# Little Chesterford Parish Council Response to Regulation 18 Local Plan September 2017

**Little Chesterford Parish Council strongly object to the 2017 Uttlesford Local Plan:**

* **The need for the stated housing numbers is based on unsound assumptions.**
* **We urge UDC to include preserving separation of settlements in the spatial vision and policies to maintain and protect their distinctive character.**
* **Policies that apply to housing development in Little Chesterford are unclear.**
* **The spatial vision of focusing development in new “garden communities” is unsustainable, and compromises the environment which makes Uttlesford a desirable place to live.**
* **The selection of the NUGV as a site is not supported by evidence and goes against the UDC and national policies on protecting the historic environment and landscape. It does not follow garden community principles, as it will serve as a dormitory town for Cambridge and further afield.**
* **Delivery of the NUGV as outlined in the plan will bring services (eg education, health) and infrastructure (eg transport) that is already at capacity to crisis point. This will have far reaching detrimental effects on neighbouring villages and towns in both north Uttlesford and neighbouring areas such as South Cambridgeshire.**
* **Financial viability and deliverability of the plan for NUGV has not been adequately demonstrated. The probability of planning conditions being relaxed is high, resulting in profits being maximised whilst design and delivery of benefits such as affordable housing are slidelined as allowed by plan policy.**
* **The process of local plan creation is compromised, both by the conflict of interest between UDC as financial stakeholders in Chesterford Park, and by failure to demonstrate co-operation with South Cambridgeshire by addressing their significant concerns.**
* **Employment designation of the wider Chesterford Park site establishes a presumption for development outside of agreed development limits that is unwarranted in a rural location.**

**Substantiation of these objections is further described through our comments on the following policies in the Local Plan and accompanying evidence base:**

**The Spatial Vision**

1. **We do not support the spatial vison of focusing development in new “garden” communities as we believe that this will compromise the delivery of the overall vision for Uttlesford.**

The challenge of these three new communities successfully delivering the qualitative parts of the vision is significant. The delivery of “*well designed development*” with “*high quality employment, services and facilities*” and “*excellent accessibility*” where the “*necessary infrastructure and community facilities and services will be in place to support growth*” whilst “*ensuring that the distinctive character of the District’s towns and villages will be maintained and enhanced*” requires careful planning, preparation and management.

The policies and evidence outlined in the local plan submission do not give demonstrate that that this significant challenge will be met (see our further comments under the relevant policies). Moreover, examples of developments elsewhere in the UK that have successfully implemented garden city principles are rare. We therefore have no confidence that focusing development in this way will achieve the stated vision.

1. **We urge UDC to include separation of settlements in the vision and supporting policies**

We note that, unlike the 2014 draft local plan which stated “*settlements will continue to be separate entities with green space between them*”, no mention of separation of settlements is to be found in the vision or its accompanying policies. We believe that maintaining the separate and distinct nature of the different settlements is a key factor in creating “*places that have character and communities create and feel a ‘pride of place’*”. We strongly urge UDC to include this.

**Policy SP2 – the Spatial Strategy**

1. **The evidence supporting the selection of North Uttlesford for a new settlement is not compelling.**

UDCs advisors have deemed development of the site inappropriate on several grounds.

For example:

*Brief Heritage Impact Assessment – Great Chesterford Garden Village Conclusion* states that

 *“ I must advise however, that based on the information available at present, it is unlikely that the proposed scheme could be achieved without causing significant harm to the significance of the numerous heritage assets detailed above, most notably Park Farmhouse (Listed Building) and the Romano-Celtic Temple (Schedule Ancient Monument). The resulting impact of the development as proposed, upon the setting of the heritage assets would compromise their overall significance in my view*”

*Land at Great Chesterford Landscape & Visual Appraisal* states that:

“*Overall, this Appraisal concludes that the land at Great Chesterford is of high landscape and visual sensitivity, given its steeply sloping landform and elevated position; its open fields and its limited vegetation structure; and the potential for long distance cross-valley views into the Site. Furthermore, given the settlement pattern within the area of Great Chesterford (where settlements and road and rail infrastructure largely follow the valley floor/lower valley sides), development cutting across the upper valley sides and the ridgeline of the Site would be uncharacteristic of the local settlement pattern. As such, it is desirable to limit development on the upper valley sides and the ridgeline.* “

Additionally, the evidence presented in the plan is flawed. For example:

*Economic Viability Study for Local Plan New Settlement and Neighbourhood Proposals, Revised October 2016*

Appendix C of this report shows the assumptions on which the projections have been made. In contrast to the other developments, those listed costs for infrastructure for NUGV are frequently listed as “to be assessed” and do not list some of the costs detailed for other sites. Where costs are listed, they are not robust. For example: *A505 Newmarket Rd/A1301 (capacity) – roundabout junction improvements (PBA)* is listed as costing £1 million, but South Cambridgeshire’s Transport study lists the cost as £7.5-11 million pounds.

