Little Chesterford Parish Council would like comment on the 2018 Regulation 19 Local Plan as follows:

1. **The level of housing need for the district has not been objectively established:**
	1. Inconsistent figures: Different housing need figures are given in the Regulation 19 Document Section 3.66 (14,000) and the Infrastructure Delivery Plan Document (June 2018) Section 2.2.1 (14,773)
	2. The West Essex and East Hertfordshire Assessment of Employment Needs (Oct 2017), calculated a moderated baseline employment need pf 7,200. This was increased by 6,750 (93%) based on a 2015 estimate of project growth at Stansted Airport. This truly exceptional increase is based on an atypical period of growth and is unsubstantiated.
2. **There is strong evidence that the North Uttlesford Garden Community Site should not have been selected for development:**
	1. A primary reason for site selection was stated to be that it meets employment needs in the Research and Development/Biotech sector , however:
		* The West Essex and East Hertfordshire Assessment of Employment Needs assessment Fig 2.8 shows negligible employment growth in the Research and Development/Biotech sector in either the 2014 or 2016 forecasts.
		* Policy SP7 states that the NUGC will deliver employment opportunities linked to the Welcome Trust Campus and Chesterford Research Park , however
			+ Section 5.42 of the Regulation 19 Local plan states that Chesterford Park is growing at a slower rate than anticipated,
			+ As documented in the minutes of the Duty to Co-operate meeting with South Cambridgeshire District Council in August 2017, the Welcome Trust will submit plans for expansion in 2018. This plan will include 1,500 dwellings for those employed there.
		* There is therefore no significant substantiated local employment needs in Biotech/R&D.
3. As stated in Section 3.97 of Reg 19, the site is of high landscape and visual sensitivity. Expert reports support this (Chris Blandford Associates 2017, Hankinson Duckett Associates, New Settlement Proposals: Landscape and visual impact (Uttlesford District Council, May 2017), However, Sections 1316 of SP7 do not provide adequate mitigation for the proposed development
	1. As per the Landscape Impact Assessment prepared by Chris Blandford Associates (June 2017), Section 3.3.5, High sensitivity of the site means that the landscape is very sensitive to this type/scale of development due to the potential for very adverse impacts on , amongst other things, the strength of character/condition of the landscape; landscape of high intervisibility, and tranquil area.
	2. Section 13 and 16 of |SP7 states that “careful consideration will be afforded to the improvement and restoration of degraded landscape features and new woodland/tree/belt and structural planting within and around the site” However, Section of Settlement Proposals: Landscape and visual impact (Uttlesford District Council, May 2017)states that “ extensive screen planting belts, and blocks of new planting would to some extent reduce the visual impact of the proposed development, such planting would in itself have a significant and detrimental affect the historic pattern and character of the existing landscape.”
4. SP7 Regulation Historic Environment proposals do not mitigate the impact on the Historic Environment as documented in
	1. Historic England’s comments on the Regulation 18 Local Plan. *“.. A site allocation in this location would result in severe harm to the character and historic significance of the area and would irreversibly impact upon the setting of nearby heritage assets. It I”s unlikely that this can be satisfactorily mitigated given the scale, extent and position of the allocation.*
	2. Heritage Impact Assessment Donald Insall Associates (\May 2018) . The impact of proposed development on the site will cause harm to the overall significance of heritage assets and non-designated heritage assets on the site and to the wider character of the area. Furthermore, the scale of the proposed garden community will be greater than surrounding historic settlements. The proposed location of the development is a change to the historic pattern of development which are concentrated in the river valley
	3. The National Planning Policy Framework (NPPF) which states that “*when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm or loss of a grade II listed building, park or garden should be exceptional’ (paragraph 132).”* And ” *where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss” (paragraph 133*).
	4. Heritage Impact Assessment Donald Insall Associates (May 2018) states that “the site and surrounding area contains evidence of human occupation from the Palaeolithic period onwards and that the archaeological potential of the site is assessed as “High” for bronze Age, Iron Age, Roman , Saxon and Medieval periods remains. However Landscape Assessment Landscape (prepared by Chris Blandford Associates) states that “the complex topography.. would require substantial cut and fill works” destroying these remains forever.
5. **Development on the NUGV Site is not economically viable**
	1. The Uttlesford Economic Viability Study (Troy Planning and Three Dragons, June 2018) models viability for different types of developments including garden communities. In section 2.24 it states that £83,000 per dwelling is an appropriate infrastructure cost for garden community dwellings given the increased infrastructure requirements, but the viability calculations in section 5.2 use a cost of £40,000 per dwelling, the same as smaller developments , thus rendering the conclusion that the site is viable completely invalid.
	2. The Infrastructure Delivery Plan (Troy Planning and Design, June 2018) Table 4 lists al the infrastructure (transport, schools, health, community facilities etc) thought to be required for delivery. However, many costs are unknown. There is no evidence to validate the infrastructure costs used.
6. **Development on the NUGV Site is not deliverable**
	1. The Uttlesford District Council Infrastructure Delivery Plan Annex: Schedules Garden Communities and Settlements contains a very long list of infrastructure required for the NUGV. However the funding and responsibilities for a large number of items are “unknown at this time”, including substantial costs for critical improvements to Junction 9 of the M11., and junctions in Saffron Walden. With this level of uncertainty and risk in the plan, it must be considered undeliverable.
	2. The Infrastructure Delivery Plan (Troy Planning and Design, June 2018) Table 2 shows the phased delivery of the three garden community sites. NUGV is scheduled to start delivery in 2022,/3, but West of Braintree (WOB) is not scheduled until 25/6. WOB has a far more detailed development plan than NUGV, so it is unclear how NUGV could be ready to deliver prior to WOB
7. **Proposed expansion of development limits at Chesterford Research Park is unsupported**
	1. The development limits at Chesterford Research Park (Policy LtChe1) have doubled the floor space and area available for development over and above the current masterplan, and are twice the increase proposed in the rejected 2015 Local Plan. However, Section 5.42 of the Regulation 19 Local plan states that “*development is progressing at a slower rate than originally anticipated. Current estimates are that completion will taken 12-15 years”*. There are no other details available to support increased growth, but the West Essex and East Hertfordshire Assessment of Employment Needs assessment Fig 2.8 shows negligible employment growth in the Research and Development/Biotech sector in either the 2014 or 2016 forecasts.
8. **The plan has not been positively prepared, as there is a conflict of interest regarding Chesterford Research Park.**
	1. We have been unable to find any reference in the Regulation 19 Local Plan to the ownership of 50% of Chesterford Research Park through Aspire, which they wholly own.
	2. There a conflict of interest between UDC as investors and plan creators.
9. **UDC have failed in their duty to co-operate with South Cambridgeshire**
	1. The last minuted meeting between UDC and South Cambridgeshire available in the evidence base was held on 22nd August 2017.
	2. At this meeting South Cambridgeshire expressed significant concerns regarding several issues, including transport infrastructure requirements relating to NUGV.
	3. An agreement was made to hold further meetings and to minute all meetings publically, including those held by officers.
	4. No further minutes are available.