

Great Chesterford Parish Council

Submission

relating to

Regulation 18 Uttlesford Local Plan

(incorporating reports prepared on behalf of GCPC by Pegasus Group, COTTEE
Transport Planning, Hankinson Duckett Associates and Place Services)

September 2017

Contents

A Introduction and overview	2
PART 1: SUBSTANTIVE ISSUES.....	4
B Principal substantive issues: Report by Pegasus Group	4
C Additional substantive issues.....	19
C(a) Housing numbers challenged.....	19
C(b) Flooding/drainage issues	21
C(c) Employment issues	21
C(d) Inadequate account of impact of neighbouring developments	22
C(e) Infrastructure issues	23
C(f) No evidence of ability to deliver NUGC in conformity with the GC Principles	23
D Adverse impacts	26
Great Chesterford today	26
Bidwells proposals disclosed to-date.....	27
Absence of any mitigation proposals.....	29
E GCPC specific comments on the paragraphs and Policies of the Regulation 18 Local Plan	30
PART 2: PROCEDURAL ISSUES	46
F Lack of transparency and absence of due process	46
GCPC’s experience of its dealings with UDC.....	46
GCPC requests for information ignored.....	46
Bidwells’ information not shared with GCPC; disclosure to Bidwells of GCPC’s reports.....	47
UDC’s appointment of GCPC’s Neighbourhood Plan consultants	48
UDC’s general failure to keep GCPC informed.....	48
Inadequate Duty to Cooperate	48
Conclusion.....	49
APPENDICES	50
Appendix 1 – East Herts DC Housing Topic Paper, August 2017 (extract).....	50
Appendix 2 – Transport: COTTEE Transport Planning.....	52
Appendix 3 – Landscape: HD Associates.....	71
Appendix 4 – Historic Environment: Place Services.....	115
Appendix 5 – Record of GCPC’s involvement with UDC	133
GCPC/UDC involvement.....	133
Duty to Cooperate	136
Appendix 5A – Copies of correspondence between GCPC and UDC	138

A Introduction and overview

A1 In this Submission Great Chesterford Parish Council (“GCPC”) sets out its views on Uttlesford District Council’s (“UDC”) Regulation 18 draft Local Plan (the “draft LP”), and its objections to inclusion of the proposed North Uttlesford Garden Community (“NUGC”, sometimes also referred to in UDC’s documentation as a Garden Village) in that draft LP.

A2 The Submission is divided into two Parts, dealing with substantive and procedural issues, as follows:

PART 1: SUBSTANTIVE ISSUES

Section B. In order to provide detailed and expert guidance relating to key aspects of UDC’s draft LP and accompanying evidence base in relation to NUGC, GCPC has engaged the services of Consultants to advise it on the four following key aspects of the draft LP:

- Spatial vision objections together with an overview of transport, landscape and heritage inadequacies in UDC’s evidence base: report prepared by Pegasus Group;
- Transport issues: report prepared by COTTEE Transport Planning;
- Landscape and visual issues: report prepared by Hankinson Duckett Associates; and
- Historic environment and heritage issues: report prepared by Place Services.

Each of these reports has been incorporated in its entirety into this Submission, and together they comprise a key part of GCPC’s overall objections to inclusion of NUGC in the draft LP. The report of Pegasus Group is included as Section B, and the other reports (themselves referred to the Pegasus Report) are included as Appendices 2-4.

Section C. This Section addresses a number of additional issues which are also of significant concern to GCPC, such as confusion about UDC’s housing figures for the Plan period, potential flooding concerns for Great Chesterford in the event NUGC proceeds, the apparent inability of UDC to ensure that Garden Community Principles will be applied in practice, amongst others.

Section D. GCPC sets out in this Section the serious adverse impacts for Great Chesterford as an existing settlement that would ensue in the event that NUGC were to proceed.

Section E. The specific comments of GCPC on the various paragraphs and Policies included in the draft LP are included here, in table form for ease of reference.

PART 2: PROCEDURAL ISSUES

Section F. In this Section, and the accompanying Appendix 5, GCPC summarises the extent of its involvement with UDC during the whole of the period in which the draft LP has been in preparation, and the overwhelming evidence of lack of transparency and due process which has characterised the emergence of NUGC as a proposed settlement site. The failure of UDC to engage with GCPC about its emerging proposals; its refusal to respond to GCPC’s legitimate requests for information whilst at the same time engaging directly with the landowners concerned and their agents, Bidwells; the manner in which it has improperly utilised materials provided to it in good faith by GCPC without regard to the interests of GCPC or Great Chesterford; and its general failure to keep GCPC informed demonstrate a serious and unacceptable lack of engagement on the part of UDC. GCPC also explains

how UDC has so far failed adequately to comply with its statutory duty to co-operate with South Cambs DC.

A3 **In the light of the above, GCPC believes that inclusion of NUGC in the final Local Plan on the basis of the current, hurriedly concocted and unsupported proposals would render the Local Plan unsound.** Not only has UDC failed properly to co-operate with neighbouring authorities, but it is also apparent any such Plan would not be justified or effective, would not provide for sustainable development, and would otherwise be inconsistent with the requirements of the National Planning Policy Framework, as more fully described in this Submission.

A4 **Furthermore, GCPC does not believe that robust evidence to justify NUGC's inclusion, including funded proposals for the very major infrastructure upgrades that would be required, could be gathered in the limited time available before the Regulation 19 consultation.** To be included in a sound Local Plan, a scheme with the aspirations and considerable infrastructure requirements as that proposed for NUGC would require many years of community engagement and discussion (on the basis of a detailed and demonstrably viable master plan put forward by an appointed developer), proper evaluation of transport, landscaping and other critical issues identified in this Submission, and evidence that funding was available for key infrastructure to be put in place at the outset.

