden Wood is an ancient woodland of ash-maple type which is now very localised in extent, both locally and in lowland England as a whole. The site. It is one of the largest remaining areas of such woods on the chalky boulder clay in Cambridge and contains a rich assemblage of woodland plants including some uncommon species.

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)	Site description (from relevant SIP)
		Air pollution (P)	The site holds colonies of Barbastelle bat, the sole European designated feature of the site. The bats are associated with the trees in Wimpole woods, these trees are used as a summer maternity roost where female bats gather to give birth to their young. The bats also use the site as a foraging area. Some of the woodland is also used as a flight path when bats forage outside the site.
Lee Valley SPA	A021(NB) <i>Botaurus stellaris</i> : Great bittern A051(NB) <i>Anas strepera</i> : Gadwall A056(NB) <i>Anas clypeata</i> : Northern shoveler	Water pollution (T) Hydrological changes (T) Public access/disturbance (T) Inappropriate scrub control (T) Fisheries: fish stocking (T) Invasive species (T) Inappropriate cutting/mowing (T) Air pollution (T)	The Lee Valley SPA comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats. The site is important for overwintering bittern as well as an internationally important population of two duck species.
Lee Valley Ramsar	Gadwall, <i>Anas strepera</i> – Wintering Shoveler, <i>Anas clypeata</i> – Wintering Water boatman, <i>Micronecta minutissima</i> Whorled water-milfoil, <i>Myriophyllum verticillatum</i>	See above	See above.
Wormley-Hoddesdonpark Woods SAC	H9160. Sub-Atlantic and medio-European oak or oak—hornbeam forest of the <i>Carpinion betuli</i> , Oak-hornbeam forests	Disease (T) Invasive species (T) Air pollution: impact of atmospheric nitrogen deposition (T) Deer (T) Vehicles (illicit) (P)	Wormley-Hoddesdonpark Woods is one of two outstanding examples in England of a type of oak-hornbeam forest mainly found in central Europe. Sessile and pedunculate oaks are key components of the canopy. Hornbeam is mixed with oaks and other trees in areas of high forest and is also

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)	Site description (from relevant SIP)
		Forestry and woodland management (T) Public access/Disturbance (T)	present as almost pure stands of stored coppice, some of which are being brought back into a coppice cycle. Over 95% of the site is ancient woodland. It includes areas of wood-pasture and many veteran pollards and coppice stools. Distinctive features of the ground flora include stands of great wood-rush and an unusual moss community more typical of continental Europe.

Appendix 3: Allocations

Summary of distances (km) from each strategic allocation to the closest point of each European site, within a 20km radius of the Uttlesford district boundary.

Allocation Name	Site Ref	No. dwellings	Distance (km) from allocation					
			Devil's Dyke SAC	Epping Forest SAC	Essex Estuaries SAC / SPA / Ramsar	Eversden & Wimpole Woods SAC	Wormley - Hoddesdon park Woods SAC	Lee Valley SPA / Ramsar
North Uttlesford								
Great Chesterford – Land between Walden Road and Newmarket Road	002	0	20.76	42.64	50.00	17.76	37.47	32.84
Newport – North of Wicken Road/West of School Lane	008	74	28.97	33.83	42.77	24.51	30.06	25.31
Newport – Land at Pond Cross Farm Frambury lane	009	338	29.33	33.61	42.73	24.79	29.86	24.88
Saffron Walden – Land south of Radwinter Road (East of Griffin Place)	003	230	23.87	38.57	42.35	24.66	35.55	31.63
Saffron Walden – Land east of Shire Hill Farm and south of Radwinter Road	001	460	24.12	37.96	42.55	24.99	34.76	29.84
Saffron Walden – Land to the south of Debden Road	037	135	24.69	37.75	42.14	25.05	34.68	29.77
Saffron Walden – Land north east of Thaxted Road	008	20	25.0	37.8	42.6	24.8	34.5	29.6
Saffron Walden - ??	006	435						
South Uttlesford								
Great Dunmow – Land off The Broadway	009	1,100	37.4	28.6	27.0	40.1	31.0	27.1
Stansted Mountfitchet – Land west of Cambridge Road and north of Walpole Meadows	015	250	36.5	25.7	38.8	30.0	23.4	18.8
Stansted Mountfitchet – Land east of High Lane	013/023	140	36.6	25.4	38.0	30.7	23.1	18.5
Takeley – Warrish Hall Farm	007	902	39.5	23.5	31.9	36.9	24.4	20.5
Takeley – Land at Parkers Farm	016	243	39.8	24.3	31.3	37.7	25.4	21.3
Takeley - ??	003	491						

Uttlesford District Draft Local Plan 2041 HRA Report

Allocation Name	Site Ref	No. dwellings	Distance (km) from allocation					
			Devil's Dyke SAC	Epping Forest SAC	Essex Estuaries SAC / SPA / Ramsar	Eversden & Wimpole Woods SAC	Wormley - Hoddesdon park Woods SAC	Lee Valley SPA / Ramsar
Thaxted and Rural Uttlesford								
Thaxted – Land at Barnards Fields	002/003	150	30.0	34.7	33.6	33.8	34.5	30.7
Thaxted – Land to the east of Guelph's Lane	015, 017, 018 & 020	339	30.2	34.6	33.8	33.6	34.3	30.5

Sustainability Appraisal (SA) of the Uttlesford Local Plan

Interim SA Report

October 2023



Quality information:

Prepared by	Checked by	Approved by
LM, Senior Planner MF, Associate Director	Mark Fessey Associate Director	Ben Castell Director

Prepared for:

Uttlesford District Council

Prepared by:

AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com

© 2023 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) in accordance with its contract with Uttlesford District Council (the “Client”) and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of contents

1	Introduction.....	1
2	The plan scope.....	2
3	The SA scope.....	5
Part 1: What has plan-making / SA involved up to this stage?		7
4	Introduction to Part 1	8
5	Defining growth scenarios	9
6	Growth scenarios appraisal	44
7	The preferred approach.....	64
Part 2: What are the appraisal findings at this stage?		65
8	Introduction to Part 2	66
9	Appraisal of the Draft Plan.....	68
Part 3: What are the next steps?		80
10	Plan finalisation	81
11	Monitoring.....	81
Appendix I: Regulatory requirements		82

1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Uttlesford Local Plan (“the Plan”), which is being prepared by Uttlesford District Council.
- 1.1.2 Once adopted, the Plan will set the strategy for growth and change for the District up to 2041, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.¹

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives”. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:²
- What has Plan-making / SA involved up to this point?
 - including appraisal of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3 This Interim SA Report

- 1.3.1 The Council is consulting on a ‘Draft Local Plan’ under Regulation 18 of the Local Planning Regulations.
- 1.3.2 The aim of this Interim SA Report is to inform the current consultation and subsequent preparation of the final draft (‘proposed submission’) version of the plan. See further discussion of ‘next steps’ below.

Structure of this report

- 1.3.3 Despite this being an ‘Interim’ SA Report, as opposed to the formally required SA Report, it is nonetheless helpful to structure this report according to the **three questions** above.
- 1.3.4 Each of the three questions is answered within a discrete ‘part’ of the report.
- 1.3.5 Before answering the first question there is a need to further set the scene by setting out the scope of the plan (Section 2) and the scope of the SA (Section 3).

Commenting on this report

- 1.3.6 This report can be referenced as part of comments on the draft plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including under ‘next steps’.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

² See **Appendix I** for further explanation of the regulatory basis for presenting certain information within the SA Report.

2 The plan scope

2.1 Introduction

2.1.1 The aim here is to briefly introduce the: context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion of key issues elsewhere in the report); the plan period; and the objectives that are in place to guide plan preparation (the ‘plan scope’).

2.2 Context

2.2.1 A key point to note, by way of context, is that **the adopted Local Plan** dates from 2005, such that it is out-of-date. Since 2005, national planning-related legislation and policy has changed many times, including with the introduction of the National Planning Policy Framework (NPPF) in 2012 and, of course, there have been wide ranging significant changes to the local planning context.

2.2.2 A central requirement of the NPPF is that all local authorities must maintain an up-to-date plan. Where the local plan is out of date the presumption in favour of sustainable development applies, which means that the Council has limited potential to defend against unwanted planning applications. The authority might refuse a planning application only for that application to be granted permission at appeal by a Planning Inspector who applies ‘the presumption’ (or ‘tilted balance’ in favour of development).

2.2.3 There has been wide-spread ‘planning by appeal’ of this nature in Uttlesford over recent years, and there are wide-ranging down-sides. Development can essentially tend to come forward in a relatively piecemeal way, without strategic consideration to factors such as infrastructure capacity, new strategic infrastructure delivery, place-making and the environment. Also, it is important to say that fighting appeals is costly.

2.2.4 In this light, there is now considered to be an urgent need to adopt a new Local Plan. With an up-to-date Local Plan development will occur in a coordinated way that delivers wide-ranging benefits to communities over-and-above simply new homes, and it will be possible to confidently refuse unwanted applications.

2.2.5 The Council began work on a new Local Plan in 2020, an initial consultation on ‘issues and options’ was held in early 2021. The Council also set up a Community Stakeholder Forum (CSF) to seek local residents’ and interested parties’ views and the Local Plan.

2.2.6 Secondly, by way of context, it is important to note that **a Local Plan was previously submitted to the Secretary of State in 2019** but later withdrawn following concerns being raised by the inspector. The Inspectors letter is available on the Council [website](#). The Inspector’s main concerns included:

- Reliance on three large ‘garden communities’, all associated with significant constraints and infrastructure requirements and, in turn, uncertainties around viability and deliverability. The Inspector was also concerned that the effect of allocation would be to decide the spatial strategy for growth within the District over a period of time extending far beyond the plan period. Paragraph 2 of the Inspector’s letter stated: *“In particular, we are not persuaded that there is sufficient evidence to demonstrate that the Garden Communities, and thus the overall spatial strategy, have been justified. We therefore cannot conclude that these fundamental aspects of the plan are sound.”*
- Insufficient supply from small and medium-sized sites and, in turn, in sufficient supply of new homes in the early years of the plan. Paragraph 34 of the Inspector’s letter stated: *“The proposed stepped trajectory which arises from the strategy’s reliance on the Garden Communities, would result in a worsening affordability problem as it would delay the provision of housing to meet the identified need in the district for a number of years. This is also a significant concern.”*
- The SA Report included insufficient evidence to demonstrate that all reasonable alternatives had been duly considered (i.e. subjected to appraisal and consultation).³ Paragraph 137 of the Inspector’s letter stated: *“We believe that the key decisions to be made on the future of the... spatial strategy need to be taken by the Council, in consultation with local residents. The most effective and transparent way to do this would be through the preparation of a new plan, based on a robust SA...”*

³ The requirement is for the SA Report is to present “an outline of the reasons for selecting the alternatives dealt with”. Also, there is a need to be mindful of the ‘justified’ test of soundness (NPPF paragraph 35), which states that plans must be: *“Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.”*

2.3 The plan area

- 2.3.1 Located in north west Essex, Uttlesford also borders Hertfordshire, Cambridgeshire and Suffolk. The M11 and associated rail corridor is a key link, including to Cambridge, which is a national growth area.
- 2.3.2 Stansted Airport is England's third or fourth busiest airport and is the single largest employer in the East of England. The airport is located within Uttlesford District, but the largest nearby settlement is Bishop's Stortford, which is within Hertfordshire. Airport-related traffic is a key issue locally.
- 2.3.3 Junction 8 of the M11, which links to the airport, is one of just two M11 junctions locally. As well as serving the airport and Bishop's Stortford, Junction 8 links to the A120 corridor, which is a strategic corridor linking to Braintree and Colchester via Great Dunmow (Uttlesford's second largest settlement) and Takeley.
- 2.3.4 Junction 9 is then located close to the northern extent of the District, serving a rural part of Essex and Hertfordshire, but importantly linking to East Anglia (Norwich) via the A11. The village of Great Chesterford is located close to Junction 9, and there is also a train station here linking to Cambridge.
- 2.3.5 Saffron Walden is located approximately 5km to the south of M11 J9 and is the District's largest settlement. It is a rural market town not served by an A-road, with a train station located at nearby Audley End.
- 2.3.6 Three final broad areas to discuss, by way of introduction are:
- The railway corridor – to the south of the aforementioned stations at Great Chesterford and Audley End (near Saffron Walden) there are stations at Stansted Mountfitchet (the District's third largest settlement), Elsenham (associated with particularly extensive recent and committed growth); and Newport (a smaller settlement, but still falling within the second tier of the District's settlement hierarchy).
 - South of the A127 corridor – Hatfield Heath is a second tier settlement here, located on the District's only other A-road (the A1060); however, land here falls within the London Metropolitan Green Belt, such that 'exceptional circumstances' must be demonstrated in order to justify growth.
 - Central / eastern Uttlesford – distant from the two main road corridors, is a deeply rural area, with Thaxted a crucial service centre. The far northwest, along the border with Hertfordshire, is also very rural, as is the far south east, although Chelmsford is not far by minor roads.
- 2.3.7 Further key characteristics include:
- Population - the population grew by 15% over the ten years to 2021 (compared to 6.6% growth for England, although Cambridge notably grew by 17.6%) and there has been ongoing growth since 2021, plus and there is also extensive committed growth. The proportion of people aged 65 and over increased by 36% in the ten years to 2021, with the figure now at 20.2%. Uttlesford is the 8th least deprived local authority in England, and the median house price in 2022 was £459,000, which is 67% above the national average. The District has the highest car ownership in Essex; 38% of households own 2+ cars.
 - Historic environment – extensive areas are highly constrained, with the District containing 3,700+ listed buildings (around a third of those in Essex), 38 Conservation Areas and various other nationally designated areas/assets. By way of an example, Saffron Walden is a renowned example of a preserved medieval market town, strongly associated with the river Cam and the Audley End Estate.
 - Landscape and the natural environment – the District is mainly associated with the dip slope of the chalk ridge that stretches across England from the southwest to Norfolk. In turn, the land mostly dips to the southeast, with waterways draining to the Essex Estuaries; however, Newport, Saffron Walden and Great Chesterford are associated with the upper reaches of the River Cam, which drains to the Wash. Key assets include chalk streams (a globally rare habitat) and Hatfield Forest, which is nationally renowned and, in turn, suffers from problematic levels of recreational pressure. There are no sites internationally designated for biodiversity within or in close proximity to the District, nor any nationally designated landscapes, but there are 14 nationally designated Sites of Special Scientific Interest (SSSIs). Another constraint is very extensive high quality (grade 2) agricultural land.
 - Stansted Airport – gained planning permission (at appeal) in 2021 to expand from 35mppa to 43mppa, along with associated improvements to the road infrastructure and sustainable transport obligations. The expectation is that expansion will deliver 5,000 new jobs and see the airport's economic contribution double to £2 billion annually. As part of the committed expansion, in July 2023 an application was received to expand the terminal building. As well as a need to manage traffic movements, there is a need to capitalise on the airport as a multi-modal transport hub.

2.4 The plan period

- 2.4.1 The Local Plan is likely to be adopted in 2026 and should cover a period of 15 years from plan adoption. Additionally, NPPF paragraph 22 states: “Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead, to take into account the likely timescale for delivery.”
- 2.4.2 The plan period start date is 2021 as this is the base date for several evidence studies. As such, and on balance, the decision was taken to plan for the twenty year period from 2021 to 2041.
- 2.4.3 A significant amount of development has already come forward since the start of the plan period (‘completions’) and a considerable amount of development with planning permission will come forward in the early years of the plan (‘commitments’). As such, the role of the Local Plan is essentially to identify new supply, including via allocations (also potentially ‘broad locations’), to bolster the committed supply and ensure a robust supply of development land, as measured against need / the defined requirement, across the entire plan period (‘supply trajectory’) as far as possible (i.e. as far as is consistent with sustainable development) and mindful that NPPF para 68 allows for flexibility in respect of latter years.

2.5 Plan objectives

- 2.5.1 The following objectives are in place to guide plan-making:
- Minimise the **environmental impact** of development.
 - Plan for the **climate and ecological emergency**, mitigate the impacts from development, including reducing energy usage of new builds.
 - Protect high-quality and locally defined **valued landscapes** by ensuring new development achieves high quality design standards and conserves and enhances landscape assets.
 - Protect the **natural environment**. Protect and maximise opportunities for biodiversity net gain and the enhancement of Uttlesford’s natural capital assets, such as soils, woodlands, hedges and ponds to capture and store carbon as well as providing for appropriate access for health and recreational value with effective multifunctional Green Infrastructure. Restore the natural ecology of the district chalk streams and rivers.
 - Protect **water resources**. Deliver developments that efficiently use local resources, including by prioritising water resilience and sustainable consumption, which minimise and are resilient to the impacts of climate change, including extreme weather events such as flooding, drought and heatwaves.
 - Protect the highest quality **agricultural land** whilst being mindful of needs for rural diversification.
 - Protect and enhance the **historic environment**, including protecting and enhancing cultural heritage assets and archaeology, and promoting inclusive access to local assets where appropriate.
 - Allocate sufficient land to accommodate **development needs**.
 - Recognise the influential role of the District’s **employment** offer, including Stansted Airport/ Northside and Great Chesterford Research Park, by embracing the planned expansion, whilst seeking to maximise their sustainability and the needs for infrastructure.
 - Maintain **economic development** opportunities. To promote a strong, diverse, resilient, sustainable, and competitive economy and range of employment and learning opportunities and a multi skilled workforce across a range of sectors including tourism, high-tech, biotech, research and development, aviation, agricultural diversification and rural business.
 - Provide adequate and timely **infrastructure** to support development.
 - Help sustain existing and deliver new local community **facilities and services** through development to promote healthy, sustainable and safe communities.
 - Meet the identified **housing needs** and an appropriate contribution of affordable housing.
 - Prioritise increased opportunities for travel by **public transport** and **active travel** in new development.

3 The SA scope

3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. Further information is presented in a [Scoping Report](#) (2021; N.B. includes settlement-specific information). However, it is important to note that the Scoping Report does not aim to define the SA scope comprehensively. Rather, there is a need for flexibility to respond to the nature of the emerging plan / reasonable alternatives and latest evidence.

3.2 Consultation on the scope

- 3.2.1 The Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA Report], the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁴ As such, these authorities were consulted on the SA scope in 2021.
- 3.2.2 Comments on the SA scope are welcomed at the current time.

3.3 The SA framework

- 3.3.1 The primary outcome of scoping is a list of topics/objectives that can then be utilised as a ‘framework’ under which to structure appraisal work (i.e. appraisal of “the plan and reasonable alternatives”). The aim is to ensure that appraisal is well-targeted, concise and engaging. The SA framework is presented below.

Table 3.1: The SA framework

Topic	Objective
Accessibility	Ensure good access to existing and planned community infrastructure whilst retaining and protecting settlement identities and rural values.
Biodiversity	Maintain and enhance the extent and quality of biodiversity and geodiversity sites and networks within and surrounding the District. Account for recreational pressure on internationally and nationally designated sites as a key issue.
Climate change adaptation	Increase resilience to the effects of climate change, including increased flooding, droughts and heatwaves. Explore options for natural flood risk management.
Climate change mitigation	Reduce per capita (i.e. per person) contribution to climate change, with a focus on both built environment and transport emissions.
Communities, equality, inclusion and health	Support high quality living environments and strong communities, including good relations fostered between people and groups. Support healthy lifestyles for all groups, reducing health inequalities and delivering positive outcomes, including via access to services/facilities and green infrastructure / open space (including with a focus on key groups such as people with restricted mobility and low-income households) and enabling active travel.
Economy and employment	Grow a sustainable and inclusive economy, building upon strengths and opportunities and increasing long-term economic resilience.
Historic environment	Conserve and enhance valued assets, including their setting, and also conserve / enhance historic character at a range of scales.

⁴ In-line with Article 6(3) of the SEA Directive, these bodies were selected because *‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’*

Topic	Objective
Homes	Provide for housing needs as far as possible, increase access to high-quality housing of the right type and tenure, including affordable housing.
Land, soils and resources	Ensure the efficient and effective use of land, including accounting for the grade of productive agricultural land.
Landscape	Protect and enhance the character and quality of the diverse landscapes at a range of scales, e.g. river valleys, chalk influenced landscapes, ancient farmed landscapes, wooded landscapes and settlement gaps. Support strategic green / blue infrastructure, including long distance walk/cycle routes.
Transport	Promote modal shift away from the private car and reduce the need to travel, whilst protecting residents and the natural environment from the impacts of congestion, air pollution and noise pollution. Preserve areas of rural tranquillity.
Water	Protect and enhance water quality, including by careful consideration of wastewater treatment capacity, and recognising existing issues of water courses not achieving target status. Account for water resource / supply constraints in the context of increasing demand and the importance of water levels for habitats.

3.4 Integrating equalities and health

3.4.1 The SA framework has been designed to integrate both health and equalities considerations, with a view to the SA process integrating Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).

EqIA

3.4.2 The Equality Act 2010 (the Act) introduced a Public Sector Equality Duty, which covers the following protected characteristics: age, disability, gender re-assignment, marriage / civil partnership, pregnancy, maternity, ethnicity, religion/belief, gender and sexual orientation.

3.4.3 Under the Duty the Council must, in the exercise of its functions, have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not.

3.4.4 EqIA is often used by public sector organisations to demonstrate how this duty has been met. However, there are no procedural requirements specific to EqIA over-and-above those relating to SA, hence integrating EqIA simply involves ensuring that the SA scope has a good focus on equality matters.

HIA

3.4.5 Addressing the determinants of good health is increasingly a focus of local plan-making, e.g. a recent [study](#) on *Integrating Health into Local Plans* identified five key themes: Healthy neighbourhood design; Healthy housing; Healthier food environments; Natural and sustainable environments; Healthy transport.

3.4.6 HIA is a tool for integrating health-related considerations in local plan-making. As per EqIA, there are no procedural requirements specific to HIA over-and-above those for SA, hence integrating EqIA simply involves ensuring that the SA scope has a good focus on health determinants.

A note on limitations

3.4.7 For plans such as the Uttlesford Local Plan (less so plans that deal with urban areas), it can be a challenge to confidently identify and evidence a causal link between key strategic choices on the one hand and both equalities and health-related issues/outcomes on the other. In particular, this is the case because the plan focuses on detailed matters relating to development management only to a limited extent, leaving considerable flexibility for matters to be explored in detail at subsequent stages of the planning process. However, there is nonetheless a range of key strategic choices to explore from both an equalities and a health perspective, including relating to meeting development needs, spatial strategy and site selection.

Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

4.1 Overview

- 4.1.1 Work on the Local Plan began in 2020, following withdrawal of the previously submitted plan. Since then work has been ongoing to gather evidence and explore issues, opportunities, options etc.
- 4.1.2 The focus here, within Part 1, is not to relay the entire ‘story’ of the plan-making/SA process, nor to provide a comprehensive ‘audit trail’ of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** ahead of the current consultation. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with - see **Section 5**
 - present an appraisal of the reasonable alternatives - see **Section 6**
 - explain the Council’s reasons for selecting the preferred option - see **Section 7**

4.2 Reasonable alternatives in relation to what?

- 4.2.1 The legal requirement is to examine reasonable alternatives (RAs) taking account of “*the objectives and geographical scope of the plan*” (see Section 2). Following discussion of the plan objectives with UDC officers, it was determined appropriate to focus on the **spatial strategy**, i.e. providing for a supply of land, including by allocating sites (NPPF paragraph 68), to meet objectively assessed needs and wider plan objectives. A key outcome of ‘spatial strategy-making’ is a **key diagram**.
- 4.2.2 Establishing a spatial strategy / key diagram is clearly a primary objective of the Local Plan.⁵ As such, it is reasonable to focus on exploring alternatives (see Sections 5 and 6) so as to inform a final decision on the preferred spatial strategy (see Section 7) and to inform the current consultation.
- 4.2.3 The decision was made to refer to the alternatives as “**growth scenarios**”.

What about site options?

- 4.2.4 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case, and is not the case for the Uttlesford Local Plan. Rather, the objective is to allocate a *package* of sites to meet needs and wider objectives, hence RAs should be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.

Is the focus on housing sites?

- 4.2.5 Establishing a supply of land to meet housing needs is typically a focus of attention, but local plans are also tasked with meeting wider development needs. This includes needs in respect of employment land, which is a key consideration for Uttlesford. The discussion presented below is somewhat housing-led, but employment land issues / options are considered throughout, and a summary is presented in Section 5.5.

What about other aspects of the plan?

- 4.2.6 As well as establishing a spatial strategy, allocating sites etc, the local plan must also establish policy on thematic district-wide issues, as well as site-specific policies to guide decision-making at the planning application stage. Broadly speaking, these can be described as development management (DM) policies.
- 4.2.7 However, it is a challenge to establish DM policy alternatives that are genuinely reasonable.⁶ Consideration was given to possible reasonable DM policy alternatives; however, on balance, it was determined appropriate to focus attention only on appraising the emerging preferred options (Section 9). Comments on reasonable DM policy alternatives are welcomed through the current consultation.

⁵ It was also considered appropriate to focus on ‘spatial strategy’ given the potential to define “do something” alternatives that are meaningfully different, in that they will vary in respect of ‘significant effects’ (mindful that SA must focus on significant effects).

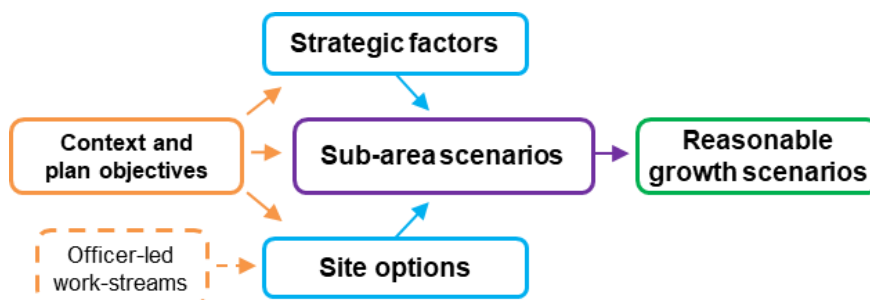
⁶ To be ‘reasonable’ alternatives must be meaningfully different to the extent that it is possible for an appraisal to differentiate between them in terms of significant effects. Also, it is important to bear in mind that ‘no policy’ is not a reasonable alternative to ‘a policy’. This is because ‘no policy’ is the baseline (and so cannot lead to significant effects *on the baseline*).

5 Defining growth scenarios

5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios. To reiterate, reasonable growth scenarios equate to **reasonable alternatives**.

Figure 5.1: Establishing reasonable growth scenarios



Structure of this section

- 5.1.2 This section explains a process to define reasonable growth scenarios as follows:
- **Section 5.2** – explores **strategic factors** (issues / opportunities / options) that are a ‘top down’ input.
 - **Section 5.3** – considers individual **site options** that are ‘bottom up’ input (‘building blocks’).
 - **Section 5.4** – explores growth options and scenarios for **sub-areas**.
 - **Section 5.5** – combines sub-area scenarios to form borough-wide **reasonable growth scenarios**.

A note on limitations

5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the definition of reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence-gathering and analysis that is proportionate, also recalling the legal requirement, which is to present an *“outline of the reasons for selecting alternatives...”* [emphasis added].

5.2 Strategic factors

Introduction

- 5.2.1 The aim of this section of the report is to explore strategic issues, opportunities and options with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:
- Quantum – *how many* new homes are needed (regardless of capacity to provide them)?
 - Distribution – broadly *where* is more / less suited to growth and what *types* of growth are supported?

Quantum

5.2.2 This section sets out the established Local Housing Need (LHN) figure for the District, before exploring arguments for the Local Plan providing for a quantum of growth either above or below LHN.

Background

5.2.3 A central tenet of the plan-making process is the need to **A)** establish housing needs; and then **B)** develop a policy response to those needs. The Planning Practice Guidance (PPG) explains (emphasis added):

“Assessing housing need is the first step in the process of deciding how many homes [to plan for]...”

- 5.2.4 With regards to (A), the NPPF (2023)⁷ is clear that establishment of **LHN** should be informed by an “assessment conducted using the standard method... unless exceptional circumstances justify an alternative approach which also reflects... demographic trends and market signals”.
- 5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting the housing **requirement** at LHN and identifying a **supply** through policies sufficient to deliver this housing requirement (at a suitable rate/trajectory over time, which will invariably necessitate putting in place a ‘buffer’ to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that *departs* from LHN.

Uttlesford’s Local Housing Need (LHN)

- 5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020 (the ‘cities uplift’, which does not apply to Uttlesford).⁸
- 5.2.7 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method, since the method was first introduced. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections (with reasons set out clearly at [paragraph 5](#) of the PPG on housing needs assessment). Updates to the PPG in late 2020 confirmed this approach and this approach was also [reconfirmed](#) in December 2022.
- 5.2.8 The standard method derived LHN for the Borough is currently **684 dwellings per annum** (dpa), or 13,680 homes in total over the plan period. This is a ‘capped’ figure, meaning that Step 3 of the standard method (“Capping the level of any increase”) applies. The uncapped figure is 769 dpa, and it should be noted that the PPG states: “Where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered.”
- 5.2.9 With regard to Step 2 (adjustment for affordability), this involves accounting for the latest (2022) [ratio](#) of median workplace earning (i.e. the median earnings of those who work in Uttlesford) to median house price, which is 13.18%. The ratio has been quite stable since 2017 but was at 10% as recently as 2011.

Is it reasonable to explore setting the housing requirement at a figure [below](#) LHN?

- 5.2.10 Paragraph 11 of the NPPF states: “... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.” [emphasis added]
- 5.2.11 Uttlesford is overall not heavily constrained by NPPF “policies... that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”. The London Metropolitan Green Belt constrains the southern part of the district, and SSSIs are a significant constraint (including Hatfield Forest); however, there are extensive parts of the District that are relatively unconstrained in the terms described by the NPPF.
- 5.2.12 For this reason alone the possibility of setting the housing requirement at a figure below LHN can be ruled out as ‘unreasonable’. Also, there is a need to consider constraints to growth affecting Uttlesford not only in an absolute sense, but also relative to neighbouring areas that would come under pressure to provide for unmet need from Uttlesford.
- 5.2.13 Furthermore, there are many positive arguments in favour of providing for LHN. As part of this, it is important to recognise that meeting housing need is important not only in and of itself, but also due to highly significant secondary benefits, for example in terms of supporting communities, health and wellbeing, strategic infrastructure delivery and the local economy.

⁷ The NPPF was updated in September 2023, but only in respect of onshore wind power.

⁸ See gov.uk/guidance/housing-and-economic-development-needs-assessments.

Is it reasonable to explore setting the housing requirement at a figure above LHN?

- 5.2.14 There are four key reasons for considering the possibility of setting the housing requirement above LHN.

Local housing need

- 5.2.15 As discussed above, the 'uncapped' LHN figure for Uttlesford is higher than the figure derived from the standard method (which involves applying a cap).

Affordable housing need

- 5.2.16 This is quite high locally, and the PPG states: *“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”* However, it is not clear that there is a strong argument for an 'uplift' for affordable housing in the Uttlesford context. The Local Housing Needs Assessment (LHNA, 2023) explains:

“Overall, the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the area... When looking at needs from households unable to buy OR rent, the analysis suggests a need for 261 affordable homes per annum across the District... Despite the level of need being high in relation to the Standard Method, it is not considered that this points to any requirement for the Council to increase the Local Plan housing requirement due to affordable needs. The link between affordable need and overall need... is complex and in trying to make a link it must be remembered that many of those picked up as having an affordable need are already in housing (and therefore do not generate a net additional need for a home).”

Unmet housing need from elsewhere

- 5.2.17 The NPPF states that authorities “should establish a housing requirement figure... which shows the extent to which their identified housing need **(and any needs that cannot be met within neighbouring areas)** can be met over the plan period.” [emphasis added]
- 5.2.18 The fact that the District is located at the edge of the London Metropolitan Green Belt serves as a reason to remain alive to the possibility of unmet need from the south. However, in the case of Uttlesford, there is no established need to provide for unmet need from Essex, whilst East Hertfordshire includes significant land beyond the Green Belt and is yet to start a review of the Local Plan adopted in 2018.
- 5.2.19 Focusing on the Essex authorities to the south, a key point to note is that Harlow is a tightly bound urban authority, such that there is an inherent risk of unmet need arising. Harlow is in close proximity to Uttlesford, but in 2017 a Memorandum of Understanding was signed by Uttlesford, Harlow, Epping Forest and East Herts agreeing that Uttlesford would provide for its locally arising needs only, i.e. would not make provision for Harlow's unmet need. Harlow (2020), Epping Forest (2023) and East Herts (2018) then subsequently adopted Local Plans, and the outcome was not to generate unmet need. None of the three authorities have commenced a local plan review, hence it is not possible to speak of future unmet need risk with any confidence. However, there is an element of risk that should be taken into account when defining reasonable alternative growth scenarios for the Uttlesford Local Plan.
- 5.2.20 Finally, there is a need to consider Greater Cambridge, to the north. A key study exploring *“Employment Land, Economic Development and Relationship with Housing”* was [published](#) in January 2023 setting out a recommendation that, whilst standard-method directed LHN is 1,769 dpa, the authorities should “consider planning for 2,463 dwellings per annum to support... jobs growth.” This is an ambitious strategy, but the latest situation, as reported on the Local Plan website, is that:
- “Due to continued work exploring water supply, and delay to the submission of the Cambridge Waste Water Treatment Plant relocation Development Consent Order, the Local Plan timetable will be updated. This will not be before September 2023, and only once we have greater clarity on these matters.”*
- 5.2.21 In this light there is uncertainty regarding the potential to adopt a plan that provides for 2,463 dpa. However, whether this serves to indicate a significant risk of unmet need to be provided for in Uttlesford is a separate question. Regardless, it is evidently the case that the Uttlesford Local Plan must be prepared mindful of the need to deliver new homes to support jobs and economic growth in Greater Cambridge, including mindful that a new Cambridge South Station will soon open that is very well linked to Uttlesford. The Network Rail website explains that the aim is to *“support the vitally important biomedical campus and serve a growing community of science and health care specialists, employees and hospital visitors.”*

Economic development or infrastructure investment

- 5.2.22 Finally, there is a need to briefly note paragraph 10 of the PPG on housing needs assessment, which sets out wider reasons for exploring ‘above LHN’ options, including in respect of economic development and infrastructure, as well as the Draft NPPF (2022), which proposes the following addition to paragraph 66:

The [housing] requirement may be higher... if it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment.” [Emphasis added].

