

Comments, David Hall - PPWG 23 May, 2018

Great Chesterford Parish Council ("GCPC") challenged UDC's Regulation 18 Local Plan proposals because of incomplete or inadequate evidence relating in particular to transport, archaeology and heritage, and overall lack of deliverability.

GCPC, whilst reserving its position regarding any eventual inclusion of NUGC, has provided UDC with no less than 27 additions to the proposed Policy SP7 as constituting the minimum red lines necessary to protect Great Chesterford in the event NUGC proceeds.

As regards Agenda Item 3, today's comments are limited to GCPC's principal objections. Taking these in turn, the Agenda Item inadequately sets out the attached evidence base, and all PPWG members should carefully study the Appendices in order to understand the full impact for Great Chesterford of what is proposed. So

TRANSPORT

Paragraph 34: refers only to the desired modal shift and the "ambitions for a step change to non-car mode". But look at Appendix 4, attached to the papers at page 131, paragraph 6.6.6 - "Achieving the mode share targets above will...require new development to deliver a step change in the use of sustainable modes". Regarding the A120 at paragraph 6.7.11, page 135, there are "current unknowns regarding deliverable modal shift", and exactly the same concerns apply to all the Garden Community sites. For the measures required to achieve the potential modal shift, look at page 244, which in relation to Great Chesterford, refers to the requirement to make the rail station "more accessible" by means of "improved routes", which inevitably means rat runs for pedestrians, cyclists and private vehicles through the centre of the Conservation area of the Village in order to reach what WYG refers to as Great Chesterford's "transport hub". The UDC proposal (Agenda Item 3, paragraph 79) that "improved access" to the rail station must be provided merely confirms that the already narrow and cluttered roads

within Great Chesterford are to be turned over to become rat runs in order to achieve UDC's requirement; how does this then square with the action point PP15 at paragraph 112 of Agenda Item 3?

Paragraph 41: the claim in the Agenda Item that "Great Chesterford has good access to walking and cycling facilities and is close to a rail station" ignores the fact that UDC's own consultants identify the need (bundle, page 1071) to "extend Park and Ride services [within NUGC] towards walking/cycling distance of Great Chesterford", emphasising at the same time that links to the station (at which identified constraints exist) will be particularly important (bundle, pages 1060 and 1069). Faith in the Consultants is in any event shaken by the assertion (bundle, page 1069) that "there is an existing cycle route south to Saffron Walden along the B184" - there is no such thing unless this refers to the road itself beyond Little Chesterford.

Paragraph 47: again, as regards access to the strategic and local network, Troy is completely wrong to claim that "it is not thought there are any major access constraints" associated with NUGC (bundle, page 1048). GCPC's redlines reflect the absolute priority to avoid the very rat-runs advocated by WSG and Troy needed in order to achieve UDC's desired "modal shift". Further, by insisting, as per Grosvenor's recently disclosed proposals, that the primary first highways access is to be at the Park Road/B184 junction, and the discovery that capacity enhancements at Stump Cross (as yet not agreed with the highways authorities, let alone funded) have to precede establishment of what is to be the principal access to NUGC at Field Farm, and that access North to the proposed Cambridge Park and Ride on the A1307 (bundle, page 1071) is but a yet-to-be-agreed, unfunded, gleam in the eye, then it is obvious that there are indeed major access constraints which are wholly unresolved.

ARCHAEOLOGY

Paragraph 51; as to details of the "number of areas of potential harm" at the NUGC site, see pages 448 onwards, in particular pages 465-466.

Paragraph 7.5.11 (page 466) opens: "It is considered that development on the site would cause harm to the heritage assets"; the suggested HIA at any stage, therefore, cannot possibly mitigate against these serious adverse impacts, and it is wholly unrealistic to suppose that it could.

HERITAGE ASSETS

Paragraphs 59, 61-62: The same comment applies. Please take account of the full implications of paragraph 3.18, Appendix 6 (bundle, page 415) about this "highly sensitive landscape". How can it be, the Roman Temple and the surrounding area having lain undisturbed for centuries, that UDC can sensibly imagine that any work on the proposed Development Plan Documents can possibly ameliorate the irreversible damage to the site that will be caused?

In conclusion, for these reasons alone the NUGC site is unsustainable, and should be omitted from any future Local Plan that UDC proposes.