A5 GCPC is aware of the need for housing in the district, which has already resulted in a considerable increase in the size of Great Chesterford itself. This recent and ongoing development in the village has been well-researched and sympathetic to the character and integrity of the village, and has been tested with local residents as evidenced by the emerging Neighbourhood Plan. Furthermore, GCPC does not object to the principle of a Garden Village in North Uttlesford, as is evident from its previous correspondence with UDC (see, for example, letter included at Appendix 5A). **However, what has so far been proposed in the draft LP is, on any objective assessment of the evidence, unsupportable.**

PART 1: SUBSTANTIVE ISSUES

B Principal substantive issues: Report by Pegasus Group

UTTLESFORD DISTRICT COUNCIL REGULATION 18 LOCAL PLAN

CONSULTATION RESPONSE

ON BEHALF OF: GREAT CHESTERFORD PARISH COUNCIL

Pegasus Group

Pegasus House | Querns Business Centre | Whitworth Road | Cirencester | Gloucestershire | GL7 1RT
T 01285 641717 | F 01285 642348 | W www.pegasuspg.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester
PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

©Copyright Pegasus Planning Group Limited 2017. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

	Page No:
1. INTRODUCTION	1
2. THE SPATIAL VISION	2
3. POLICY SP2 – THE SPATIAL STRATEGY 2011-2033	3
4. POLICY SP3 – THE SCALE AND DISTRIBUTION OF HOUSING DEVELOPMENT	4
5. POLICY SP5 – GARDEN COMMUNITY PRINCIPLES	5
6. POLICY SP7 – NORTH UTTLESFORD GARDEN COMMUNITY	5
7. SUMMARY	12

1. INTRODUCTION

- 1.1 This statement has been prepared on behalf of Great Chesterford Parish Council (GCPC) to support its response to the Regulation 18 draft of the Uttlesford Local Plan (the Plan). It should be read in conjunction with the following statements that have also been prepared on behalf of GCPC:
- Draft Local Plan Consultation Representations: Transport Matters prepared by COTTEE Transport Planning (the transport statement)
 - Local Plan Review: Historic Environment prepared by Place Services (the heritage statement)
 - Landscape and Visual Representations prepared by Hankinson Duckett Associates (the landscape statement)
- 1.2 The position of GCPC is that it objects to the proposed North Uttlesford Garden Community (also referred to as a Garden Village in the Plan) and believes that it should be removed from the Local Plan. The representations provided in this statement explain the reasons for this objection and also refer to consequential concerns with other elements of the Plan and the evidence base that currently supports it.
- 1.3 It is noted that South Cambridgeshire District Council has raised significant concerns about the justification of the allocation with particular reference to transport impact and the consequential effect on the viability of the scheme. This raises important Duty to Cooperate issues that must be resolved in order for the eventual Plan to pass the legal tests and proceed to examination.

2. The Spatial Vision

- 2.1 GCPC objects to the spatial vision as it refers to the new development at NUGC as part of the vision. The detailed objections to the allocation of this site are set out under policy SP7 and so are not repeated here.
- 2.2 GCPC considers that the transport, landscape and heritage impacts have not been properly considered when choosing to allocate this site and as such it is not considered that the assessment set out in the Sustainability Appraisal (SA) is properly evidenced.
- 2.3 The SA considers that the spatial vision has the following impacts:
- Minor positive impact in terms of the Strategic Environmental Assessment (SEA) objectives 3 (landscape) and 5 (heritage).
 - No impact in terms of SEA objectives 6 (climatic change) and 7 (pollution);
 - Significant positive impacts in terms of SEA objectives 9 (sustainable travel) and 12 (meeting housing needs).
- 2.4 For the reasons set out below under policy SP7 and in the supporting statements submitted with this statement, GCPC considers that this assessment cannot be substantiated by the available evidence.
- 2.5 It is noted that the SA reports “No alternative approaches can be considered reasonable as the Vision largely reiterates the thread of sustainable development as espoused in the NPPF. Any alternative that deviates from this approach would be contrary to NPPF and therefore an unsound approach.”
- 2.6 GCPC considers that such a statement can only be made about a generic policy or vision that repeats text within the NPPF. That is not the case here. The spatial vision is specific about where new development will be delivered. Alternatives to the location of new development are self-evidently possible and should have been considered in the SA. The absence of this exercise means that the Plan cannot be considered to be justified and is therefore unsound.
- 2.7 To remedy this objection, GCPC wish to see the reference to NUGC removed from the Spatial Vision and supporting text.

3. Policy SP2 – The Spatial Strategy 2011-2033

- 3.1 For consistency across these representations, GCPC objects to the reference to NUGC in this policy and the supporting text and requests that it be deleted. The reasons for this objection are set out elsewhere in the statement.
- 3.2 The alternative scenarios for this policy were all rejected as they would fail to meet the District's Objectively Assessed Need (OAN). It is noted that East Herts DC (which is within the same Housing Market Area (HMA) as Uttlesford) has recently published a Housing Topic Paper that refers to updated evidence on housing need across the HMA.
- 3.3 It notes at paragraph 2.41 that an amended Memorandum of Understanding with the Councils in the HMA is currently being prepared to reflect a revised agreed position on housing need in each district. For Uttlesford, this is identified as being 12,500 homes across the plan period – some 1,600 less than is currently being planned for under policy SP3. The supply identified in SP3 is also the figure that was used in assessing the reasonable alternatives for the spatial vision.
- 3.4 Given the new evidence that suggests a lower OAN is justified and the significant number of potential sites that have been put forward it is unclear how this assessment of reasonable alternatives remains valid for the purposes of supporting this Plan.
- 3.5 The SA considers that policy SP2 has the following impacts:
- Minor positive impact in terms of the SEA objectives 3 (landscape) and 5 (heritage);
 - No impact in terms of SEA objectives 6 (climatic change) and 7 (pollution);
 - Significant positive impacts in terms of SEA objectives 9 (sustainable travel) and 12 (meeting housing needs).
- 3.6 For the reasons set out below under policy SP7 and in the supporting statements, GCPC considers that this assessment cannot be substantiated by the available evidence.

