

Widdington Parish Council

1) Omission of any reference to Protected Lanes

Currently the UDC 2005 policy ENV9 specially references Protected Lanes and offers strong protection.

Policy ENV9 – Historic Landscapes: Development proposals likely to harm significant local historic landscapes, historic parks and gardens and protected lanes as defined on the proposals map will not be permitted unless the need for the development outweighs the historic significance of the site.

The LP says three separate policies will replace ENV9:

Core Policy (CP) 37: The Natural Environment

CP 40: Landscape Character

CP 63: The Historic Environment

Elsewhere in the Local Plan documents these are referred to CP 38, 41 and 62 respectively.

Nowhere in these new policies is there any specific reference to Protected Lanes. Their protection needs to be cited explicitly in the Core Policy for the members of the Planning Committee to be able to 'reach in' and have easy access to the wording.

Looking at the Core Policies cited above it may be most appropriate to insert a specific reference to Protected Lanes in CP 62: The Historic Environment:

"In determining applications, great weight and importance will be given to conserving the significance of designated heritage and non-designated assets, including i. the special architectural and historic interest of Listed Buildings, including with regard to their character, fabric and their settings

and then insert a new line at ii Protected Lanes and their settings.

Then further down in CP62 there is a para starting Listed Buildings: Proposals which would harm the significance of a designated will not be approved, unless there is a clear justification, using the balancing principles set out in national policy and guidance...

below that and before Archaeological Assets I would suggest inserting virtually the same wording for Listed Building as also for Protected Lanes ie

Protected Lanes: Proposals which would harm the significance of Protected Lanes will not be approved, unless there is a clear justification, using the balancing principles set out in national policy and guidance....

That is virtually the same wording as ENV9 and so fully appropriate.

2) Meadows

Meadows are one of the rarest habitats in the UK, with 97% of this habitat lost in Britain since World War II according to English Heritage.

<https://www.english-heritage.org.uk/learn/conservation/gardens-and-landscapes/meadow-conservation/>

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One of the things that has troubled Widdington Parish Council (WPC) in recent years is the lack of protection in the planning process for meadows. In our experience meadows are treated no differently to a ploughed field. This is strange given the huge national conservation effort and especially because their carbon capture qualities have now been widely recognised as more effective than planting trees. Indeed, the NPPF specifically suggests in para 120b the "retention of undeveloped land for carbon capture".

Although the new LP mentions chalk grassland in a number of places this is too specific. Plantlife, a national conservation charity, has been working closely with King Charles on Meadow conservation and restoration projects. They point out that "*semi-natural grassland, particularly 'unimproved' grassland that hasn't been recently fertilised or ploughed, is an **increasingly rare habitat**; 'amongst the most threatened in Britain'.*"

Despite the new Local Plan highlighting chalk grassland (eg CP9 Green and Blue Infrastructure), it is our view that the protection is too narrow given the huge national campaign to save our remaining meadows. Surely Uttlesford's few remaining endangered Meadows should be offered more protection than a ploughed field?

WPC looked though the draft of the new local plan and the most relevant parts seems to be Core Policy 40 on Biodiversity about the protection of the soil.

"9.143 The protection of soil from a biodiversity perspective is also increasingly important in agricultural areas. Development which would disturb or damage any soils of high environmental value will not be acceptable. 9.144 The Council will support measures for the creation, restoration, retention, protection and extension of biodiversity areas as this applies to woodland, watercourses, grassland or other priority habitats in the district." (my underlining).

But these points though were not repeated in the Core Policy 40 itself and the word Meadow was not mentioned.

Our view is that it would be helpful if the new Local Plan was stronger in its protection of Uttlesford's remaining Meadowland on both conservation and carbon capture grounds.

It could be inserted here in CP40..." *Planning consent will be refused where there is a potential loss or deterioration of protected or rare habitats or areas (including grassland and wildflower Meadows) without adequate mitigation measure such as proposed access and management arrangement or provision of new or enhanced habitats as agreed with Local Planning authority.*" (underlining is our suggestion)

Alternatively, the protection could be firmed up in CP38 which currently reads The Natural Environment: Protection of Priority Habitats: Development resulting in the loss or deterioration of irreplaceable habitats, according to the latest Detra Biodiversity Metric, will be refused, save for where exceptional circumstances are demonstrated and appropriate mitigation and compensation is provided, including but not limited to:

v. Ancient Woodland vi. Coastal and Floodplain Grazing Marsh vii. Lowland Meadows viii. Chalk Rivers/Streams ix. Ancient or Veteran Trees

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Lowland Meadows in vii can be widened to "Grassland and Wildflower Meadows"

Our own experience of Planning Meetings is that unless the words "Grassland and Wildflower Meadows" are specifically mentioned in Core Policies, they will not get the protection they deserve.

3) Village Facilities Study

Widdington PC wants to point out there is a mistake in this metric. The village has not had a mobile library for many years and the 2 points allocated for that reason should be removed taking Widdington's total score in the study from 23 to 21. It remains a smaller village on this metric.

4) WPC would like to point out that the UDC should take into account that villages like Widdington have been subject to planning approvals made by Essex County Council for two large industrial pits. These seem to be outside of the control of UDC, yet the planning process takes no account of increased traffic as it relates to the village.

4) Newport allocation

Finally, WPC would question whether it is appropriate to include sites in nearby Newport that have only recently been rejected by the Planning Inspectorate.

For example, in the case of the Land North Of Wicken Road And West Of School Lane Newport, I believe officers have said in a meeting that they can mitigate the harms identified by the Inspector but looking closely, the plans seem little different. There is no reference in the site allocations to the two sites having been refused at appeal and therefore no statement of any intended mitigations. This seems a serious omission.

It is also of serious concern that the traffic assessment for the Newport and Thaxted sites on page 20 shows queue times in Newport up to 1670 seconds, which is 28 minutes.

5) Drainage

Widdington PC would like to emphasise that the foul waste system for Widdington has reached full capacity. When it rains moderately heavily the reservoir tanks and pumps at the Widdington pumping station on Spring Hill can no longer cope with the extra volume of water which is supposed to be pumped at pressure through a 4 inch pipe all the way to the Newport. As a result of this capacity issue diluted sewage spurts at force like a geyser from the manhole cover outside the pumping station. This situation is agreed with Anglian Water Services Networks Management which is currently investigating the problem.

I know Widdington is not alone in suffering these problems. Newport, where our sewage waste ends up has even worse problems. Yet despite the sewer infrastructure being unable to cope, the planning process seems incapable of recognising there is a problem and then to apply the brakes on building at these pinch-points. Anglian Water are obliged by law to say they will connect new housing to their system despite knowing full well it has reached full capacity. In the view of WPC in these circumstances it is incumbent on UDC Planning to recognise there is a problem and this should be reflected in the ability to refuse new housing applications. It is almost negligent to allow more houses to be built when it is known with certainty that the infrastructure cannot cope.