**Little Chesterford Parish Council Comments: Regulation 19: Addendum of Focused Changes October 2018**

**1. Sustainability Appraisal**

Our comments on the *Sustainability Appraisal (SA) - October 2018 by Place Services* as one of the key documents of this focused addendum now seem to be redundant since it is to undergo a “fundamental update” following a report commissioned by the officers of UDC*: Independent Review of the Sustainability Appraisal – AECOM November 2018.* We welcome the fact that the officers at UDC have sought to identify the weaknesses in the SA by commissioning this report.

**We consider that the fundamental flaws in the SA evidenced by the AECOM report, especially with regard to Garden Communities, demonstrate that Local Plan has not been positively prepared and should therefore be rejected.**

We do not have confidence that the “fundamental update” that is being undertaken will address the essential finding of the report that the evidence base is not objective.

Section 4.5 states *“It is not clear why there is a need for 3 GCs [Garden Communities] in light of the alternatives. There are also concerns around the objectivity of the appraisal of these GC options, which relies heavily of what was being proposed by the promoters of the sites in 2016/2017”.*

There are also errors and inconsistencies identified in the way that the evidence has been presented, for example section 3.69 highlights that North Uttlesford is stated to have an overall positive effect on Landscape in the comparative assessment whist the individual assessment (correctly) shows that it has potential for a significant negative impact.

At the Planning Policy Working Group (PPWG) Meeting on 20th November 2018, UDC clarified that the “fundamental update” of the SA that is being undertaken would not look at new evidence, but would seek to address issues in the existing evidence used in the SA. Inconsistencies such as the one highlighted in Section 3.69 will be relatively easily corrected, but it is not clear as to how the more significant issue of reliance on promoters’ evidence will be corrected.

Indeed Historic England observed in their Regulation 19 response that “*the site assessment seems to be retrofitting the evidence to justify a decision that has already been made*”, with particular reference to the North Uttlesford Site. This would indicate that a significant change to the evidence is required to ensure that it is objective.

Another concern is that UDC believe that the probability of the update resulting a different decision is “low” (PPWG agenda 20th November 2018). This does not give us confidence that the revised SA will address the central issue of biased evidence.

UDCs own Statement of Community Engagement (section 5.7) and the Environmental Assessment of Plans and Programmes Regulations (2004) both state that the SA must be published and be subject to consultation at the same time as the full Local Plan. However, UDC have stated that they plan to only publish and take representations on the updated SA alone in Jan/Feb 2019, unless the decisions around key sites (ie Garden Communities) change. We regard this as contrary to both the letter and the spirit of these regulations as the SA is at the heart of decision making regarding the Local Plan – a fundamental update to the SA is a fundamental update to the Local Plan and cannot be taken in isolation.

**This period for representation on the SA has been inappropriate and the relevant evidence has not been made available**

It would appear that AECOMs initial assessment of the SA was made over the period June to August 2018 (as per recording of the Planning Policy and Working Group meeting 20th November 2018 ), and their full report was certainly available to UDC by 2nd October 2018, as evidenced by the revision notes on the AECOM final report.

This was prior to 16th October when representations on the Place Services Sustainability Appraisal (October 2018) were invited. Why did the period for representations go ahead when it was known that there were serious concerns? The AECOM report was only made available – and then only as an appendix to a PPWG meeting happening outside of the usual schedule - at the end of the representation period.

**2. Employment Evidence**

**The Employment Evidence also indicates that**

1. **The employment allocation for Chesterford Research Park (CRP) is unjustified**
2. **The selection of the NUGC site is not justified by employment at CRP, within the NUGC or in South Cambridgeshire**

In our previous response to Regulation 19, we have commented that there is no evidence to support the inclusion of the North Uttlesford Garden Community (NUGC) on the grounds it will provide housing for employment in the Biotech Sector, particularly at Chesterford Research Park (CRP) which is located in the Parish of Little Chesterford.

We would like to further bring to the inspector’s attention that this same conclusion has been drawn by the *Haristy Jones Associates Report – Ensuring Robust Employment Evidence for the Uttlesford Local Plan, Final report September 2018*

In summary, this says that

* The overall demand stated for employment in the local plan has been overinflated by an allocation for CRP
* The allocation for CRP is overinflated and well in excess of the requirements from both studies undertaken.
* There is no evident need for North Uttlesford (or any other GC) to provide B Use employment land.

[References: Section 2.3.7 , 2.3.12 2.3.17, 2.3.21]

Section 2.3.20 highlights that the drafting of future DPDs for NUGC does not specifically include B use class, and that this should be clarified. Again, the justification for NUGC employment in the Biotech sector is not evidenced.

Since the use of the CRP is limited to class B under Policy LtChe1, we cannot see any link between employment at the CRP and housing provision at NUGC. There is no evidence in the employment need that supports any such requirement.

We would like to again highlight that 50% of CRP is owed by Aspire, which is wholly owned by UDC. This continues to raise issues conflict of interest that arises when decisions affecting both the financial return on investment from growth at CRP and planning decisions are made by the same body and indeed the same individuals. It must be transparent as to how employment projections for CRP have been objectively derived. This is not evident from the information available.

Another rationale for selection of the NUGC has been stated as providing housing for employment at other Biotech sites in close proximity to NUGC. These are located in South Cambridgeshire, and these have housing provision included in the South Cambridgeshire Local Plan, which is has now been adopted (Sept 2018). Furthermore, the Wellcome Trust at Hinxton has consulted widely (most recently in October 2018) on a plan to build 1,500 residential units specifically tied to its workers. This site is immediately adjacent to its current campus and just over the boundary of the NUGC site, which is also the county boundary. There is therefore no evidenced need from the South Cambridgeshire Biotech sector for the NUGC.