4. Policy SP3 – The Scale and Distribution of Housing Development

- 4.1 GCPC objects to the housing target referred to in this policy in light of the new evidence referred to in the comments made on the Spatial Vision. The level of housing growth planned for is no longer supported by the most recent evidence available and as such the housing target should be reduced.
- 4.2 To remedy this objection, GCPC would like to see the housing target amended to reflect the latest available evidence on this matter.
- 4.3 GCPC also objects to the reference to NUGC in this policy and its inclusion as part of the housing supply. The detailed objections to the allocation of this site are set out under policy SP7 and so are not repeated here.
- 4.4 As mentioned previously, GCPC considers that the transport, landscape and heritage impacts have not been properly considered when choosing to allocate this site and as such do not consider that the assessment set out in the Sustainability Appraisal (SA) is properly evidenced.
- 4.5 The SA considers that this policy has the following impacts:
- Uncertain impacts in terms of the SEA objectives 3 (landscape), 5 (heritage), 6 (climatic change) and 7 (pollution);
 - Minor positive impacts in terms of SEA objective 9 (sustainable travel), and;
 - Significant positive impacts in terms of SEA objective 12 (meeting housing needs).
- 4.6 It is unclear how the uncertain impacts under this assessment can allow for the more positive impacts or lack of impacts noted under the spatial vision. This assessment of impact appears inconsistent. Notwithstanding this, for the reasons set out below under policy SP7 and in the other statements that accompany statement, GCPC considers that this assessment cannot be substantiated by the available evidence.
- 4.7 To remedy this objection, GCPC wish to see the reference to NUGC removed from this policy and supporting text. It should be noted that the removal of this site would not have a significant impact on meeting the adjusted housing land supply target referred to above.

5. Policy SP5 – Garden Community Principles

- 5.1 For consistency across these representations, GCPC object to the reference to the NUGC in this policy and its supporting text and request that it be deleted. The reasons for this objection are set out elsewhere in this statement.

6. Policy SP7 – North Uttlesford Garden Community

- 6.1 GCPC objects to this policy in its entirety as the allocation of this site has not been adequately justified, is not based on robust evidence and therefore is not the consequential product of having tested all reasonable alternatives. Furthermore, the allocation of this site is not considered to represent sustainable development and as such it conflicts with national policy. For all of these reasons it is considered that this policy cannot pass the test of soundness and should be deleted from the Plan.

- 6.2 The following text explains the reason for this opinion.

Transport

- 6.3 GCPC has commissioned COTTEE Transport Planning (CTP) to review the transport related evidence for the Plan and this review is submitted by GCPC as a separate statement alongside this statement.
- 6.4 The review found that WYG (on behalf of the Council) had identified capacity issues as a result of the proposal, which have not been adequately addressed by subsequent evidence. Furthermore, the evidence used to justify the allocation is based on a significantly smaller development at the NUGC. There is no evidence presented that demonstrates that the impacts arising from the proposed allocation have either been tested or that the relevant mitigation has been planned for. For example, in the December 2016 report WYG considered 5,000 units in a broad sense but this was not carried forward to the subsequent detailed South Cambridgeshire Junction Assessments in May 2016; the principal focus of which was to examine 1,400 units.
- 6.5 It is clear from the Council's own evidence that the routes around Great Chesterford will be under considerable stress by 2033 (even without factoring in the planned growth in this Plan). This also fails to factor in emerging schemes in nearby South Cambridgeshire (the proposed AgriTech scheme) as well as any potential for future development on the South Cambridgeshire side

of the nearby district boundary. The report prepared by SCDC regarding UDC's draft Plan raises significant concerns regarding NUGC and the implications for transport impact. Paragraphs 18-20 of their report to the Planning Portfolio Holder dated 25 August 2017 are relevant in this regard. SCDC acknowledges that the new housing at NUGC could assist in meeting some of its housing needs but also raises concern that it could constrain the growth potential of existing employment facilities. Paragraph 19 comments:

"...the NUGC could constrain the future growth of the three nearby research institutes and science parks in South Cambridgeshire by overloading local transport infrastructure, taking up additional capacity that could be created in the local road network in South Cambridgeshire through more local mitigation measures (as opposed to strategic improvements, particularly to the A505 for which there is currently no scheme of committed funding). It 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."

- 6.6 It goes on to say that the NUGC should not be allocated unless it can be demonstrated that it is a sound and sustainable option. For the reasons expressed in this statement, GCPC consider that these important requirements have not been met. The SCDC report also goes on to raise "a number of technical queries that need to be followed up with Uttlesford District Council, which could have implications for the soundness of the evidence" (para 27 of their report).
- 6.7 GCPC consider that the concerns raised by SCDC – if left unanswered – raise significant duty to cooperate issues.
- 6.8 Policy SP7 identifies 1,900 units from NUGC by 2033 and 5,000 in total. WYG referred to 5,000 initially which reduced to 2,800; and then using extrapolation techniques a figure of 3,294 was arrived at in their May 2017 report. However, this only relates to the junction modelling and ignores link capacity issues. This is not considered to be a logical approach as junction capacity cannot be considered in isolation and without due consideration being given to mitigating the impact on route corridors, therefore the number of units cited by WYG is unjustified and cannot be relied upon.
- 6.9 As set out in the transport statement, the consequence of this is that capacity will be at critical conditions as SP7 is delivering. Although the policy requires contributions towards resolving capacity issues, the limited evidence presented about what this work will involve. For example, WYG has identified

some junction improvements and has costed those but has not identified measures to improve route corridors nor have those been costed meaning that – at the very least – the implications on the viability of the scheme cannot and have not been tested. This calls into question the deliverability of the scheme.

- 6.10 It is also noted that the viability of the scheme is a concern that is being raised by SCDC. At paragraph 14 of the SCDC report referred to above, it states

"A (sic) Economic Viability Study regarding the new settlements concludes that they are viable but in regard to the NUGC it appears to only have taken account of £1m of road transport mitigations compared to the £7.5m to £11m of mitigations identified in the South Cambridgeshire Junctions Study."

- 6.11 The unknown impacts of such mitigation measures is a concern to GCPC. Without a scheme for mitigation it is impossible to understand what this could mean for ecological, landscape or heritage impact for example. As such the full impacts of the proposal cannot and have not been properly taken into account when selecting this option for development. This is a failing of the process that raises serious soundness issues.

- 6.12 This is further complicated by the apparent contradiction in the evidence base regarding the recognised capacity constraints without planned development and the subsequent conclusion of minimal impact with planned development. This is explained further in the transport statement.