Both the unlisted costs and the underestimated costs together mean that the costs of this development have been seriously misrepresented.

1. **Limitation of development in Little Chesterford and Type B villages**

Clarification is required on permitted development in Little Chesterford and Type B villages. SP2 states that “*New development in the Type A and Type B villages will be limited*”, and Section 3.22 states that “*There will be no new allocations for housing development in Type B Villages in the Local Plan*”. Little Chesterford is not specifically listed in table 3.3 Type B villages, but is presumably included in “*Other villages and hamlets*”. Little Chesterford would welcome a limitation on the amount of development permitted within the village rather than reliance on SP10 – Protection of the Countryside to provide well considered, sustainable growth.

**Policy SP3: Scale and Distribution of Housing development**

1. **The scale of housing growth is based on flawed assumptions**

The housing numbers in the report take as their basis a period of rapid development at Stansted Airport that is atypical. The overall forecasts differ significantly from those used by adjoining districts. The projected growth rates do not take account of current economic forecasts. . Indeed, the GLA has recently forecast significantly lower housing growth projections than those used as the basis for the plan, and the market slow down already being experienced has not been included in the forecast.

1. **Focusing housing provision into three main sites is not sustainable and deliverable.**

Successfully managing the delivery of a single large site within a district would be challenging. Relying on just three large sites to provide nearly all of UDCs housing places an unacceptably level of risk on the likelihood of delivery.

1. **The distribution of housing need at northernmost boundary of the district is based on flawed assumptions**

Growth patterns in the South of the area should not be used for North Uttlesford housing needs where growth due to Stansted Airport do not apply.

**4. Housing provision at the NUGV will serve South Cambridgeshire not Uttlesford housing needs**

The promotor of the NUGV has made it clear that the target market for the development is those employed at South Cambridgeshire Science Sites, and the location of the site abutting the South Cambridgeshire facilitates this.

However, in their response to the Uttlesford Local Plan, South Cambridgeshire District Council raises serious concerns about the NUGV proposal as the most appropriate to meet this need , for example they state *“ [the proposal] could also prevent or reduce potential for consideration of whether there are better alternative housing-led options to support the growth of the life sciences cluster south of Cambridge”* and *“We are aware of potential employment-led proposals being worked up to the north of Uttlesford in South Cambridgeshire. If they come forward they will be relevant considerations for the Uttlesford Local Plan.”*

Whether it is required or not, targeting provision at this sector does not, of course serve Uttlesford housing needs.

**5. The plan does not appear to take account of planned development in neighbouring areas**

No account appears to have been taken of other planned housing development in the wider area when planning housing provision or accompanying infrastructure requirements. For example, Appendix C of *Economic Viability Study for Local Plan New Settlement and Neighbourhood Proposals, Revised October 2016,* does not mention any existing planned development in North Herts (Royston Area), South Cambs or West Suffolk (Haverhill area), all of which have potential impacts. Neither can any reference to these planned developments be found in any other supporting documentation.

**Policy SP4: Provision of employment**

1. **Employment for NUGV residents is primarily intended to be for South Cambridgeshire Science sites, rather than Uttlesford.** See previous comment.

**Policy SP5-Garden Community Principles**

1. **The principles are aspirational but not enforceable**

The principles as written are aspirational, but do not provide sufficient direction to determine whether a proposal adheres to the principles. Neither is this direction provided elsewhere in the local plan. We therefore have to conclude that these principles are practically meaningless.

1. **Currently available information, including Promoter’s presentations and site allocations do not give confidence that principles will be upheld**

Whilst we appreciate that the promoter’s presentations do not form part of the local plan, the information contained do not give confidence that the aspirations outlined in principles will be upheld. For example it is clear that very limited employment opportunities will exist within the NUGV and that private car journeys will be needed to commute, as well as to access many services until later phases of development.

**Policy SP7 – North Uttlesford Garden Community.**

1. **Delivery of development in stated timescales is unrealistic**

3.60 states that *“ housing delivery will commence in 2021/22*”, however adoption of the Plan is not projected to be until 2019, giving only 2 years to gain approval for a both a masterplan and specific planning application, plus preparatory works (eg archaeological surveys for this historically sensitive site) and building works. When compared with other developments this can be seen to be unrealistic.

