

GREAT DUNMOW TOWN COUNCIL



22nd June 2021

Dear Mr Allwood

Re: UTT/21/1708/OP – 1200 Homes at Land East of Highwood Quarry

Summary

The Town Council strongly objects to the proposals. The location of the site is unsustainable, and it has unacceptable access arrangements.

The new homes would be heavily reliant on car travel and road congestion is unlikely to have a viable solution. This would impact on the general public on a daily basis, compromising access to the town, surrounding villages and the strategic road network. Detailed comments will be covered in our Transport Report (to follow).

The development would form a poorly connected urban extension of the town into open countryside, with loss of high grade agricultural land and creating urban sprawl. There would be unsustainable harm to the character and setting of the historic market town and neighbouring village, contrary to a range of UDC and Neighbourhood Plan policies.

The development would fill the important gap between Great Dunmow and Little Easton, effectively making the two settlements coalesce. Landscape harm would be significant and wildlife corridors effectively destroyed, as described in our Landscape Report (attached).

A development of this size is not capable of delivering homes within a 5-year period therefore it would make no contribution to the 5-year housing land supply.

Supporting documents and request for extension of time to comment

Our detailed landscape and transport objections should be read in conjunction with the attached Landscape Report (March 2021) by Sophie O'Hara Smith and a Transport Report by Lawrence Walker Ltd (to follow).

We respectfully request additional time to submit our Transport Consultant's Report on the Transport Assessment.

Policies and the 5-year housing land supply

The proposal conflicts with ULP Policies S7 – The Countryside, ENV5 - Protection of Agricultural Land, ENV7 The Protection of the Natural Environment - Designated Sites, Policy ENV8 – Other Landscape Elements of Importance for Nature Conservation and GEN1 – Access and potentially Policy ENV10 - Noise Sensitive Development and Disturbance from Aircraft.

Furthermore, it is contrary to the Neighbourhood Plan (GDNP) Policies DS1: Town Development Area, NE1: Identified Woodland Sites, NE2: Wildlife Corridors and LSC1: Landscape, Setting and Character.

This is an unsustainable site; details of the site's planning history are summarised in section 6 of our Landscape Report, produced by Sophie O'Hara Smith, where the site was previously ruled by the Secretary of State to be unsustainable.

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There is no evidence that the site for 1200 homes is capable of delivering housing within a 5-year period, therefore, the application would not contribute to Uttlesford's 5-year housing land supply.

There is, however, evidence of anticipated delivery rates for schemes over 1,000 homes. Lichfields have prepared a report, 'Start to Finish', which sets out the factors affecting build-out rates of large-scale housing sites. This is a recent insight, published in February 2020, and its purpose is to inform the production of realistic housing trajectories for plan making and decision taking. The research paper produces empirical evidence that facilitates a better understanding of housing delivery and Local Authorities' five-year housing land supply positions.

The Lichfields Report gives the average planning approval period for larger sites (1000-1499 dwellings) as 4.6 years and the average planning to delivery period is 2.3 years; this is therefore a total of 6.9 years from the validation of first application to completion of the first dwelling.

Comparable evidence of slow housing delivery in Great Dunmow includes the adjacent 2013 application for Land West of Woodside Way for 790 homes, which has only just started on site. Woodlands Park is another example, where the development has so far taken over 20 years to be built out.

Given the site's poor connectivity, constraints of an adjacent working quarry and a backdrop of over-supply of housing sites in the immediate vicinity, housing delivery is likely to be challenging. To the west of Gt Dunmow, there is permitted development for an additional 2,000 homes at Woodlands Park Sectors 3 and 4, Land West of Woodside Way and Land South of Stortford Road.

Strategic issues

There is a fundamental argument against this proposal being put forward as both an acceptable urban extension and/or the first phase of a Garden Community and this does not seem to be adequately addressed in the outline application.

This area of land cannot function as both a well-connected urban extension for Great Dunmow and the open space and strategic gap between settlements that is required to go with a Garden Community.

The planning application can only deal with current proposals where it fails to meet policy requirements but, as the Planning Statement at 7.10 warns:

"choosing to grant planning permission now for the Landsec planning application to help meet the immediate 5 year housing supply shortfall could be seen as allowing development of a site that may well be a preferred housing allocation within the new Local Plan."

The Town Council strongly objects to the planning application for 1200 homes and has previously strongly objected to the Easton Park proposal for 10,000 homes in the withdrawn Local Plan.

Coalescence

The Town Council objects to the proposal, which would effectively join Great Dunmow and Little Easton, as described in our Landscape Report at para 9.11,

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‘The scale of the proposed built development at some 925m by 750m almost completely fills the strategic gap between the settlements of Gt Dunmow and Little Easton leaving a strip of only one field between the new residential area and Little Easton Conservation Area and listed buildings on Park Road as “retained open landscape character”. It would be effectively contiguous with Great Dunmow to the south, continuing on from approved (Barratts) development south of the brook and north of the B1256 and west of the town.’