- 6.13 The transport statement also notes the lack of evidence to support the 10% modal shift assumed for this site when considering transport impact. GCPC fully supports the idea of encouraging non-car modes of transport but it must be based on a realistic prospect of achieving this.

- 6.14 The NUGC will need to be supported by public transport connections that provide new residents with an alternative to the private car. There is no evidence to demonstrate how this will be achieved in this location or the costs of delivering this vital element of the infrastructure for this new community. Furthermore, there is no evidence about how the impact of the capacity of existing public transport provision and the extent to which it can be upgraded to cope with an increased demand. As such, neither reality of the modal shift or the costs of facilitating this have been tested. This is a fundamental flaw in the site selection process.

- 6.15 The concern of GCPC is that policy SP7 causes severe transport impact for both the village and the wider area, which would give rise to adverse environmental, economic and social impacts. These impacts have not been adequately tested and the mitigation measures have not be adequately developed such that the deliverability of the proposal can be deemed as realistic. The transport issues arising from this proposed allocation mean that it cannot be considered as delivering sustainable development – in clear contradiction to the requirement of the NPPF.
- 6.16 It is noted that the SA considers that no impacts are considered to arise from this policy in terms of SEA objectives 6 (climatic change) and 7 (pollution). In terms of SEA objectives 9 (sustainable transport) and 12 (meeting housing needs) no impacts are predicted over the short – medium term with significant positive impacts in the long term. For the reasons set out above, it is unclear how such an assessment can be made in light of the evidence available.
- 6.17 No alternatives are considered as the SA concluded that the policy delivered sustainable development. The evidence in terms of transport impact suggests otherwise.

Landscape

- 6.18 GCPC has commissioned Hankinson Duckett Associates (HDA) to review the landscape evidence that supports the Local Plan. This is included with these representations. HDA is also assisting GCPC with the preparation of its Neighbourhood Plan (which is being prepared jointly with Little Chesterford Parish Council) and the Landscape Character Assessment prepared by HDA has been accepted by the Council as part of its evidence base for the Local Plan¹.
- 6.19 The landscape statement prepared by HDA notes GCPC's previous objection to the site allocation on the basis of landscape impact (letter to Councillor Howard Rolfe, dated 5 June 2017). It also notes the Council's own assessment of the site (by Chris Blandford Associates, June 2017) as being highly sensitive in landscape terms. The report also notes that the size of settlement proposed by the allocation would be completely out of keeping with the character identified by the Council's assessments ('Braintree, Brentwood, Chelmsford,

¹ See Great and Little Chesterford Neighbourhood Plan Landscape Character Assessment by Hankinson Duckett Associates, 2016 filed under the Historic Environment section of the evidence base documents

Maldon and Uttlesford Landscape Character Assessments' by Chris Blandford Associates for the respective Councils, September 2006).

6.20 The report provides a thorough critique of the supporting information submitted by the site promoter and considers that it provides an inadequate assessment of the site.

6.21 The Council's evidence on this matter is contained in a report prepared by the Council's landscape officer and dated 5 May 2017. In relation to this site it concludes:

"I am of the view that this site cannot accommodate the development shown in the illustrative masterplan submitted in the North Uttlesford Garden Village Prospectus of Delivery document, as presented to Members of the District Council on 27th March 2017, without causing significant and unacceptable harm to the important visual qualities of the site and the wider landscape."

6.22 It goes on to suggest that development may be achievable on parts of the proposal site but does not clarify the quantum or location of development.

6.22.1 It is noted that SCDC (in the report referred to above) has also raised concerns about the landscape impact of the NUGC. At paragraph 30 of that report, it states:

"The development of the NUGC, according to the evidence supporting the draft Uttlesford Local Plan, would have significant negative impacts on landscape. It has not been demonstrated at this stage that these can be appropriately mitigated or that it is possible to develop the new community avoiding ridgelines and elevated valley sides. Major development on the site could appear to be an alien and intrusive element in the local landscape which would be visible in long distance views. It has not been demonstrated that reasonable alternatives do not exist which would have a reduced impact on the landscape. These points call in question whether a Local Plan including the NUGC would be justified."

6.23 In contrast to the Council's own evidence, the SA considers no landscape impact over the short to medium term and uncertain impacts in the long term. There is clearly a mismatch in the level of harm identified, which calls into question the robustness of the SA and the consequential justification for the policy.

6.24 No alternatives are considered as the SA concluded that the policy delivered sustainable development. The evidence in terms of landscape impact suggests otherwise.

Heritage

- 6.25 GCPC has commissioned Place Services to review the heritage evidence that supports the Local Plan. This is included with these representations. This review has found the Council's heritage evidence to be of poor quality that lacks sufficient detail to judge the harm arising from the proposed allocation of the NUGC. It also noted that despite the paucity of the Council's evidence on this topic, it still concluded that heritage harm would arise and that the further work recommended to the Council in its own evidence has not been carried out.
- 6.26 As noted in the heritage statement, the site of the NUGC is located within a heritage-rich environment both on site and in the surrounding area. The known heritage assets that exist increase the sensitivity of both the site and the location as well as the likelihood for unknown heritage assets to be present.
- 6.27 The heritage statement confirms that the available evidence on heritage assets has not been adequately consulted rendering the conclusions reached by the evidence base on heritage impact unsubstantiated. This is completely contrary to the clear requirement set out at paragraph 169 of the NPPF.
- 6.28 It is inappropriate for such assets to be inadequately considered as part of the allocation process and renders the Plan unsound as a result.
- 6.29 It is noted that the SA for this policy considers that there is no impact on SEA objective 5 (heritage) in the short to medium term and unknown impact in the long term. It is deeply concerning that this conclusion has been reached on the basis of the inadequate evidence before the Council. For the reasons set out above the conclusions are not justified.
- 6.30 No alternatives are considered as the SA concluded that the policy delivered sustainable development. The evidence in terms of heritage impact suggests otherwise.
- 6.31 In conclusion on this policy, GCPC consider that it is not justified by the evidence available and has not been appropriately assessed in the SA. It raises impacts that have not been adequately assessed and that call into question the deliverability of the site. To remedy the objections raised in

relation to this policy, GCPC request that the policy be deleted from the Plan and the supported text.