For example Beaulieu Park in Chelmsford (3,600 units) was circa 20 years in the making. Following years of meetings and planning with the various service and utility providers, strategic highways engineers, local, district and county planners plus many more, an outline planning submission was finally made in September 2009, and only approved in March 2014. A reserved matters approval was granted for the first phase of 49 units at the end of June 2014, with the first sale completing in August 2015. This gives a timescale of 6 years from the award of outline planning permission to the completion of 1 unit.

Therefore if we assume for NUGV an allocation is given in mid-2019 a well-considered approval could be granted in summer 2023 with completions starting from about 1 year later (allowing for build and sale). When using an industry average of 5 private sales completions and 2 affordable houses per month this would provide the housing need with 42 houses complete by the start of 2025, contrary to the stated expectation of 2021/22.

1. **Conflict of interest with economic link between Chesterford Park and NUGV**

As UDC owns a 50% share in Chesterford Park and is responsible for approving and monitoring the development of the NUGV its impartiality is compromised.

1. **Access strategy outlined is unsupported and does not tally with assumptions in viability assessment, promoters plans and South Cambridgeshire transport plans**

For example, a link with the Cambridge Park and Ride stated in the policy is not included in the viability assessments or the written responses from the promoters to the UDC on this question. Funding for the A505 junction is stated to be from the developers but has not been agreed with South Cambridgeshire – as previous stated, they are underestimated by up £10 million.

As previously stated, the traffic assessments provided in the evidence planned do not take account of additional planned development in Cambridgeshire, West Suffolk and East Herts and are therefore flawed.

1. **Although provision of services (eg schools, doctors, shops) and infrastructure (eg transport, drainage) are outlined, no indication of phasing is given in the policy and so detrimental impact on existing residents must be assumed.**

Although there is a singular lack of information as to the phasing of development in the plan itself, promotor’s materials and normal practise indicate that delivery of services and infrastructure will be linked to ‘triggers’ of occupations before delivery – eg 700 occupations before a primary school is required, or 3,330 before A505 dualling is required.

There will therefore will be a significant amount of demand before the trigger points are reached – for example of traffic requiring road capacity and children requiring school places. As there is currently no local spare capacity in healthcare, education, transport or other local services and infrastructure, this can only lead to detrimental impacts for residents – longer waiting times to access doctors, longer journeys out of area to schools and so on.

For example, the nearest primary school to the development is the highly regarded Gt Chesterford School which is located in the centre of the village on a constrained site. It has approximately 200 spaces and a catchment area including Little Chesterford 1 mile away. Once occupation starts at a new development but before the trigger level those children will compete for spaces with Little Chesterford children and since capacity at the school cannot be increased, those children will need to go to school somewhere. Perhaps this will be at least 4 miles to the new primary school being built in Saffron Walden, necessitating twice daily journeys through the narrow medieval town streets which have AQM issues? Or will this school already be at capacity from children living closer to it? Similar scenarios can be foreseen for transport, doctors’ surgeries, hospital places and other services and infrastructure.

Another example of impact is on increased traffic passing through local villages to avoid traffic blackspots such as the A1301/A505 roundabout, which is already at capacity. This “rat running” is already an issue for local villages which have introduced traffic calming measures and 20mph limits (eg Gt Chesterford, Ickleton, Duxford). Little Chesterford is particularly concerned with the increased traffic that the development would generate through our small village and the safety issues associated with this. This is exacerbated as the single road that goes thorough the village is single track in many places, including where it passes over a weight limited, listed bridge. Historic (listed) buildings abut the roadside, there is a single footway for only part of the length and it has two sharp bends.

**Policy SP10 Protection of the Countryside/ Policy SP12 Sustainable Development Principles**

1. **NUGV is a greenfield agricultural site of over 1,100 acres – development of this site does not accord with the policies stated aims to protect this type of land** :

The policies state: “*The countryside will be protected for its intrinsic character and beauty, for its value as productive agricultural lands*”; ”*Minimising the amount of greenfield land that is developed*”; “*protect the best and most versatile agricultural land*”.

The NUGV site is over 1000 acres of Grade 2 agricultural land, the official description of which is “the best and most versatile”. Irreversible loss of this asset is contrary not only to this policy but also the National Planning Policy Framework and Core Planning principles.

**Policy C1 Protection of Landscape Character**

1. **The development of the NUGV is contrary to the policy as stated**

***“****Development will be permitted provided that*

* + *Cross valley views in the river valley are maintained with development on valley dsides respecting the historic settlement patter form and building materials of the locality.*
	+ *Panoramic views of the plateaux and uplands are maintained especially open views to historic buildings and landmarks such as churches*
	+ *No material harm is caused to the historic settlement pattern, especially scale and density”*

As per the previously quoted independent landscape and historic assessment, the NUGV would not meet these policies, being of high visual and landscape sensitivity.