- 5.2.23 There is a lack of clarity nationally regarding whether any such uplift should be made as part of objectively establishing LHN or as a subsequent a policy choice. Regardless, there is no case for an uplift in the Uttlesford context. The Uttlesford LHNA (2023) explains that under Standard Method LHN:

“...the labour supply would increase by around 14% over the 2023-33 decade and that this could support around 7,200-7,300 additional jobs – this is slightly higher than the upper end job growth estimate from economic forecasts (around 6,900 jobs) and therefore does not point to a need to plan for housing in addition to the Standard Method – there does appear to be a good alignment between homes and jobs if using the Standard Method.”

Conclusion on housing quanta options

- 5.2.24 The high level discussion above serves to suggest that, in addition to a focus on growth scenarios that would enable the housing requirement to be set at **LHN**, there is also a need to remain open to the possibility of setting the housing requirement at a figure **above LHN**.
- 5.2.25 However, the high level case for setting the housing requirement above LHN is not strong (including, and notably, because no neighbouring authority has requested that Uttlesford make provision for unmet housing need), which serves as a reason to rule-out scenarios that aim to support a housing requirement well-beyond LHN (e.g. >10%). With regards to growth scenarios that would necessitate setting the housing requirement at a figure below LHN, such scenarios can be ruled out at this stage in the process.
- 5.2.26 The question of precise quanta figures to reflect across the growth scenarios is returned to within **Section 5.5**, subsequent to consideration of broad distribution, site options and sub-area scenarios.⁹

Box 5.1: A note on employment land need

The Employment Needs Update (ENU, 2023) recommends that the Local Plan identifies new supply as follows:

- Offices and R+D – after having accounted for completions and, commitments including Stansted [Northside](#) there is a residual need for 10ha, of which 3-5 ha is needed around Stansted reflecting some uncertainty in respect of the timing of Northside. R+D naturally focuses on Chesterford Research Park.
- Industrial – there is a significant supply shortfall within 10 miles of Bishops Stortford with a 99.6% occupancy level. The ENU report recommends that 235,000 sqm of floorspace is provided during the plan period. Broadly, the non-strategic floorspace at Northside is considered adequate to meet Stansted-specific business needs of 81,000sqm; therefore the need for the remainder of Uttlesford is 153,800sqm or 34ha. Taking into account completions and commitments there is a residual need for 30.4 ha industrial land to meet local Uttlesford needs. Of this the ENU recommends that allocations are made at Great Dunmow (5-10ha); Saffron Walden (up to 5ha) and in the Stansted vicinity (15 ha).

⁹ It is important to reiterate that there is invariably a need to provide for a supply buffer over-and-above the housing requirement. This is to ensure that the requirement is met in practice over the plan period, i.e. there is a robust supply ‘trajectory’, recognising that unforeseen delivery issues inevitably occur prior to and at the planning application stage. A “robust supply trajectory” involves a situation whereby a five-year housing land supply (5YHLS), as measured against the housing requirement, can be maintained throughout the entire plan period, and the Housing Delivery Test (HDT) can be met when applied annually.

There is also a need to consider the question of a constant/consistent versus a stepped housing requirement. The ideal situation involves a consistent housing requirement over the entire plan period. However, under the Government’s PPG, there is flexibility to set a ‘stepped’ housing requirement (and, in turn, supply trajectory), where there is evidence to demonstrate that this is necessary. A stepped requirement / trajectory is one whereby the requirement is set at a level below the annualised total plan period housing requirement in the early years of the plan, and then compensated for in the latter years of the plan.

There is a need to recall the following from the Inspector’s letter (2020; available [here](#)): “In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5-year housing land supply”... This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing. It would also create a buffer so the target of 14,000 homes is not only just being met by a narrow margin and would allow for a less steeply stepped housing trajectory”.

Broad distribution

Introduction

5.2.27 This is the second of two sections examining 'strategic factors' of relevance to the matter of defining reasonable growth scenarios for the Local Plan. The aim is to explore broad distribution issues / options as well as the question of broad growth typologies that are supported, e.g. strategic versus non-strategic.

Focus of this section

5.2.28 There is a wide range of important 'broad distribution' considerations with a bearing on reasonable growth scenarios. This is particularly the case for Uttlesford, as a large District that is relatively free from headline constraints (NPPF footnote 7) and with good transport links to key areas including London and Cambridge. Also, there are wide-ranging broad distribution considerations that stem from locally established objectives and aspirations, not least in respect of achieving net zero carbon emissions district-wide by 2030.

5.2.29 The following list of evidence-gathering workstreams informing the current Draft Local Plan provides a further indication of the breadth of issues/opportunities that could potentially be discussed here:

- | | | |
|------------------------|-------------------------|----------------------|
| • Housing | • Transport | • Water |
| • Employment | • Landscape | • Viability |
| • Retail | • Green infrastructure | • Leisure and sports |
| • Gypsy and Travellers | • Hatfield Forest, LWSs | • Air quality |
| • Infrastructure | • Flood risk | • Green Belt |

5.2.30 There is the potential to explore all of these matters within the sections of this report that follow. However, it is considered appropriate to focus this section on a specific fundamentally important question: *Is it reasonable to consider a focus on large garden communities as per the withdrawn plan?*

Is it reasonable to consider a focus on large garden communities?

5.2.31 As discussed above (Section 2), the District submitted a Local Plan in 2019, only to then withdraw the plan in 2020 after the appointed Planning Inspectors raised a series of concerns, particularly in respect of the proposed focus on three large garden communities. There are two further contextual points to note:

- One of the three previously proposed new settlements (West of Braintree) was also being taken forward via a separate joint plan by the North Essex Authorities (NEA), such that the Uttlesford Inspector's Report (2020) did not reach detailed conclusions. However the NEA Inspector's report was then published in December 2020, finding the West of Braintree proposal to be "not justified or deliverable".
- The District similarly also had a Local Plan rejected by Planning Inspectors in 2014.

5.2.32 The current situation is that there is an urgent need to adopt a Local Plan, for reasons that are introduced above (Section 2). Essentially, there is an urgent need for a plan-led approach to housing and jobs growth.

5.2.33 Furthermore, the current situation is that the 'numerical' argument for a focus on large garden communities is not strong. This reflects three factors: 1) after having accounted for supply from completions since the start of the plan period, sites with planning permission and a windfall assumption, the quantum of new supply to be identified through the Local Plan is *at most* ~7,000 homes; 2) it is essential that a good proportion of this supply comes from small and medium sized sites; and 3) there are a range of settlement-specific arguments for growth via urban extensions (as discussed in Section 5.4).

5.2.34 There do remain high level arguments in favour of large garden communities. These apply nationally and to Uttlesford in particular, e.g. given links to Greater Cambridge. However, progressing garden community options requires a very large amount of work, which would take time (and, of course, resources).

5.2.35 In **conclusion**, there is a high level case to rule out a focus on large garden communities, as follows: 1) there is a need to avoid a rushed plan that would be at risk of failing; 2) time is of the essence for the Uttlesford Local Plan, and hence a need to avoid undue delay; and 3) there is a weak numerical argument.

5.2.36 It should also be noted that Local Plans must be reviewed every five years, such that work to consider large garden community options could begin in perhaps 2026, prior to adoption of a new Local Plan in 2031 and potentially delivery of one or more large garden communities in the mid-2030s. That plan will also have the benefit of building upon an up-to-date plan (as opposed to one dating from 2005), which will make the process easier and increase potential to consider large garden community options.

5.3 Site options

Introduction

- 5.3.1 The aim of this section is to introduce the long list of available site options feasibly in contention for allocation and the work that has been undertaken to appraise and 'sift' site options, in order to arrive at a manageable shortlist that can then be a focus of work to explore sub-area scenarios in Section 5.4.
- 5.3.2 To recap, this is a 'bottom-up' workstream undertaken as a component of the wider process of defining reasonable alternative (RA) growth scenarios for appraisal and consultation (see Figure 5.1).
- 5.3.3 This section covers: The Housing and Economic Land Availability Assessment (HELAA); Officer-led site-sifting and assessment; and Garden community options.

HELAA

- 5.3.4 The starting point for the HELAA was a long list of 429 site options identified from a range of sources. The HELAA assesses these sites finding that 417 sites are 'available, achievable and suitable' such that they are deliverable (potentially able to deliver within five years) or developable (potentially able to deliver later in the plan period). Of these, 104 sites have planning permission. Focusing only on sites without permission, the combined *theoretical* capacity of the deliverable/developable sites is ~142,000 homes, which is obviously many times more homes than needed under any reasonable scenario.

Officer-led site-sifting and assessment

- 5.3.5 Taking the 313 non-permitted deliverable/developable HELAA sites as a starting-point, the first step involved sifting-out 'non-strategic' sites with a capacity below 100 homes. The approach is to focus on 'strategic' sites at this stage in the process, mindful that neighbourhood plans are well-suited to delivering non-strategic sites and given the potential for non-strategic site allocations to be added to the Local Plan subsequent to the current consultation if necessary. Matters are discussed further in Section 5.4.
- 5.3.6 The second step was to sift-out sites not associated with a settlement falling within one of the top two tiers of the settlement hierarchy (N.B. new settlement options are a special case, discussed below). It is fair to assume that lower tier settlements are not suited to a strategic allocation, given settlement-specific considerations and also given that such settlements can be associated with higher car dependency.
- 5.3.7 The remaining site options (strategic sites associated with a higher order settlement plus new settlement options) were then subjected to assessment of development related constraints and opportunities. All of these site options are discussed in Section 5.4, informed by the officer-led assessment.

Garden community options

- 5.3.8 As discussed in Section 5.2, there is limited strategic case to be made for a focus on large garden communities anything akin to the withdrawn local plan. However, there is nonetheless a need to give garden community options proportionate consideration. All are discussed in Section 5.4.
- 5.3.9 Finally, it should be noted that a Landscape Sensitivity Study is available as part of the consultation that examines 12 new settlement / garden community options and includes a clear map of their locations. Landscape considerations are an important starting point, when considering garden community options, and the report serves to identify concerns with: the option located between Stansted Airport and Elsenhem; the Great Chesterford option; and any option that would risk coalescence between Hatfield Broad Oak and Hatfield Heath. It is also fair to say that the option between Takeley and Stansted Airport gives rise to significant CPZ concerns. Furthermore, the option at Birchanger is located in the Green Belt, and the land in question serves as a gap between Bishops Stortford and Stansted Mountfitchet.
- 5.3.10 Another headline consideration is transport connectivity, and one option that is in a notably rural area is the option at Leaden Roding. Another consideration is that the two options at the eastern extent of the District would have to be considered in collaboration with Braintree District.
- 5.3.11 These are all key factors that potentially serve to narrow the options feasibly in contention for allocation (or identification as a broad location; see NPPF para 68) within the Local Plan.

5.4 Sub-area scenarios

Introduction

5.4.1 Discussion has so far focused on A) ‘top down’ considerations of housing quantum and broad distribution issues / options; and B) ‘bottom-up’ consideration of site options. The next step is to consider each of the District’s sub-areas in turn, exploring supply options, including how sites might be allocated in combination.

What sub-areas?

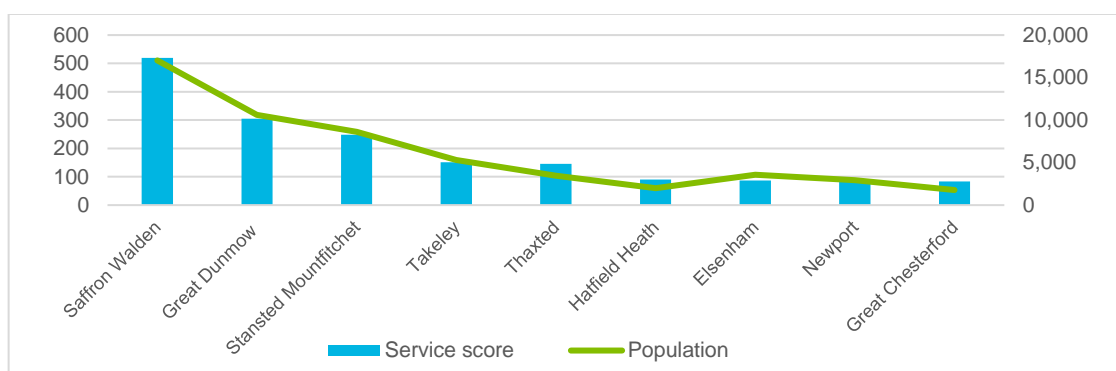
5.4.2 In the Uttlesford context it is clearly the case that each of the higher order settlements warrants being considered in turn, with a final discussion then dealing with ‘the rest of the District’.

5.4.3 Hence sub-areas are as follows:

- Key Settlements (Saffron Walden, Great Dunmow and Stansted Mountfitchet)
- Local Rural Centres (Takeley, Thaxted, Hatfield Heath, Elsenham, Newport and Great Chesterford)
- Rest of the District

5.4.4 Settlements are discussed in order of ‘service score’, as set out in the Settlement Hierarchy Study (2023).

Figure 5.2: Key findings of the Settlement Hierarchy Study (2023)



Methodology

5.4.5 The aim is to conclude on reasonable sub-area scenarios that need to be taken forward to Section 5.5 of the report, where sub-area scenarios are combined in order to arrive at reasonable growth scenarios. The aim is *not* to present a formal appraisal of reasonable alternatives. Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment. The aim is not to discuss all site options to precisely the same level of detail, but rather to focus attention on those options (and site combinations / scenarios) *judged to be more marginal*, i.e. where the question of whether or how to take the option forward is more finely balanced. This approach is taken mindful of the legal requirement, which is to explain reasons for arriving at reasonable alternatives in “outline” terms.

5.4.6 After having introduced the sub-area, key strategic issues/opportunities and the level of recent and committed growth, the primary aim of each discussion is to place non-committed site / growth options in a broad sequential order of preference. As part of this, reliance is placed on the officer-led site assessment work discussed above as well as other sources of available evidence.

5.4.7 It is naturally the case that site options low down the order of preference can be discussed relatively briefly where it is the case that better performing sites would together a quantum of homes in line with what would be required under a reasonable high growth scenario, given:

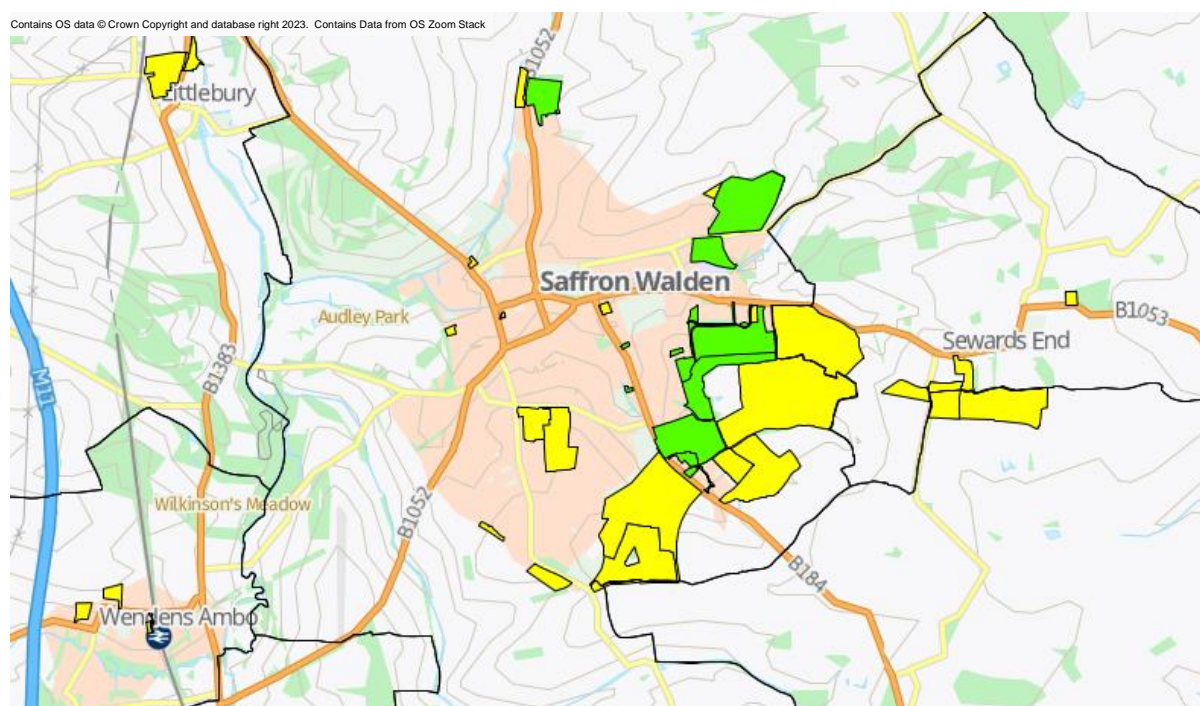
- clear arguments for distributing growth broadly in line with the settlement hierarchy (see Figure 5.2); and
- understanding of the total quantum of homes needed from ‘new supply’ district-wide (*max* ~7,000).

5.4.8 Each section ends by concluding on reasonable growth scenarios to progress to Section 5.5. This inevitably involves applying a degree of pragmatism, i.e. there is a need to avoid progressing too many sub-area scenarios to Section 5.5, in order to aid the final step in the process (defining growth scenarios).

Saffron Walden

- 5.4.9 Saffron Walden is comfortably the highest order centre in the District and so is well-suited to receiving a good proportion of growth over the plan period. The town is located in the north of the District, in relative proximity to Cambridge, and is located along the M11 / rail corridor (and, in turn, the River Cam corridor).
- 5.4.10 However, M11 Junction 9 is ~7km distant and the train station is ~3km to the west of the town. There is also an inherent transport constraint, with no A-road link or orbital routes / bypasses to the town centre. As well as inherent transport challenges, there is a clear heritage constraint (including given traffic through the historic town centre) and the town is surrounded by a valued rolling chalk influenced landscape.
- 5.4.11 The Chesterford Research Park is located to the north of Saffron Walden, where there is an opportunity for significant investment and growth. Also, the Wellcome Genome Campus is located adjacent to M11 Junction 9 (within South Cambs), with consent for up to 150,000M² of employment floorspace and up to 1,500 homes. Further significant employment growth to the south of Cambridge can be anticipated.
- 5.4.12 One other point to note is a proposal, set to feature in the Local Plan, for a new country park to the west of Saffron Walden, adjacent to Audley End station. This could be supportive of objectives around increasing cycling and public transport connectivity between the town and the station.
- 5.4.13 **Completions** since the start of the plan period were quite low, but **commitments** are fairly high: 1,020 homes as of April 2023. In total, completions and commitments amount to 7% of the population, which is mid-ranking when compared to the other higher order settlements discussed within this section. Additionally, there was a significant amount of expansion in the years preceding the start of the plan period, and there is a general perception that infrastructure provision alongside growth has been sub-optimal.
- 5.4.14 The Council's HELAA shows permitted sites (green) and other developable sites (yellow)

Figure 5.3: HELAA sites at Saffron Walden, also showing parish boundaries



- 5.4.15 After having discounted non-strategic sites and the option of strategic growth at the small village of Seward's End (see Section 5.3), as well as the one site option within the urban area (valued sports pitches in the context of a local deficit), attention focuses on land to the **east and south east**. There are six sites in total here, stretching from the Debden Road north to the Radwinter Road (B1053).
- 5.4.16 A logical starting point is the two central sites **adjacent to the north of Thaxted Road (B184)**. In particular, a starting point is Site 009EMP, which performs very well as an employment site option. Indeed, it is the only employment site option at Saffron Walden in the context of an identified need for ~5ha. The site would extend Knights Park, which is a fairly recently developed retail park with a hotel.

5.4.17 Moving on to **the other three sites located between the two B-road corridors** (east of the town). There is a clear case for considering these three sites in combination, including with a view to maximising the infrastructure delivery opportunity. As part of this, there is an aspiration for a road link between the two B-road corridors, although there is a need for further work to determine precisely what can be achieved.

5.4.18 These three sites would be less-well contained in topographical terms than the committed sites to the west; however, the potential to draw upon topography to contain growth can be envisaged. There is a clear need to plan comprehensively for growth with a long term perspective as far as possible, avoiding piecemeal growth / development creep over time, with commensurate opportunities missed.

5.4.19 The final two sites to consider are located to the **south of Thaxted Road (B184)**. Topography is a key consideration here, with the land rising to the south, towards a high point within the southern-most site (Site 005). In this light, it is the northern-most site (Site 006) that is clearly preferable, plus this site is better-connected in transport terms. Also, Site 005 is associated with a listed farmhouse and a footpath.

5.4.20 In **conclusion**:

- The option of **strategic growth to the east**, between the two B-roads, performs strongly, to the extent that it can reasonably be held 'constant' across the growth scenarios. It is recognised that there are constraints to growth at Saffron Walden, but the option of 'no strategic allocation' is unreasonable, and allocating just one or two of the three component sites in this sector would risk ongoing piecemeal urban expansion with opportunities missed in terms of delivering infrastructure alongside new homes. Initial masterplanning work serves to suggest a capacity of 845 homes.
- The question of whether to support **additional growth to the south east**, to the south of Thaxted Road, is more finely balanced. On the one hand, higher growth to the east / southeast of Saffron Walden would increase the potential to deliver upon community infrastructure and transport objectives.¹⁰ However, on the other hand, there is a need to minimise the risk of problematic development creep / sprawl over time, plus there is a general argument in favour of limited growth given constraints affecting the town. A further consideration is minimising pressure on the catchment of the Hunters' Well / Fulfen Slade chalk stream. On balance, it is appropriate for this option to be taken forward as a 'variable' across the growth scenarios. Initial masterplanning work serves to suggest a capacity of 435 homes; however, it is recognised that the possibility of fewer homes focused on lower growth warrants further consideration.
- In light of the above, there are **two reasonable growth scenarios**, which are set out below. The next port of call is potentially higher growth with view to a comprehensive expansion that brings with it added certainty in respect of realising infrastructure opportunities alongside housing growth. However, there is a need to respect the position of the town within the landscape (see map of topography [here](#)).

Table 5.1: Saffron Walden growth scenarios (new supply only) progressed to Section 5.5

Progressed scenarios		Homes	Employment land
1)	Strategic growth to the east	845	~3ha
2)	Scenario 1 plus growth to the south east	1,280	

¹⁰ Development at Saffron Walden provides an opportunity to provide substantial new **education facilities**, including a primary school that will provide for some of the recently committed development as well as the newly proposed allocation. Essex County Council as Education Authority favours a single larger primary school, and there is also an established opportunity to deliver a new Sixth Form Centre for Saffron Walden County High School, thus enabling secondary expansion in the town, and preventing students having to travel for school. Site 006 could be very well placed to deliver one or both of these education facilities, given its relative proximity to the town centre and its position adjacent to the town's leisure centre. With regards to **transport infrastructure**, addition of Site 006 could enable a local distributor road that links not only the two B-road corridors but also extends to link to Debden Road (a minor road). This extension would then open-up the possibility of a future further section of road to the west linking to the Newport Road (B1052). There is no HELAA site here, but it is understood that land could potentially be made available. Land here is associated with the Beechy Brook valley (including a long distance footpath) and is sensitive in landscape terms. However, there is a long term aspiration for a strategic road solution for Saffron Walden, to the benefit of the town centre and potentially supporting modal shift, hence there is a strong argument keeping this option open.

Great Dunmow

5.4.21 Great Dunmow is located in the south of Uttlesford, on the A120 corridor and near equidistant between Braintree to the east and Bishops Stortford to the west. It is a historic settlement associated with the River Chelmer corridor and the intersection of north-south and east-west historic routes (Roman Roads). However, Great Dunmow has expanded well-beyond the linear historic core area, including in the direction of bypass roads. As can be seen from the [historic mapping](#), the town was historically located to the west of the River Chelmer, with the small village/hamlet of Church End to the east, straddling the river corridor.

5.4.22 A high rate of recent and committed growth is a key feature of Great Dunmow, and it is also important to note that the Local Plan withdrawn in 2020 proposed two garden communities in the vicinity of Great Dunmow (discussed further below). The Town Council [website](#) explains recent and committed growth locations, and another map is available on the Little Easton Parish Council [website](#); however, the information available at these sites is slightly out of date, at the time of writing.

N.B. a large scheme near-adjacent to the west of Great Dunmow very recently gained permission at appeal (ref. [UTT/21/1708/OP](#)). However, the window for judicial review remains open at the time of writing.

5.4.23 Growth has delivered strategic infrastructure; for example, there is a committed new secondary school to the west of the town (shown on the town/parish council websites linked above; recently announced as [delayed](#)). However, as per Saffron Walden, there is a concern that piecemeal growth in the absence of an up-to-date local plan has led to infrastructure capacity issues and opportunities missed.

5.4.24 **Completions** since the start of the plan period and **commitments** are both high. In total, completions and commitments totalled 2,777 homes as of April 2023, which amounts to 26% of the population (10,624 as of the 2021) and, as discussed, there have been significant permissions post April 2023.

5.4.25 The Council's HELAA shows permitted sites (green) and other developable sites (yellow). Points to note:

- The figure shows the location of the proposed and previously supported new settlement to the west of the town, known as 'Easton Park'. Another new settlement was also previously supported to the east of the town ('West of Braintree').
- The large site directly to the west of the town is the aforementioned site recently permitted at appeal for 1,000 to 1,200 homes ('East of Highwood Quarry').
- 'White land' to the west of the town, directly either side of the B125, is committed, under construction or completed (see the town/parish council websites linked above).

5.4.26 After having discounted non-strategic sites and the option of strategic growth at lower tier settlements (see Section 5.3), the first point for consideration is **new settlement options**. The strategic case for a new settlement / garden community is weak in the context of the current local plan, as discussed in Section 5.3, but options nonetheless warrant consideration on their merits:

- West of Great Dunmow – the aforementioned East of Highwood Quarry site was previously proposed as the eastern extent of a much larger new settlement known as Easton Park -see Figure 5.5. The remaining part of the previously proposed Easton Park scheme (i.e. land to the west of the East of Highwood Quarry site) is still being promoted. It is this western area that comprises the former Easton Park estate, which was cleared of extensive tree cover for the purposes of an airfield in WWII (see [here](#)).

Three figures presented below aim to further explain the situation. Figure 5.5 is the concept masterplan for Easton Park (up to 10,000 homes between Great Dunmow and Takeley) submitted to the Council by the site promoter in 2021. Figure 5.6 is the land use strategy for 'East of Highwood Quarry'. Figure 5.7 is an 18th Century map showing the East of Highwood Quarry site adjacent to the east of Easton Park.

The site is associated with a range of significant constraints, including relating to biodiversity (High Wood SSSI and related smaller woodlands, including ancient woodland and others designated as a County Wildlife Site) and the historic environment (investigated in detail as part of the examination of the withdrawn local plan). There are also clear transport connectivity challenges, including in respect of M11 Junction 8 and the viability and ultimately deliverability of a Bus Rapid Transport (BRT) scheme. Matters were explored in detail in the Inspectors' letter that reached conclusions on the withdrawn local plan (2020), and it is not clear what progress has been made since 2020 in terms of addressing the issues raised. In respect of M11 Junction 8, it should be noted that Road Investment Strategy (RIS) 3 is still forthcoming (due in 2024, as discussed [here](#)).

Figure 5.4: HELAA sites at Great Dunmow, also showing parish boundaries

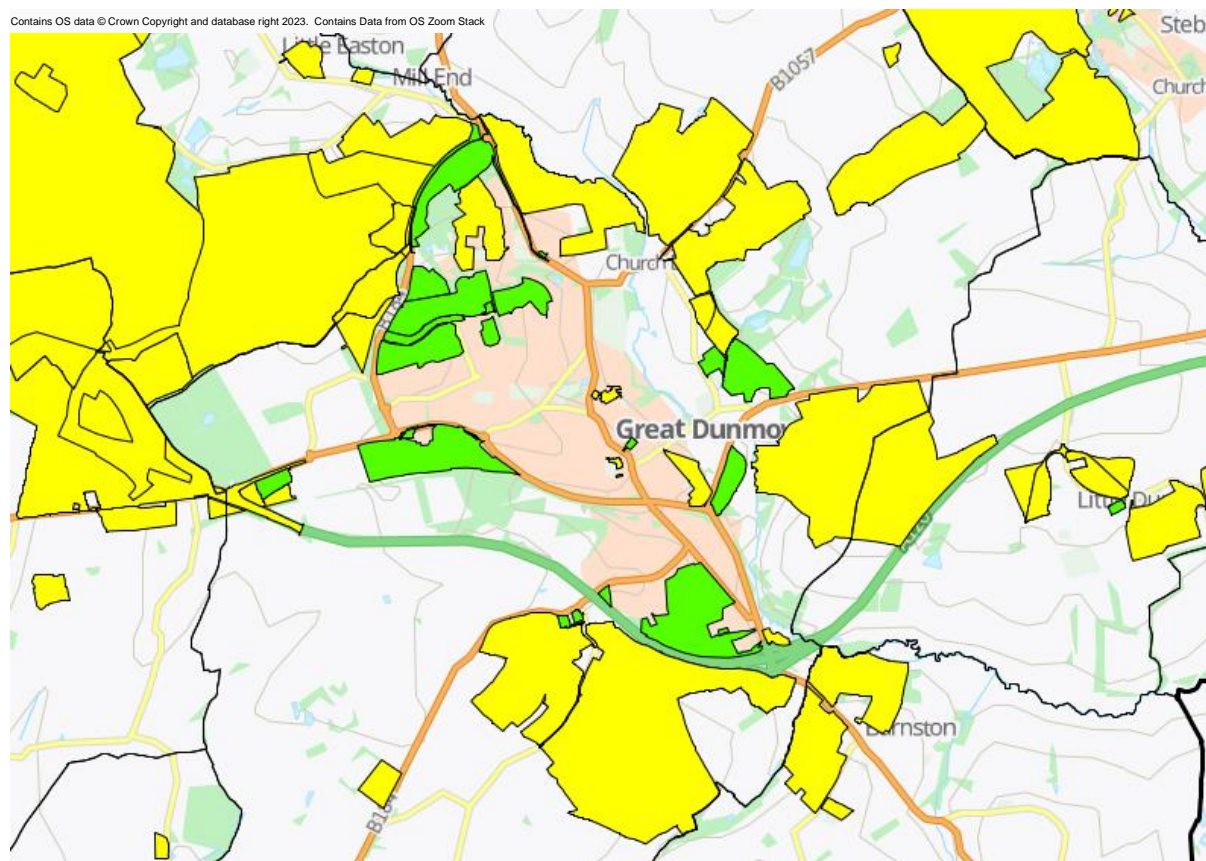


Figure 5.5: Easton Park (including Land East of Highwood Quarry) site promoter's concept plan (2021)



Figure 5.6: Land East of Highwood Quarry land use strategy (from application UTT/21/1708/OP)

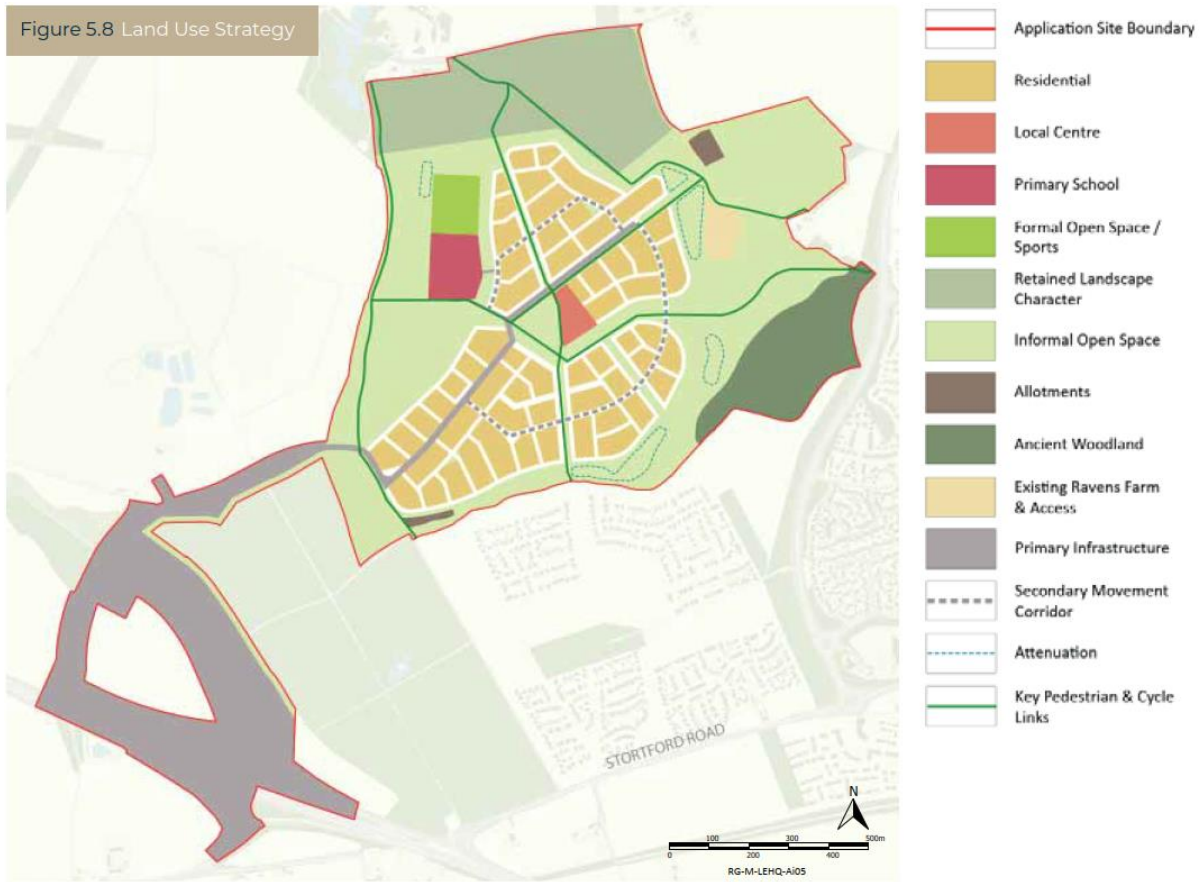


Figure 5.7: Land East of Highwood Quarry site location on 18th Century map (from application UTT/21/1708/OP)



- South of Great Dunmow – this was not a preferred option / proposed garden community in the withdrawn local plan (2020), but the latest situation is that a 134 ha is being promoted as available (Site 007). There is potentially a degree of landscape capacity in this area, given the potential for growth to be contained within the valley of Martel's Brook, the site would be well-placed to deliver employment land and the potential to deliver community facilities to the benefit of Barnston (a small village with limited historic sensitivity) is also of note. However, the A120 is a clear barrier to effective connectivity with Great Dunmow, and a key area of land south of the A120 junction is seemingly not available.
- East of Great Dunmow – the withdrawn local plan (2020) proposed to allocate the western part of a larger garden community known as West of Braintree, the bulk of which would have been located within Braintree District, and which was proposed to be allocated through a Joint Plan prepared by the North Essex Authorities (NEA). However, the Inspectors for the withdrawn Uttlesford Local Plan raised some concerns – particularly in respect of the viability and deliverability of a BRT scheme – and then the allocation was deleted by the Inspector for the NEA Joint Plan in December 2020 (as discussed above). Clearly it is for Braintree District to take the lead on any further consideration of a new settlement here and, in this respect, Braintree District adopted a Local Plan in 2022 and a review is yet to commence.