7. Summary

7.1 The following table summarises the objections raised in this statement on behalf of GCPC. For the avoidance of doubt, the summary relates to both the Plan and the Sustainability Appraisal that relates to that aspect of the Plan.

Policy/Section	Response	Reason	Remedy
Spatial Vision	Object	Unjustified; reasonable alternatives not tested	Remove NUGV from the spatial vision and supporting text
Policy SP2	Object	Unjustified	Remove NUGV from the policy and supporting text
Policy SP3	Object	Unjustified	Remove NUGV from the policy and supporting text
Policy SP5	Object	Unjustified	Remove NUGV from the policy and supporting text
Policy SP7	Object	Unjustified; reasonable alternatives not tested	Remove NUGV from the policy and supporting text

7.2 It should be noted that GCPC has submitted representations to other parts of the Plan that are not referred to in the table above.

C Additional substantive issues

In this Section GCPC reviews the draft LP and the evidence base relied upon by UDC in making its proposals in relation to the following specific substantive issues:

- C(a) Housing numbers
- C(b) Flooding/drainage
- C(c) Employment
- C(d) Adverse impact on neighbouring villages
- C(e) Lack of information regarding infrastructure requirements
- C(f) Ability to deliver NUGC in conformity with Garden Community principles

C(a) Housing numbers challenged

Ca1 The extent of UDC's confused approach to estimating the housing need for Uttlesford between 2011 and 2033, and its wholly non-transparent procedure leading to adoption of the draft LP, is exemplified by the figures on which it has based its proposals.

Ca2 According to UDC's Strategic Housing Market Assessment ("SHMA") at the time of the pause in November 2016, it was proceeding on the basis that it needed to provide 12,500 homes between 2011 and 2033 - or 568 dwellings per annum (source: UDC's Media Briefing Pack, October 2016). These figures were based on its "Objectively Assessed Housing Need ("OAHN") figures deriving from UDC's 2015 SHMA which had been published in September 2015. At the time of the pause officers were proposing two settlement sites (Easton Park and Braintree), it being stated that the other "SHMA authorities (i.e. Epping, East Herts) [are] all supportive of two settlements on [the] A120 corridor". The Media Pack further states, as regards the Duty to Cooperate, that there are "Potential objections to Great Chesterford from South Cambs District Council and Cambridge City Council".

Ca3 For reasons not clear to GCPC (though possibly resulting from experience derived by other local authorities when seeking to justify their own housing figures to the Planning Inspector), between November/December 2016 UDC revised its OAHN figures to 14,100 homes for the Plan period. As regards this figure, and as part of the PAS review of UDC's evidence base undertaken in late December 2016, the reporting Inspector stated:

"4.2...it appears to me that there are some significant gaps in the published evidence base for the Plan. ... the 2015 SHMA projects an OAHN of 46,100 for the whole SHMA, of which Uttlesford's share is set at 12,500, although the method of apportionment between the authorities is not clear.

4.3 The evidence base on [UDC's] website does not include a revised SHMA, updated to take into account the latest 2014 [Department for Communities and Local Government] household projections published in July 2016. I understand that some re-modelling has been done by the SHMA authorities which has resulted in an agreed OAHN figure of 54,600 for the whole area, of which Uttlesford's component is 14,100. Again I have seen no explanation as to how the OAN figure has been apportioned. I understand that the four authorities intend to plan for only 51,000 dwellings, based on an updated [Sustainability Appraisal] by AECOM which I have not seen."

Ca4 Paragraph 4.3 of the PAS report then continues:

“I agree with the Planning Inspector who made an advisory visit to Uttlesford that [UDC] should take the OAHN figure of 14,100 as a starting point and that any housing requirement at a lower figure would need very robust justification. From what I have seen, staying with the 12,500 figure would be a serious risk to the soundness of the Plan.”

Ca5 In line with such views, UDC’s Planning Policy Working Group (PPWG) was then advised at its meeting on 22 February 2017 to “test a revised Objectively Assessed Need target of 14,100 new homes up until 2033. This higher housing target requires testing the delivery of up to three new settlement proposals, as well as examining reasonable alternative sites across the District” (para 3.1, PPWG Agenda item 5, “Preparing for the Local Plan Regulation 18 Consultation”). Despite efforts by third parties at that meeting and subsequently to obtain clarification from PPWG about selection of 14,100 as the appropriate number, no explanation has been provided in justification.

Ca6 The definitive answer is now available, and one which confirms that the figure of 14,100 is significantly higher than it needs to be. In a report (“West Essex and East Hertfordshire Strategic Housing Market Assessment - Establishing the Full Objectively Assessed Need (“FOAN”)” (July 2017)), which was jointly commissioned by Epping Forest, Harlow, UDC and East Hertfordshire, ORS reviewed the entire evidence base for establishing the FOAN both for the combined housing market area, and each of the planning authorities concerned. In the case of UDC, the conclusion reached by ORS is that **the correct figure for housing need for the period 2011 - 33 is 13,332 dwellings**, requiring an annual average build of 606 units. (See, however, Section B, paragraph 3.3 and Appendix 1 of this Submission – an even lower figure of 12,500 for Uttlesford is still being suggested as at August 2017 by East Herts DC.)

Ca7 ORS’s conclusion demonstrates that the decision of UDC to increase its previous proposal from two to three settlements on the basis of its unsubstantiated increase in numbers from 12,500 to 14,100 cannot, on any objective or reasonable basis, now be justified. Nor, in this connection, is there any basis in the PAS report to seek support for the higher figure – the PAS author makes clear in para 4.2 that he neither received an explanation for the figures proposed by UDC, nor can he, in light of the ORS report, be regarded as being in a position to endorse the higher figure as “a starting point”.