The promotor indicative plans show that the valley bottoms will be required to allow for drainage infrastructure, this requiring built development to be on the tops and sides. This is contrary to the historic settlement pattern which is in valley bottoms and will be visible for many miles, causing irreparable damage to views within Uttlesford and neighbouring counties.

**Policy EN1 – Protecting the Historic Environment**

1. **The policy as written is ambiguous and does not provide sufficient protection to historic assets.**

The policy states *“Development will be supported where it protects and enhances the significance of any heritage asset and makes a positive contribution to the street scene or landscape”.* To make the UDC support for protection of our historic assets unambiguous, we suggest the addition of the word “only” ie *“Development will be supported* ***only*** *where it protects and enhances the significance of any heritage asset…”*

1. **The development of the NUGV would irreparably damage a highly sensitive historic environment contrary to this and national policy**

The historic environment of the NUGV is stated to be “*highly sensitive*” by the UDCs own assessors (in contrast with the other proposed development sites). It contains a Roman scheduled ancient monument, as well as significant other sites and archaeology from all historic periods, including a recently discovered significant Anglo-Saxon site.

The development would irreparably damage these important assets, notwithstanding the promotor’s assurances to include the Roman Temple in a “water park”. We cannot see how this would preserve the historic setting of this site, independent of the feasibility of construction of such a feature on a chalk upland site.

Development of this site is also contrary to the National Planning Policy Framework and Core Planning principles regarding the historic environment.

**Policy INF1- Infrastructure delivery & TA1- Accessible development**

1. **The development of the NUGV as currently proposed does not meet these policies**

The policies state: “*Development must take account of the needs of new and existing populations. It must be supported by the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from development. This is particularly important for the new garden communities*.”

“*The capacity of the access to the main road network and the capacity of the road network itself must be capable of accommodating the development safely and without causing congestion*”

However, the available plans for NUGV do not support this, for example:

* No firm transport or access plans – the only access to the site is via B184. To access the nearest services in the attractive historic market town of Saffron Walden, traffic will be funnelled down the narrow Bridge Street, affecting Air Quality Management Zones and adding to existing congestion.
* The only planned improvement is that to the A505/A1301 roundabout, which is already at capacity at peak periods and beyond. Plans for this improvement have not been agreed with South Cambridgeshire, where it is located, and the costs provided in the evidence are up to £10 million less than those estimated by South Cambridgeshire. Dualling of the A505 to remediate some of these problems is not planned until 2033 at the earliest.
* The traffic assessment in plan does not appear to be consistent with experience of congestion at this junction and does not take proper account of predicted growth from in neighbouring areas such as South Cambridgeshire, North Herts and West Suffolk. We suggest that a more comprehensive and up to date study is made.
* The railway station at Great Chesterford does not have potential to increase parking and peak services are at capacity.

**Policy M2 : Implementation and Monitoring of Major Projects**

1. **Implementation of this policy gives the greenlight for developers to get out of NUGV planning commitments**

 This is stated in the policy as follows:

“*Progress of housing delivery for the New Garden Communities will be measured against the housing trajectory. Where performance over a rolling three-year period falls more than 25% below the expected rate of completions, the Council and other stakeholders in development will seek to implement the following hierarchy of contingency measures:*

*Review the timetable for phasing and delivery in the Local Plan period;*

*Explore measures to secure additional funding or re-allocate funding to enable essential infrastructure provision;*

*Require additional marketing and expand the range of development partners;*

*Review the details of the allocation in terms of the type, scale and location of housing and the mix of other land uses.*

*Allow renegotiation of planning obligations and amendments to existing consent.*

*The Council will positively encourage measures to speed-up the determination of planning applications within such developments, including Planning Performance Agreements (where appropriate). The Council will respond positively to applications where these demonstrate that amendments to the proposals would be in the interests of sustainable development”*

This allows UDC and developers to accelerate building by compromising required benefits such as affordable housing and infrastructure, resulting in a flawed design that would be detrimental to all stakeholders.

**Chesterford Research Park – LtCHE1**

1. **Employment designations encompass all of the site rather than within development limits, creating a presumption of expansion**

 In a change previous versions of the local plan, the full site owned by the park rather than the area within the agreed development limits within the masterplan has been designated as an employment site. Whilst we appreciate that changes to the masterplan would require planning approval, designation of the reminder of the greenfield site as an employment site indicates a presumption for future expansion to which we strongly object.

1. **Conflict of interest between UDC as planning authority and owner of Chesterford park**

As UDC owns a 50% share in Chesterford Park and is responsible for approving and monitoring the development of Chesterford Park its impartiality is compromised..