The impact on the character and setting of Gt Dunmow does not meet the 2016 Great Dunmow Neighbourhood Plan’s (GDNP) Town Development Area (TDA) Objective, which states:

‘This Neighbourhood Plan will support the housing market in Great Dunmow to cater for local demand, while protecting the distinct rural identity of the parish. The identity and character of Great Dunmow is heavily influenced by its setting, and this is to be retained as a priority. The requirements of a growing population must be met, but the price of this need not be the destruction of the local rural and historic character. Great Dunmow should be contained to prevent urban sprawl encroaching on the surrounding countryside, and to prevent amalgamation with the neighbouring settlement of Little Easton or any other settlement’.

Landscape and views

Our Landscape Report at 7.7 comments on ‘the loss of the countryside setting to the west of Great Dunmow,’ which the Neighbourhood Plan seeks to prevent in the GDNP Policy DS1: Town Development Area ‘Protecting the rural setting of Great Dunmow’.

Clearly, this would also be contrary to policy LSC1: Landscape, Setting and Character, albeit this proposal is largely outside the GDNP boundary, as it would harm the approach to the Town and the character and setting of the town ‘as a whole.’

Significant adverse visual impact on the long views and existing Public Rights of Way are described in section 8 of our Landscape Report, with a list of 14 locations, with photographs in the Appendices.

At 9.9 the Report describes ‘potential for a significant adverse impact on the Broxted Farmland Plateau and wider Central Essex Farmland Landscape Character Areas with the scale of the development and the change of use from rural to urban covering such an extensive area’.

The Secretary of State ruled on this specific site on appeal in 2016, commenting on the ‘harmful effect on the landscape as a result of the loss of open fields and the impact on views. He further agrees with the Inspector that the proposals are contrary to LP policy S7, for the reasons set out at IR15.44’

The countryside gap is significant as an open landscape not only for its intrinsic countryside and wildlife value but as the setting for both historic communities.

Woodland and wildlife corridors

We strongly disagree with the Planning Statement at 7.9 that this site ‘completes the

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“rounding-off” of the Great Dunmow settlement to the west by expanding the development already permitted at the West of Woodside Way site.’

The ancient woodland SSSI and Local Wildlife Sites are highly sensitive for biodiversity and the development at Land West of Woodside Way has been carefully mitigated. These efforts would be undone by this proposal, as described in 7.9 and 7.10 of our report,

‘There is the potential for a significant adverse impact on the Wildlife Corridor as identified within the Great Dunmow Neighbourhood Plan Policy NE2 and its potential for future enhancement. The position of the proposed development mirrors that of the approved housing scheme south of the brook.’

‘This would leave only a narrow corridor with development and potential recreational and access pressure from north and south especially with the direct desire-lines to services and facilities in Great Dunmow from the proposed development. The access road also runs adjacent to High Wood further severing the corridor.’

Key features of the north-west approach to Great Dunmow, described in the GDNP para 62, would be lost:

‘the importance of Hoglands Wood, Broomhills and Frederick’s Spring in biodiversity and landscape terms; the views to the undulating landscapes north east; the importance of trees in the landscape; the footpath network linking the town to the Eastons.’

Landscape and biodiversity harm far outweighs the benefits of this proposal.

Historic environment

The harm to the setting and views from the Little Easton Conservation Area and other heritage assets, including Stone Hall in Little Canfield Parish, conflicts with ULP ENV2 - Development affecting Listed Buildings. The harm is described in our Landscape Report paragraphs 9.3 and 9.6.

Transport and access

The proposed single point of access at the remote A120/B1256 interchange and the unsustainable location of the development, being over 1.4km from the centre of town it is beyond normal walking expectations and makes the use of the private car essential. The introduction of public transport would be economically unviable and traffic congestion is unlikely to find a viable solution from this proposal.

Our Transport Report will comment in detail on the Transport Assessment documents and the potential effect on the local road network.

Other constraints

Residential use is considered to be sensitive receptor to the adjacent ongoing minerals extraction, which will constrain housing delivery.

Stansted Airport, a short distance to the west, has consent to almost double in capacity from 2018 levels, to a capacity similar to Gatwick Airport. It is unclear how the development will mitigate potential noise disturbance from ground operations and overflying.

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Design Code

The planning application description itself gives rise to concern, in stating that 'All development, works and operations to be in accordance with the Development Parameters Schedule and Plans'.

Adherence to the Design Code is not specifically mentioned in the description and detailed collaborative work would be required between the developer, the planning authority and parish councils prior to any such commitment. This matter cannot be an afterthought because it would be bound into the grant of any planning permission via S106 agreement.

The Design Code is unclear on the applicants' intentions as to status of the document, other than reference to conditions, for example, on page 4 it refers to 'broad guidelines'. It is important that details are scrutinised as its purpose is to ensure that the climate change objectives underpinning the EIA are delivered.

There is concern that there is an expectation is that the Design Code will be 'adapted and adjusted' therefore UDC cannot rely upon it. The document also refers to the NPPF regarding 'unnecessary prescription or detail' and this perception should be explored.

Conclusion

The Town Council's strongly objects to the application as an urban extension to the town or as a stand-alone settlement due to its unsustainable location and the immense harm it would inflict on the town and surrounding communities.

The Town Council has commissioned consultant reports on Landscape and Transport matters, to evidence the scale of harm to Great Dunmow and our concern over impacts on the wider community in Uttlesford.

Yours faithfully

Jackie Deane

Deputy Town Clerk
On Behalf of Great Dunmow Town Council