Ca8 The consequence of the ORS conclusion for the draft LP is obvious: UDC’s entire Spatial Strategy is predicated on figures which cannot be justified. Even assuming (which GCPC does not) that 13,332 dwellings correctly constitutes the number of new houses now needed for the period 2016 - 2033, adjustment of the housing need figures would, for example, reduce the total number of new houses required. UDC appears to be suggesting that, as an alternative to the proposed new settlement at Great Chesterford, no site from the remaining 300 or so sites submitted in response to the Call for Sites is available for that number of additional houses to be located – or, indeed, that delivery of houses at the other two proposed new settlements could not be accelerated to meet that demand. This is disputed by GCPC. Further, UDC appears to be prepared to sacrifice the beautiful area of land involved in favour of a new town larger than Saffron Walden when it is clear that, even today, it has no clear idea of the number of houses that is actually required. GCPC believes that this is wholly inappropriate.

Ca9 GCPC notes that, following publication of the ORS figures, the Chairman of PPWG is now reported as stating (Walden Local, 16 August 2017) that:

“We will continue to monitor the situation but do not propose, in the meantime, to change the key recommendations because (a) the housing number reduction is not significant and could change

again; (b) we will learn from the East Herts examination whether the Planning Inspector accepts the lower figure; (c) the Government intends to review how numbers are calculated; (d) the number of homes (up to 2033) for each of the three settlements could be challenged if delays occur. The situation will be more certain by the time we undertake the Regulation 19 consultation in the winter and we will give a clear explanation, based on empirical data, on why a housing number has been recommended for the Plan.”

In view of the decision of UDC to propose NUGC as a third settlement site because of the apparent realisation, following the November 2016 pause in the Plan process, that the housing figures were insufficient, continuing inclusion of NUGC in the draft LP becomes all the more incomprehensible in light of this statement – on UDC’s own admission it could in all probability opt for a much lower housing need than is currently proposed.

C(b) Flooding/drainage issues

Cb1 GCPC, in its letter dated 5 June 2017 to UDC, identified flooding as an issue of concern. The River Cam flows through Great Chesterford, south to north, and a corridor of land between 4m and 200m forms, according to the Environment Agency, the extent of the 1 in 1,000 year flood zone. In addition, there are numerous other minor watercourses, field drains and ponds in the immediate vicinity of the Village. The presence of the River Cam floodplain carries with it a significant risk of flooding to the south and west of Great Chesterford which restricts or prevents altogether any further development in the areas concerned. In the result, GCPC has in the past had to cope with resultant flooding that has, on occasion, affected the centre of Great Chesterford, especially in and around Horse River Green, South Street and other roads in the immediate location. Such flooding has led the Environment Agency to identify some parts of South Street as at risk from flooding, which has recently resulted in at least one house sale falling through because of the concern by the prospective purchaser about such risk. Further, an important field drain located between Park Road and Cow Lane is also liable to flood from time to time, as happened on one occasion when the Recreation Ground and the newly opened Community Centre were flooded to the depth of several feet.

Cb2 More significantly regarding NUGC generally is the fact that there is a known risk of downstream flooding in the valleys below the site, as well as potential impacts on the aquifer beneath the site. The Parish Councils of neighbouring villages located in South Cambs, in particular Hinxton and Ickleton, have expressed concerns about the impact of drainage and potential run-off from the NUGC site, in regard to which no adequate assurances have yet been received.

Cb3 There is no evidence to-date that, as regards flooding, the NUGC proposals accord with NPPF environmental policies, or that proposed Policy EN11 in the draft LP is sufficient. Significant further work is required to ensure that the impact on surrounding villages, including Great Chesterford, is fully understood and the effects fully mitigated.

C(c) Employment issues

Cc1 The draft LP proceeds on the basis that NUGC will be central to the London/Stansted/Cambridge economic growth area, citing Chesterford Research Park as part of the Uttlesford/South Cambridgeshire research and bio-technology cluster that will be served. Whereas the draft LP estimates that within the next 12 - 15 years expansion at Chesterford Research Park could provide an additional 900 jobs (para 5.7), GCPC notes that Bidwells, in its Call for Sites submission, estimates that research institutes and science parks in South Cambs (Wellcome Genome, Grants Park, Babraham Research Campus etc) can be expected to result in the creation of

an additional 15,700 jobs – to be served principally, according to Bidwells, by establishment of the new settlement at Great Chesterford.

Cc2 It is clear from the limited studies undertaken to-date that UDC itself expects a significant number of residents of NUGC to commute further afield than South Cambs, not least to London and elsewhere along the M11 corridor, and has therefore proposed some local road and rail improvements to cope with the additional demand that is thereby expected. In the result, the suggestion in the draft LP at paragraph 5.1 that creation of NUGC will contribute to the growth of future employment opportunities in Uttlesford is simply not justified by the creation of the new settlement. On the basis of all available evidence NUGC will merely result in the creation of a major dormitory/commuter town for South Cambs which, given its hillside location, will provide little if nothing by way of employment opportunities in North Uttlesford when the majority of them are in any event centred in and around Stansted Airport.

C(d) Inadequate account of impact of neighbouring developments

Cd1 The soundness of the draft LP, to the extent that it relates to the proposal to site a new settlement near the border with South Cambridgeshire, must be called into question by its **apparent failure to take full account of well-known, and in some cases well-advanced, developments across the border**. The evidence base that purports to support NUGC must be stress-tested against the impact of expected development in South Cambridgeshire that would utilise the same transport and other infrastructure as NUGC. GCPC does not believe that this work has been undertaken, and believes that, if it were undertaken, it would reveal significant deficiencies in the evidence base.

Cd2 This issue has been identified by South Cambridgeshire District Council (SCDC). In a report prepared for the Planning Portfolio Holder by the Joint Director for Planning and Economic Development on 25 August, discussing UDC's failure to take account of the considerable cost of required road mitigation measures in its viability study, it is said that:

“One knock-on effect of this omission is that the delivery of these 3,300 homes would remove any ‘spare’ capacity on the Cambridgeshire highway network close to the Uttlesford border, with implications for future growth in this successful and dynamic part of South Cambridgeshire ...”

Cd3 Considerable future growth is indeed likely. Concrete proposals already exist for a very significant expansion to the Wellcome Genome Campus, with up to 1,200 residential dwellings, as well as significant employment growth, envisaged over a site of 30 ha – see <https://www.wellcomegenomecampus.org/locatehere/campusvision.html>.