5.4.27 There are three broad **strategic expansion options** to consider:

- North – there are two options here, both of which are considered to perform relatively poorly, namely: A) expansion beyond the B184, in the direction of Little Easton; and B) expansion east of the B1008.

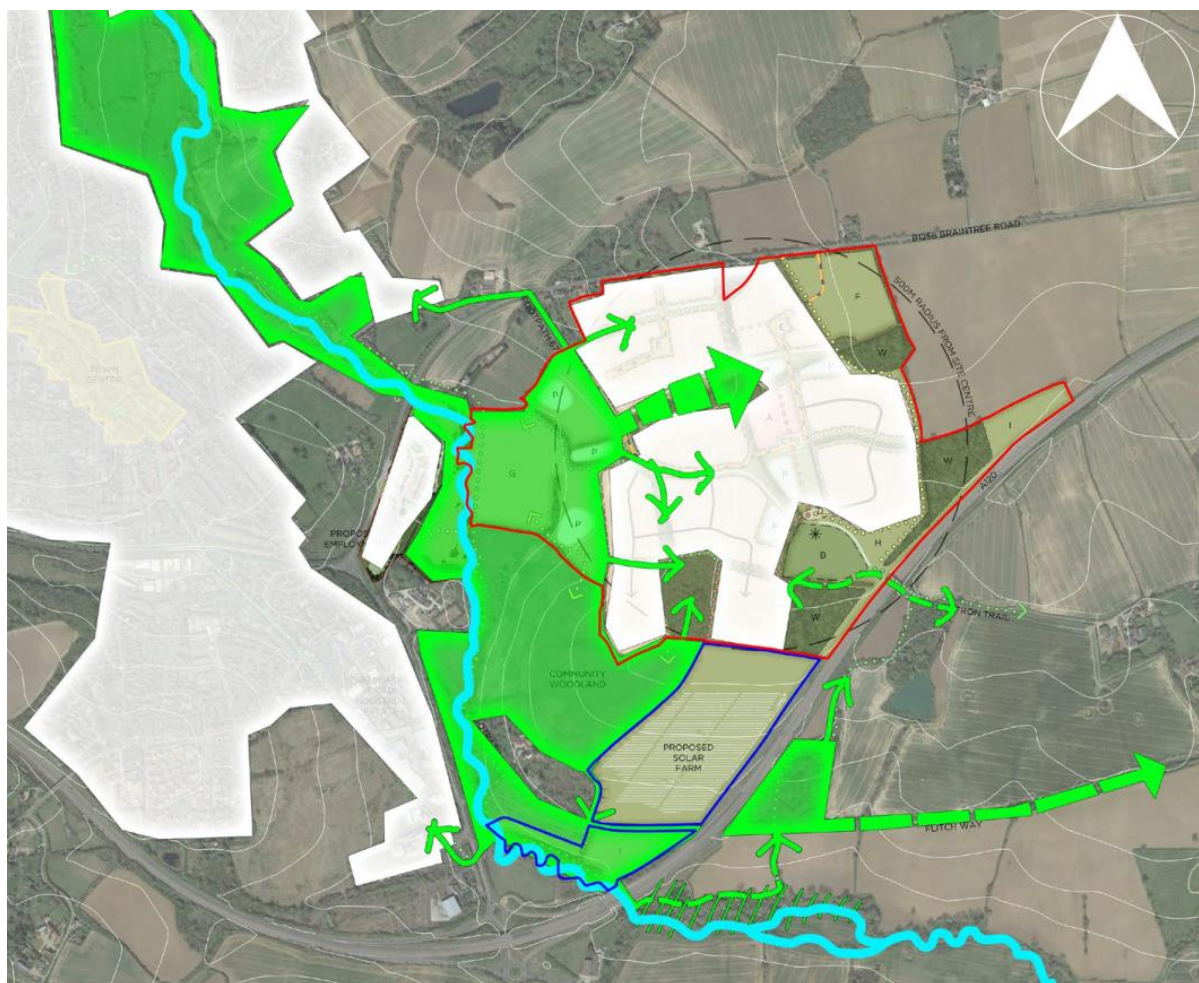
With regards to (A), there is potentially a degree of landscape capacity given the potential to draw upon the Chelmer Valley for containment; however, the site would risk coalescing Great Dunmow with historic Little Easton / Mill End. The site would also relate poorly to the adjacent Land East of Highwood Park (discussed above), given extensive proposed greenspace proposed at the northeast extent of the site (see Figure 5.6). The site might alternatively be considered for a country park (discussed below).

With regards to (B), land here does relate well to Great Dunmow; however, there is significant historic environment constraint, given conservation areas to the west (Great Dunmow) and to the east (Church End) and also given an adjacent scheduled monument and potential archaeology within the site. There is also clear landscape constraint given views across the Chelmer Valley from the B1008. The option of a stand-alone strategic urban extension here can be ruled out as unreasonable; however, this land parcel does warrant further consideration, ahead of plan finalisation, including potentially in combination with the option of strategic expansion in the vicinity of Church End (discussed below).

- East – Site 009 would deliver a strategic urban extension to Church End but is considered to relate suitably well to Great Dunmow, with the potential for relatively good walking and cycle connectivity to the town centre. The Church End Conservation Area is a clear constraint, as is road (including bus) connectivity; however, there is a degree of landscape capacity and emerging work in respect of a concept masterplan serves to highlight a considerable green infrastructure opportunity and the potential to deliver local/neighbourhood centre to include a 2 form entry primary school.¹¹
- South east – a considerable amount of work has been undertaken by the site promoters of Site 008, with the proposal (as of 2021) being for a 1,300 home scheme to include 2ha of employment land and a local/neighbourhood centre with a 2 form entry primary school. The employment site would be fairly well located, in the context of somewhat limited employment land at Great Dunmow and an established need for employment land along the A120 corridor and in the vicinity of Great Dunmow (see Box 5.1). Also, growth here might contribute to strategic objectives around increasing accessibility to the River Chelmer corridor throughout Great Dunmow and beyond (but potentially to a lesser extent than is the case for the Church End option discussed above). Also, there would be good road/bus connectivity to Braintree. However, as can be seen in Figure 5.8, after having taken steps to avoid an extensive flood risk zone, the site would be poorly linked to Great Dunmow, also noting that land to the south comprises a community woodland and land proposed for a solar farm (ref. [UTT/23/2136/FUL](#)). Also, parcels of land between the site and Great Dunmow are unavailable that might otherwise assist with connectivity, including historic Dunmow Park (although the south west part of the Park comprises HELAA Site 013).

¹¹ The emerging proposal for expansion east of Great Dunmow (Church End) involves significant green space at the north / north east extent, which will be important in terms of ensuring containment / avoiding the risk of future development creep (beyond walking distance of Great Dunmow town centre). The proposal is also to deliver significant greenspace to the east, which will link well to an existing complex of woodlands (including ancient woodland and an area of former landfill). Also, the proposal to the west is to deliver new accessible parkland alongside the Chelmer Valley, potentially contributing to a long term objective to make the valley accessible throughout Great Dunmow and beyond. The final direction is then to the north west, along the Chelmer Valley, where there is a concern regarding the potential for extensive containment, noting the nearby historic farmstead.

Figure 5.8: Site promoter’s landscape concept plan for Land South East of Great Dunmow (2021)



5.4.28 There is also a need to briefly note two much **smaller site options** that could feasibly deliver 100 homes, namely: Site 003 to the east (south of Church End; east of St Edmunds Lane); and Site 013 (the western extent of Dunmow Park). However, both sites are constrained in heritage terms (Site 003 is adjacent to a prominent Grade II listed windmill; whilst Site 013 clearly contributes to the setting of Grade II listed Dunmow Park). Also, there is a clear case for strategic growth alongside new infrastructure (notably a new primary school) as opposed to further piecemeal growth.

5.4.29 In **conclusion**:

- The **no allocation scenario** warrants being progressed to Section 5.5, given the scale of recent and committed growth. However, there is also the need to test one or more scenarios involving strategic growth, given the position of Great Dunmow in the settlement hierarchy and also an established need for growth at Great Dunmow and/or Takeley to contribute towards delivery of a new secondary school.
- In light of the discussion above, the two strongest performing strategic growth options are: A) growth to the north east (Church End); and B) growth the south east. Of these two options, and on balance, the option of **growth to the north east (Church End)** is considered to be better performing. There is also feasibly the possibility of allocating both sites, including with a view to realising opportunities for the Chelmer Valley,¹² however, this scenario is ruled out as unreasonable on balance, given the level of completions/commitments and the importance of a geographical spread of growth across the District.

Another consideration is waste-water treatment, with the existing works the most capacity constrained in the District (Water Cycle Study, 2023), although high growth might help to secure an upgrade.

- In light of the above, there are **two reasonable growth scenarios**, which are set out below.

¹² There might feasibly be a new country park at the north west Great Dunmow, which might then be linked via the river corridor to new strategic greenspace at Church End, then via the river corridor to Dunmow Park and South East Great Dunmow. There could then be further enhancements to the river corridor (also mindful of the Flitch Way and Saffron Way) to Felsted.

5.4.30 Finally, with regards to **employment land**, the emerging preferred option involves allocation of land adjacent to the west of the A120 / B1256 junction for 15 ha. This site falls within the boundary of the previously proposed Easton Park new settlement (see Figure 5.5) and is constrained by a grade 2 listed building associated with a former entrance to Easton Park. The site comprises two roughly equal sized fields, and further consideration might be given to allocating only the eastern field (adjacent to the junction) given the heritage constraint (there is also a footpath and likely a degree of biodiversity constraint). The proposal is also to deliver a mobility hub alongside employment land (discussed below, under Takeley).

Table 5.2: Great Dunmow growth scenarios (new supply only) progressed to Section 5.5

Progressed scenarios		Homes	Employment land
1)	No allocation	0	~15ha
2)	Strategic growth to the north east (Church End)	869	

Stansted Mountfitchet

5.4.31 Stansted Mountfitchet is a smaller settlement than Great Dunmow, but there is a secondary school and a leisure centre (located at the south east extent of the settlement), and the settlement is ultimately placed in the top tier of the settlement hierarchy (Key Settlement) by the Settlement Hierarchy Study (2023).

5.4.32 The village benefits from a train station as well as very good links to Bishops Stortford and Stansted Airport, where there is extensive employment. Another strategic consideration is close links to Elsenham, to the east, where there is insufficient primary school capacity to accommodate committed growth.

5.4.33 With regards to strategic constraints to growth, the key point to note is that the southern half of the settlement edge is constrained by the Green Belt. There are feasible growth options here, including land sites/land with good accessibility credentials. However, there is not considered to be any realistic potential to demonstrate the ‘exceptional circumstances’ necessary to justify Green Belt release at Stansted Mountfitchet, given other options for growth at the settlement itself and elsewhere within the District outside of the Green Belt. As such, Green Belt options are not discussed further.

5.4.34 **Completions** since the start of the plan period and **commitments** (as of April 2023) are both very low in comparison to other higher tier settlements. However, there was notable growth prior to the start of the plan period – most recently to the north and, prior to that, there was extensive growth to the south (c.2010).

5.4.35 The Council’s HELAA shows permitted sites (green) and other developable sites (yellow). It should be noted that the large developable site adjacent to the airport is [Northside](#) strategic employment site.

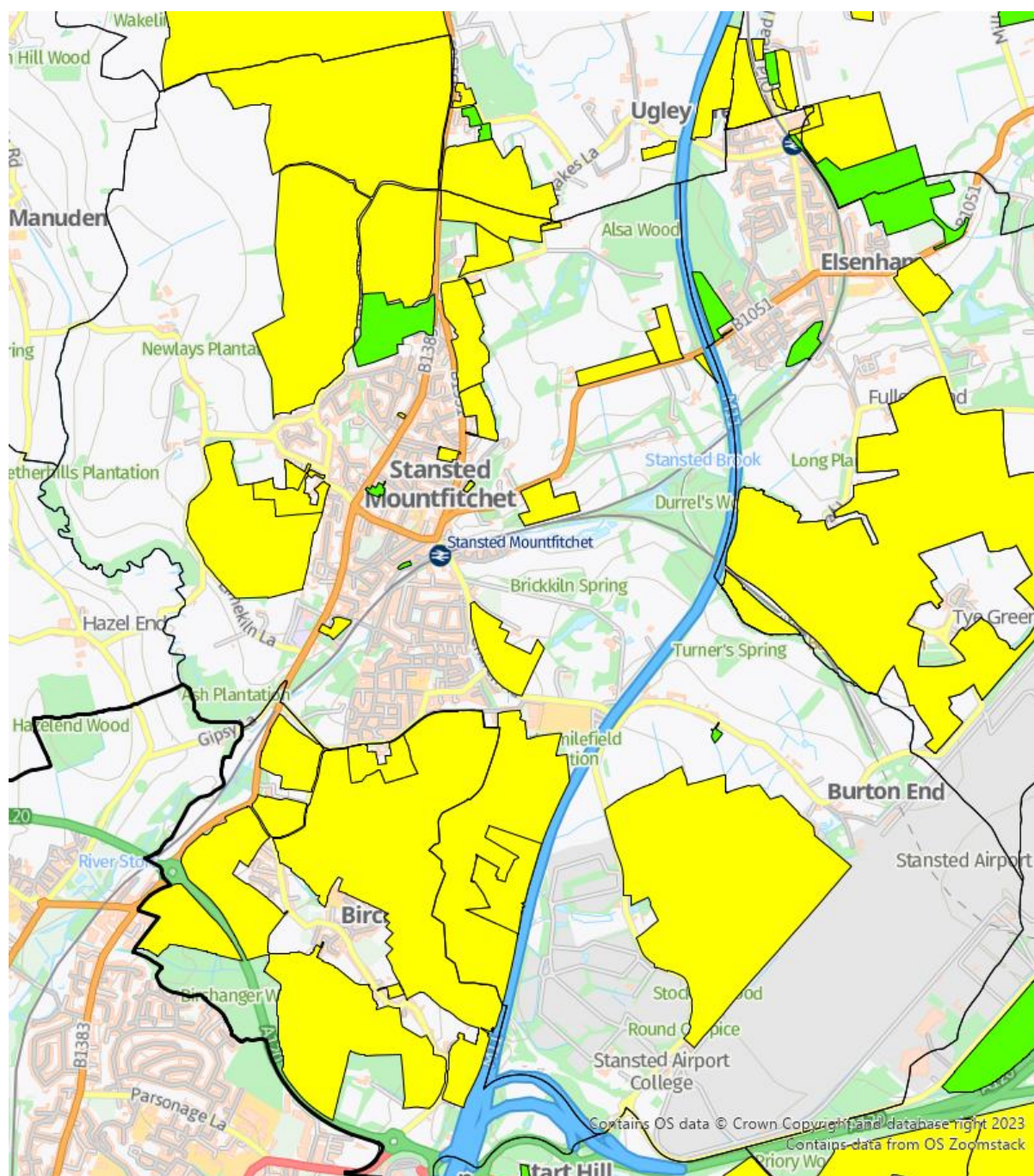
5.4.36 As discussed, the southern circa half of the settlement is constrained by the Green Belt, and this includes the large site adjacent to the west of the settlement. As such, attention focuses on options for strategic expansion to the **north**, in the vicinity of the committed site nearing completion.

5.4.37 Beginning with the two adjacent sites to the **east of the B1351** (Sites 013 and 023), these sites have the potential to deliver ~140 homes in combination. Separate land ownership is a potentially an issue; however, assuming the potential for a coordinated scheme, then the option of growth here is considered to perform well (subject to being able to deliver a new primary school – see discussion below), particularly given very good accessibility to the centre of Stansted Mountfitchet and the train station.

5.4.38 The southern site comprises woodland / scrub, and the value of this habitat must be considered in the context of several nearby woodlands (although mostly not ancient woodland). However, historic satellite imagery from 2000 shows this wooded land as open pasture. It should also be noted that the northern site is split by a stream corridor, and the proposal is to use the stream corridor to bound the northern extent of the built form, with the undeveloped land presumably made accessible as open space (it is currently an arable field). This land is discussed further below.

5.4.39 The next sites to consider are those located to the **west of the B1351**, either side of Pennington Lane. There are three sites here, but two sites overlap (namely those to the west of Pennington Lane).

Figure 5.9: HELAA sites at Stansted Mountfitchet, also showing parish boundaries



- 5.4.40 A key consideration here (west of the B1351) is the need to deliver a strategic scale scheme able to deliver a primary school, as there is understood to be a need for a new primary school at Stansted Mountfitchet (the existing school could be expanded, but this would not be an ideal solution).
- 5.4.41 This being the case, there is a strategic case in support of the max growth option in this area, which would deliver ~550 homes. A combined scheme would include an area of strategic greenspace at its northern extent in order to prevent northward 'sprawl' of what is already a linear settlement. Also, there would be the potential to enhance Pennington Lane as a historic route linking to an extensive bridlway network.
- 5.4.42 However, there is also a need to consider a focus of growth to the east of Pennington Lane, which is much better contained in landscape terms (see rising land to the west of Pennington Lane [here](#)). This might involve either A) no growth to the west of Pennington Lane; or B) only modest growth to the west of Pennington Lane, directly adjoining the settlement edge. With regards to (B), a small site has been proposed within the wider site, but this does not align well with the existing field boundaries.

- 5.4.43 The final urban extension option for potential consideration would involve a northern extension **either side of the B1351**. In addition to the aforementioned site to the west of the B1351 / east of Pennington Lane, this would involve growth to the east of the B1351, comprising: land to the north of the stream within aforementioned Site 013; Site 001, which is accessed from Alsa Lane; and intervening land not currently available. This is potentially an option that warrants further consideration, with a view to securing a new primary school and ensuring a rounded built form (without breaching Pennington Lane). However, in addition to the barrier of land not currently being available, there are wider constraints to delivering this option, relative to: historic environment – there are two Grade II listed buildings along Alsa Lane in this area, one of which is located within Site 001, plus there are other buildings within clear historic character, and the lane itself has a strong historic character ([historic mapping](#) shows an area of parkland); biodiversity and landscape – there is a considerable amount of priority habitat in this area, including two County Wildlife Sites (one of which is accessible as a nature reserve), plus an ancient woodland is nearby; landscape - there are views across the stream valley, towards the woodland, from High Lane; and employment / commerce – part of the land not currently available currently comprises an auction room, a garden centre and a rifle range (the Rifle range is a former quarry and a new CWS).
- 5.4.44 Finally, there is a need to consider the option of a **new settlement** to the north of Stansted Mountfitchet, within Site Ugley 003, known as Bollington Hall Farm, Ugley. The site promoters suggest a garden community of 2,200 – 3,600 homes, to include a secondary school (Figure 5.10). However, transport connectivity would be an issue for a scheme of this scale and there is no clear need for a secondary school here (plus there is generally limited strategic case to be made for a large garden community, as discussed above). The potential for a small garden community to be well-located within the landscape can be envisaged (e.g. south of the Halcramow Way), and new homes could be concentrated in relative proximity to Stansted Mountfitchet and Elsenham train stations. A smaller scheme would also serve to reduce regarding traffic through Ugley Green, where there is heritage constraint. As such, it is considered appropriate to assume that any garden community here would be of a smaller scale (e.g. 1,500 homes). Importantly, there is no reason assume that the scheme might expand further in the longer term (or plan with ‘one eye’ on this option of an expanded / larger scheme, with commensurate evidence requirements).

Figure 5.10: The site promoter’s proposal for a large garden community at Ugley



5.4.45 In conclusion:

- There is a clear case for a **comprehensive strategic urban extension to the north** with a view to securing a primary school. This would involve ~550 homes including to the west of Pennington Lane.
- However, there is also a need to test the option of a northern urban extension involving limited or no growth to the west of Pennington Lane. On balance, it is considered appropriate to test an option involving **no growth west of Pennington Lane**. This would involve ~250 homes.
- Given issues associated with urban expansion to the north, and in the context of the primary school issue, it is also appropriate to test the option of a small **garden community** (1,500 homes).
- Finally, the assumption under all of the above scenarios is that adjacent sites to the **east of the B1352** (Sites 013 and 023) would be allocated for 140 homes.
- In light of the above, there are **four reasonable growth scenarios**, which are set out below.

Table 5.3: Stansted Mountfitchet growth scenarios (new supply only) progressed to Section 5.5

Progressed scenarios		Homes	Employment land
1)	Urban extension to the north (also Sites 013/023)	390	-
2)	Scenario 1 plus expansion west of Pennington Lane	690	
3)	Garden community at Ugley (also Sites 013/023)	1,640	

Takeley

5.4.46 Takeley is a notably smaller settlement than those discussed above but is marginally the largest of the Local Rural Centres, as defined in the Settlement Hierarchy Study (2023).

5.4.47 Whilst there is no train station, the settlement comes into consideration for strategic growth for reasons including: A) proximity and cycle connectivity to Stansted Airport; B) a need to consolidate the settlement and deliver community infrastructure; and C) the A120 bypass to the north, which could form a defensible new northern boundary to the settlement. The settlement is also very well-suited to employment growth and is well-linked to both Bishops Stortford and Great Dunmow, including via the Flich Way cycle route.

5.4.48 However, there are a range of challenging constraints to growth, notably in terms of:

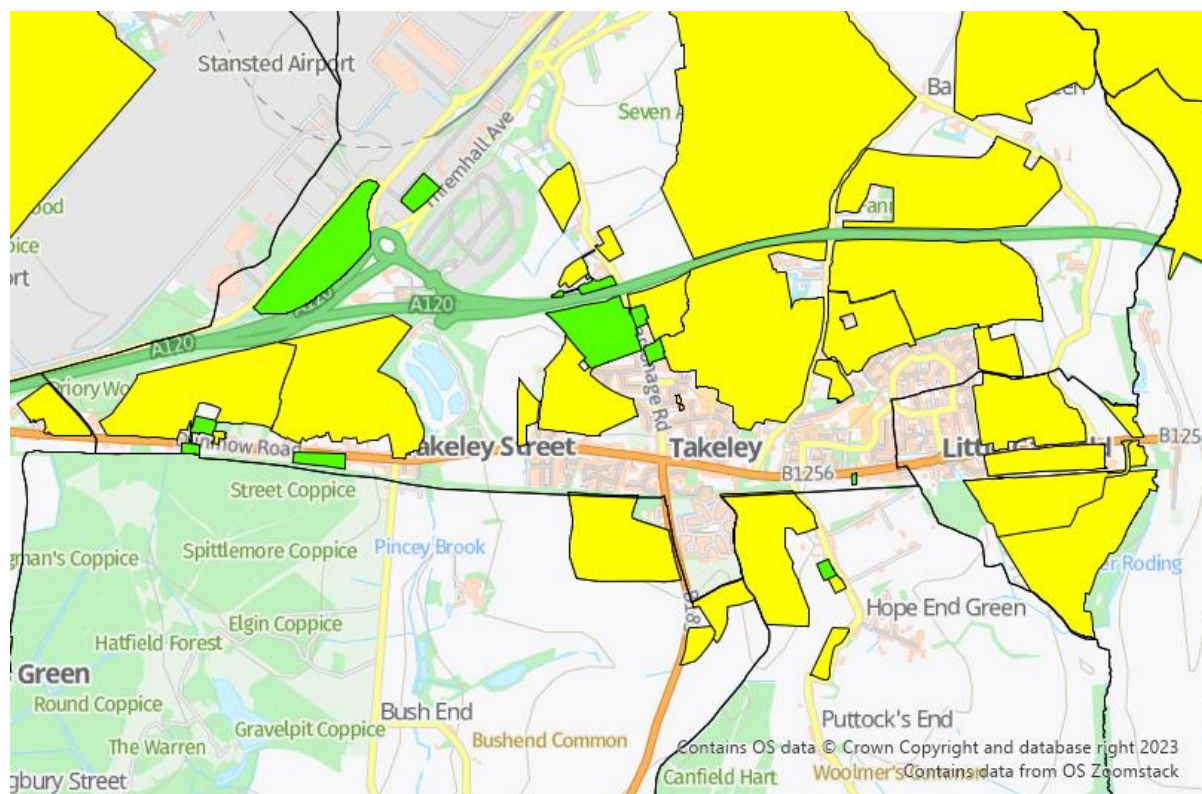
- Historic environment – whilst Takeley is currently notable as a larger settlement without a designated conservation area, the central Smiths Green area is associated with a strong historic character, and there was recently [consultation](#) on a potential Conservation Area. It is also important to note that a historic lane (and cycle route) links through Smiths Green to Bamber’s Green to the north (north of the A120) via Grade I listed Warish Hall, which is also a scheduled monument. There is also historic character along the B1256 to the east of the village (a Roman Road), with a number of listed buildings including a notable cluster at Little Canfield (associated with a wooded stream corridor).
- Biodiversity – first and foremost, there is a need to note the proximity of Hatfield Forest, which has already been introduced above as highly sensitive to increased recreational pressure. Also, Priors Wood ancient woodland CWS is a significant constraint to growth, including recognising its value within a wider wooded landscape, with a position between Hatfield Forest to the west and High Wood SSSI to the east. There is also a notable concentration of woodland priority habitat within the central part of Takeley.
- The Stansted Airport Countryside Protection Zone (CPZ) – is an existing designation that has a clear purpose and is widely valued. The designation had a strong influence on the previous two withdrawn versions of the local plan; however, at the current time the view is that arguments for strategic growth north of Takeley are likely to outweigh arguments for retaining the current extent of the CPZ designation. The clear intention though would be for the A120 to form a new defensible northern boundary to Takeley, and it is important to note that the CPZ designation pre-dates the A120 Takeley bypass.

5.4.49 **Completions** since the start of the plan period and **commitments** are significant (762 homes in total, as of April 2023) but considerably lower than at Great Dunmow. However, there has been significant growth over recent years, with satellite imagery from 20 years ago showing the settlement primarily located to the west of Smith’s Green, centred on the historic cross-roads (also see [historic mapping](#)).

5.4.50 Strategic expansion to the east delivered a second primary school for the village in c.2010; however, the general view is that infrastructure delivery alongside new homes has been sub-optimal. There is now a need for a secondary school, and an aspiration for a local centre to act as a focal point for the village.

5.4.51 The Council's HELAA shows permitted sites (green) and developable sites (yellow). N.B. the developable site adjacent to the west of the village is now committed (ref. [UTT/21/3311/OP](#)).

Figure 5.11: HELAA sites at Takeley, also showing parish boundaries



5.4.52 With regards to growth options, there is considered to be only one option reasonably in contention, namely strategic growth to the **north of the village** to include a secondary school and local centre. Growth options to the south of the village perform relatively poorly (despite lower landscape sensitivity), as there would be a risk of further problematic piecemeal growth. Equally, a northern expansion is clearly preferable to a garden community to the north of the A120, including from a Stansted Airport CPZ perspective.

5.4.53 In this light, the key question is considered to be in respect of the scale, configuration and broad conceptual approach to strategic growth north of the village, recognising the aforementioned constraints to growth. In this respect, initial masterplanning work has been completed that suggests capacity for 1,636 homes alongside: an adjacent secondary school and local centre to the east of Smith's Green; extensive green infrastructure, including via very limited growth in the central Smiths Green / Warrish Hall area and woodland creation to the north of Prior's Wood; and a new road link / multimodal corridor. The proposal does not involve new employment land, but there is a [permitted](#) site adjacent to the west.

5.4.54 There are a range of important masterplanning considerations that warrant further detailed scrutiny. For example, there is a need to consider: A) maximising delivery of strategic open greenspace so as to minimise recreational pressure on Hatfield Forest; B) impacts to Priors Wood and it's functional role at a landscape scale; C) the suitability of a location adjacent to the A120 for a secondary school; and D) securing a defensible eastern boundary to Takeley, recognising [descending land](#) towards the sensitive Little Canfield area (valley), and the strong likelihood of employment growth to the east of Little Canfield (discussed above). Also, there are strategic considerations in respect of capacity along the A120 / B1256 corridor, given growth locations to the east (including Great Dunmow, Braintree and Chelmsford).

5.4.55 However, at the current time it is not clear that there is a clear alternative strategy for testing. Attention focuses on lower growth options, but there would be a clear risk of not securing the necessary new strategic infrastructure. There is a parcel of land to the east that is currently unavailable, but which could serve to relieve development pressure on land parcels to the west were it to be made available.

5.4.56 A further argument for comprehensive growth relates to securing transport infrastructure upgrades. As well as supporting the enhancement of Stansted Airport as a transport interchange, enhancing existing links between Takeley and the Airport and enhancing the Flitch Way Country Park, there is also the potential for a new active and public transport hub between Takeley and Great Dunmow (alongside the potential employment allocation discussed above under Great Dunmow). This facility would better enable those seeking to access Stansted and the M11 corridor from the east to do so via active and public transport, reducing road traffic, but would also support movements between Takeley and Great Dunmow. The net effect of growth at Takeley alongside new transport infrastructure could be to reduce traffic movements west from Takeley to Bishops Stortford along the problematic B1256 corridor via M11 J8.

5.4.57 In **conclusion**, it is reasonable to progress only **one growth scenario** to Section 5.5. Of course, and to reiterate a general methodological point, the decision to progress just one growth scenario does not serve to indicate that approach to growth at Takeley is a *fait accompli*; rather, it reflects: A) a view that there is a not a clear strategic choice to the same extent as is the case for certain other settlements (including all three of the higher order settlements discussed above); and B) a pragmatic need to minimise the number of variable sub-areas / sub-area scenarios progressed to Section 5.5.

5.4.58 Finally, with regards to **employment**, there is also the option of a ~15 ha employment site to the west of Takeley, specifically to the north of Takeley Street (Site 005 EMP) – see discussion in Box 5.2

Table 5.4: Takeley growth scenarios (new supply only) progressed to Section 5.5

Progressed scenario		Homes	Employment land
1)	Strategic expansion to the north	1,636	17 ha

Box 5.2: Proposed employment site at Takeley Street

An issue here is that access would be via the B1256, i.e. the site would not have direct access to the A120. Also, it is recognised that there are adjacent / near adjacent historic environment constraints at Takeley Street (23 listed buildings including one Grade II*), plus there would be impacts to residents / the community at Takeley Street. Also, proximity of Hatfield Forest SSSI and National Nature Reserve clearly amounts to a significant biodiversity constraint; however, a key issue affecting Hatfield Forest is recreational pressure and, in this sense, industrial land may give rise to limited concerns (it is also important to note that there is a formerly wooded surface water flood channel through the site that links to Hatfield Forest, discussed further below).

Also, there is a need to note the CPZ designation, as development here likely does give rise to greater concerns, in respect of conflicts with the purposes of the designation, than is the case for land north of Takeley.¹³ In particular, the concern is that there could eventually be a sense of development coalescence along the A120, between M11J8 and Takeley, including recognising that there could be pressure for future employment growth adjacent to the A120 airport junction (there is currently a narrow strip of land that has not been available that prevents this). However, there are numerous features within the landscape that could be drawn upon in order to ensure settlement separation, and there could also be the potential for green infrastructure provision (including habitat creation in support of Hatfield Forest) to contribute in this sense (it is important to note that the current proposed employment site amounts to 27 ha, but the assumption is only 15 ha of employment land).

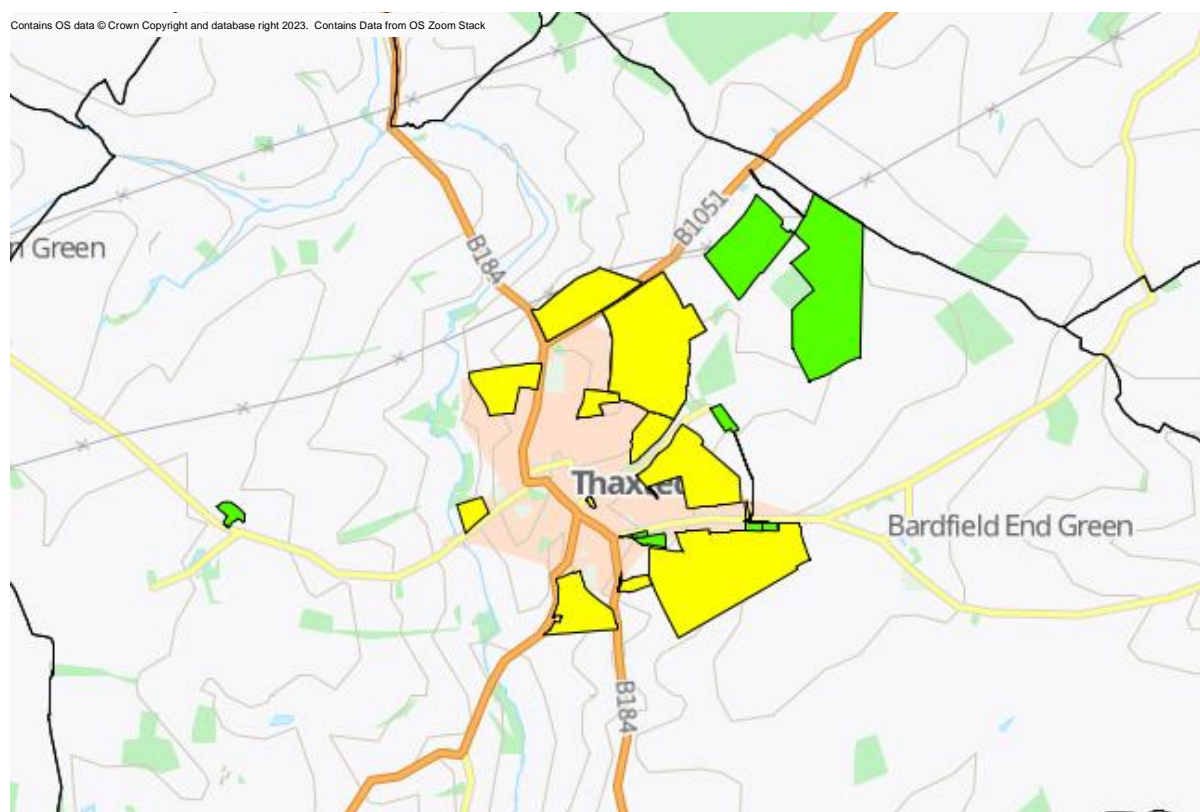
Ultimately, it is considered reasonable to take this site forward as a ‘constant’, given the strategic context (Box 5.1) and limited alternative options for new employment land in the south of Uttlesford, particularly at locations outside of the Green Belt and well-connected to the M11 and Stansted Airport. There is a cluster of small site options to the north of Takeley (Parsonage Road), but this area is sensitive from a CPZ perspective, plus the intention is to enhance this road as a cycle route. Finally, there is a site available adjacent to the M11 junction, but an [application](#) was recently refused by a planning inspector. It is recognised that there is a clear case for focusing employment land adjacent to M11 J8 (although there is also merit to employment close to Takeley).

¹³ The CPZ Study (2016) concluded that this parcel of land is sensitive as per land to the north of Takeley. It also notably stated that: “Infill development in Takeley Street has [link to local vernacular style and brings a suburban feel to the village](#)”.

Thaxted

- 5.4.59 Thaxted is unique in that, unlike all other Key Settlements and Local Rural Centres, it does not lie along either the M11 or A120 corridors. Thaxted is a notably rural settlement that serves an extensive hinterland.
- 5.4.60 The medieval core includes seven Grade I listed buildings, and Grade II* listed Thaxted Windmill is also an important landmark to the west. The village has expanded beyond the designated conservation area to the north and east, but overall retains a very strong historic character linked to the surrounding chalk influenced landscape, as experienced from the roads through the village (also the Harcamlow Way).
- 5.4.61 The rural nature of the village means that car dependency is unavoidably high, and it is important to note that there is no secondary school (with Thaxted near equidistant between secondary schools at Saffron Walden, Newport, Stansted Mountfitchet and Great Dunmow). However, an hourly bus service links Thaxted to Saffron Walden and Great Dunmow between Mon-Sat, and a further hourly bus service runs through Thaxted via Debden between Saffron Walden and Stansted Airport on Mon-Sat.
- 5.4.62 **Completions** since the start of the plan period and **commitments** are fairly low. However, there has been some housing growth over the past decade (a scheme to the north and another to the north east).
- 5.4.63 The Council's HELAA shows permitted sites (green) and other developable sites (yellow). N.B. the permitted site to the north east of the village is a solar farm.

Figure 5.12: HELAA sites at Thaxted, also showing parish boundaries



- 5.4.64 Landscape sensitivity serves as a clear argument against the sites located to the north and to the west, which leaves options for expansion: to the **east** (either side of Cophall Lane) and to the **south east**.
- 5.4.65 Of these two options, it is the option of expansion to the **east** that is judged to be preferable. There is the potential for a comprehensive scheme here, to include a primary school, including because land to the north east is in public sector ownership, and expansion here is preferable in built form and landscape terms. The site to the south east does not draw upon a field boundary at its southern extent and is prominent in the landscape from Bardfield Road (the route to/from Braintree) on the approach to Thaxted. Growth to the east is also potentially marginally preferable in terms of linking to the village centre. Finally, expansion to the south east could lead to pressure for further growth to the west, such that built form links to the B184, which would give rise to concerns in respect of impacts to the conservation area.

5.4.66 With regards to the nature of scheme that might be supported to the east, masterplanning work has been completed that suggest the potential for comprehensive growth across this sector, i.e. between the B-road in the north (B1051 Great Sampford Road) to the homes lining Bardfield Road in the south. Copthall Lane could be utilised as an active travel corridor; however, a constraint is the strong surface water flood channel and green corridor along the northern edge of the lane. There is the potential to deliver a primary school adjacent to the current north east edge of Thaxted; however, the scale of growth involved (489 homes in total) could create a challenge from a viability perspective. A 1fe school on a 2fe site would be viable, but the County Council’s preference is 2fe schools. A final consideration is that Site 001 OTH – which is the small site adjacent to the north east edge of Thaxted (not adjacent to Copthall Lane) is proposed as a nature reserve, which is a barrier to connectivity (in respect of the northern-most HELAA site, which is where the primary school is proposed); however, there could be a footpath through the site.

5.4.67 In **conclusion**:

- **Nil strategic growth** is ruled out as unreasonable on balance, including given the need to support the viability of services and facilities at Thaxted (including bus services)and, more generally, provide for locally arising housing needs (including affordable housing) and support the vitality of the village.
- It is essential that strategic growth delivers a new primary school, as there is limited or no capacity at the existing school and it cannot be expanded. As such, the option of growth to the **south of Copthall Lane** only is ruled out as unreasonable.
- In light of the above, there is **one reasonable growth scenario** involving comprehensive growth to the **east** for a total of 489 homes. The next port of call (other than the option of nil strategic growth) is feasibly higher growth in order to increase confidence around viability of delivering a 2fe primary school.

Table 5.5: Saffron Walden growth scenarios (new supply only) progressed to Section 5.5

Progressed scenario		Homes	Employment land
1)	Strategic expansion to the east	489	-

Hatfield Heath

5.4.68 Hatfield Heath is constrained by the London Metropolitan Green Belt, and there are not known to be any particular development related opportunities, beyond meeting locally arising housing needs and maintaining village viability / vitality. In this respect it is important to note that the village is well-linked by road to both Bishops Stortford and Harlow, i.e. it is not a deeply rural settlement akin to Thaxted.¹⁴

5.4.69 The village has overall relatively low historic environment sensitivity, with no designated conservation area and few listed buildings, but there is a clear historic character linked to the central heath (see [historic mapping](#)). There is a dispersed built form that might benefit from consolidation, but there is no identified opportunity in this respect. The one submitted site with the potential to deliver a strategic scheme comprises lowland heath priority habitat according to the nationally available dataset (see [magic.gov.uk](#)).

5.4.70 Finally, it should be noted that there is a new settlement option to the north of Hatfield Heath. However, land here is not very well connected in transport terms, and there would be a clear concern regarding impacts to Hatfield Forest. A new settlement here would link to Harlow and Bishops Stortford, so could feasibly be reconsidered in the future should there be a need for growth to support these settlements.

5.4.71 In conclusion, there is only **one reasonable scenario** involving **no strategic allocation**. Given growth options outside of the Green Belt there is unlikely to potential to demonstrate the ‘exceptional circumstances’ necessary to justify release of land from the Green Belt for development at Hatfield Heath.

¹⁴ Completions and commitments are low (42 homes in total, as of April 2023), and historic satellite imagery shows very low housing growth over the c.20 years preceding the start of the plan period.

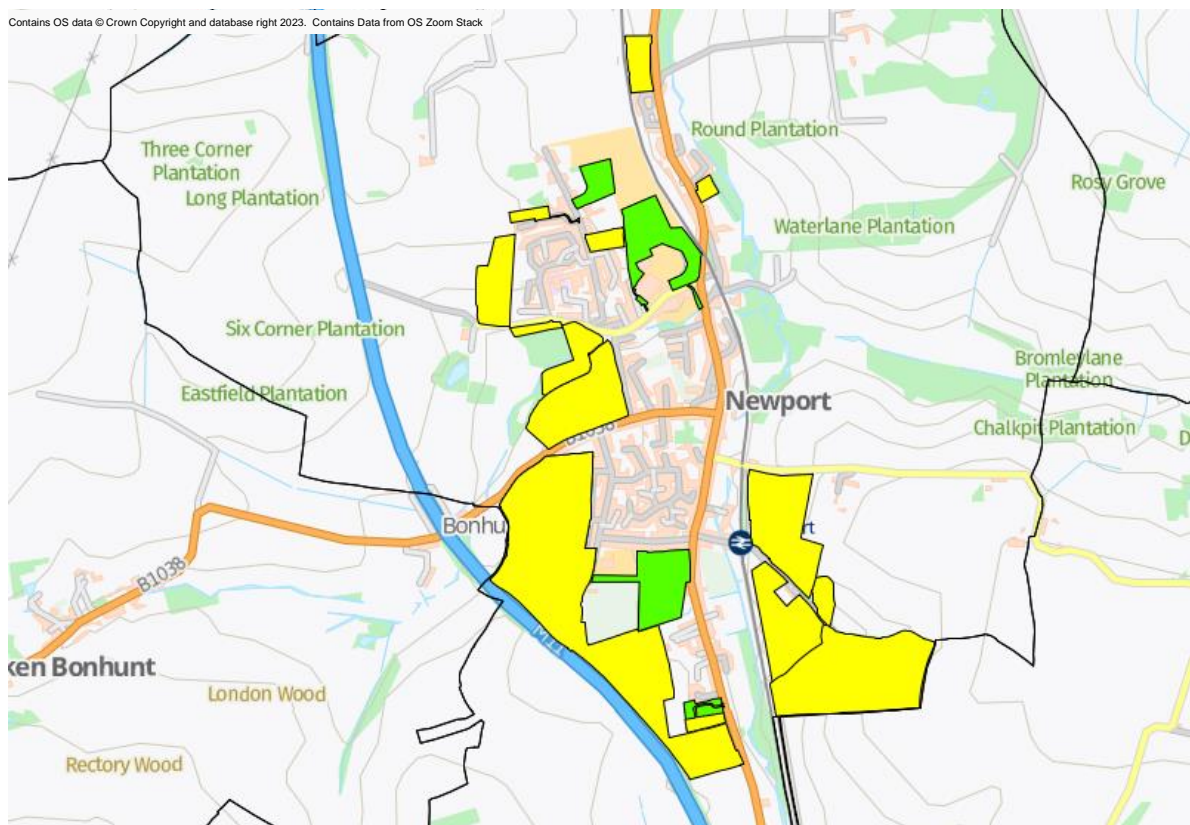
Elsenham

- 5.4.72 Elsenham benefits from a train station and good links to Stansted Mountfitchet and Stansted. There is also notably low historic environment constraint, and fairly limited constraint in wider respects. However, the level of completions and commitments is very high (particularly in terms of the resulting percentage increase in dwelling stock), and all of the strategic growth options are now committed.
- 5.4.73 As such, there is only **one reasonable scenario** involving **no strategic allocation**.
- 5.4.74 Finally, with regards to **employment**, the proposal is to support an expansion to an existing employment site at Gaunts End. This site is not very well-connected in transport terms, but otherwise gives rise to few concerns, and allocation assists with ensuring the Local Plan provides for identified needs (Box 5.1).

Newport

- 5.4.75 Newport is located in the north of Uttlesford, to the south of Saffron Walden. Newport has a lower 'service score' than Takeley and Thaxted (see Figure 5.2) but benefits from a train station (25 minutes to Cambridge) and a secondary school. The village is distant from an M11 junction and not on an A-road.
- 5.4.76 The village has a strong medieval core associated with a confluence of valleys and associated transport routes (the upper reaches of the River Cam) and has solely expanded beyond the conservation area to the west. The M11 is located to the west, and could serve to contain expansion of the settlement.
- 5.4.77 There is some secondary school capacity, but the County Council has confirmed that primary expansion at Newport already needed to address existing commitments within the catchment. In turn, as per other settlements discussed above, there is a need to focus on growth options that boost school capacity.
- 5.4.78 **Completions** since the start of the plan period and **commitments** are relatively low (155 homes in total, as of April 2023), and it appears there was limited housing growth over the preceding c.20 years.
- 5.4.79 The Council's HELAA shows permitted sites (green) and other developable sites (yellow). N.B. the larger committed site to the north relates to the secondary school.

Figure 5.13: HELAA sites at Newport, also showing parish boundaries



- 5.4.80 Attention focuses on growth options to the west, as landscape sensitivity is higher to the **east**, including given two long distance footpaths from which there are likely to be views across Newport from raised ground, plus there is a need to consider the proximity of Debden Water SSSI.
- 5.4.81 However, it is recognised that ongoing consideration should be given to the possibility of growth on lower land adjacent to the train station, plus consideration might feasibly be given to development within the chalk quarry that is the south-eastern-most of the HELAA sites (it has been identified as a potential CWS).
- 5.4.82 With regards to growth options to the west, attention focuses on the sites immediately adjacent to the B1038. The only other larger site is located to the **northwest**, but this site would likely deliver significantly fewer than 100 homes. It would extend a recently delivered site, and appears fairly unconstrained, but the site does not relate as well to the village as is the case for land to the south, adjacent to the B1038.
- 5.4.83 Focusing on the two sites **adjacent to the B1038**, the smaller site to the north is subject to a degree of historic constraint, in that the conservation area is adjacent (although there are no listed buildings here) and the site is visible from the surrounding roads. Indeed the field in question frames a distant view of the Parish Church on the approach to the village along the B1038. The Wicken Water (chalk stream) corridor is also adjacent, but it is fair to assume the potential to buffer and potentially enhance the stream corridor. However, the site performs strongly on account of relating very well to the village centre.
- 5.4.84 The site to the south gives rise to fewer historic environment concerns, and there appears to be limited visibility of the site from roads. The land here is mostly very well contained in landscape / built form terms, and there is also the potential to deliver a new community facility adjacent to the primary school, which could potentially deliver or support expansion of the school.
- 5.4.85 However, the Harcamlow Way long distance path passes through the site. Also, another constraint is noise and potentially air pollution from the adjacent M11. However, there is existing vegetation that would buffer new homes from the motorway to some extent. Finally, it is noted that the site is in several parts, and existing vegetation / [historic field boundaries](#) creates a challenge in respect of achieving good access.
- 5.4.86 In **conclusion**:
- **Nil strategic growth** is ruled out as unreasonable, particularly given a secondary school with capacity and very good rail connectivity, and recalling the number of homes required district-wide and growth related issues at other higher order settlements.
 - There is a need for further scrutiny of the growth quantum and non-housing uses delivered at the two sites **adjacent to the B1038**, including from a perspective of minimising historic environment, landscape and biodiversity / water-environment concerns. However, lower growth could potentially call into question the potential to secure an expansion to the village primary school.
- The emerging preferred approach, established on the basis of initial masterplanning work, involves 412 from the two sites. Lower growth options do warrant further consideration; however, at the current time, it is not clear that there is a reasonable lower growth option to progress to Section 5.5.
- In light of the above, there is **one reasonable growth scenario** involving comprehensive growth to the west (and southwest), either side of the B1038, for a total of 412 homes.

Table 5.6: Saffron Walden growth scenarios (new supply only) progressed to Section 5.5

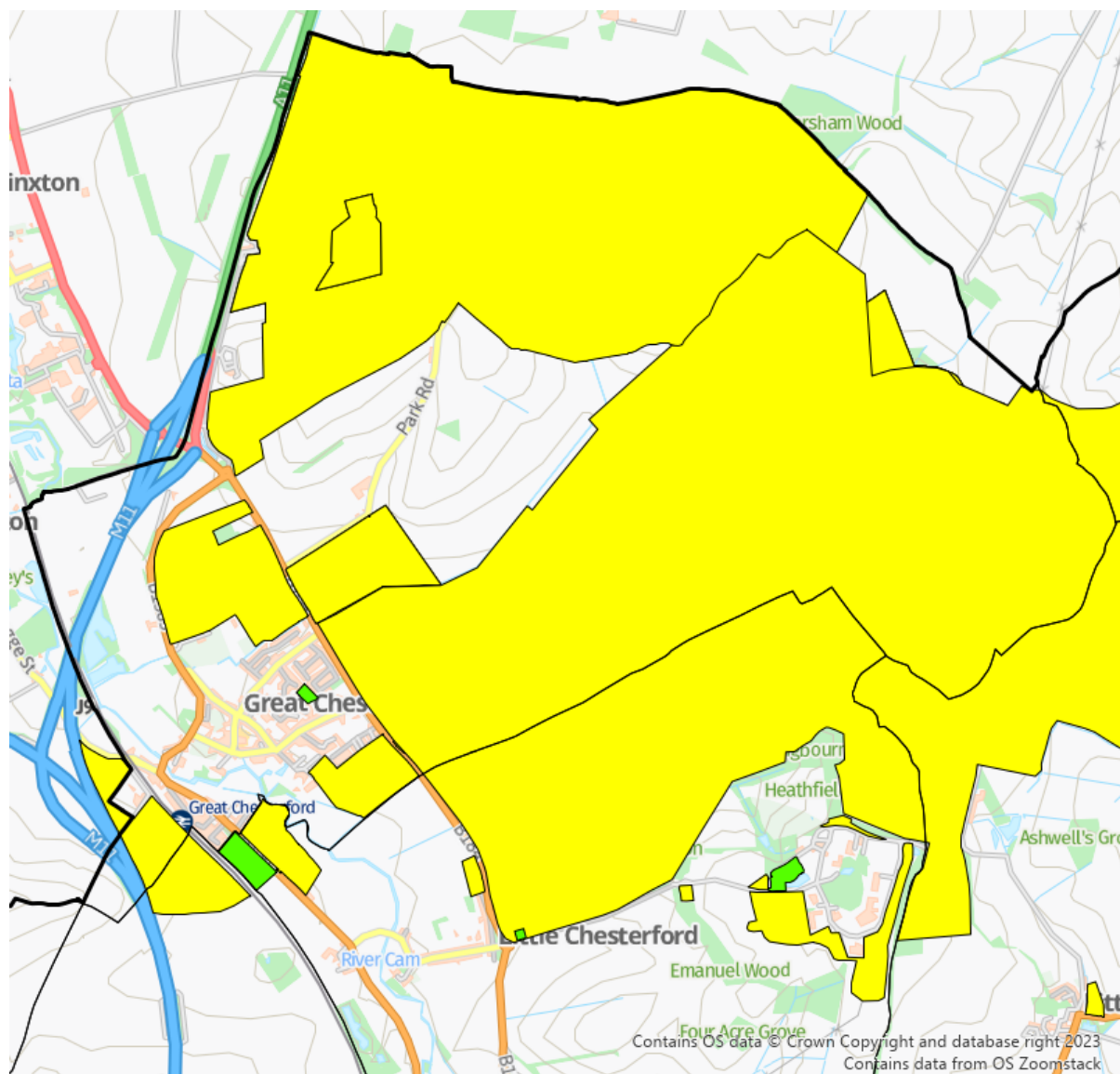
Progressed scenario	Homes	Employment land
1) Strategic expansion to the west / southwest	412	-

Great Chesterford

- 5.4.87 Great Chesterford is the smallest of the settlements under consideration here (as a potentially location for strategic growth). The village is located at the northern extent of the District, adjacent to the River Cam and M11 Junction 9. There is a train station and the journey to Cambridge is ~15 minutes. There are also strategic employment sites in close proximity, and the potential for further strategic employment growth to the south of Cambridge, within both South Cambridgeshire and Uttlesford, can be anticipated in the future.

- 5.4.88 In this light there is a clear strategic argument for growth here. However, there is significant historic environment constraint, both in terms of the village conservation area and also given an adjacent Scheduled Monument comprising a Roman fort, Roman town, Roman and Anglo-Saxon cemeteries. There are five scheduled monuments in total surrounding the village, with the primary located to the north west (see map [here](#)), plus there is extensive wider land known to be of archaeological value.
- 5.4.89 There is also a need to be mindful of possible water environment constraint, given sensitive chalk streams (the Cam here is in 'poor' [ecological condition](#)) and also given wastewater treatment capacity. It is noted that the Greater Cambridge Local Plan is currently [paused](#) to allow for consideration of water resource / environment issues, but this does not necessarily imply any particular constraint at Great Chesterford.
- 5.4.90 Finally, there is a significant primary school constraint to growth, with the existing primary school small and unable to expand. The County Council has identified the need for a 2.1ha site for a new 2fe primary school and would be unwilling to support a smaller school.
- 5.4.91 **Completions and commitments** total 229 homes, as of April 2023, which is amounts to a significant level of growth, given an existing population of 1,776 (2021). Historic satellite imagery indicates that there was some modest housing growth in the years preceding the start of the plan period.
- 5.4.92 In light of the above, there is a clear case for considering strategic growth options. However, there are very limited options in practice. Attention naturally focuses on land to the west of the B184, given the existing settlement form (relating to the river / rail corridor) and the need to avoid breaking into an open and expansive chalk influenced landscape to the east; however, in this area:
- **North** of the village – has been considered as having good potential to deliver a strategic scheme to include a new primary school; however, Historic England has raised significant concerns. There will be a need for further work to consider whether there is a viable scheme that balances competing issues.
 - **West** of the village – land is available to the west of the railway line; however, it has not been possible to conclude the potential for good/safe road access, including because access would need to through land that falls within South Cambridgeshire District. Also, it is important to note that the [Icknield Way](#) passes through the site, although there might be an enhancement opportunity.
 - **East** of the village – land here relates well to the village edge; however, there is landscape sensitivity here, with the site in the foreground of extensive views across the Cam Valley, as experienced from the Walden Road (B184). Regardless, the latest situation is that the land is not available for development.
- 5.4.93 The final matter for consideration is then the option of a **garden community** to the east, which was previously proposed through the withdrawn local plan (2020). Historic environment, landscape and transport constraints were considered in detail by the [Inspectors' letter \(2020\)](#), for example the Inspectors concluded: *"Presently, the proposed Garden Community at North Uttlesford is not justified by the historic heritage evidence available and we share Historic England's views that there is a possibility that it is not a suitable location for the development proposed due to its impact on the significance of heritage assets."* In this light, and also recalling the strategic context (Section 5.3) the option is ruled out as unreasonable.
- 5.4.94 In conclusion, at the current time there is **one reasonable scenario** involving no strategic allocation.
- 5.4.95 There will be a need to revisit this conclusion, given the strategic case for growth. It is clear that all potential locations for expansion outside of the areas of significant historic environment constraint warrant consideration, and historic environment enhancement opportunities might also be explored.
- 5.4.96 Chalk grassland habitat creation could also be a growth-related opportunity to explore, noting that the Environment Agency highlighted the following for Uttlesford through the SA Scoping Report consultation (2021): *"Creating new chalk grassland is achievable and would be locally special and distinctive."*
- 5.4.97 Finally, with regards to **employment**, the proposal is to support an 18 ha expansion to Great Chesterford Research Park (over-and-above land already with permission). This is a thriving research park well-related to the Greater Cambridge area. However, this is a rural location such that transport connectivity is an inherent issue (albeit there is a frequent shuttle bus service from Great Chesterford Station).
- 5.4.98 The allocation will enable realisation of the landowner's [masterplan](#) vision in full, but would lead to an oversupply of R+D / office employment land district-wide (in combination with the small proposed allocation at Gaunts End, discussed above), as measured against the established need (Box 5.1). This will require further scrutiny, including in discussion with South Cambridgeshire District.

Figure 5.14: HELAA sites at Great Chesterton also showing Cambridge to the north and Haverhill to the east



Rest of the District

- 5.4.99 As discussed, the proposal at the current time is to focus on strategic allocations at the settlements discussed above, namely those that fall within the top two tiers of the settlement hierarchy. However, it is recognised that some or all of the 13 villages that fall within the third tier of the settlement hierarchy (Large Villages) may be suited to a degree of plan-led growth, for example in order to maintain village services / facilities and/or in order to deliver new infrastructure.
- 5.4.100 Plan-led growth might be via the Local Plan or a Neighbourhood Plan, and matters will need to be explored in greater detail at the subsequent stage of plan-making, i.e. at the time of finalising the Pre-submission Local Plan for publication under Regulation 19 of the Local Planning Regulations.
- 5.4.101 At the current time the assumption is a total of **1,000 homes** from allocations at Larger Villages. This figure warrants further scrutiny; however, it is based on sound assumptions to the extent that it is not clear that there are significantly higher or lower growth options that warrant detailed consideration through the appraisal of reasonable alternative growth scenarios. Whilst, of course, a strategy involving, for example, 25% fewer or more homes across Larger Villages could feasibly be appraised, it would be challenging to draw meaningful conclusions without knowledge of the specific sites involved.
- 5.4.102 Even though the 1,000 homes assumption is held constant, there is nonetheless a focus on exploring broad / high-level arguments for and against growth at Larger Villages within the appraisal sections below.

Conclusion on sub-area scenarios

5.4.103 Table 5.7 shows the sub-area growth scenarios defined on the basis of the analysis set out above (informed by Sections 5.2 and 5.3). Having defined sub-area growth scenarios, the next step (Section 5.5) is to combine them to form a single set of reasonable growth scenarios for the District as a whole.

5.4.104 Figure 5.14 then shows the site-specific implications of the sub-area scenarios, namely:

- Site options progressed to Section 5.5 as a **constant allocation**, namely:
 - East of Saffron Walden
 - Small site(s) east of Stansted Mountfitchet
 - North of Takeley
 - East of Thaxted
 - West of Newport
- Site options progressed to Section 5.5 as a **variable allocation**, namely:
 - South east of Saffron Walden
 - East of Great Dunmow (Church End)
 - North of Stansted Mountfitchet (extension or small garden community)
- Select sites not progressed but **of note**:
 - South east of Great Dunmow
 - East of Newport
 - North east of Stansted Mountfitchet (a small site is shown, but the discussion focuses on a broad area)
 - Sites north, west and east of Great Chesterford

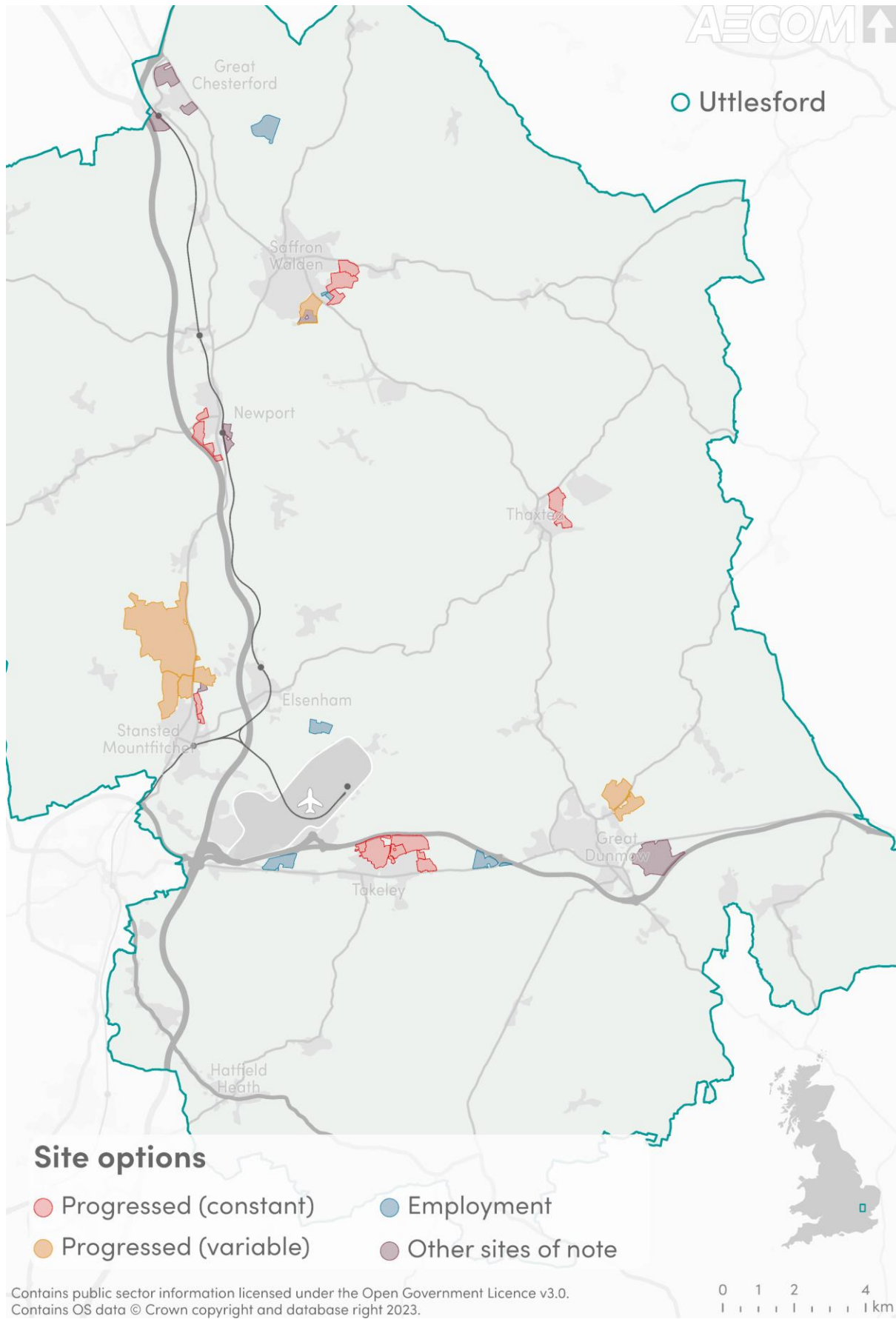
Note on approach / methodology

5.4.105 With regards to allocation / growth options progressed to Section 5.5 as a ‘constant’ (i.e. with a view to growth being assumed as a constant across the reasonable alternative growth scenarios) it is important to reiterate that the option of growth is not in any way a *fait accompli*. Indeed, all of the ‘constant’ options listed above (less so East of Stansted Mountfitchet, as a smaller site very well related to the village) undoubtedly do warrant further detailed scrutiny with a view to potentially adjusting the quantum of homes supported or even removing the allocation entirely. Identification of constant allocations is a methodological necessity, as part of a process to define growth scenarios in the form of alternative packages of sites, but constant allocations are also a focus of the appraisal sections below.

Table 5.7: Summary of sub-area scenarios (new supply only, i.e. over-and-above completions and permissions)

Sub area	Scenarios for new homes
Saffron Walden	Two scenarios: 845 or 1,280 homes
Great Dunmow	Two scenarios: 0 or 869 homes
Stansted Mountfitchet (including garden community)	Three scenarios: 140, 690, or 1,640 homes
Takeley	One scenario: 1,636 homes
Thaxted	One scenario: 489 homes
Hatfield Heath	One scenario: 0 homes
Elsenham	One scenario: 0 homes
Newport	One scenario: 412 homes
Great Chesterford	One scenario: 0 homes
Rest of the District	One scenario: 1,000 homes

Figure 5.15: Site options status established on the basis of the sub-area analysis¹⁵



¹⁵ This map does not show permitted sites. Also, any garden community to the north of Stansted Mountfitchet would comprise only a small part of the HELAA site shown, likely involving land at the southern extent of the HELAA site.

5.5 Reasonable growth scenarios

5.5.1 The final step was to **combine sub-area scenarios** introduced above (which, to reiterate, deal with new supply only) into district-wide reasonable growth scenarios, also accounting for:

- Completions since the start of the plan period – 980 homes
- Permissions between the start of the plan period and 31st March 2023 - 5,800 homes
- An estimate of permissions since 1st April 2023 – 650 homes
- A windfall allowance - 1,650 homes

5.5.2 The following rules were applied in order to arrive at a manageable number of scenarios:

- It is reasonable to test a scenario involving low growth across all the sub-areas.

Specifically, it is reasonable on the assumption that the number of permissions could potentially increase significantly, noting A) the Local Plan is out of date;¹⁶ and B) the 500 homes estimate for ‘permissions post April 2023’ does not account for East of Highwood Quarry (up to 1,200 homes west of great Dunmow).

- The first port of call would then be higher growth at Saffron Walden.
- The next port of call would then be higher growth at Great Dunmow.
- The final port of call would then be higher growth at Stansted Mountfitchet, which might be achieved either via comprehensive growth to the north or a garden community at Bollington Hall Farm, Ugley.

5.5.3 Applying these rules leads to **5 reasonable growth scenarios**, which are set out below.

5.5.4 It can be seen that the total quantum of growth supported ranges from **LHN plus 1% to LHN plus 20%**.

5.5.5 Under the lower growth scenario, the minimal supply buffer is a clear issue, including recognising the importance of flexibility to reduce certain elements of the proposed supply post consultation if necessary. However, on the other hand, the number of homes with permission could potentially increase significantly.

5.5.6 Under the higher growth scenario the supply buffer is likely larger than is necessary, assuming that the housing requirement is set at LHN. As such, under the highest growth scenario there could be flexibility to set the housing requirement at a figure modestly above LHN (e.g. LHN plus 5%).

5.5.7 At this stage, it is important to note that there will be the potential for further work to refine / revisit reasonable alternative growth scenarios subsequent to the current consultation, and also that the phrase all reasonable alternatives does not equate to all conceivable alternatives.¹⁷

5.5.8 Finally, with regards to **employment land**, this is held constant across the growth scenarios. The emerging strategy involves: two larger allocations for industrial / logistics along the A120 (each ~15 ha); an 18 ha expansion to Great Chesterford Research Park in the north of the District; and two smaller allocations (2-3ha) – one linked to Stansted (Gaunts End) and the other at Saffron Walden.

5.5.9 The strategy broadly aligns with the recommendations of the Employment Land Review (ELR, 2023), but: A) there would be oversupply of R+D space that will require further scrutiny, including in discussion with South Cambridgeshire District; there will be a need for further consideration of the extent to which the proposed strategy for industrial / logistics uses aligns with strategic objectives in respect of boosting supply along the M1 corridor and in proximity to Stansted. Box 5.2 above presents a specific discussion of the 15ha site at Takeley Street as it is recognised that this site is subject to significant constraint.

Note on the growth scenario maps presented below

5.5.10 Table 5.8 is followed by five maps showing the reasonable alternative growth scenarios. It is important to note that the maps do not show permitted sites. Also, any garden community to the north of Stansted Mountfitchet would comprise only a small part of the HELAA site shown under Scenario 5.