Cd4 In addition, there are emerging proposals for an Agri-Hub on land at Hinxton, also very close to the site proposed for NUGC, and this significant development would also rely upon the same transport infrastructure. Although it is understood that there are currently no proposals for residential dwellings on that site, it is acknowledged that there would be a significant impact on transport – see: <http://www.smithsonhill.co.uk/agritech-jan-2017/>.

Cd5 Combined with the further development at Sawston envisaged in the SCDC emerging local plan, and the proposed Sawston Trade Park currently under consideration by SCDC (<http://howard-ventures.com/case-study/fenland-roofing/>), it is clear that pressure on the transport infrastructure is likely to build considerably during the plan period, and the failure to take these likely developments into account undermines the evidence base underpinning the draft LP.

C(e) Infrastructure issues

Ce1 As described more fully in Section E below, there is already considerable strain on the limited infrastructure of Great Chesterford. For example: the primary school has no scope for expansion and it is often over-subscribed from applicants within its catchment; the nearest secondary school, SWCHS, is full and does not have capacity to take applicants from Great Chesterford; there are considerable problems with parking; the railway station has very limited parking facilities and is not served by fast trains; there is one shop and no post office facility.

Ce2 Policy SP7 claims that four primary schools, one secondary school, early years and childcare facilities, health care facilities, and community and youth centres will be provided at NUGC. However, there is no indication as to the timing of any such service provision, especially for a community which will amount to 1,900 dwellings in the period to 2033, nor is it clear that sufficient “financial contributions” could be achieved in order to provide them. It is not clear that a secondary school could be provided in the near future for a settlement of this size, and indeed it could take several years before even the most basic infrastructure is delivered to NUGC. In the intervening period, very significant strain would be put on the facilities in Great Chesterford, giving rise to very considerable adverse impacts for residents of the existing village.

Ce3 Any new garden community, in order to be sustainable, would need to have a secondary school at its heart, with other vital community services provided from the very beginning and before development begins. No evidence has been presented to suggest that such an approach to development, entailing the provision of key services at the outset, is proposed or achievable.

C(f) No evidence of ability to deliver NUGC in conformity with the GC Principles

Cf1 The draft LP refers to UDC’s intention to deliver the proposed settlements, including NUGC, in conformity with Garden Community Principles as defined by the Town and Country Planning Association (“TCPA”) – see Policy SP5, SP7 and 19 Appendix 4. However, there is no clear and unambiguous commitment to deliver NUGC in accordance with those Principles, and neither could there be, because it is entirely unclear how UDC intends to ensure that such Principles are applied.

This section of the Submission explains why GCPC currently has no confidence that NUGC would be developed in accordance with TCPA Principles.

Cf2 SP5 explains that:

“Prior to any planning applications being considered detailed development frameworks for each of the garden communities will be prepared as development plan or supplementary planning documents and adopted by the local planning authority, demonstrating how the development accords with the garden city principles defined by the Town and Country Planning Association ...”

It is considered that to make this commitment unambiguously UDC would need to amend the wording of SP5 so that it is clear that no development plan or supplementary planning documents will be adopted unless the development frameworks are in full compliance with TCPA Principles.

Cf3 However, given the current stage of the proposals in relation to NUGC there can be no confidence that any proposals which come forward from the developer would be in conformity with these Principles. Indeed, Bidwells (acting on behalf of the landowners), when repeatedly questioned on that point at a public meeting in Great Chesterford on 14 June 2017, was unable to confirm that the proposals put forward complied with the TCPA Principles. In any event, given that the landowners’ proposals for NUGC are at such an early stage of preparation, and remain vague and

aspirational, it is far from clear that any eventual masterplan will comply with the TCPA Principles and, in the event that it does not, UDC does not have a “Plan B” enabling it to deliver the additional housing that it says is required during the plan period. The leverage that would then be in the hands of the developer would be enormous, inevitably entailing compromise on the part of UDC. At this stage SP5, in so far as it relates to NUGC, must be regarded as purely aspirational, with no evidence to support its deliverability.

Cf4 More specifically, and with reference to the Principles set out in 19 Appendix 4 of the draft LP:

1 Land value capture for the benefit of the community

A “distinguishing characteristic” of a garden community is “fair distribution to the community of the profits that result from new development”. This is said to require “acquisition of the land at, or near, current use value by a body with effective planning and land assembly powers”. To date, GCPC has not seen any evidence that this land value capture is achievable. As described elsewhere in this Submission, there are significant gaps in the provision of key infrastructure, in particular for transport link improvements, but there is no evidence to support the view that these are affordable and can be financed from land value capture.

If it is anticipated that Section 106 contributions would be the mechanism for land value capture, GCPC is of the view that this would be a wholly inadequate and unreliable solution. In order to achieve full compliance with the Principles, GCPC would expect UDC to become a significant shareholder together with any eventual NUGC promotor in a Special Purpose Vehicle set up to oversee and control the entire NUGC project on behalf of the community (both existing and new).

2 Strong vision, leadership and community engagement

Garden communities require that “both the designation process and the development of the Garden City should demonstrate a real commitment to community participation”. This is self-evidently not the case for NUGC, in relation to which there has been a failure to engage constructively with the local community (see, in particular, Section F and Appendix 5 of this Submission) and there is ample evidence of vociferous local opposition (for example, see <http://www.stopnugv.org.uk/>).

There is also no evidence that UDC has the “dedicated planning and delivery team with the right skills and experience” that is required, and certainly no evidence that it could manage three new garden communities during the Plan period.

4 Mixed-tenure homes and housing types that are genuinely affordable for everyone

Is the developer committed to “60-70% minimum” affordable housing, with “at least 50%” of those available for social rent? GCPC has not seen credible evidence to support such a view.

5 A robust range of employment opportunities ...

It is not credible that a garden community on the scale envisaged will create “no less than one job per new household”, and it is clear that most residents would need to commute to work. Some may commute to the nearby science parks, but many would commute to central Cambridge or London, undermining one of the key Garden City Principles. In addition, it is not clear that a development on the scale envisaged would support a secondary school, despite the assertion in SP7, with the inevitable consequence that students would have to travel to Newport (the nearest Essex secondary school with capacity), over seven miles away from the proposed settlement site.