¹⁶ See the recent 5YHLS statement: www.uttlesford.moderngov.co.uk/documents/s33131/Cabinet%20Report%205YHLS.pdf

¹⁷ This is a quote from an Inspectors Report, see www.ay.gov.uk/sites/default/files/VALP/VALP%20Report.pdf

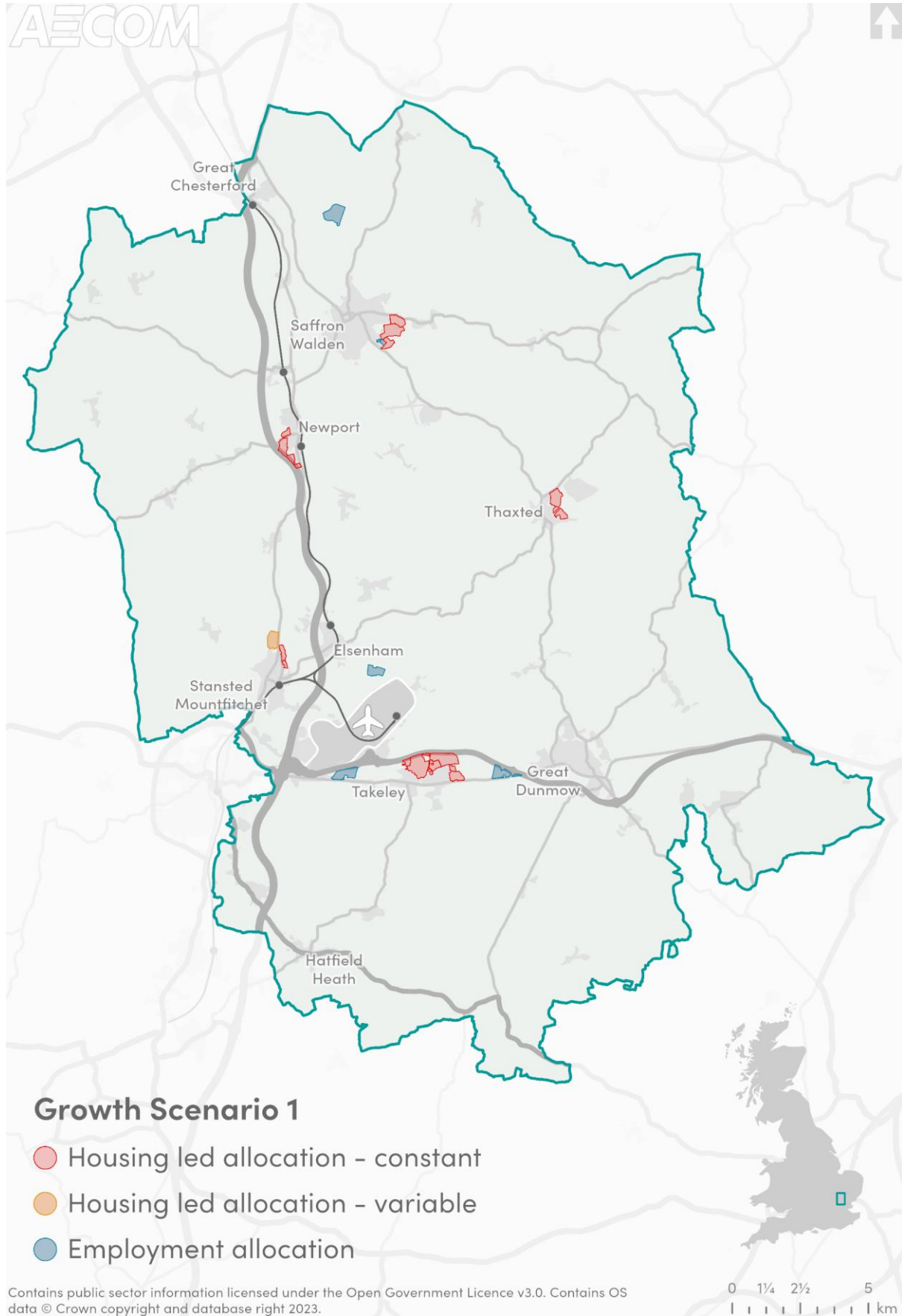
Table 5.8: The reasonable alternative growth scenarios

Supply component		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
Completions		980	980	980	980	980
Permissions prior to 1 st April 2023		5,800	5,800	5,800	5,800	5,800
Estimate of permissions since 1 st April 2023		650	650	650	650	650
Possible additional permissions		?	?	?	?	?
Windfall allowance		1,650	1,650	1,650	1,650	1,650
Large village allowance		1,000	1,000	1,000	1,000	1,000
Allocations	Takeley	1,636	1,636	1,636	1,636	1,636
	Thaxted	489	489	489	489	489
	Newport	412	412	412	412	412
	Great Chesterford	0	0	0	0	0
	Elsenham	0	0	0	0	0
	Hatfield Heath	0	0	0	0	0
	Saffron Walden	845	1,280	1,280	1,280	1,280
	Great Dunmow	0	0	869	869	869
	Stansted Mountfitchet	Expansion	390	390	390	690
Garden Community		0	0	0	0	1,500
Total homes		13,852	14,287	15,156	15,456	16,406
% above LHN (13,680)		1	4	11	13	20

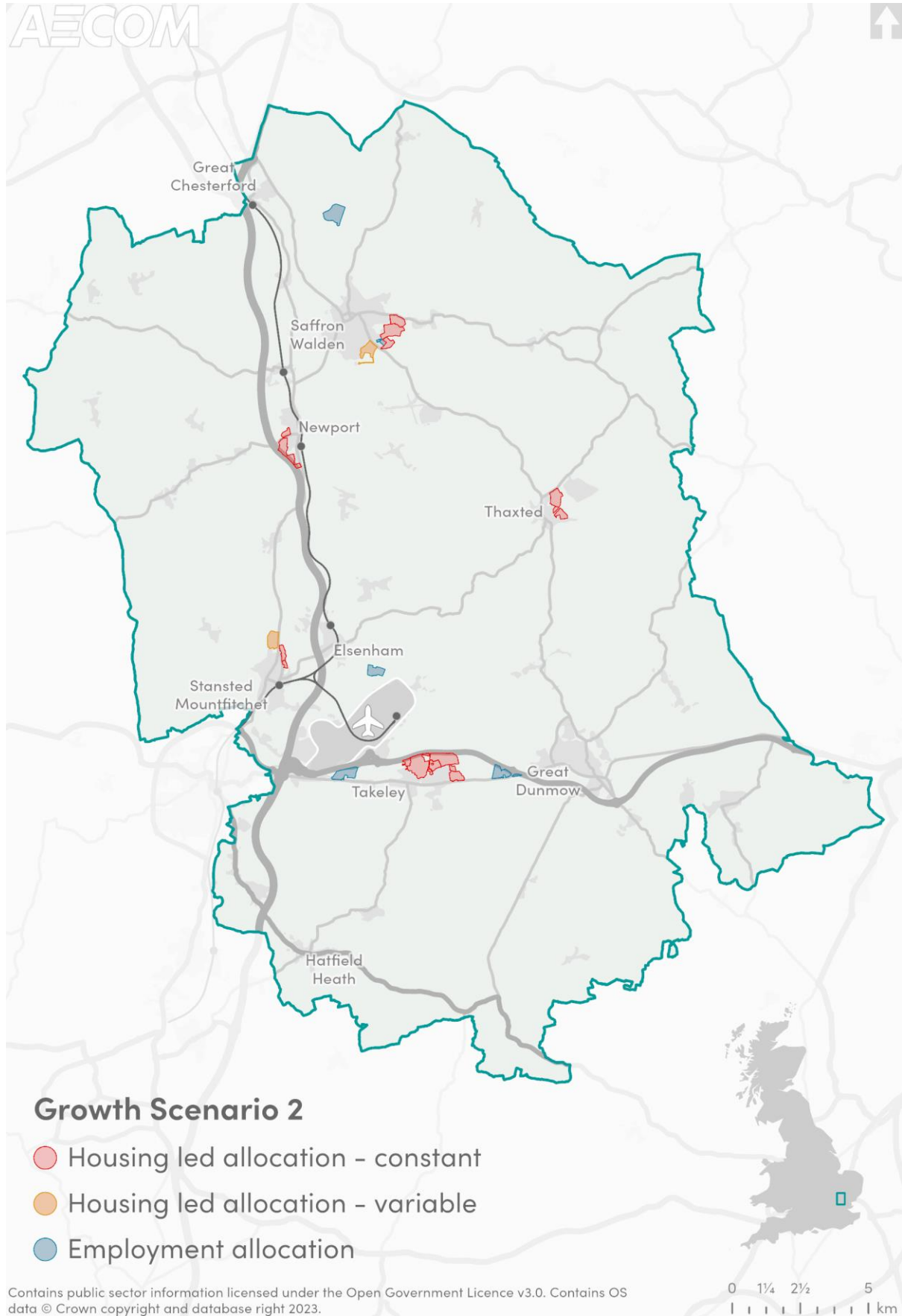
5.5.11 In summary:

- Scenario 1 – Low growth across all sub-areas
- Scenario 2 – Scenario 1 plus higher growth at Saffron Walden
- Scenario 3 – Scenario 2 plus higher growth at Great Dunmow
- Scenario 4 – Scenario 3 plus additional expansion north of Stansted Mountfitchet
- Scenario 5 – Scenario 4 plus garden community north of SM, minus expansion to the north of SM

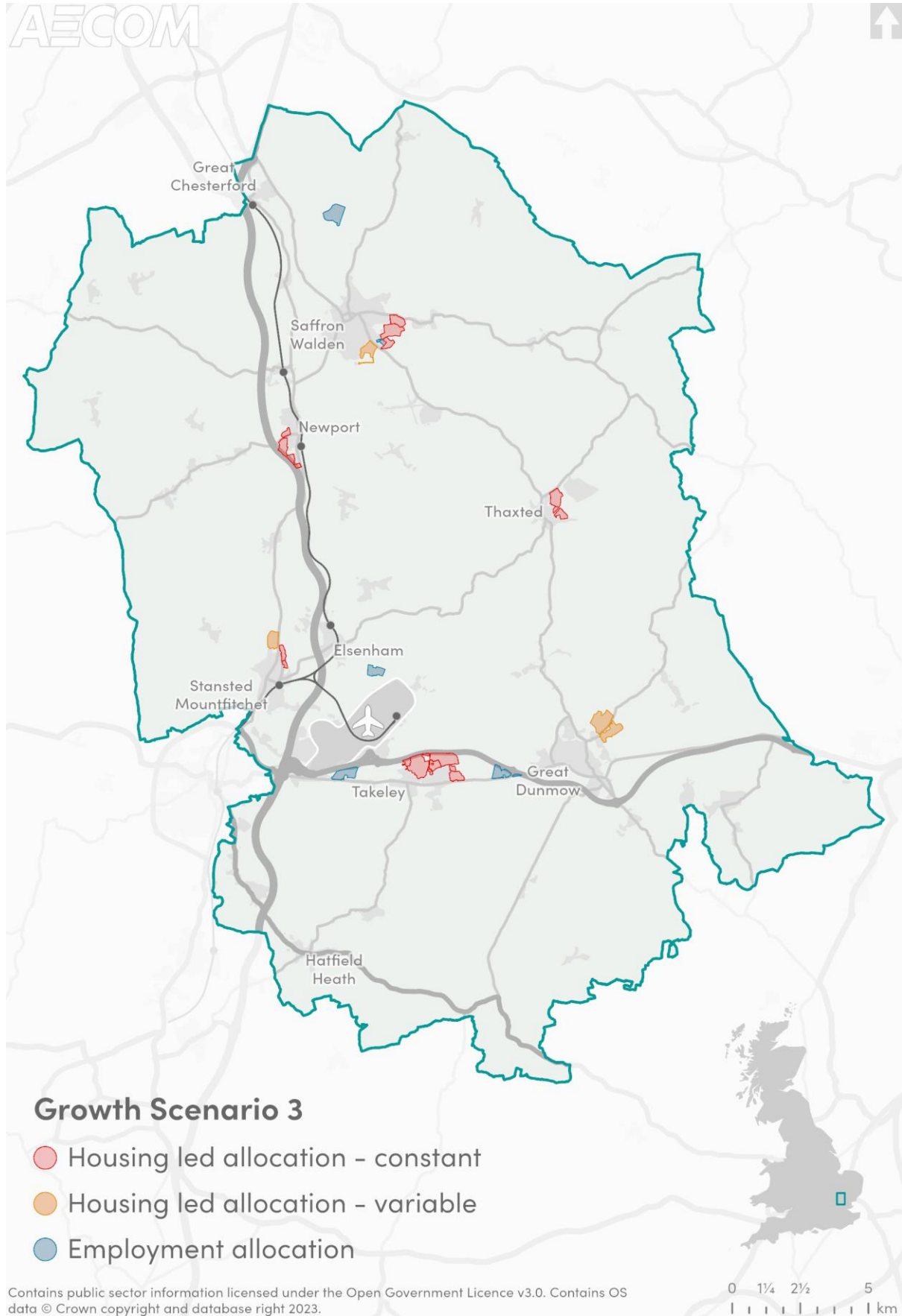
Reasonable growth scenario 1: Constant allocations plus land north of Stansted Mountfitchet



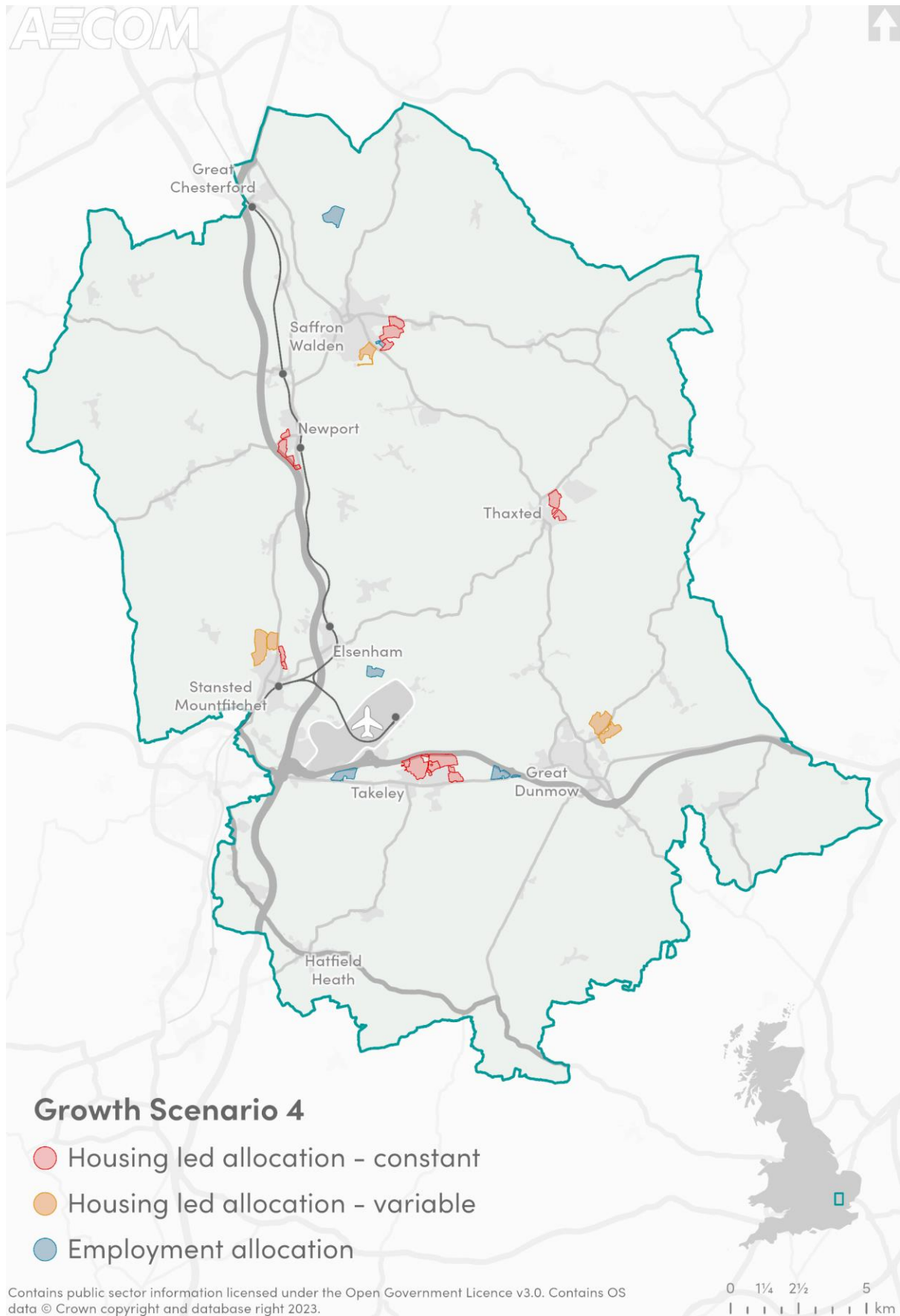
Reasonable growth scenario 2: Scenario 1 plus land south east of Saffron Walden



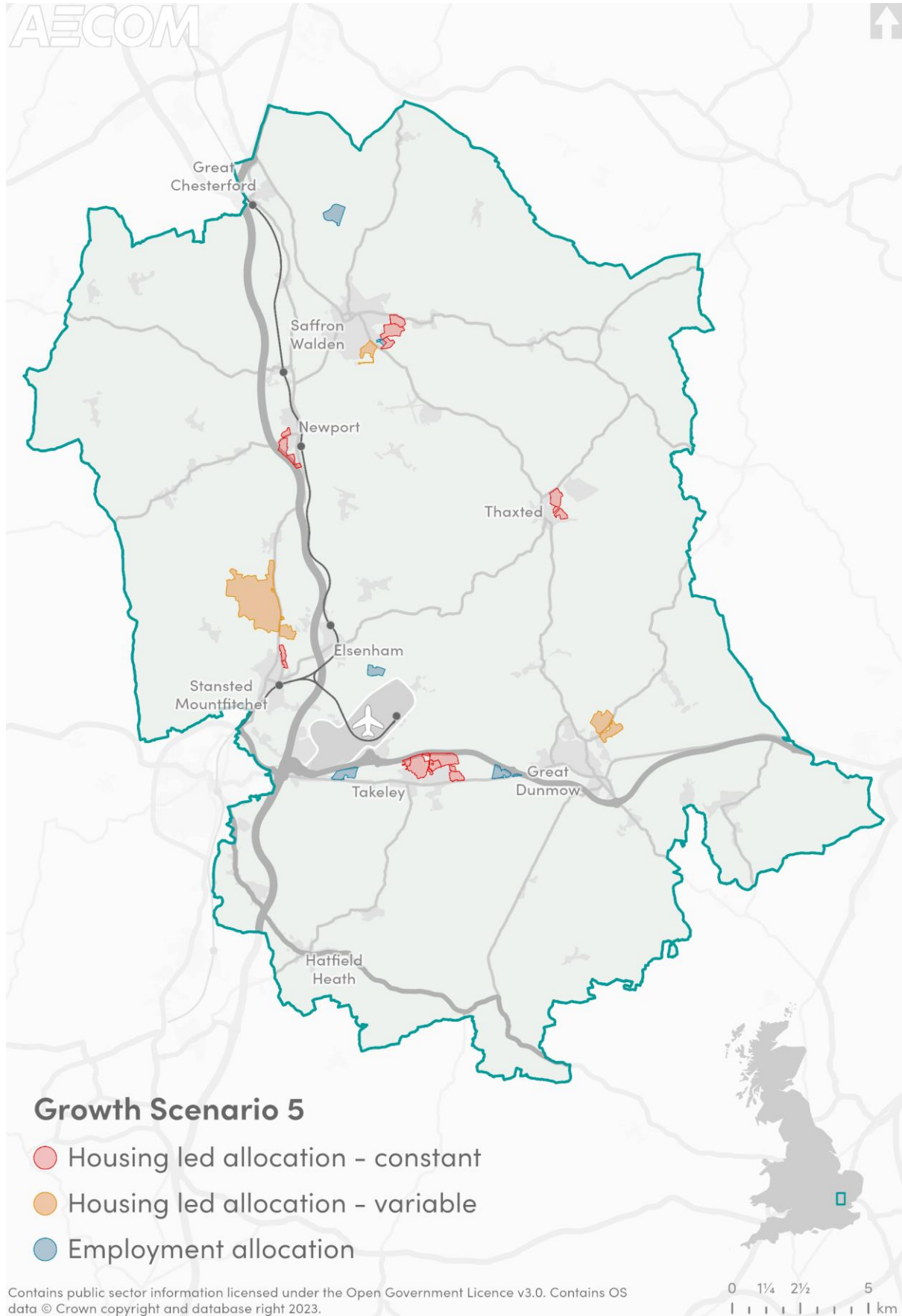
Reasonable growth scenario 3: Scenario 2 plus land east of Great Dunmow (Church End)



Reasonable growth scenario 4: Scenario 3 plus additional land north of Stansted Mountfitchet



Reasonable growth scenario 5: Scenario 4 plus small GC north of SM, minus



6 Growth scenarios appraisal

6.1 Introduction

6.1.1 Having defined reasonable alternatives in the form of four growth scenarios, the next step is to present an appraisal under the ‘SA framework’ (see Section 3).

Appraisal methodology

6.1.2 The appraisal is presented under 13 headings – one for each of the topics that together comprise the SA framework (see Section 3), before a final section presents an overview ‘matrix’. Under each heading, the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green**.¹⁸

6.1.3 Finally, it is important to be clear that there is a need to make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery etc. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness and accessibility.

6.2 Appraisal findings

6.2.1 The appraisal is presented under 13 headings – one for each of the topics that together comprise the SA framework – before a final section presents conclusions, including a summary appraisal matrix.

6.2.2 A final key methodological point to note is in respect of **growth quantum**. It is not always appropriate to simply conclude a preference for lower growth (Scenario 1) from an environmental perspective, despite the fact that housing growth inevitably leads to environmental impacts.

6.2.3 This reflects an assumption that Scenario 1 could either result in: unmet housing needs (if the housing requirement is set at a figure below LHN) that would have to be provided for elsewhere within a constrained subregion; or a housing supply trajectory that lacks robustness due to the lack of a sufficient supply buffer, leading to a risk of the presumption in favour of sustainable development being applied.

Accessibility (to community infrastructure)

Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M’chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
4	3	2	★1	★1

6.2.4 Close engagement with Essex County Council in respect of **school capacity** has been a primary ‘driver’ of the RA growth scenarios. However, an inherent challenge is a ‘chicken and egg’ situation whereby the County Council seeks certainty on growth locations before undertaking detailed work in respect of school capacity whilst, from an Uttlesford Local Plan perspective, there is a need for understanding of school capacity issues / opportunities to inform thinking in respect of spatial strategy and site selection.

6.2.5 With regards to the variable growth locations:

- Higher growth at **Saffron Walden** is strongly supported from a schools perspective. An ideal solution might involve a new secondary school, but there is not currently thought to be the growth capacity to support this (see Section 5.4), hence ‘the next best option’ is to support a new Sixth Form Centre, which would enable the existing Secondary School to cater for more pupils. Secondary Schools operate successfully in many locations across the country with more than one physical site, and the County Council will wish to comment further through the consultation.

¹⁸ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

However, there is a need for further work to confirm the ability of the proposed growth quantum (1,280 homes) to secure new community infrastructure alongside road infrastructure and compliance with other policy objectives (e.g. net zero). It is important to note that multiple landowners can create challenges.

- Higher growth at **Stansted Mountfitchet** is similarly supported, whether via growth at a garden community (although the timing associated with bringing forward a new school at a garden community could lead to a challenge, as the need for capacity may be somewhat urgent).
- Higher growth at **Great Dunmow** is also supported, as there is a need to secure contributions sufficient to deliver a new secondary school at Takeley. However, it is not entirely clear the extent to which there is reliance upon further growth (beyond commitments) at Great Dunmow to deliver the school.
- Lower growth at **Stansted Mountfitchet** (Scenarios 1, 2 and 3) gives rise to a concern in respect of primary school capacity to serve both Stansted Mountfitchet and nearby Elsenham, where there is a high level of committed growth but no plans to deliver increased primary school capacity. It is noted that the site promoter of the current site option north of the settlement is the same as for the adjacent site currently under construction, which could feasibly assist in terms of securing a primary school.

6.2.6 Briefly, with regards to constant aspects of the strategy across the scenarios:

- High growth at **Takeley** is strongly supported, given potential to deliver a large secondary school and a primary school, as well as an associated local centre to serve as a new focal point for the village.
- At both **Thaxted** and **Newport** there is the potential for growth to support increased schools capacity, but there remains some uncertainty in respect of precisely what can be achieved.
- At **Great Chesterford** the inability to identify a strategic growth location leads to an opportunity missed in respect of delivering a new primary school to serve the village.

6.2.7 Aside from matters relating to schools capacity, there is generally a need to support growth in line with the **settlement hierarchy** and also at locations that are **well-connected** to existing centres / community facilities. In this regard there are no major concerns under any of the scenarios:

- New road infrastructure at **Saffron Walden** should serve to reduce traffic and so support the functioning of the town centre. Growth would be somewhat distant from the town centre, but there would still be potential to walk and cycle, plus the intention is for the scheme to deliver community infrastructure onsite.
- At **Great Dunmow** the site in question (Church End) performs similarly to land east and south east of Saffron Walden in terms of active travel links (although there is a need for further work in respect of cycle connectivity). Potential for good bus connectivity necessitates further detailed consideration.
- The proposed scale of growth at **Takeley** potentially represents a marginal departure from the settlement hierarchy. However, not only will the scheme deliver community infrastructure onsite, but there is a need to recognise that Takeley is well connected to higher order settlements and also Stansted Airport.
- At **Thaxted** (a constant across the growth scenarios) there is a need for further work to confirm that a new primary school to the north east of the village would be suitably accessible, but there is unlikely to be any significant concern in this respect. There is also a need to recall that Thaxted's is a notably rural village (e.g. with secondary schools 6 - 10 km distant) serving a large rural hinterland.
- The 1,000 home **larger villages allowance** does not give rise to any concerns, in terms of accessibility to community infrastructure. The assumption is that the number of homes directed to any given village will not exceed ~100 homes, which is a number of homes that balances: A) a clear 'accessibility' argument for distributing growth in line with the settlement hierarchy, i.e. with a focus on towns and key service ahead of villages; and B) the need to support village services, facilities and retail.

However, there will be a need for further work to confirm capacity at local primary schools, noting that the County Council generally prefers growth to be concentrated rather than dispersed, from a perspective of effective planning for schools capacity. There will also be a need to account for representations received from Parish Councils regarding growth related issues and opportunities.

With regards to villages assigned nil homes, this generally reflects Green Belt or a lack of HELAA sites. For these villages, from a perspective of supporting local community infrastructure and general village vitality, it will be important to ensure that there is ongoing consideration of potential growth options. For those villages outside of the Green Belt without an assigned housing target the Parish Council might wish to undertake a call for sites with a view to then allocating land through a neighbourhood plan.

6.2.8 In **conclusion**, there is support for the higher growth scenarios, although there remains a degree of uncertainty regarding precisely what level of growth is needed and where in order to secure a new secondary school at Takeley, given recent permitted growth. Scenarios 4 and 5 are judged to represent highly proactive approaches to planning for housing growth with a clear focus on access to community infrastructure. This is in the context of an infrastructure deficit that has arisen due to the prolonged period without an up-to-date local plan, over which time there has been speculative and piecemeal development. However, there is a need for further work including ongoing engagement with the County Council.

Biodiversity

Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M'chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
2	1	1	1	1

6.2.9 All of the variable growth locations are considered to be fairly unconstrained in biodiversity terms. In this light, there is an argument for supporting growth at these locations so as to minimise pressure for growth elsewhere. In this light, there is an argument against **Scenario 1** (Low growth).

6.2.10 Maintaining a focus on the variable growth locations, one constraint of note is Pennington Lane at **Stansted Mountfitchet**, which is clearly a strong green corridor and important component of the local green infrastructure network (it is a historic lane and links to a wider bridleway network). It is also appropriate to flag a potential constraint to higher growth at **Saffron Walden**, namely the chalk stream(s) that drain the land in question. However, the Water Cycle Study (2023) serves to suggest limited concern.

6.2.11 The following constant housing growth locations are more constrained in biodiversity terms:

- **Takeley** – the site itself is constrained by Priors Wood (ancient woodland CWS), as well as other onsite priority woodland habitat. Also, there is a need to avoid increased recreational pressure on nearby Hatfield Forest SSSI as far as possible. The Forest is not internationally designated, and is managed as a National Nature Reserve, but Natural England have significant concerns regarding the impact of recreational pressure. Concerns are reduced on account of the extent of green infrastructure proposed to be delivered onsite, which ties in with the need to avoid/mitigate historic environment impacts. As part of the GI strategy there will also be a need to consider recreational pressure on Priors Wood.

N.B. the Green Infrastructure Study (2023) also identifies a location for a potential new country park to the north of the A120 corridor, including with a view to mitigating recreational pressure on Hatfield Forest.

- **Thaxted** – Copthall Lane is strongly associated with a surface water flood channel and a green corridor that links to woodlands to the north east of the village. However, the two closest woodlands are neither ancient woodlands nor designated as a CWS.
- **Newport** – the northern-most of the two proposed allocations is adjacent to Wicken Water, which is a chalk stream. There could well be the potential to avoid issues and potentially deliver an enhancement to the stream corridor (there is already a footpath), but this could have implications for site capacity. The site to the south is associated with several mature and historic field boundaries.
- **Stansted Mountfitchet** – the smaller site proposed adjacent to the east of the village currently comprises scrub or developing woodland, but historic satellite imagery shows that the site was an open paddock (albeit surrounded by mature historic field boundaries) as recently as 2000. The need to secure funding for a primary school is a reason for maximising housing supply from these sites.

6.2.12 There is also a need to consider the proposed **employment** allocations, notably:

- West of Takeley (Takeley Street) - which is in very close proximity to Hatfield Forest. There is a need for further work, but it is currently not clear that this gives rise to a particular concern, assuming that the scheme would generate very limited recreational pressure, given that the land in question seemingly includes limited onsite habitat (bar mature hedgerows) and recognising that air quality impacts are very localised, i.e. problematic concentrations of air pollution occur only in close proximity to roads.

However, it is recognised that the land in question falls in-between Hatfield Forest and other ancient woodlands in the wider landscape, including Priors Wood CWS, which is adjacent to the west of the site.

Also, [historic mapping](#) shows further woodland in the area, including through the site in question, with the former woodland associated with a surface water flood channel that could indicate a degree of hydrological connectivity. A final point to note is the proposal for 15 ha of employment land within a 27 ha site, such that there should be scope to address concerns via masterplanning and habitat creation.

- East of Takeley (Little Canfield) – there is a green corridor through the site comprising a historic driveway associated with Easton Park; however, significance in biodiversity terms is potentially quite limited.

6.2.13 Finally, there is a need to consider biodiversity-related opportunities, with a need to consider the potential for sites to deliver an ambitious level of biodiversity net gain and also strategic green infrastructure. In particular, there is considered to be a strategic opportunity at **Great Dunmow**, given the river corridor adjacent to the west and also a woodlands cluster to the east. There is an established need to deliver large-scale green infrastructure at Great Dunmow as part of a strategy for mitigating recreational pressure on Hatfield Forest (Great Dunmow is located at the edge of the defined recreational impact zone).

6.2.14 In **conclusion**, there is little potential to differentiate between the scenarios; however, on balance, it is appropriate flag a slight concern with the lowest growth scenario (which could give rise to a risk of unplanned growth and/or unmet need that could have to be provided for elsewhere in a constrained subregion, e.g. biodiversity constraint potentially increases in the direction of the Essex Coast). One high growth consideration is traffic through Epping Forest SAC (A104) on the northern edge of London.

6.2.15 Significant effects are not predicted on balance. The Hatfield Forest constraint is not thought to be so great that a conclusion of negative effects is warranted, and the green / blue infrastructure opportunity at Great Dunmow is a focus of discussion below under the ‘Communities’ topic heading. It is recognised that there is a need for further close collaboration with Natural England in respect of Hatfield Forest.

Climate change adaptation

Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M'chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
=	=	=	=	=

6.2.16 A key consideration is the need to avoid development - in particular new homes - encroaching on **fluvial flood risk zones**, given worsened flood risk under climate change scenarios. **Surface water flood risk** is another consideration, but this can often be dealt with through masterplanning and sustainable drainage systems (SuDS). Another consideration is development impacting on water flows and, in turn, downstream flood risk; however, it is difficult to pinpoint issues ahead of detailed work, and it is typically the case that SuDS can be implemented to ensure no net worsening of run-off rates, and often a betterment.

6.2.17 Beginning with the variable growth locations, the primary point to note is that a garden community to the north of **Stansted Mountfitchet** would intersect a narrow fluvial flood risk channel, including with consideration given to down-stream flood risk. The flood risk channel is a constraint to achieving access to the site. However, because this is a large site no significant masterplanning challenges are envisaged.

6.2.18 With regards to the constant proposed growth locations, one consideration is a significant surface water flood channel within the proposed site to the east of **Saffron Walden** (this could prove to be a significant challenge for masterplanning, given a case for concentrating housing growth on lower land to minimise landscape impacts); and another consideration is the aforementioned surface water flood risk channel adjacent to Cophall Lane, east of **Thaxted**, noting that village centre is downstream.

6.2.19 At Saffron Walden it is also important to note that land adjacent to Radwinter Road drains to the Slade, which then flows through the town centre. The EA highlighted a concern with the town centre culvert through the Scoping Report consultation (2021) and suggested a need to reduce flows through the culvert.

6.2.20 Other than flood risk it is a challenge to identify climate change adaptation considerations – of relevance to this appraisal of growth scenarios – that are not more appropriately dealt with under other headings.

6.2.21 In **conclusion**, it is not possible to differentiate between the growth scenarios and significant effects are not predicted. The Environment Agency will comment further on flood risk matters and might also alert the Council to any potential development-related opportunities for strategic flood water attenuation.

Climate change mitigation


Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M'chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
=	=	=	=	=

- 6.2.22 The discussion here focuses on per capita greenhouse gas emissions from the **built environment**, mindful that alignment of the reasonable alternative growth scenarios with strategic transport objectives is a focus of discussion under other topic headings. In particular, a focus of discussion here is in respect of the potential for each of the scenarios to support a focus on strategic growth locations to enable 'onsite net zero development', i.e. net zero development without having to resort to offsetting (if at all possible).
- 6.2.23 **Larger developments** can give rise to an opportunity over-and-above smaller developments, given economies of scale and also the possibility of delivering a mix of uses onsite, which can feasibly support one or more heat networks. Also, it is simply the case that large sites will generate a high degree of attention and scrutiny (including at the masterplanning stage), and housebuilders will often be keen to demonstrate good practice or even exemplar development. However, the relationship between scale and decarbonisation opportunity is not clear-cut, e.g. because large sites can face viability challenges due to the need to deliver major infrastructure upgrades. Also, heat networks are technically challenging to deliver, and practice is not well advanced nationally, with a clear opportunity currently only seen to exist where there is very high density development and/or a good mix of uses (to allow heat to be shared across the course of the day) and/or a source of waste or ambient heat that can be sourced (e.g. a watercourse).
- 6.2.24 A further consideration, in respect of built environment decarbonisation, is a case for directing growth to locations that benefit from strong **viability**, with a view to ensuring funding for decarbonisation measures (recognising that there are inevitably competing funding priorities, including affordable housing and infrastructure). However, it is not clear that this is a significant consideration in the Uttlesford context.
- 6.2.25 In light of the above points, one of the variable growth options that potentially performs well (i.e. has good potential to deliver onsite net zero development) is the option of a garden community to the north of **Stansted Mountfitchet**. This is for two reasons: A) the scale of development; and B) there are few concerns around fragmented landownership, which in practice can result in development viability challenges. East of **Great Dunmow** (Church End) is also not thought to be associated with any concerns around fragmented land ownership; however, development viability is slightly lower here.
- 6.2.26 There is also a good degree of support for the proposed growth location north of **Takeley** that is a constant across the growth scenarios, although it is noted that this is a growth location where there will clearly be numerous competing objectives / priorities – e.g. around maximising green infrastructure provision and delivering community and transport infrastructure – that could feasibly conflict with net zero ambitions.
- 6.2.27 Finally, it is important to ensure that 'net zero development' is carefully defined. There are perhaps three key points to make. Firstly, any approach to net zero development must align with the **energy hierarchy**, which means a primary focus on efficiency ('fabric first') followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort. Secondly, it is important to be clear that the focus of discussion above is in respect of 'operational' energy/carbon, i.e. the energy used / carbon emitted as a result of the development's occupation / use. Additionally, there is a (crucially important) need to consider the '**whole life cycle**' of a development, to include to the emissions associated with construction, retrofitting over time and demolition.¹⁹ Thirdly, there are two broad approaches to calculating and monitoring / evaluating operational emissions, namely 1) the methodology applied under the Building Regulations; and 2) an **energy-based approach**. The two approaches are compared and contrasted in a recent report [here](#).²⁰

¹⁹ It is not possible to differentiate in terms of 'whole life cycle' considerations. One consideration is support for modern methods of construction (e.g. 'modular' buildings), e.g. a facility could be built to serve a high growth sub-region (e.g. Greater Cambridge).
²⁰ Under the Building Regulations methodology the question for any given planning application is the extent to which the development can exceed the regulatory requirement, measured in percentage terms up to a possible 100% improvement. The energy based methodology involves scrutiny in absolute terms, measured in terms of kWh /m²/yr. It has wide-spread support amongst specialists, including due to the simple fact that actual 'as built' performance can be monitored using a smart meter.

- 6.2.28 In **conclusion**, it is not possible to differentiate between the growth scenarios with any confidence. Whilst certain of the sites could be associated with a theoretical opportunity, there is little evidence to suggest an opportunity in practice, given available evidence. It is important to recognise that none of the scenarios involve a focus on large-scale strategic growth locations akin to the previously withdrawn local plan (2020), or what is proposed at Harlow and Gilston Garden Town (~10,000 homes, e.g. where detailed masterplanning work has been completed and where a [Design Review Panel](#) is in place to scrutinise developer proposals), or what might be anticipated in the future in the Greater Cambridge area.
- 6.2.29 With regards to significant effects, whilst all scenarios would undoubtedly see an improvement on the baseline (a situation whereby growth continues to come forward but in a less well-planned way, and without stringent development management policy in place such that Building Regulations default applies), there is a need to reach conclusions mindful of established objectives and targets, including the local 2030 net zero target, which amounts to a high bar to reach before predicting positive effects of any significance.
- 6.2.30 It is hoped that it will be possible to predict significant positive effects at the next stage (Regulation 19); however, at this current stage there is insufficient evidence of built environment decarbonisation being integrated as a key factor with a bearing on spatial strategy and site selection to the extent that the required steep decarbonisation trajectory will be achieved (although transport-decarbonisation is a strong focus, as discussed below). There is a need for further work, including by site promoters to demonstrate the extent to which there is a particular site or concept-specific decarbonisation opportunity.

Communities, equality, inclusion and health

Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M'chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
2		2	2	2

6.2.31 The aim here is to discuss factors other than in respect of 'Accessibility'. Key considerations include:

- **Place-making, high quality design and beauty** – growth at scale can, in theory, lead to an opportunity, particularly if delivered in line with garden community principles. However, it is recognised that opportunities can often be missed in practice. At the current time the Council has undertaken initial masterplanning work for most of the sites in question, in order to demonstrate the ability to bring forward a scheme that fully aligns with communities-focused objectives, including in respect of supporting good health via green infrastructure, active travel infrastructure, sports / recreation facilities and a mix of uses in support of walkable communities. For example, in respect of Great Dunmow, the vision is as follows:

“The development will support a local centre organised around a new riverside park, to include a new primary school and additional bus facilities... creation of extensive areas of green and blue infrastructure across the site, including an expansion of the existing woodland to the east of the site. New connections and increased permeability into the existing public rights of way network and wider rural landscape.

The one site option 'in question' (i.e. that features within the growth scenarios) for which work has not been undertaken by the Council is the garden community option north of Stansted Mountfitchet; however, the promoter of this site has submitted a range of material, e.g.

*“The site has been submitted... as having potential to deliver a Garden Village of 3,800– 4,800 dwellings, employment land, a primary school and a secondary school.... [Further work] has identified the sensitivity of the neighbouring Stort Valley and has proposed the retention of outlying areas as productive arable farmland... This has reduced the proposed developable area of the site meaning that the scale of development is now more likely to be within the region of 2,200– 3,600 dwellings **but still retaining all the additional facilities and services identified above.**” [emphasis added]*

It is difficult to comment further at this stage, in respect of the varying merits of site options, and it is anticipated that further account will be taken of scheme proposals at the next stage (Regulation 19).

- **Neighbouring uses** – an issue in constrained areas can be pressure to direct new homes to locations adjacent to main roads and railways where there is degree of air and noise pollution. Noise pollution is typically reflected in house prices, but there can be impacts not accounted for by the market.

The proposed growth location to the south west of **Newport** is adjacent to the M11; however, the site is considered to perform well in wider respects, in the context of strategic arguments for growth at Newport (secondary school, train station). Also, there is mature vegetation that serves to buffer the site from the motorway to some extent, and there is also the potential for noise mitigation measures (albeit at a cost and potentially with landscape/visual implications). The strategic growth location north of **Takeley** is similarly constrained by the A120, and the proposed schools location is adjacent to the road.

There is also a need to consider noise pollution relating to Stansted Airport; however, it is only **Thaxted** that falls within the defined [noise contours](#), and the village falls only within an outer contour.

- **Green and blue infrastructure** – this has been a key driver of the emerging strategy / work to define growth scenarios, informed by Green Infrastructure Study (2023). One specific reason for this is the Hatfield Forest recreational pressure issue, which gives rise to a need to seek to deliver one or more new country-parks (that are ‘destinations’ akin to Hatfield Forest). However, and more broadly, delivering high quality green and blue infrastructure alongside housing growth is a priority issue locally, with a view to achieving wide-ranging sustainability objectives, e.g. good health, biodiversity and climate resilience.

As has been discussed above, there is considered to be a particular growth-related opportunity at **Great Dunmow**, and the potential for high quality green infrastructure within the proposed strategic site to the north of **Takeley** can also be envisaged, albeit there is a need for further work to confirm what can be achieved (and the suitability of this, e.g. given Hatfield Forest and Priors Wood). Other key growth options of note in this respect are: **Newport** (the sites in question intersect or are in close proximity to a network of important public rights of way that radiate out from the village into the surrounding countryside); and **Stansted Mountfitchet** (Pennington Lane is an important asset, as discussed).

Less closely related to strategic growth, the current proposal is also to investigate opportunities for delivering new **country parks** at: Wendens Ambo to the west of Saffron Walden (there is a clear case for this, given the adjacent Audley End Estate, but there is a need for a note of caution re long term strategic planning for land in the vicinity of Audley End Station and land to the west of Saffron Walden in general); and in the vicinity of former Easton Park (again, there is a need consider this in the context of potential future growth options – see Figure 5.5 – although there is not thought to be any significant concerns as it is likely that a new country park would form part of any garden community proposal).

- **Access to the countryside** – the District is broadly well served by a network of public rights of way linking settlements to high quality countryside, including river corridors, ancient woodlands and historic rural villages. However, there is some variability, in terms of access to the countryside, such that growth-related opportunities might be explored. For example, there are woodlands / woodland complexes where improved accessibility might be sought, and opportunities for improving access along river/stream corridors. The key opportunities appear to be along the A120 corridor (Bishops Stortford → Hatfield Forest → Takeley → Little Canfield / High Wood / former Easton Park → Great Dunmow → Felsted).
- **Active travel** – this is a focus of discussion under other headings, but also warrants mention here, as access to active travel infrastructure (linking to key destinations) is important for good health, and new / upgraded infrastructure is a key means of achieving ‘planning gain’ to the benefit of existing community. The District has a very good existing network, most notably along the **A120 corridor** and in the vicinity of Stansted (already considered a transport hub, and with the potential for this role to be significantly enhanced), and this network has been a key factor influencing site selection. Along the A120 there is a considerable opportunity to support and encourage active travel, and this will likely be a key consideration from both a health / wellbeing perspective and also in terms of minimising car movements.
- **Traffic congestion** – directing growth in order to minimise traffic congestion is often a key issue for existing communities. Matters are discussed further below, under the ‘Transport’ heading, but it is fair to say that there is a need for further work to confirm the ability to address (mitigate) the traffic impacts of growth at several settlements, including **Great Dunmow** and **Thaxted**. There is also a need to highlight **Saffron Walden** as a settlement with inherent road transport constraints (discussed in Section 5.4), and where there is a need to consider long term strategic options / potential solutions.

The in-combination impact of growth on **B1256** road traffic is also a key ‘communities and health’ consideration, given the number of homes / communities located along the corridor, and it is recognised that environmental quality along the road corridor is already an issue, including because of HGV traffic.

Another consideration is ‘rat-running’ along rural lanes and through rural communities, but concerns are perhaps not as great in the Uttlesford context as elsewhere (specifically locations with a higher density of access points to the strategic road network). One consideration is presumably Cambridge-bound traffic from Great Dunmow choosing to route via Thaxted and Saffron Walden rather than via the M11.

Road safety is a related issue. However, at the current time it is not possible to pinpoint any particular concerns. HGV traffic from new employment land along the B1256 is potentially one consideration.

- **Green Belt** – warrants mention here as an issue that can clearly generate concern amongst local residents; however, none of the growth scenarios assume any Green Belt release. In turn, the question arises as to whether this will result in any development-related opportunities missed. This consideration particularly relates to **Hatfield Heath**, but it is not clear that there are any particular development related opportunities here, beyond meeting locally arising housing needs (and, in this respect, the village does benefit from being in proximity to both Bishops Stortford and Harlow).
- **Countryside Protection Zone (CPZ)** – the designation is highly valued by residents of Takeley and Takeley Street but does require review given that it pre-dates the NPPF. There is considered to be a strong argument for comprehensive growth north of Takeley as far as the A120 in order to limit further piecemeal growth that risks ‘sprawl’, contrary to the purposes of the CPZ. However, it is recognised that the question of employment land growth to the west of Takeley (Takeley Street) is more finely balanced, in terms of long term planning for a CPZ around the airport. There are also wider communities-related sensitivities associated with employment growth in this area, which are discussed above (Box 5.2).
- **Village vitality** – as discussed in Section 5.4, levels of recent completions and committed growth vary significantly across the villages. Low recent/committed growth can suggest support for strategic growth, in that: a lack of new housing can contribute to an ageing population and suppressed household formation; the national trend towards online retail is putting strain on local and neighbourhood centres; rural primary schools can struggle to maintain school rolls, due to a recent period of low birth rates; and rural bus services can tend to be at risk. However, equally, if significant growth has come forward, or is coming forward, in a relatively unplanned way (e.g. as a result of sites gaining planning permission at appeal) then there can be an argument for supporting plan-led growth in order to deliver new infrastructure, e.g. (and notably) schools capacity. In respect of the latter point, **Elsenham** is the primary example, hence the importance of delivering a new primary school at Stansted Mountfitchet.
- **Relative deprivation** – there are no particular pockets of relative deprivation within Uttlesford that might potentially be addressed via spatial strategy / site selection. However, there are large towns (also Cambridge) surrounding Uttlesford that are associated with significant relative deprivation. This serves as an argument for remaining alive to the possibility of providing for any unmet housing needs that might arise, and also ensuring a cross-border focus (including cross-county) when planning for infrastructure.
- **Rural deprivation** – is likely to be an issue to some extent in the more deeply rural parts of the District, particularly the area around Thaxted that is most distant from the main transport corridors. The suitability of the 1,000 home larger villages allowance – in terms of supporting village services/facilities, meeting housing needs and generally supporting village vitality – is discussed above under ‘Accessibility’.
- **Gypsies and Travellers** – meeting accommodation needs is a focus of discussion under ‘Housing’.

6.2.32 In **conclusion**, there are wide-ranging factors, such that it is very difficult to differentiate between the growth scenarios with confidence. It is recognised that there may be concerns amongst some members of the local community regarding the negative impacts of housing growth; however:

- Without a Local Plan housing growth will continue to come forward but in a relatively unplanned way, as *per* what has been experienced over recent years at most settlements within the District.
- There is a need for a healthy ‘supply buffer’ over-and-above the housing requirement in order to minimise the risk of future unplanned development (discussed further below, under ‘housing’).
- The lowest growth scenario (Scenario 1) would risk generating unmet need that would presumably have to be provided for by one or more neighbouring local authorities.

6.2.33 On balance, it is considered appropriate to flag a concern with scenarios involving further strategic growth at Great Dunmow, given the level of recent and committed growth. However, this conclusion is very marginal, as there is every opportunity to deliver comprehensive growth at Great Dunmow in a way that benefits the existing community and supports objectives for the wider A120 corridor.

6.2.34 With regards to significant effects, overall neutral effects are predicted on balance. One point for consideration is that the current proposed spatial strategy is very different to that previously proposed through the withdrawn local plan (2020), which focused growth at three large new settlements, with commensurately low growth at existing settlements. The views of the local community / key local stakeholder organisations are sought through the current consultation and will feed-in subsequently.

Economy and employment

Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M'chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
5	4	3	2	1 

6.2.35 Employment land supply is broadly held constant across the scenarios – see Table 6.1. There could be some potential to deliver modest new employment land at a garden community to the north of **Stansted Mountfitchet**, but this is uncertain given transport connectivity, and given a potential argument for focusing growth to the west of the B1383, with a view to avoiding growth encroaching upon Ugley Green.

Table 6.1: Employment land need and supply (held constant across the scenarios)

Supply	Office and R&D (ha)	Industrial (ha) ²¹
Completions and permissions (exc. Northside)	11.7	3.7
New strategic allocations	21.5	33
Total	33.2	36.7
Above/below need	+11.5	+2.6

6.2.36 As can be seen from Table 6.1, the proposal is to significantly over-supply in terms of office and R&D land, as a result of allocating 18ha of land at Chesterford Research Park in order to enable realisation of the landowner’s masterplan vision. This warrants further scrutiny from a transport perspective, because the research park is located in a rural area and there is a need to align employment land supply with need in order to avoid unsustainable commuting. Also, there will be a need for further discussion with South Cambridgeshire (in particular) and West Suffolk to ensure that supporting the expansion of Chesterford Research Park is not to the detriment of realising employment land objectives in their respective areas. However, the simple fact is that Great Chesterford Research Park is a thriving employment location that relates very well to similar R&D employment growth locations in South Cambridgeshire.

6.2.37 With regards to site-specific considerations, attention focuses on the two identified sites along the A120, both of which are associated with a degree of environmental constraint, plus there is a concern regarding traffic, including HGV traffic, along the B1256. As such, there will be a need for further work to confirm supply from these sites / along the A120 corridor in proximity to Stansted and the M11. Ultimately, it is clear that there is a need to ensure a comprehensive long-term approach to both housing and employment growth along this sensitive road / settlement corridor, respecting Hatfield Forest and historic environment constraints, avoiding settlement coalescence and avoiding HGV traffic through communities. One of the sites is 27ha in size but assumed to deliver only 15ha, which serves to generate confidence (see Box 5.2).

6.2.38 The other key consideration here is a need to deliver homes in support of employment growth, which means: **A)** setting the housing requirement at a level that reflects LHN, any economic / infrastructure opportunity and any unmet needs; **B)** ensuring that the identified supply is sufficient to give confidence that the housing requirement will be provided for in practice over the plan period; **C)** delivering a good mix of homes, including homes suited to those working in key growth sectors; and **D)** focusing homes in close proximity to key employment hubs / growth locations, including in locations well-linked to Cambridge.

6.2.39 In **conclusion**, the alternatives are ranked in order of total growth quantum (albeit with a note of caution relating to the impact of housing growth on traffic congestion). The two best performing options would focus growth at Stansted Mountfitchet, where there are good links to Great Chesterford Research Park, Cambridge and Stansted Airport.

²¹ The total need figure is 52.2 ha of which 34.1 ha is Stansted specific. The Stansted need will be met by Northside.

Historic environment

Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M'chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
2	★ 1	3	3	4

6.2.40 This is a key growth-related issue locally. The withdrawn local plan’s focus on three large garden communities gave rise to significant historic environment concerns, however, there are also clear sensitivities associated with a strategy that focuses growth at the existing higher order settlements.

6.2.41 Taking each component of the proposed strategy in turn (with settlements in size order):

- **Saffron Walden** – there are inter-related landscape and historic environment concerns associated with expansion to the east (a constant across the growth scenarios) and potentially additional expansion to the south east (Scenarios 2 -5). The first point to note is that the town has already expanded to the east well-beyond the limits of its conservation area. With regards to the option of growth to the east, it is important to note that recent / committed expansion takes the settlement edge as far as two historic farms (although not with any listed buildings) and a historic lane (now a bridleway); however, historic environment concerns are overall fairly limited.

With regards to the option of growth to the south east, there are potentially greater concerns. These relate to the risk of growth (including transport infrastructure) encroaching on a historic farm (‘Herberts’) where there is a Grade II listed barn, and it is noted that the farm is associated with a notably raised position in the landscape and there is an adjacent footpath. It is also important to recognise that expansion to the south east could lead to pressure for further expansion to the south in the future, where land is significantly more sensitive in both landscape and historic environment terms, including given relative proximity to the Audley End Estate, which is a Grade I listed Registered Park and Garden. The current proposal is to safeguard land for a link road south of Saffron Walden through the Local Plan, in recognition of the benefits that this would achieve including for the constrained historic town centre.

Two final considerations at Saffron Walden are: A) traffic through the town centre conservation area, including as a result of growth elsewhere in the District (to the south / south east); and B) the need to avoid the risk of coalescence with Swards End, where there are several listed buildings (including thatched cottages) and a water tower, although there is overall limited historic character.

- **Great Dunmow** – there is a clear concern regarding impacts to the Church End Conservation Area, which is associated with a characteristic position in the landscape. As well as risks of impacts to the setting of the Conservation Area, which includes a Grade I listed church and also a Grade II* listed house (located directly on the B1057), there is also a need to consider the impact of increased traffic. A further consideration is the notable density of historic farms / farmsteads within the rural landscape to the north and east of Church End. This includes Crouches Farm, where the farmhouse is Grade II listed, although the potential for historic buildings to be retained as a focal point of a new community can be envisaged.

Overall, there is clearly a need for further work to confirm ways of avoiding and mitigating impacts, although it is important to note that early work to date includes a strong focus on green and blue infrastructure enhancements, including with a view to enhancing access to the historic river corridor and also ensuring that expansion of Church End is well contained in the landscape.

- **Stansted Mountfitchet** – there are fairly limited concerns associated with growth to the east (a constant across all scenarios) and growth to the north (Scenarios 1 – 3), and the option of expanded growth to the north only gives rise to limited additional historic environment concerns, in the sense that Pennington Lane is a historic lane that might be well-suited to delineating the north-western edge of the settlement.

Potentially the greatest concern is in respect of traffic through the Stansted Mountfitchet Conservation Area, which includes Mountfitchet Castle, which is a visitor attraction and a Scheduled Monument. Also, there is a need to consider traffic through Ugley Green, where there is a significant concentration of listed buildings. Traffic concerns could potentially be highest under Scenario 5, which would involve high growth at Stansted Mountfitchet via a small garden community to the north. The site itself is also notably adjacent to a cluster of seven listed buildings, including Grade II* listed Orford House.

- **Takeley** – currently stands-out as a higher order settlement without a designated conservation area. However, there was recently [consultation](#) on a potential Conservation Area for the central Smiths Green area. It is also important to note that a historic lane (and cycle route) links through Smiths Green to Bamber's Green to the north (north of the A120) via Grade I listed Warish Hall, which is also a scheduled monument. There is also historic character along the B1256 to the east of the village (a Roman Road), with a number of listed buildings including a notable cluster at Little Canfield / Little Canfield Hall. In light of the above, it is fair to say that there are significant historic environment sensitivities that act as a constraint to growth. However, on the other hand, there is a clear case for supporting comprehensive, masterplanned strategic urban expansion, rather than risk further piecemeal expansion.
- **Thaxted** – is very sensitive in historic environment terms, with the medieval core containing seven Grade I listed buildings, and Grade II* listed Thaxted Windmill is also an important landmark to the west. The village has expanded beyond the designated conservation area to the north and east, but overall retains a very strong historic character linked to the surrounding chalk influenced landscape, as experienced from the roads through the village (also the Harcamlow Way). The sites in question (which are a constant across the growth scenarios), are subject to limited constraint; however, there is a need to recognise likely high car-dependency and, in turn, potential traffic impacts, both through the Thaxted Conservation Area (southward journeys) and also through Saffron Walden (northward journeys). Potential issues associated with traffic in the village centre are discussed further below under 'Transport'.
- **Hatfield Heath** – nil strategic growth is a constant across the growth scenarios, and it is unlikely that the potential for a non-strategic allocation will be identified, given the Green Belt constraint. The village has overall relatively low historic environment sensitivity, with no designated conservation area and few listed buildings, but there is a clear historic character linked to the central heath.
- **Elsenham** – has notably low historic environment constraint, and fairly limited constraint in wider respects. However, the level of completions and commitments is very high, and all of the strategic growth options are now committed, hence 'no strategic allocation' is a constant across the scenarios.
- **Newport** – has a strong medieval core, strongly associated with a confluence of valleys and associated transport routes, and the village has expanded beyond the conservation area only to the west. Both proposed sites are a constant across the growth scenarios, and it appears to be the smaller of the two sites that is subject to greater historic environment constraint. Specifically, the conservation area is adjacent (although there are no listed buildings here) and the site is visible from the surrounding roads, somewhat framing a distant view of the Parish Church on the approach to the village along the B1038.
- **Great Chesterford** – again there is significant historic environment constraint, both in terms of the village conservation area and also given an adjacent Scheduled Monument comprising a Roman fort, Roman town, Roman and Anglo-Saxon cemeteries. Beyond the Scheduled Monument extensive areas of land are known to be of archaeological value. However, on the other hand, there is a clear strategic argument for growth, as discussed. Land to the north of the village has been considered as a potential location for new homes and a primary school; however, Historic England has significant concerns. There will be a need for further work to consider options, balancing competing issues / opportunities.
- **Employment sites** – both of the proposed allocations along the A120 corridor are subject to a degree of historic environment constraint, as has been discussed. With regards to the site to the west, the assumption is for 15ha of employment land within a 27ha site, which serves to reduce concerns. With regards to the site to the east, there might be the possibility of a reduced scheme (western field only).
- **Large villages** – the assumption is that non-strategic allocations will be identified – either at the next stage of the Local Plan or through Neighbourhood Plans – to deliver 1,000 homes in the plan period. Clearly numerous of these villages are constrained in historic environment terms, and some have expanded little from their historic cores / conservation areas, such that expansion could well lead to concerns in respect of impacts to the setting of the conservation and/or specific listed buildings. However, it is not possible to comment further without knowledge of the specific sites involved. There is clearly good potential to avoid and mitigate issues through site selection and good design etc.

6.2.42 In **conclusion**, it is appropriate to flag a concern with the higher growth scenarios. However, it is also important to recognise that there is a need to plan for strategic growth locally and that there are no easy choices, in respect of avoiding impacts to the historic environment whilst realising wider objectives, hence low growth (Scenario 1) also performs quite poorly. Scenario 2 is flagged as potentially striking a good balance, *from a historic environment perspective*, as there are relatively limited historic environment constraints to further expansion of Saffron Walden to the east and south east.

Homes

Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M'chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
5	4	3	2	★ 1

- 6.2.43 The headline consideration is the **housing requirement** that would be set under each of the scenarios, i.e. the number of homes that the Council would commit to delivering annually. It is also important to ensure that **supply** exceeds the requirement (at least in the early years of the plan period, given the potential to boost supply for latter years through a plan review), as failing to deliver on the housing requirement could render the Local Plan out-of-date (leading to issues as discussed in Section 2).
- 6.2.44 Under **Scenarios 2 - 4** the housing requirement would be set at Local Housing Need (LHN) with a supply buffer. However, Scenario 4 is the preferable scenario, due to a higher supply buffer, and recognising that certain of the proposed allocations are large and somewhat complex site that are potentially associated with a degree of delivery risk. For example, there is a need for further work to confirm necessary transport infrastructure upgrades in support of growth along the A120 corridor, and there is also a need to recognise that a number of settlements there will be a need for negotiations in respect of contributions to schools, which could take time, although a Community Infrastructure Levy could help to avoid this issue.
- 6.2.45 In contrast, **Scenario 1** could necessitate a housing requirement set below LHN, such that the Local Plan generates unmet housing need. Generating unmet housing need is highly problematic, from a housing perspective, for two reasons. Firstly, housing need must be met as close to source as possible. Secondly, there is currently little or no certainty regarding where, when or even if any unmet need generated by the Local Plan would be provided for, such that it might ultimately stay unmet.
- 6.2.46 It follows that **Scenario 5** is strongly supported from a housing perspective. It would represent a highly proactive approach to meeting housing needs, with a robust supply buffer and also potentially some flexibility to set the housing requirement at a figure modestly above LHN. This might be with a view to 1) providing for a higher proportion of affordable housing needs arising locally (see the Local Housing Needs Assessment, 2023); and/or 2) making provision for unmet housing need from elsewhere.
- 6.2.47 With regards to possible flexibility to provide for unmet need from elsewhere, this is particularly noting: A) Harlow as a tightly bounded urban area, albeit there is a committed 10,000 home garden town to the north as well as other committed strategic urban extensions into Epping Forest District; and B) Greater Cambridge has established a high LHN figure (to reflect employment growth aspirations and affordability issues) but have recently paused the local plan to allow time to explore water-related growth constraints. It is also fair to highlight Bishop's Stortford as a constrained town, and also to highlight authorities to the east as subject to environmental constraint in terms of proximity to the Essex coast and estuaries.
- 6.2.48 Further key points for consideration area as follows:
- **Delivery risk** – none of the sites that feature across the growth scenarios stand-out as being associated with particular delivery risk; however, it is fair to highlight Great Dunmow as subject to slightly lower development viability, which when combined with the quantum of committed growth and wide-ranging policy asks (including onsite and offsite infrastructure) could serve to indicate an element of delivery risk. Also, relatively limited work has been undertaken in respect of understanding deliverability risks associated with a garden community north of Stansted Mountfitchet, but there are no obvious concerns.
 - **Timing of delivery** – there is a need to ensure a balanced housing supply trajectory across the plan period, accounting for committed sites as well as new supply identified through the Local Plan. There is overall considered to be a good mix of site sizes, which should assist in this respect, plus certain of the larger proposed growth locations will be able to come forward in phases, e.g. at Saffron Walden.

- **Geographical spread** – there is a need to recognise that there will be very locally arising needs – i.e. needs associated with specific parts of the District and also specific settlements. Also, there is a need to avoid over-concentrations of growth that risk a degree of market saturation that leads to unforeseen delays to delivery. Generally there are no major issues across the scenarios, although there is need to be mindful of possible market saturation in the south of the District, and possible unmet needs in the north. Having said this, it is difficult to identify reasonable higher growth options in the north of the District, given constraints to growth at Saffron Walden, Newport and Great Chesterford (and Thaxted).
- **Rural housing needs** – under the growth scenarios around 6% of new planned supply would be directed to Larger Villages. A pro-rata distribution of new supply between parishes according to the split of the current population would suggest a need for a greater degree of dispersal. However, there are clear arguments against growth dispersal in wider respects, as discussed under other headings.
- **Affordable housing** (and, more generally, development viability) – there are no particular concerns regarding development viability and, in turn, no particular concerns regarding the potential to deliver a policy compliant quota of affordable housing (alongside compliance with other policy requirements). No site promoters are known to have made a clear statement regarding to the extent to which affordable housing would be prioritised relative to other policy asks. Potential need for specialist accommodation is another consideration, which may warrant further investigation prior to plan finalisation.
- **Gypsy and Traveller accommodation needs** – this may prove to be a key matter for consideration at the next stage of plan-making, pending the outcome of an updated needs assessment (commissioned by the Essex authorities and currently in preparation). A number of the strategic sites that feature across the growth scenarios could potentially be suited to providing a site, but this is a factor that ideally needs to feed in early at the masterplanning stage, e.g. with a view to ensuring good road access, and a degree of separation or seclusion from the ‘bricks and mortar’ community. Also, it is important to recognise that there are strategic arguments for stand-alone sites for Gypsies and Travellers (including from a delivery perspective), and there can also be reasons for supporting expansion of existing sites.

Every effort must be made to meet needs, as poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers tending to experience very poor outcomes in terms of health, education and a range of other indicators (see www.gypsy-traveller.org/our-vision-for-change).

- 6.2.49 A final matter for consideration is providing for needs in the **long-term**, looking beyond the plan period. As has been discussed above, certain of the arguments in favour of large-scale new garden communities in the District that led to the strategy proposed in the withdrawn local plan (2020) remain valid. However, the priority is to adopt a local plan without delay, in order to provide for housing needs in the short and medium term and ensure plan-led growth. That being the case, there is limited scope to allocate one or more large-scale garden communities through the current Local Plan, but there will be the potential to revisit the possibility in the near future through a Local Plan Review. The following statement from the Inspectors’ letter of 2020 serves to highlight the scale of the task involved:

“In general terms we are concerned about the lack of evidence before us to enable us to conclude these [garden communities] are sound. Whilst we realise it is the Council’s intention to lay down much of the detail of the proposed Garden Communities in further Development Plan Documents (DPDs), following the adoption of the plan, it is this examination which must determine whether the Garden Community proposals are properly justified and realistically developable. This is of major importance in this case given the large scale and long-term nature of the Garden Community developments, combined with the fact that they would be the primary source of housing in the district for the next 30 to 40 years.”

- 6.2.50 In **conclusion**, there is a clear need to rank the scenarios in order of total growth quantum. There is clear support for Scenario 5 as the housing requirement would be set at LHN with a sufficient supply buffer, such that there would be confidence in the ability to provide for LHN in practice over the course of the plan period. Furthermore, there would be a balanced supply, in terms of site size, type, location and timetable for development. There would also be flexibility to consider the possibility of providing for unmet needs from elsewhere, although this is unlikely to be an issue for Uttlesford (see discussion in Section 5.2).
- 6.2.51 However, even under Scenario 5 there remain uncertainties, including around providing for affordable housing alongside other policy ‘asks’, and there is a need for further work in respect of providing for Gypsy and Traveller accommodations needs following receipt of an Essex-wide study.

Land, soils and other resources

Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M'chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
=	=	=	=	=

6.2.52 Uttlesford is associated with notably high quality agricultural land, in the national context. Specifically, the nationally available dataset (available at magic.gov.uk) shows the great majority of the District to comprise **grade 2 quality agricultural land**, where grade 1 quality land is that which is of the best quality nationally.

6.2.53 There are also areas of grade 3 quality land associated with the river valleys, including in the vicinity of Great Dunmow and Stansted Mountfitchet. However, there is little potential to differentiate between the growth scenarios with confidence. This is because the national dataset is very low resolution and also low accuracy, in the sense that it does not differentiate between land that is of grade 3a quality (which the [NPPF](#) defines as 'best and most versatile') and that which is of grade 3b quality.

N.B. there is also a second agricultural land quality dataset available at magic.gov.uk, which reflects the outcomes of field surveying and hence is highly accurate. However, the dataset is very patchy, with data available for only a very small proportion of the District, and data is not being available for any of the sites currently in question. Data is typically submitted as part of planning applications.

6.2.54 In **conclusion**, whilst there is an argument for supporting lower growth and/or scenarios that would direct growth to Stansted Mountfitchet, on balance it is considered appropriate to rank the alternatives on a par.

6.2.55 This reflects the fact that grade 2 quality agricultural land is quite widespread across the wider sub-region, with the western part of East Hertfordshire (around Stevenage) the nearest broad area associated with extensive lower quality (grade 3) land. There is also extensive grade 3 quality land in South Essex, including the majority of Brentwood District and the southern part of Chelmsford District.

Landscape

Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M'chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
=	=	=	=	=

6.2.56 Whilst there are no nationally designated landscapes, landscape character and capacity/sensitivity is a key issue locally, and one that has been explored through recent character and sensitivity studies.

6.2.57 Taking each component of the proposed strategy in turn (with settlements in size order):

- **Saffron Walden** – a range of key issues have already been introduced above, under the 'Historic environment' heading. Beginning with option of expansion to the east (between the B-road corridors), which is a constant across the growth scenarios, it is important to recognise that the three sites here would be less-well contained in topographical terms than the committed sites to the west. However, the potential to draw upon topography to contain growth can be envisaged (potentially broadly drawing upon the 100m contour). Ultimately, landscape sensitivity work concludes 'low-moderate' sensitivity, which equates to relatively low sensitivity in the context of the growth options currently under consideration.

The other site in question is located to the south of Thaxted Road and features only under Scenarios 1 to 5. Land here is potentially more sensitive in landscape terms than land to the north (discussed above), with the land notably rising to the south, towards an adjacent high point.

Both to the east and the south east there is a clear need to plan comprehensively for growth as far as possible, avoiding development creep over time along with commensurate opportunities missed for infrastructure and environmental planning.

Also, there is a need to ensure early consideration is given to any possible road options that would link the two B-road corridors to the east with the M11 corridor to the west, bypassing the historic town centre. The transport/traffic and wider arguments in support of exploring such options are recognised, but there are clear landscape constraints. The current proposal is to safeguard land for a potential future link.

- **Great Dunmow** – there is a degree of landscape capacity, however, this is a relatively flat landscape and there are limited features within the landscape to contain growth. As such, there will be a need for masterplanning with a view to a suitably comprehensive scheme / avoiding development sprawl. It is also important to recognise the merits of a new area of ‘riverside parkland’.
- **Stansted Mountfitchet** – beginning with the two adjacent sites to the east of the B1351, which are a constant across the growth scenarios, these sites relate well to the settlement edge and give rise to limited landscape concerns. The northern site is split by a stream corridor, and the proposal is to use the stream corridor to bound the northern extent of the built form, presumably in perpetuity.

With regards to the option of growth to the north (limited under Scenarios 1 to 5; comprehensive under Scenario 4), there is a strong landscape argument for a more limited scheme east of Pennington Lane.

Finally, with regards to the option of a new settlement to the north, the potential for a small garden community to be well-located within the landscape can be envisaged (e.g. south of the Halcramow Way). However, the land in question is clearly visible from the B1383 on the approach to Stansted Mountfitchet.

- **Takeley** – constraints to growth north of Takeley (a constant across the growth scenarios) have been discussed extensively under other headings. There is landscape sensitivity, e.g. noting the rural lane and the public rights of way passing through the land in question; however, equally there is a landscape argument for planning comprehensively for expansion of the village as far as the A120, with a view to avoiding further piecemeal expansion over time.

A further broad consideration is long-term planning for growth along the A120 / B1256 corridor, with a view to avoiding risk of settlement coalescence / maintaining settlement gaps. As part of this, there is a need to recognise that Takeley is associated with raised land between stream corridors to the west (associated with Takeley Street and Hatfield Forest) and to the east (associated with Little Canfield).

It is also recognised that employment growth west and west of Takeley gives rise to an ‘in-combination’ risk, which will require further consideration. Matters have already been discussed above, including within Section 5.4 (including Box 5.2).

- **Thaxted** – is overall quite sensitive in landscape terms, but there is a degree of landscape capacity to the east, which is the proposed location for growth (a constant across the growth scenarios). Copthall Lane, which is located centrally within the proposed broad growth location, is associated with a shallow valley (also a strong surface water flood corridor and green corridor), which assists with landscape containment. There is also wider potential to draw upon topography and strong features within the landscape for containment, although this is less the case to the north east.
- **Hatfield Heath** – nil strategic growth is a constant across the growth scenarios, and it is unlikely that the potential for a non-strategic allocation will be identified, given the Green Belt constraint. The village has a dispersed built form, which can suggest some capacity for growth from a landscape perspective.
- **Elsenham** – has notably low landscape constraint, and fairly limited constraint in wider respects. However, the level of completions and commitments is very high, and all of the strategic growth options are now committed, hence ‘no strategic allocation’ is a constant across the scenarios.
- **Newport** – is strongly associated with a confluence of valleys and associated transport routes (the upper reaches of the River Cam catchment), and the M11 is located to the west, which provides an opportunity to deliver growth that is well contained in landscape terms. This is an area, along with land to the east and south east of Saffron Walden, that is identified as having only ‘low-moderate’ landscape sensitivity. In particular, the proposed allocation to the south west is thought to give rise to limited landscape concerns; however, it is important to note that a long distance footpath passes through the site.
- **Great Chesterford** – nil strategic growth is a constant across the growth scenarios, which is supported from a landscape perspective, because landscape sensitivity work concludes ‘high’ sensitivity (to the west of the B184, and whilst sensitivity is classed as lower to the east, there is equally a clear landscape case for containing the settlement to the west of the road). However, there are also strategic arguments for growth in this area, which must be balanced against the constraints to growth that exist.

- **Employment sites** – both of the proposed allocations along the A120 corridor are subject to a degree of landscape constraint, as has been discussed. With regards to the site to the west, there is a need to recognise its role in terms of contributing to the purposes of the CPZ, whilst the site to the east must be carefully considered from a perspective of wishing to avoid the risk of future settlement coalescence.

6.2.58 In **conclusion**, whilst there is an argument for favouring low growth, this would involve a land supply that lacks robustness such that the Local Plan risks becoming out-of-date and, in turn, the Council risks being unable to defend against speculative planning applications that give rise to landscape concerns. None of the variable growth locations stand-out as particularly constrained in landscape terms, hence the scenarios are judged to perform broadly on a par. However, having taken account of sites that are a constant across the scenarios it is appropriate to flag ‘moderate or uncertain’ negative effects. Also, it is important to flag a landscape concern associated with a possible link road south of Saffron Walden.

Transport

Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M'chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
2	1	2	2	2

6.2.59 Discussion under this heading is structured as follows:

- Broad distribution of growth
- Transport evidence topic paper
- Conclusions

Broad distribution of growth

6.2.60 A key consideration is around directing new supply (i.e. supply over-and-above completions and permissions) in accordance with the **settlement hierarchy**.

6.2.61 Focusing on Scenario 3, 43% of total new supply would be directed to Key Settlements, with 31% directed to Local Rural Centres and 6% of planned supply to Larger Villages. The proportion of growth directed to Key Settlements would then decrease under Scenarios 1 and 2 and increase under Scenarios 3 and 4.

6.2.62 The split of new proposed supply under Scenario 3 is considered broadly appropriate. There is a theoretical argument for directing a higher proportion of growth to **Key Settlements** (Scenarios 4 and 5); however, in practice growth would be directed to land north of Stansted Mountfitchet, which is not one of the stronger performing locations in transport terms.

6.2.63 With regards to **Takeley**, whilst the proposal (under all scenarios) amounts to a relatively high growth strategy, and the village does not benefit from a train station, there is a clear transport argument for strategic growth given the inherent locational merits of Takeley combined with identified opportunities for delivering new and upgraded transport infrastructure in line with a clear long term strategy that includes:

- A multi modal corridor for public transport and active travel between Takeley and Stansted Airport public transport interchange including improvements along Parsonage Road to improve connectivity for cyclists and offer priority for bus services, plus connections through the airport to the transport interchange.
- Creation of a Sustainable and Public Transport Mobility Hub adjacent to the proposed strategic employment allocation at Canfield End providing convenient access to the B1256/A120 junction.
- Flich Way upgrade - safety, access, interpretation, multi-functional surface and eco- management. As part of this, it is important to recognise that the former railway line functions as a country park.
- Explore B1256 Dunmow/Stortford Road as a secondary vehicular route and as a sustainable travelling route following on from the A120 sustainable transport study.

6.2.64 However, there are also risks and uncertainties, particularly relating to the B1256, A120 and M11 J8.

- 6.2.65 With regards to the 6% of new proposed supply directed to **Larger Villages**, it is important to note that a pro-rata split of housing growth according to existing population within each parish would involve a greater degree of growth 'dispersal'; however, there is a clear transport argument against a dispersal strategy (and, in turn, a clear argument from a decarbonisation perspective). It is recognised that there is an ongoing national switch-over to electric vehicles, but EVs are not without their issues, including from a perspective of greenhouse gas emissions, air pollution and traffic congestion / road safety. Also, there is some uncertainty regarding the timing / pace of the national switch-over.

Transport topic paper

- 6.2.66 The Transport Topic Paper (2023) presents the outcome of transport modelling for: A) the A120; and B) select settlements. However, a key point to note is that the modelling work was undertaken relatively early in the process of preparing the Draft Local Plan (i.e. to inform plan-making early) and, as a result, the distribution of growth modelled is significantly different to that which is now proposed for consultation.

- 6.2.67 With regards to the **A120**, the Topic Paper concludes:

"It should be noted that... The modelled growth is 42% higher than is proposed.

The modelling outputs highlight that even before development comes forward through the Local Plan that the M11 J8 and Dunmow South and East Intersections in particular, will be subject to increasing levels of delay [including from Chelmsford traffic].

The Local Plan will add to the level of demand on the corridor but only marginally when compared to other increases as a result of committed developments and expansion of operations at Stansted Airport and would be expected to be even less when the lower quantum of growth is tested.

The interventions proposed to mitigate the increases in travel demand across Uttlesford are all schemes that would be delivered on the local road network and not the SRN. [However]... These will still have an impact on the A120... in terms of reducing demand [on the A120].

Whilst there is clearly a need for a long term solution to address delays which occur at M11 J8, the key driver for this is not the Local Plan. In this respect no proposed scheme has been identified.

It is anticipated that when a solution has been determined, Local Plan development sites would contribute a commensurate amount towards the costs of the scheme...."

- 6.2.68 With regards to settlement specific modelling results, the strongest conclusions are reached for:

- **Saffron Walden** – the conclusions are positive, for example: *"Providing a package of intervention which focuses on the provision of attractive sustainable travel options providing realistic alternatives to the car will offer many benefits to the travel offering in the town, beyond the performance of the highway network... If a high degree of modal shift can be achieved, the majority of the network will perform as effectively as within the Reference Case, even with the additional 1,000 dwellings that were modelled."*

The above comment relates to a scenario without a southern link road, however, a scenario with a southern link road was also modelled, with the conclusion:

"The scheme itself could have many benefits in terms of the removal of traffic from many existing routes in the south of the town. However... many vehicles will still be required to travel through the town centre via High Street. In particular, if they are travelling north towards the M11 and Cambridge. In this respect, the link road would fall short in addressing all of the town's highway capacity issues...

... The link road could unlock wider benefits in terms of the reallocation of road space to more sustainable forms of travel within the town, and subsequent improvements to air quality..."

- **Great Dunmow** – the modelling raises concerns including in respect of problematic queuing at the B1008 / B1057 junction. However, the modelled new supply (1,500 homes) is significantly higher than the actual proposed new supply (869 homes). The following quote from the Topic Paper highlights the need for further work prior to plan finalisation, including in respect of junction capacity and modal shift:

"In other settlements many of the delays on the highway network will be as a result of committed development coming forward in the Reference Case. However, in Great Dunmow, the impacts more directly relate to the Local Plan and provision of an additional 1,500 dwellings in the town. This is thought to be due to a combination of the location of the site allocations to the north-east of Great Dunmow, and demand to access the M11 and Stansted Airport to the west, that appears to draw development traffic through the centre of the town resulting in the queuing traffic that then looks to reassign on the network..."

... Providing a package of interventions to mitigate the impacts of the Local Plan site allocations through attractive sustainable travel options that provide realistic alternatives to the car, will provide some benefits to the travel offering in the town. However, in Great Dunmow such interventions don't go far enough. Whilst a degree of additional delay on the network may be palatable, the residual delays are such that consideration needs to be given to making better use of the existing highway capacity to supplement improvements to the walking, cycling and public transport offer."

- **Thaxted** – there are concerns regarding a junction in the village centre Conservation Area:

"The [B184 / B1051 / Orange Street] junction suffers significant delays as a result of the Local Plan growth and will require an integrated highway scheme in order to mitigate the impact.

... When Local Plan traffic is added the junction exceeds its operational capacity and delays increase significantly in both peaks with delays of circa 12 minutes on the B1051 Park Street in the PM Peak."

Conclusions

6.2.69 There are strong arguments in support of the distribution of growth from a perspective of supporting modal shift away from the private car and minimising the need to travel, relating to:

- directing growth in line with the settlement hierarchy and restricting growth in rural areas (although it is important to highlight Thaxted as a rural settlement that is assigned strategic growth);
- directing growth to settlements with a train station;
- supporting 'orbital' routes at Saffron Walden; and
- directing growth to the A120 corridor where, despite inherent constraints (given background traffic growth outside the control of the Local Plan), there is also a strategic opportunity.

6.2.70 At all settlements, to varying extents, there will be a need for measures to both avoid and mitigate traffic growth, and for some settlements this will mean measures to both reduce demand and increase capacity. At certain settlements delivering infrastructure upgrades could be challenging and/or costly (e.g. Thaxted).

6.2.71 Low growth is not supported, from a transport perspective, as proactive strategic planning is crucially important from a transport perspective. Unmet need and unplanned growth can lead to major issues.

6.2.72 However, there are also concerns with the higher growth scenarios, including but not limited to a traffic concern with growth at Great Dunmow. There will be the potential to undertake further work to confirm mitigation measures, and to develop an integrated strategy for the A120 / B1256 corridor; also, it is important to recall that there is merit to strategic growth to the north east of Great Dunmow, including given links to a town centre (the alternative site discussed in Section 5.4 is likely less well-linked). However, at the current time, it is appropriate to flag a risk of negative effects pending further work.

Water

Scenario 1: Low growth	Scenario 2: Saffron Walden	Scenario 3: Saffron Walden Great Dunmow	Scenario 4: Saffron Walden Great Dunmow Stansted M'chet	Scenario 5: Saffron Walden Great Dunmow Ugley GC
=	=	=	=	=

6.2.73 The Uttlesford Water Cycle Study (WCS, 2023) gives consideration to: wastewater management (sewer network and capacity at wastewater treatment works (WWTWs); water resources / supply; water quality; and the specific issue of protecting chalk streams (which relates to water quality and water levels).

6.2.74 It is **wastewater treatment** that is typically a key issue for local plan spatial strategy and site selection, and this is also an issue high on the agenda nationally at the current time. Capacity at existing treatment works can often be increased to accommodate increased flows (at least hydraulic capacity of the works, with the other consideration being the biological and chemical capacity of the receiving water course to accept an increase in treated water). However, there are major cost and lead-in time implications, and a risk of unforeseen issues and delays. As such, there is a need to provide the water companies with early certainty regarding growth locations. Also, strategic growth locations can be conducive to planning for strategic infrastructure upgrades (also measures aimed at water efficiency).

6.2.75 The WCS does not raise any major concerns in respect of WwTW capacity, however it concludes:

“A capacity assessment was performed on the 18 WwTW in Uttlesford. Of these, four WwTW (Clavering, Felstead, Great Dunmow and Great Sampford) are already close to their permit limit (based on 80th exceedance percentile - the EA use the 90th exceedance percentile for permit compliance). By the end of the plan period, Great Chesterford, Great Easton and Newport are also expected to be at or exceeding their permit limit if no action were taken.”

6.2.76 As such, there will be a need for further work / discussions with the Environment Agency and the company regarding the potential to upgrade Great Dunmow, also accounting for recently permitted growth.

6.2.77 The other more significant consideration is then protection of **chalk streams**, which is relevant to the question of growth at Newport (412 homes new supply held constant across the scenarios), Great Chesterford (nil new supply is held constant) and Saffron Walden (a variable growth location).

6.2.78 At both Newport and Saffron Walden the proposed growth locations are outside – or almost entirely outside – the identified ‘riparian buffer zones’; however at Newport there will clearly still be a need to ensure that ensuring a riparian buffer zone is a key masterplanning consideration. At Saffron Walden the growth locations in question are not located in close proximity to a chalk stream, but there will still be a need to carefully consider mitigation of surface water runoff via Sustainable Drainage Systems (SuDS). Finally, the WCS sets out the need for ambitious standards of water efficiency:

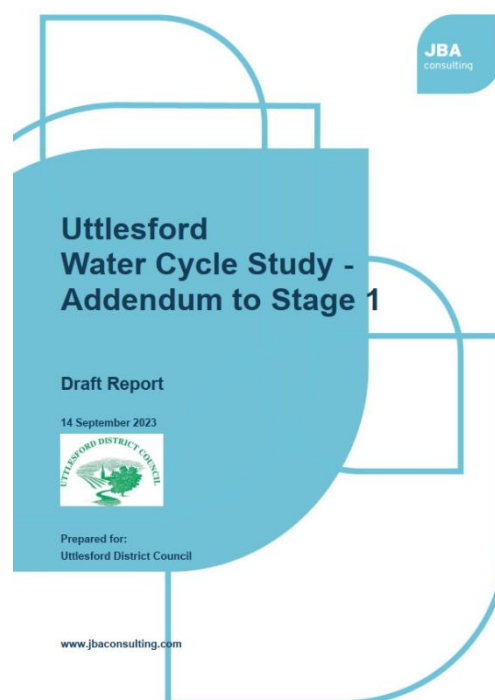
“The chalk stream evidence base prepared in parallel with the WCS identified abstraction for public water supply as a significant issue for the chalk stream catchments. Further unmitigated growth could increase water demand – and therefore the volume that needs to be abstracted from chalk aquifers. Investigations are underway by AfW and the EA into sustainable abstraction, however water demand from the local plan should be minimised where possible. The chalk stream evidence base recommends aligning with the Catchment Based Approach Chalk Stream Strategy target of 90 l/p/d in chalk stream catchments. As Uttlesford lies entirely within one water resource zone, this target should apply to the whole of Uttlesford.”

6.2.79 The other matters covered by the WCS are likely to be less significant for decision-making in respect of spatial strategy and site selection. With regards to the sewer network, the WCS flags a possible concern for the Takeley area. With regards to water resources, this is a significant issue across the region (and this is one of the issues that has led to a pause on the Greater Cambridge Local Plan), but the WCS does not flag any particular concerns. With regards to water quality, the WCS concludes:

“It can be seen that changes in the volume of treated wastewater in Uttlesford do not cause a significant response in the concentrations of ammonia within the study area in the north of Uttlesford with the exception of the River Pant. High sensitivity is observed for the River Chelmer as it passed Great Dunmow, which may be significant for the preferred options.... For BOD, more waterbodies are moderately sensitive with a 0 to 10% deterioration, again concentrated more in the south apart from the River Pant.”

6.2.80 The River Pant drains the rural north east of Uttlesford, and it is not clear that Local Plan growth scenarios rise to any particular concerns. However, water quality within the River Chelmer at Great Dunmow warrants further investigation.

6.2.81 In **conclusion**, there is a need for further work to confirm that there are no issues in respect of wastewater treatment capacity and the capacity of the River Chelmer to receive treated wastewater at Great Dunmow. However, on balance the scenarios are judged to perform broadly on a par in light of the WCS.



Appraisal summary

6.2.82 The table below present a summary of the appraisal of reasonable growth scenarios presented above. To reiterate, within each row, the aim is to **1)** rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence); and then **2)** categorise performance in terms of ‘significant effects’ using **red / amber / light green / green**.

Table 6.2: The reasonable growth scenarios – summary appraisal findings

	Scenario 1: Low growth	Scenario 2: SW	Scenario 3: SW, GD	Scenario 4: SW, GD, SM	Scenario 5: SW, GD, UGC
Topic	Rank of preference (numbers) and categorisation of effects (shading)				
Accessibility	4	3	2	1★	1★
Biodiversity	2	1★	1★	1★	1★
Climate change adaptation	=	=	=	=	=
Climate change mitigation	=	=	=	=	=
Communities, equality, health	2	1★	2	2	2
Economy and employment	5	4	3	2	1★
Historic environment	2	1★	3	3	4
Homes	5	4	3	2	1★
Land and soils	=	=	=	=	=
Landscape	=	=	=	=	=
Transport	2	1★	2	2	2
Water	=	=	=	=	=

6.2.83 The appraisal serves to suggest that **Scenario 1** performs quite poorly overall. However, it is important to note that the appraisal reflects an assumption that Scenario 1 would lead to a risk of unmet housing need (if the housing requirement is set below LHN) or unplanned growth (if the housing requirement is set at LHN without a sufficient supply buffer). In practice, this assumption may not hold true because supply from permissions will likely increase prior to plan finalisation (see discussion in Section 5.5).

6.2.84 For the **other scenarios** the appraisal shows a mixed picture. In this regard, it is important to be clear that the appraisal is undertaken without any assumptions regarding the degree of importance that should be assigned to each of the SA topics, such that the intention is not that a numerical approach should be taken to concluding on overall performance. Also, there is a need to state that the appraisal conclusion under several topics is finely balanced, such that new evidence could serve to tip the balance of favour.

6.2.85 Having made these overarching comments, the following bullets consider the topic headings in turn:

- Accessibility – the higher growth scenarios would reflect a highly proactive approach to securing new schools capacity alongside new homes, with a high degree of delivery confidence.
- Biodiversity – the growth locations in question are subject to limited biodiversity constraint (Takeley is a key consideration, including given proximity to Hatfield Forest), hence low growth performs poorly.
- Climate change adaptation – flood risk is often a key climate change adaptation consideration for local plans, but the growth locations in question are subject to limited constraint.
- Climate change mitigation – it is not clear that any of the scenarios would lead to a particular built environment decarbonisation opportunity, in the context of a highly ambitious local 2030 net zero target.
- Communities, equality, health – there are wide-ranging factors, but the appraisal reflects a view that there is a case avoiding new supply at Great Dunmow given the extent of recent and committed growth.
- Economy and employment – there is a preference for a higher growth strategy, including with a view to ensuring a balance between housing growth and employment land supply.
- Historic environment – this is a key issue for a number of the variable growth locations, although less so Saffron Walden. However, there is also an urgent need to adopt a Local Plan with a robust supply.
- Homes – there is support for higher growth scenarios enabling a housing requirement at LHN along with a robust supply (also possibly flexibility to provide for unmet needs). Specific needs require further work.
- Land and soils – Uttlesford is strongly associated with high quality (grade 2) agricultural land but this is also the case for most neighbouring areas. There is some grade 3 quality land at Stansted Mountfitchet.
- Landscape – a number of the growth locations are subject to constraint. However, there is also an urgent need to avoid further growth coming forward in the absence of an up-to-date plan.
- Transport – there is a need for further work to examine the traffic constraint to growth at Great Dunmow (also Thaxted), although the growth location in question is supported in terms of links to a town centre.
- Water – there are limited concerns on the basis of the evidence presented in the Water Cycle Study (2023), although there is a need to confirm wastewater treatment capacity at growth settlements.

6.2.86 Consultees are encouraged to comment on the merits of the reasonable alternative growth scenarios, with a view to supporting efficient plan finalisation. However, it is recognised that consultees will also wish to advocate for scenarios other than those presented above. Suggestions for growth scenarios other than the five appraised above might be informed by the discussion in Section 5.4. Equally, it is recognised that consultees will wish to make representations on specific sites; however, such comments should be made recognising that there is extensive strategic context to factor-in, as discussed in Sections 5.2 and 5.4.

7 The preferred approach

7.1.1 The aim here is to provide reasons for supporting the preferred scenario in light of the appraisal of reasonable alternatives. The following text was provided to AECOM by UDC officers:

“The preferred scenario is **Scenario 3**, which the appraisal shows to perform reasonably well relative to the alternatives. Scenario 3 gives rise to a degree of tension with certain sustainability objectives, as is inevitable in the context of a local plan, and it is recognised that there are certain arguments in favour of supporting an alternative approach, but Scenario 3 is judged to represent sustainable development on balance. There is good potential to address the identified tensions through policy (see the Draft Plan appraisal below), and adjustments can also be made to the spatial strategy subsequent to the current consultation, taking into account consultation responses received.

With regards to Scenarios 4 and 5, the first point to make is that this quantum of growth could well prove to be in excess of what is required in order to meet locally arising needs, particularly once account is taken of the potential for the number of permissions to increase prior to plan finalisation. Secondly, whilst it is recognised that higher growth at Stansted Mountfitchet could assist with securing a new primary school, the sites in contention to potentially deliver higher growth are both associated with clear issues.”

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal of the current Draft Local Plan (as a whole).

8.1.2 In practice, the aim is to appraise the following two broad components of the plan together:

1. The proposed **growth strategy** (i.e. the suite of proposed allocations that aim to provide for the identified housing requirement and employment land needs, as reflected in the Key Diagram – see Figure 8.1 – and as appraised above as Growth Scenario 3).
2. The proposed suite of policies that aim to support the growth strategy and generally manage growth and change in the District. The plan distinguishes between ‘core’ and ‘development management’ policies, but **development management policy** is also an appropriate overarching term (including noting the Government’s proposal to publish [national development management policies](#)).

Appraisal methodology

8.1.3 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each sustainability topic the aim is to discuss the merits of the Draft Plan, as a whole, before reaching an overall conclusion on significant effects.

8.1.4 Specifically, the regulatory requirement is to “identify, describe and evaluate” significant effects taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. ‘long term’.

8.1.5 Also, significant effects are defined as follows:

- An effect is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the Local Plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the Local Plan. Also, neighbouring local authorities might have to consider providing for Uttlesford’s unmet need.
- The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. the District has a 2030 net zero target date, such that there is a need to achieve a rapid decarbonisation trajectory).

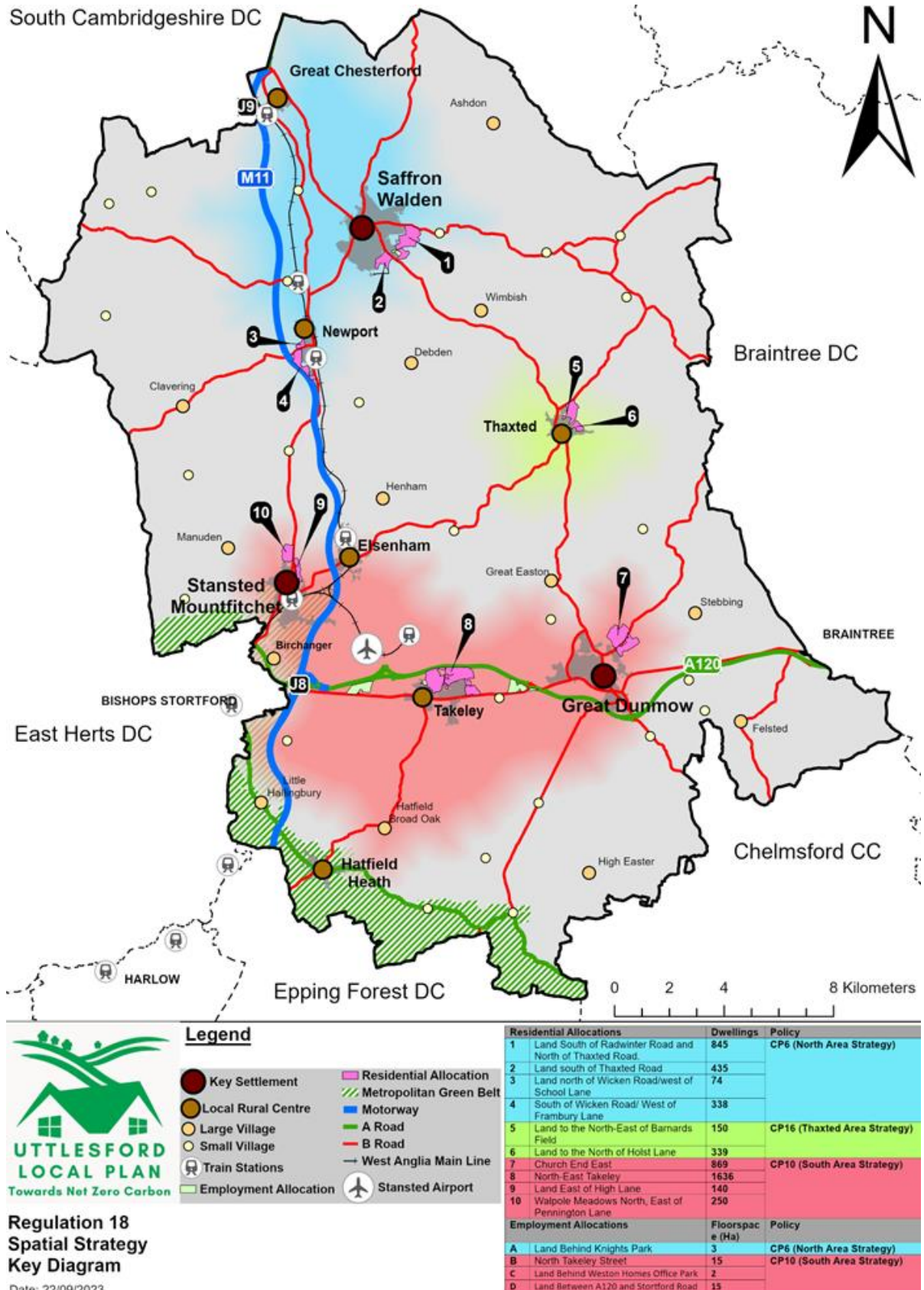
8.1.6 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the Draft Plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the Draft Plan will be implemented and the effect on particular ‘receptors’.

Further note on methodology

8.1.7 It is important to state that:

- The **growth strategy** appraisal aims to briefly recap key messages from the appraisal of Growth Scenario 3 presented in Section 6. The aim is it to avoid repetition of text.
- The **development management policy** appraisal focuses on those policies where there has been a strategic choice to make, whether because there is a need to balance competing sustainability objectives or because the policy will have implications for development viability.

Figure 8.1: The Draft Local Plan Key Diagram



9 Appraisal of the Draft Plan

9.1 Introduction

- 9.1.1 Set out below is an appraisal of the Draft Local Plan as a whole. The appraisal takes the form of 13 narrative discussions – one for each of the topic headings that together comprise the SA framework.

9.2 Accessibility (to community infrastructure)

Growth strategy

- 9.2.1 The appraisal in Section 6 finds Scenario 3 to perform reasonably well relative to the alternatives, although there is a case to be made for a higher growth strategy. The package of proposed allocations has been selected with a strong focus on delivering community infrastructure, in the context of an infrastructure deficit that has arisen due to the prolonged period without an up-to-date local plan.
- 9.2.2 The proposed high growth strategy for Takeley is particularly supported in this respect. For other settlements there is a need for further work to confirm the links between growth and infrastructure delivery and to confirm that proposed / anticipated new community infrastructure will prove viable and deliverable in practice. There may also be a need to further consider primary school capacity at larger villages.

Development management policy

- 9.2.3 Recognising the challenges associated with securing infrastructure alongside growth, a key policy is Core Policy 5 (**Providing Supporting Infrastructure and Services**), which explains: *“All new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. Infrastructure requirements will be delivered directly by the developer and/ or through an appropriate financial contribution prior to, or in conjunction with, new development. Where appropriate, developers will be expected to collaborate...”*
- 9.2.4 The latter point on collaboration is important, as there are numerous instances of where this will be necessary in order to secure key infrastructure. It is also important to note that the policy goes on to present detailed guidance on the approach that will be taken to addressing development viability issues.
- 9.2.5 The policy also ends by discussing a proposed **Community Infrastructure Levy (CIL)**:
- “The Council’s Delivering Infrastructure Strategy will include both a CIL Charging Schedule and a Supplementary Planning Document for Section 106 agreements.*
- Upon adoption of the CIL Charging Schedule, CIL will be used to pool developer contributions towards a wide range of new and improved infrastructure necessary to delivery new development.*
- Where not covered by the CIL Charging Schedule, infrastructure and services... should be delivered directly by the developer through the development management process.*
- 9.2.6 Given the extent of infrastructure required in support of growth – including transport infrastructure, community infrastructure, green infrastructure and utilities – taken into account alongside wider policy asks of developers including in respect of net zero, biodiversity net gain, water efficiency and Hatfield Forest recreational pressure mitigation, it will be very important that a CIL Charging Schedule is adopted.

Conclusion

- 9.2.7 In conclusion, given the detailed requirements around schools and wider community infrastructure, and on the assumption that infrastructure delivery is achievable in practice, it is appropriate to predict a **moderate or uncertain positive effect** on the baseline, accounting for established objectives. There is a need to account for consultation responses from key organisations, including the County Council, and undertake further work including in collaboration with landowners.

N.B. the above conclusion is reached on the understanding that the baseline situation is one whereby housing growth would continue to come forward but in a relatively unplanned way. This also applies below.

9.3 Biodiversity

Growth strategy

- 9.3.1 The appraisal in Section 6 finds **Scenario 3** to perform well relative to the alternatives. A number of the proposed allocations are subject to a degree of constraint, but overall there is support for proactively providing for housing and employment needs in full, as opposed to risking further unplanned growth or seeking to export unmet needs to a constrained sub-region. Also, there is a significant green / blue infrastructure opportunity associated with a number of the proposed growth locations.
- 9.3.2 Growth at Takeley and Takeley Street (employment) warrants further scrutiny from a biodiversity perspective, given the proximity of Hatfield Forest and given a wider wooded landscape at risk of further fragmentation. However, early work on green infrastructure strategy is encouraging, including the proposed strategy of delivering three new country parks in the south of Uttlesford. In the north of Uttlesford a key sensitivity is the network of chalk streams, but it is not clear that there are any significant concerns.

Development management policy

- 9.3.3 Focusing on the south of Uttlesford, which is a key area of sensitivity, the Core Policy on **Green and Blue Infrastructure in the South Uttlesford Area** sets out that the Council will “*seek contributions towards the strategic projects (including their enhancement and on-gong management costs) identified in the Uttlesford Green and Blue Infrastructure Strategy... including:*”
- A 12 ha country park at Stansted Mountfitchet; and
 - A 20 ha country park at Great Dunmow (Church End) that will “*stretch in a continuous parkland of public open space from the north, near to Marks Farm around the eastern edge, and along the River Chelmer alongside Bigods Lane to the track to the north. Public access will be created through it and will continue as a green route from Marks Farm south towards the River Chelmer. This landscaping and habitat creation/enhancement should take place in the first phase of the development to allow time for it to mature as far as possible for the enjoyment of residents. The developer will make an endowment contribution towards the future maintenance of the park to be secured through a section 106 Agreement.*”
- 9.3.4 Also relevant to the South of Uttlesford, the Core Policy on **The Natural Environment** requires: “*Where appropriate... contributions from proposed residential developments will be secured towards recreational mitigation measures and Priority Habitat enhancement/ connectivity at Hatfield Forest SSSI....*”
- 9.3.5 In the north of Uttlesford, as discussed, a key issue is chalk streams, hence the Core Policy on **Chalk Streams Protection and Enhancement** sets out a need to ensure a 15m buffer to chalk streams and requires that: “*All development proposals within the river basin or floodplain of a chalk stream must provide a Chalk Stream Impact study [that presents certain information]*”. The policy also states:
- “*Planning approval will be contingent on adequate water supply and treatment infrastructure being in place with no additional burden on chalk aquifer abstraction or ecology. To achieve this, developers are expected to contribute proportionate costs and mitigation of addressing any potential impacts.*”
- 9.3.6 Finally, applying district-wide will be the Core Policy on **Biodiversity**, which sets out a requirement for developments to secure a 20% net gain in biodiversity, i.e. a requirement in excess of the legislative minimum requirement for 10% net gain. A number of adopted and emerging local plans nationally feature a requirement for 20% biodiversity net gain but understanding of the level of evidence needed to justify this approach, and the viability implications of taking this approach, is still evolving.

Conclusion

- 9.3.7 In conclusion, given the detailed green infrastructure and policy requirements set out above, aligned with relatively limited biodiversity sensitivity at the majority of the proposed allocations, it is appropriate to predict a **moderate or uncertain positive effect** on the baseline, accounting for established objectives.
- 9.3.8 Consultees will wish to scrutinise the green infrastructure strategy and comment on potential issues to address / opportunities to be realised via the local plan growth strategy. Also, it is recognised that there is a need for further collaboration with Natural England in respect of Hatfield Forest impacts and mitigation.

9.4 Climate change adaptation

Growth strategy

- 9.4.1 The appraisal in Section 6 finds Scenario 3 to perform on a par with the alternatives. Focusing on flood risk, which is typically the primary climate change adaptation consideration for local plans, none of the proposed allocations give rise to any significant concern in respect of fluvial flood risk, but there are significant surface water flood risk channels affecting proposed allocations at Saffron Walden and Thaxted.

Development management policy

- 9.4.2 There are a number of policies that are supportive of climate change adaptation objectives, including those discussed above under 'Biodiversity' and below under 'Water'. A key policy for discussion here is the Core Policy on **Overheating**, which requires:

"All development proposals must demonstrate how the cooling hierarchy has been integrated into design decisions, via the Climate Change & Sustainability Statement. Major development proposals are encouraged to use the CIBSE (Chartered Institute of Building Service Engineers) standards: TM52 for non-residential development; and TM59 for residential development."

Conclusion

- 9.4.3 In conclusion, **neutral effects** are predicted. Flood risk can be a key issue for some local plans, but is not a major issue for the current proposed local plan (subject to consultation with the Environment Agency). There are range of other important climate change adaptation / resilience considerations, but these are appropriately considered under other topic headings.

9.5 Climate change mitigation

Growth strategy

- 9.5.1 The appraisal in Section 6 finds Scenario 3 to perform on a par with the alternatives. Focusing on per capita greenhouse gas emissions from the built environment, a key focus of the appraisal is the extent to which there is a focus of growth at large-strategic sites or sites otherwise benefiting from strong viability. In this respect, it is not clear that the proposed package of site allocations has been selected with strong focus on realising built environment decarbonisation opportunities to the greatest possible extent; nor is it the case that any of the site promoters have submitted materials serving to suggest a particular locational or scheme-specific opportunity. However, it is recognised that national practice, in terms of spatial strategy / site selection aimed at built environment decarbonisation, is not very well advanced.

Development management policy

- 9.5.2 The proposed development management policy framework is very strong and reflects the outcomes of a considerable amount of detailed work. This is a very live topic at the current time, and ambitious decarbonisation focused policies have scrutinised closely as part of a number of local plan examinations over the course of recent months. The proposed policy framework is considered to represent cutting edge best practice; however, there is a need to ensure a focus on conciseness and accessibility, to the benefit both of planning applicants and also interested members of the public seeking to understand the role of the Local Plan in terms of contributing to the District's ambitious 2030 net zero target.
- 9.5.3 In particular, the Core Policy on **Net Zero Operational Carbon Development** reflects a cutting-edge best practice approach to securing net zero development. The proposal is to require application the 'energy-based' approach to scrutinising performance and ultimately demonstrating net zero. This approach involves scrutiny of development proposals in absolute terms, specifically in terms of 'energy use intensity' (kWh /m²/yr). The energy-based approach has wide-spread support amongst specialists, including due to the simple fact that actual 'as built' performance can be monitored using a smart meter.

- 9.5.4 With regards to the specifics of the proposed approach, there is a clear focus on aligning with the energy hierarchy, which means a primary focus on efficiency ('fabric first') followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort. In turn, the clear aim is to secure *onsite* net zero operational carbon.
- 9.5.5 Beyond operational built environment emissions, there is also a need to consider non-operational emissions, with the term 'embodied' emissions typically used as an intuitive shorthand. This is a focus of the Core Policy on **Embodied Carbon**, which again is considered to represent cutting-edge best practice.
- 9.5.6 The policy requires a tiered approach whereby:
- *"All development proposals must demonstrate, through the Climate Change & Sustainability Statement, what measures have been taken to reduce embodied carbon content as far as possible. Where it is proposed to demolish a building, this should be justified e.g., in relation to..."*
 - *Major new-build proposals should identify the steps taken to reduce the building or overall development's impact on embodied carbon e.g., regarding its design and building materials...*
 - *Proposals for large scale new-build developments (e.g. 100 dwellings...) must submit a Whole Life Carbon Assessment that demonstrates the following targets have been met..."*
- 9.5.7 Taken together, the two policies reflect a highly ambitious approach, and it is also noted that the policies have been developed in light of work undertaken recently by Essex County. However, there will be a need for ongoing scrutiny of viability implications – when taken into account alongside other infrastructure and policy requirements – and there is also a need to consider the practical challenges associated with applicants demonstrating compliance with the policy. The energy based approach is gaining traction nationally, and benefits from being relatively easy to understand and implement, but it currently remains the case that an alternative methodology is a requirement under the Building Regulations.
- 9.5.8 Finally, there is a need to consider the Core Policy on **Renewable Energy Infrastructure**, which sets out criteria to be used when determining applications for renewable and low carbon energy generation, with particular policy support for *"community-led schemes with evidence of community support along with local energy sharing schemes, and battery storage."* The policy does not specifically refer to solar farms, which is something that might be revisited prior to plan finalisation, recognising that solar farms are the primary type of largescale energy infrastructure delivered locally (on the basis of recent experience). It is also important to note that the reference in the policy, as currently drafted, to avoiding best and most versatile agricultural land could warrant further consideration, as this applies to the great majority of the District.

Conclusion

- 9.5.9 In conclusion, a **neutral effect** is predicted on the baseline, accounting for established objectives, in particular accounting for the District's ambition of achieving net zero by 2030. As discussed, there is very strong support for the proposed development management policy framework; however, this will require further scrutiny through consultation, and there is also a need to recognise that the national policy context – in respect of requiring net zero development (onsite as far as possible) – is potentially subject to change. In turn, it is important to ensure that there is not undue reliance placed on development management policy, and that 'no regrets' actions are taken through spatial strategy and site selection, ensuring that growth is directed with a view to maximising the potential for built environment decarbonisation.

9.6 Communities, equality, inclusion and health

Growth strategy

- 9.6.1 The appraisal in Section 6 finds Scenario 3 to perform on a par with most of the alternatives appraised, although the appraisal suggests a potential preference for a slightly lower growth strategy without further growth at Great Dunmow, given the extent of recent and committed growth at the town. This is a very marginal conclusion, given that a strategic urban extension to Great Dunmow could deliver a new primary school and a country park, and would also contribute to delivery of a new secondary school at Takeley.
- 9.6.2 There are also wide-ranging other 'communities and health' issues discussed within Section 6, but it is difficult to draw overall conclusions. One key issue is simply the need to adopt a Local Plan in order to prevent further sub-optimal piecemeal growth without delivery of sufficient infrastructure alongside.

Development management policy

9.6.3 Numerous policies have broadly positive implications. The following are of particular note:

- Core Policy on **Noise** – sets out a range of detailed requirements, which are important in the context of Stansted Airport and also noise pollution from the M11 and A120.
- Core Policy on **Movement and Management of Freight** – sets out that submitted Freight Management Strategies should “ensure the prioritisation of the use of the Strategic Road Network and minimise the use of the rural network and that encourage the movement of freight by sustainable modes whilst minimising negative impact of freight trips on local communities.”
- Core Policy on **Good Design Outcomes and Process** – development will be supported where proposals can clearly demonstrate compliance with appropriate national policy and guidance in respect of Design, especially the most up-to-date version of the Uttlesford Design Code(s), and the Essex Design Guide. Proposals must clearly demonstrate how ten defined characteristics are addressed.

The policy also sets out specific requirements for:

- Major Development – “submit Masterplans and Design Codes... undertake appropriate Community Engagement that informs the proposals from an early stage in accordance with [guidance] make use of Pre-application discussions with the Local Planning Authority and others as appropriate.”
- Schemes of 100 dwellings or more – “make use of a Design Review as early in the process as possible. The Uttlesford Quality Review Panel is the preferred approach, but the Essex Design Review Panel, or a Building for a Healthy Life assessment... are also acceptable options.”
- Core Policy on **Planning for Health** – requires a Health Impact Assessment for major development.

Conclusion

9.6.4 In conclusion, a **neutral effect** is predicted. Despite the clear benefits associated with ‘getting a plan in place’ and the strong focus on directing growth so as to realise community infrastructure objectives, there are also clear tensions associated with the strategy, including around further growth at Great Dunmow. Also, it is important to recognise that the current proposed spatial strategy is very different to that previously proposed through the withdrawn local plan (2020), which focused growth at new settlements, with commensurately low growth at existing settlements. The views of the local community / key local stakeholder organisations are sought through the current consultation and will feed-in subsequently.

9.7 Economy and employment

Growth strategy

9.7.1 The appraisal in Section 6 finds **Scenario 3** to perform reasonably well, but there is a preference for a higher growth strategy, including with a view to ensuring a balance between housing growth and employment land supply. The suite of proposed allocations represents a proactive response to identified needs, however: there are constraints affecting the two main allocations in the South of Uttlesford (where the key aim is to meet needs associated with the M11 corridor and Stansted Airport); and the proposed 18 ha expansion of Great Chesterford Research Park

Development management policy

9.7.2 The plan includes a range of policies aimed at protecting existing employment land and guiding applications for new employment land. Other key policies include:

- Core Policy on **London Stansted Airport** – amongst other things, the policy states: “In consultation with the airport operator, the Council will ensure that... sensitive uses such as housing... are not located in areas significantly affected by aircraft noise without acceptable mitigation measures.”
- Core Policy on **Rural Diversification** – strikes a balance between competing objectives. The policy supports “economic activities that bring about rural diversification” providing that criteria are met including: “the development... contributes to the viability of the holding... [and] it is not detrimental to the character and appearance of existing buildings and their setting within the landscape.”

- Core Policy on **Retail and Main Town Centre Uses Hierarchy** – sets new town centre boundaries, which will be used to guide planning applications for main town centre uses, and also defines Primary Shopping Areas, where requirements will apply including:

“Where planning permission is required, proposals resulting in the loss of Main Town Centre Uses at ground floor level within a Primary Shopping Area must demonstrate that the unit has been proactively and appropriately marketed for at least 12 months and it has been demonstrated that there is no longer a realistic prospect of the unit being used for E Class Uses in the foreseeable future.”

- 9.7.3 There is also a need to consider any development management policies that could potentially conflict with ‘economy and employment’ objectives. One point to note is the requirement within the Core Policy on **Net Zero Operational Carbon Development** to achieve ‘on site net zero’ to include an energy use intensity of 35 kWh/m²/yr. There can be an argument for allowing for a higher energy use intensity and, in turn, increased reliance on rooftop solar PV in order to achieve onsite net zero (over the course of a year).

Conclusion

- 9.7.4 In conclusion, a **moderate or uncertain positive effect** on the baseline is predicted. The approach to allocating land for employment is highly proactive, although there is a need for further work to confirm the suitability of certain proposed allocations and there is also a need to confirm that the proposed over-supply in respect of land for R&D does not create an issue for neighbouring areas or in terms of commuting. The proposed development management policy framework is supported, including policy for town centres.

9.8 Historic environment

Growth strategy

- 9.8.1 The appraisal in Section 6 flags a concern with **Scenario 3** and suggests that a lower growth strategy might be preferable from a historic environment perspective. Key considerations relate to: impacts to the Church End Conservation Area at Great Dunmow; impacts to the Smiths Green area and wider historic impacts at Takeley; impacts to views of the Grade 1 listed parish church on the approach to Newport; and traffic generation and the potential need for junction upgrades in the Thaxted Conservation Area.

Development management policy

- 9.8.2 The suite of development management policies primarily reflects the standard wording included across local plans nationally. In this respect, it should be noted that the Government has committed to publishing a set of [national development management policies](#).
- 9.8.3 There is also a need to consider any development management policies that could potentially conflict with historic environment objectives. Numerous policies could potentially be discussed, but one policy of note is the Core Policy on Tourism and the Visitor Economy, which is supportive of “small-scale development to support the visitor economy, including farm diversification and equine development” provided that certain criteria are met. One of the requirements is that schemes *“are in keeping with the scale and character of the locality and will not adversely affect heritage assets or their setting.”*

Conclusion

- 9.8.4 In conclusion, it is appropriate to flag a **moderate or uncertain negative effect** at this relatively early stage in the plan-making process, ahead of consultation with Historic England and other key stakeholder organisations. The historic environment has fed-in to the spatial strategy / site selection process as a key issue (e.g. influencing the proposed approach of nil proposed new supply at Great Chesterford); also, it is recognised that a significant amount of work has been undertaken in respect of site masterplanning and site-specific policy requirements; however, there are inherent constraints to growth at all the key settlements. It is important to recognise that the proposed strategy is very different to that which underpinned the previously withdrawn local plan, namely a strategy centred on delivering three large new garden communities (which generated significant objection from a historic environment perspective).

9.9 Homes

Growth strategy

- 9.9.1 The appraisal in Section **Scenario 3** to perform well, although there is a clear preference for higher growth scenarios. The proposal is to set the housing requirement at Local Housing Need (LHN) (as defined using the Government's standard method) with a supply buffer of ~11% (after having accounted for an estimate of permissions since 1st April 2023; N.B. the plan document does not account for these recent permissions and so records a smaller supply buffer of ~4.5%). Also, it is recognised that the number of homes with permission is likely to increase significantly, which could serve to further boost the supply buffer (assuming that the number of homes from allocations and/or windfall does not decrease).
- 9.9.2 The proposed suite of site allocations is also considered to represent a good mix of sites, from a housing perspective. There are arguments in favour of larger strategic sites from a housing perspective, including terms of delivering a mix of homes, specialist housing and potentially also a site for Gypsies and Travellers; however, there is a need for further work to ensure a good mix of sites to include small sites. There are a number of benefits to ensuring a good proportion of supply from smaller sites, including from a perspective of ensuring a robust trajectory of supply over the entire course of the plan period (although in Uttlesford's case the large number of existing permissions leads to little concern in respect of maintaining a five year housing land supply in the early years of the plan period) and meeting locally arising housing needs at villages. The 1,000 home larger villages allowance is considered suitable but warrants further scrutiny.

Development management policy

- 9.9.3 The first point to make here is the implications of wide ranging requirements in terms of infrastructure and wider policy asks for **development viability**. The Viability Study (2023) reaches a positive conclusion; however, there will undoubtedly be a need for further work to consider viability, to include discussions with landowners. It will be important to ensure that decisions taken through spatial strategy / site selection reflect key ambitions with cost implications, including around infrastructure delivery (notably new schools capacity and transport infrastructure) and wider policy asks including affordable housing and net zero. There is a need to avoid delivery risks that amount to storing up issues for the future, and one specific matter for further consideration is in respect of sites that will require collaboration between landowners, including instances of one landowner having to forego housing to provide land for strategic infrastructure. For example, at Saffron Walden there are several land owners involved but it may be that just one is expected to make land available for a new primary school and sixth form centre.
- 9.9.4 The following bullets consider policies with broadly positive implications for housing objectives:
- **Affordable Dwellings** – new residential development (including conversions and changes of use) with the capacity to provide 10 or more self-contained units should provide 35% of the total dwellings as affordable dwellings. This would go a long way to meeting affordable housing needs, as set out within the Local Housing Needs Assessment (LHNA, 2023); however, it is not uncommon for some local authorities to prioritise affordable housing to the extent that the policy ask is 40% affordable housing.²²

The policy also sets out that: *“Affordable dwellings should incorporate a mix of tenures and sizes prioritising rented dwellings at social rent levels.”* Specifically, after having first accounted for the [requirement](#) need to deliver 25% of homes as First Homes, the policy sets out a requirement that the remaining affordable homes should split as follows: 70% affordable/ social rented; 30% other forms.
 - **Standards for New Residential Development** – the requirement is for all residential schemes to be wheelchair accessible, i.e. M4(2) compliant. Also, 10% of market homes and 20% of affordable homes should be M4(3) compliant. M4(2) dwellings are those that are ‘accessible and adaptable’ so a wheelchair user can visit whereas a Part M4(3) dwelling is one in which a wheelchair user could live.

The LHNA provides data in support of this approach, for example identifying that over the 2023-2033 period there will be a 32% increase in the population aged 65+ and a 41% increase in the number of people aged 65+ with dementia and a 39% increase in those aged 65+ with mobility problems.

²² The Local Housing Needs Assessment identified that 261 households p.a. in Uttlesford are currently in affordable housing need, which equates to 38 % of the annual LHN figure for the district of 684 dwellings. However, the link between affordable and overall needs is complex and many of those identified as having an affordable housing need are already in housing and thus do not generate a net additional need for a home. An adjusted need is 122 dwellings, or 28 % of our LHN.

- **Specialist Housing** - strategic housing sites will be expected to provide at least 5% extra care dwellings¹⁴ (C3 Use Class) as part of the overall mix. Should it be agreed with the Council that extra care housing would not be desirable in a particular location, an equivalent amount of alternative specialist housing¹⁵ (C3 Use Class) for older people will be required.

Also, the policy sets out that the Council will support residential care homes (C2 Use Class) and developments which provide for a mix of Uses Classes C3 and C2 where the appropriate infrastructure is provided and they offer easy access to community facilities and frequent public transport. Sheltered and extra care housing are alternatives to care/nursing home bed spaces and can help to reduce costs associated with care by supporting people to remain as independent for as long as possible.

The LHNA suggests that in the period 2023-2033 there is a need for: 355 sheltered/retirement market homes; 330 additional housing units with care (extra-care) (90% to be market sector); 300 additional nursing care bedspaces, and 370-640 dwellings for wheelchair users (meeting M4(3) standards).

- **Custom and Self-Build Housing** - proposals for 100 or more dwellings will provide serviced plots to deliver at least 5% of the total number of dwellings on the site as self-build or custom build homes. Custom and self-build homes are another route to achieving home ownership.
- **The Travelling Community** – the policy sets out criteria to guide planning applications for new or expanded sites. However, there is a need for further work subsequent to the current consultation in respect of ensuring that there is a supply of land locally to meet the needs of the local Travelling Community in full. See further discussion in Section 6.

Conclusion

- 9.9.5 In conclusion, a **moderate or uncertain positive effect** is predicted on the baseline, accounting for established objectives. The plan represents a considerable step-change, in terms of addressing housing and wider accommodation needs locally, in the context of a national housing crisis, but there is a need for further work, including around deliverability and providing for Gypsy and Traveller accommodation needs.

9.10 Land, soils and other resources

Growth strategy

- 9.10.1 The appraisal in Section 6 finds **Scenario 3** to perform broadly on a par with the alternatives. Uttlesford is associated widespread grade 2 quality agricultural land, but this is also mostly the case for neighbouring local authorities over the sub-region. Other than productive / best and most versatile agricultural land, it is difficult to identify other significant issues of relevance to spatial strategy / site selection.

Development management policy

- 9.10.2 Protecting agricultural land is more of an issue for spatial strategy / site selection than it is for the development management process. However, of note is the proposed DM policy on **Change of Use of Agricultural Land to Domestic Gardens**, which sets out that: *“Change of use of agricultural land to domestic garden will be permitted if the proposal, particularly its scale and means of enclosure, does not result in a materially negative change in the character and appearance of the surrounding countryside.”*
- 9.10.3 Also of note is the Core Policy on **Renewable Energy Infrastructure**, which sets out that account should be taken of best and most versatile agricultural land when making decisions, e.g. on solar farms. However, avoiding BMV agricultural land in Uttlesford is not easy, given the extent of BMV land and also limitations within the available data (see discussion in Section 6).
- 9.10.4 Also of note here is the Core Policy on **Managing Waste**, which has a dual focus: 1) support proposals for sustainable waste management facilities as identified in the Essex Minerals Local Plan (2014) and Essex and Southend-on-Sea Waste Local Plan (2017), or their replacements (subject to criteria); and 2) sets out that new development must include adequate recycling facilities to allow occupiers to separate and store waste for recycling and recovery, preferably within the premises of the dwelling, or provide adequate, secure, external or communal storage facilities. Convenient and safe access to manage waste must be ensured, including for older persons or persons with disabilities.
- 9.10.5 In respect of waste there is also a need to note the Core Policy on **Embodied Carbon**, discussed above.

Conclusion

- 9.10.6 In conclusion, it is appropriate to flag a **moderate or uncertain negative effect** given the extent of high quality agricultural land that would be lost. However, it is difficult to envisage an alternative strategy that would be preferable, and there is no clear guidance in respect of judging the significance of loss of agricultural land through local plans. The available [guidance](#) focuses on planning applications.

9.11 Landscape

Growth strategy

- 9.11.1 The appraisal in Section 6 finds **Scenario 3** to perform broadly on a par with the alternatives. Whilst there are no nationally designated landscapes, landscape character and capacity/sensitivity is a key issue locally, and one that has been explored through recent character and sensitivity studies. In turn, there is an argument for favouring low growth. However, it is difficult to pinpoint which particular proposed allocations might be removed in order to allay landscape concerns. Attention may focus on the B1256 corridor, accounting for both proposed housing and employment allocations. Also, there is a need to further consider the proposal to safeguard land for a possible new link road to the south of Saffron Walden.
- 9.11.2 However, reduced supply could risk a land supply that lacks robustness such that the Local Plan risks becoming out-of-date and, in turn, the Council risks being unable to defend against speculative planning applications, potentially leading to problematic ongoing piecemeal expansion of settlements.

Development management policy

- 9.11.3 The Core Policy on **Landscape Character** is considered robust but reflects limited tailoring to the local context (recalling the Government's proposal to introduce National Development Management Policies, as discussed above). The policy sets out that proposals will not be permitted if they would:

"i. cause an unacceptable visual intrusion into the open countryside ii. be inconsistent with local character iii. introduce disturbances to areas with a high level of tranquillity iv. cause coalescence between settlements v. harm views to distant landmarks and landscapes of interest vi. harm the setting of natural and built landmark features, and vii. reduce the historic significance of the landscapes."

- 9.11.4 Other key policies from a landscape perspective include:

- The Core Policy on **Good Design Outcomes and Process** – sets out a list of criteria that reflects a degree of local tailoring, but importantly sets out that: *"Development will be supported where proposals can clearly demonstrate compliance with appropriate national policy and guidance in respect of Design, especially the most up-to-date version of the Uttlesford Design Code(s), and the Essex Design Guide."*

Also, the policy sets out that specific requirements for major developments and schemes involving 100 homes or more (*"make use of a Design Review as early in the process as possible"*).

- The **area specific policies** on both green / blue infrastructure and safeguarding land for transport infrastructure. As discussed, a key issue is a potential new strategic link road south of Saffron Walden.
- The suite of policies set out within the **Rural Area Strategy** section of the Draft Local Plan.
- The Core Policy on **Renewable Energy Infrastructure**, which has already been discussed above. The policy is clear that a key criterion is "visual impacts on local landscapes".

Conclusion

- 9.11.5 In conclusion, after having accounted for the proposed suite of development management policies and also the site specific policies that have been developed (which will be further refined and supplemented prior to plan finalisation), it is appropriate to predict a **broadly neutral effect** on the baseline. However, the fact remains there are clear sensitivities. It will be important that plan-finalisation is informed by consultation responses received and further work, e.g. in respect of development densities, scheme layouts and integration of green infrastructure. There will be a need to consider the in-combination effects of developments and also ensure a suitably long-term perspective, including along the A120/B1256.

9.12 Transport

Growth strategy

- 9.12.1 The appraisal in Section 6 finds **Scenario 3** to perform on a par with most of the alternatives appraised. There is potentially a 'transport' argument for a reduced focus of growth at Great Dunmow, given the results of early transport modelling that flags a risk of problematic traffic congestion. However, there is a need to direct growth in line with the settlement hierarchy, the site in question appears to be better linked to the town centre than the alternative site discussed in Section 5.4 and further strategic growth at Great Dunmow should help to secure a new secondary school at Takeley, which is a central component of the wider strategy for the A120 / B1256 corridor. In wider respects there is a good degree of support for the proposed strategy, including with its focus on rail connectivity, strategic growth at Takeley and growth at Saffron Walden that should be able to deliver new road links to help relieve traffic in the town centre.

Development management policy

- 9.12.2 Numerous policies have broadly positive implications for transport objectives. For example, the Core Policy on **Active Travel – Walking and Cycling**, which sets out that developers will be expected to:

“enable and contribute towards improvements and delivery of local and strategic active travel routes and links as identified in the Area Strategies and associated [Infrastructure Delivery Plan, IDP] and [Local Cycling and Walking Implementation Plan, LCWIP].”

- 9.12.3 The Core Policy on **Providing for Sustainable Transport and Connectivity** is also highly relevant. Amongst other things, the policy sets out that:

“The Council will support measures identified in the Essex Local Transport Plan and the area travel plans and work with Essex County Council to ensure that transport improvements contribute positively to...”

“Sustainable modes of transport should be prioritised in new developments to promote accessibility and integration with the wider community and existing networks. Priority should be given to cycle and pedestrian movements and access to public transport.”

- 9.12.4 It is also possible to highlight policies for the **rural area** as potentially leading to a degree of tension with transport-related objectives. However, the key point to note is that the spatial strategy seeks to balance, on the one hand, a need to support a degree of new development in the rural area in support of rural communities and the rural economy; and, on the other hand, a need to limit the dispersal of growth to rural areas from a transport perspective (albeit recognising the national switchover to electric vehicles).

Conclusion

- 9.12.5 In conclusion, as per the discussion above under 'Landscape', whilst the appraisal in Section 6 flagged a significant concern in respect of the proposed growth strategy, after having taken account of development management policies and emerging site-specific policy is appropriate to predict a **broadly neutral effect** on the baseline. There will be a need for further detailed work in collaboration with key partner organisations including National Highways and the County Council. The current Draft Local Plan seeks to avoid the pitfalls experienced with the previous withdrawn local plan, by avoiding an over reliance on costly and uncertain major new/upgraded transport infrastructure, but there are nonetheless a range of transport-related assumptions that will require further detailed scrutiny.

9.13 Water

Growth strategy

- 9.13.1 The appraisal in Section finds **Scenario 3** to perform on a par with most of the alternatives appraised. However, there is a need for further work to confirm that there are no issues in respect of wastewater treatment capacity and the capacity of the River Chelmer to receive treated wastewater at Great Dunmow.

Development management policy

- 9.13.2 The Core Policy on **Water Supply and Protection of Water Resources** presents policy under several headings, but of particular note is the following requirement on water efficiency:

“All development proposals should demonstrate how they incorporate water efficiency measures to minimise consumption of water; protect and enhance water quality; and protect water resources. All new residential development that achieves at least the water efficiency of 110 litres per person per day described in the Building Regulations G2 will be supported. A standard of no more than 90l/p/d must be achieved in the sensitive chalk stream catchments.”

- 9.13.3 The policy requirement will require further scrutiny, both from a viability perspective (including given the extent of chalk stream catchments in the District) and from a perspective ensuring effective spatial targeting, recognising that water resource zones will not always correspond with water catchments.
- 9.13.4 By way of context, water use in the Uttlesford area is relatively high at around 161.27 litres per person per day (l/p/d) for existing customers, compared to a national average of 147 l/p/d and 121.92 and 126.19 in the East and Southeast Affinity Regions with higher levels of metering. The Building Regulations offer a standard beyond the mandatory 125l/p/day or 110l/p/d where there is local stress.

Conclusion

- 9.13.5 In conclusion, broadly **neutral effects** are predicted, in light of the Water Cycle Study (2023) and given stringent proposed DM policy, including in respect of water efficiency. However, there will be a need for ongoing consideration of wastewater treatment capacity, water quality, water resources and the water environment, including in discussion with the Environment Agency and Affinity Water, and recognising sensitivities around chalk streams (also noting ongoing work for the Greater Cambridge Local Plan).

9.14 Conclusions

- 9.14.1 The Draft Plan appraisal presented above seeks to build upon the appraisal of Growth Scenario 3 presented in Section 6. After having accounted for the proposed growth strategy alongside development management policy (including site-specific policy), and after having accounted for established sustainability objectives (see Section 3), the appraisal predicts **moderate or uncertain positive effects** under four topic headings (Accessibility, Biodiversity, Economy/employment and Homes), but flags **moderate or uncertain negative effects** under two headings (Historic environment and Land/soils). Loss of high quality agricultural land is likely to be largely unavoidable, but Historic England will wish to comment further on the merits of the Local Plan in terms of impacts to the historic environment.
- 9.14.2 Under the remaining topic headings the appraisal concludes **broadly neutral effects**. This includes some key topic headings in terms of which there are some important detailed considerations, including Climate change mitigation (the proposed DM policy framework is very strong), Landscape (one matter for ongoing consideration is the A120/B1256 corridor including the CPZ designation) and Transport (there will be a need to revisit traffic modelling and options for supporting modal shift at Great Dunmow).
- 9.14.3 With regards to predicted negative effects and the other tensions with sustainability objectives ‘flagged’ through the appraisal, it is important to note that an inherent uncertainty relates to the baseline situation. Specifically, the baseline could well involve a situation whereby the District sees further piecemeal growth leading to wide-ranging issues/impacts, including due to sub-optimal planning for strategic infrastructure.
- 9.14.4 Also, it should be noted that some of the negative effects and tensions with sustainability objectives may be somewhat unavoidable. Section 6 of this report considers reasonable alternative growth scenarios and, whilst non-preferred scenarios warrant ongoing consideration, they all have drawbacks.
- 9.14.5 Regardless, issues and tensions with sustainability objectives identified through the appraisal should be taken into account as part of the process of updating the plan (and reasonable alternatives) subsequent to the current consultation, alongside consultation responses received and other new/updated evidence.
- 9.14.6 There is every likelihood of being able to predict more strongly positive effects at the next stage of plan-making (Regulation 19), at which time there will be the potential to draw upon consultation responses and the outcomes of further detailed work, e.g. in terms of site specific policy and whole plan viability.

- 9.14.7 The appraisal also makes a number of specific recommendations, which should be considered. However, it is recognised that the recommendations are made ‘in silos’, whilst the Council must reach decisions on balance and from a perspective of ensuring whole plan viability. It is easy for the SA to recommend more stringent policy with a view to improving the performance of the plan in respect of any given sustainability objective, but the implication could be a need for a less stringent policy elsewhere in the plan.

Cumulative effects

- 9.14.8 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to ‘cumulative effects’, i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and ‘larger than local’ effects. The following bullet points cover some key considerations:

- **Housing needs** – progressing the Uttlesford Local Plan and providing for local housing needs (LHN) in full is strongly supported from a ‘larger-than-local’ perspective. It is not impossible that one or more neighbouring local authorities in the sub-region will struggle to provide for their own LHN in full.

Following on from this, meeting **Gypsy and Traveller accommodation needs** is often a larger-than-local consideration. At the current time the results of an Essex-wide accommodation needs assessment are awaited, and providing for needs could well be a key issue for the next stage of plan-making.

- **The economy** – the proposed strategy of providing for employment land needs in full is also strongly supported from a ‘larger-than-local’ perspective. The need to deliver employment land, including for logistics, along the M11 corridor and in the vicinity of Stansted is clearly of at least regional importance. Also, there is a need to support national objectives around economic growth at Cambridge, which leads to a focus on Great Chesterford (the plan does not propose any new supply) and Chesterford Research Park (the plan proposes to allocate land to enable the park to expand to the full extent of its masterplan).

- **Transport corridors** – there is need for ongoing consideration of capacity issues at M11 J8, and there is also a need to work with neighbouring local authorities – including East Herts (Bishops Stortford), Braintree and Chelmsford – in respect of capacity along the A120. Another key consideration is capacity on the train line to Cambridge, e.g. taking into account committed strategic growth to the north of Harlow.

It is recognised that National Highways and Essex County Council are key partner organisations, including in respect of the **A120 corridor**. The previous withdrawn local plan included ambitious proposals for rapid transit, and the current Draft Plan does not hinder future reconsideration of options.

- **Stansted Airport** – is a key national asset. The local plan is supportive of employment growth in the vicinity of the airport and has a strong focus on avoiding conflicts with the airport’s operation.
- **Internationally and nationally important biodiversity sites** – it appears that the key consideration is recreational pressure on nationally designated Hatfield Forest from Uttlesford and East Herts. There are also well known issues associated with recreational pressure on the Essex Estuaries and air pollution from traffic through Epping Forest, with these designated sites being of international importance. However, Uttlesford District is peripheral to the zones of influence in both instances.
- **Landscape scale nature recovery** –larger-than-local considerations primarily relate to river corridors, including the River Cam in the north of the District and the River Chelmer in the south. However, other strategic considerations are set out in the Green and Blue Infrastructure Strategy (2023), and further spatial guidance will be set out in the forthcoming Essex Local Nature Recovery Strategy ([LNRS](#)).
- **Agricultural land** – self-sufficiency of food production is increasingly a key national consideration. The Local Plan will result in a significant loss of high quality agricultural land; however, in the absence of a Local Plan there is no reason to assume that development pressure locally would be any less.
- **Green Belt** – the Draft Local Plan does not propose any Green Belt release, hence there are no concerns in respect of impacts to the integrity of the London Metropolitan Green Belt. Not all of the District’s Green Belt will contribute strongly to the purposes of the Green Belt, but one key area is clearly the landscape / Green Belt gap between Bishops Stortford and Stansted Mountfitchet.
- **Net zero** – the question of setting stringent policy for ‘net zero operational carbon development’ (including via application of the ‘energy based approach’), is a very live topic of discussion nationally at the current time, hence this is a larger-than-local consideration. The same can be said for bringing forward development in line with a design code.
- **Water** – this is a key larger-than-local issue, including recognising that the Greater Cambridge Local Plan is paused whilst work is undertaken in respect of water resources and the water environment.

Part 3: What are the next steps?

10 Plan finalisation

Publication of the Proposed Submission Local Plan

- 10.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the Local Plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.
- 10.1.2 The SA Report will be published alongside the Proposed Submission Local Plan. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

- 10.1.3 Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.1.4 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.1.5 Once found to be 'sound' the Local Plan will be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 Within the SA Report (N.B. this is not the SA Report, but rather an "Interim" SA Report), the requirement is to present "measures envisaged concerning monitoring".
- 11.1.2 A draft monitoring framework is presented within the current Draft Local Plan, covering a wider range of issues including many of the issues that are a focus of the appraisal presented in Section 9 of this report.
- 11.1.3 Amongst other things, it is noted that a range of detailed performance measures are proposed in respect of net zero carbon development, which is strongly supported, recognising the need to monitor progress against the District's 2030 net zero target.
- 11.1.4 There will be the potential to bolster the monitoring framework prior to plan finalisation, for example:
- Agricultural land - there is currently no proposed indicator / performance measure, which could warrant further consideration in discussion with Natural England.
 - Historic environment - the current proposal is only to monitor the number of assets at risk, hence Historic England may wish to propose additional performance measures through the current consultation.
 - Water - the three performance measures proposed in respect of water resources and the water environment could warrant further consideration in collaboration with the Environment Agency.
 - Community infrastructure - there is currently only one performance measure under the 'community / social' heading, namely: *"Delivery of infrastructure alongside allocated sites in each area strategy."*
- 11.1.5 However, it is recognised that there is also a need for pragmatic consideration of what can be monitored in practice, given available resources.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

N.B. this is not the SA Report, but nonetheless aims to present the information required of the SA Report.

Table A: Questions answered by this Interim SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C: ‘Checklist’ of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 (‘What’s the plan seeking to achieve’) presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an ‘SA framework’, which is presented within Section 3 in an adjusted form.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an ‘SA framework’, which is presented within Section 3. Also, see Appendices II and III. <i>With regards to explaining “how... considerations have been taken into account”, Section 7 explains ‘reasons for supporting the preferred approach’, i.e. how/why the preferred approach is justified in-light of alternatives appraisal.</i>
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with ‘reasons for selecting the alternatives dealt with’, with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim SA Report is published alongside the Draft Plan in order to inform consultation and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when finalising the plan for publication (as discussed in Section 10).