7 Development which enhances the natural environment

This is self-evidently problematic given the adverse effects on the local and historic environment described in some detail in the reports prepared by GCPC by Hankinson Duckett Associates and Place Services (see Appendices 3 and 4 to this Submission).

9 Integrated and accessible transport systems

The TCPA Principles make it clear that “Garden Cities should be located only where there are existing rapid public transport links to major cities, or where real plans are already in place for its provision”. As described more fully elsewhere in this submission, the nearest railway station at Great Chesterford is not easily accessible from the proposed NUGC site, has very limited car parking facilities and is only served by slow, stopping train services. No credible proposals have been made to increase capacity on this line, nor to improve the stations and the transport links to them. Roads are also at capacity (as explained in the report prepared for GCPC by Cottee Transport Planning reproduced in Appendix 2 to this Submission), with only a southbound access / northbound exit from the M11 at J9) and no clear and financed proposals have been made for their improvement. (Policy TA5 is devoid of any meaningful content in this regard.)

Cf5 Overall, on any objective analysis, it seems clear that significantly more evidence would need to be produced in order to support a credible assertion that a new settlement on the site proposed for NUGC could be built to anything approaching garden community principles. As the evidence base currently stands it would appear that the tag “garden community” is being used as a marketing device; at best, it sets out a laudable aspiration which is not achievable on the basis of the current proposals. To that extent, the draft LP cannot be said to comply with the NPPF requirement that it should be “deliverable over its period”. Furthermore, its failure to provide evidence that it can deliver compliance with TCPA Principles undermines its claim to deliver “sustainable development” as also required by the NPPF: a number of the omissions outlined above, for example in relation to the lack of provision for road and rail improvements and delivery of a secondary school and employment opportunities, would be needed for the plan to be NPPF compliant.

D Adverse impacts

D1 The promoters of NUGC, via Bidwells, have made any number of claims regarding the benefits that might result from a new settlement at Great Chesterford, the majority of which are completely untested. In this Section GCPC identifies the principal implications of the proposed new town for the existing Village, and the detriments that can be expected to result.

D2 Bidwells has claimed, on the one hand, that:

“A new Sustainable Garden Village would seek to include key services and facilities necessary to support the growing community and provide these at the earliest available and viable stage. Improvements to the facilities at Great Chesterford such as the Primary School, Health facilities and Railway Station either enabled through the commencement of the new Garden Village or in conjunction with sustainable growth of the existing village as supported through its Key Village role could help provide additional capacity until new facilities are completed resulting in additional long term benefits to the existing population of Great Chesterford.” (Bidwells response to Question 11, UDC’s Local Plan Consultation, Autumn 2015)

and, on the other hand, that:

“...the site would need to maintain a buffer zone in order to safeguard the Scheduled assets...There will be no direct physical impact on any of the identified heritage assets as a result of the proposed development...It is considered that there will be a negligible impact on the extended setting of the Church of All Saints...In terms of the impact on the Great Chesterford Conservation Area, as a result of its enclosed and the intervening built form of the Conservation Area itself and modern housing development to the north, the development of the proposed site will have no impact on the special interest of the core of the Conservation area.” (paras 2.5.18, 2.5.20 , 2.5.23 and 2.5.24, Bidwells Prospectus of Delivery, 27 March 2017).

D3 Any assessment of the likely impact of NUGC on the existing Village is significantly hampered by the fact that, even today, no master plan for the new town yet exists. As a result, the precise location of the development, its suggested rate of build, and the proposed transport and other infrastructure implications remain wholly unclear - all that GCPC has by way of any guide is the Bidwells Prospectus of March 2017 with its numerous artists’ impressions of what might be in mind. GCPC’s views as set out below are therefore necessarily provisional, and it reserves the right to amend or add to them as it considers appropriate in the circumstances.

D4 In view of all the continuing uncertainties that surround the NUGC proposal, GCPC describes, first, Great Chesterford as it exists today, before considering the implications of the contradictory positions implicit in the two statements of Bidwells set out in D2 above.

Great Chesterford today

D5 Great Chesterford comprises just 600 dwellings, with 1,130 voters registered on the most recent electoral Roll which suggests a population of around 1,500/1,600 residents. Within the past four years new houses completed or for which planning permission has been granted will add an additional 110 - 157 houses (an increase of 20-25%). The Village is the smallest Key Village identified by UDC (a matter about which the GCPC objected in its response to UDC’s draft Assessments of the Call for Sites – see F4(ii) below), as well as being smaller than some of the Type A Villages (identified

by UDC as “Villages with primary school with some local services e.g. village hall/pub/ shop - suitable for a scale of development that reinforce [its] role as a local centre”) such as Felsted.

D6 Great Chesterford is located in rolling, open countryside within 1 mile of Junction 9, M11 with access at Stump Cross to the A11. It has its own small Railway Station on the Cambridge/Liverpool Street mainline (though only intermediate stopping trains stop at the station, which has virtually no parking availability), and the village is currently served by an hourly bus service between Cambridge and Saffron Walden. The Village has one small shop (from which Post Office facilities have now been withdrawn), two public houses, two small satellite surgeries, two churches, and a small industrial/office sector. A primary school is located in the centre of the village, and a pre-school operates from the Community Centre which is located on the Recreation Ground at the edge of the Village.

D7 Increased car ownership, the lack of off-road parking facilities of many houses within the Conservation Area and increased traffic generally (resulting in part from the closure of a surgery in Saffron Walden with resultant transfer of patients to the High Street satellite surgery) have made use of Great Chesterford’s principal roads increasingly difficult. Church Street, South Street and the High Street are used both by the bus service (frequently impeded by parked cars), and a dedicated taxi plies many times daily between the Railway Station and Chesterford Research Park. GCPC has recently been forced, following advice from Highways, Essex County Council, to put in place yellow line parking restrictions in the High Street, the success of which remain to be determined.

[Bidwells proposals disclosed to-date](#)

D8 To the extent that the representations of Bidwells made to-date represent any sound basis for identifying possible detriments, it appears from such proposals as have so far been made publicly available that NUGC will involve:

- (i) access from NUGC onto the B184 at Field Farm Drive, Park Road and Cow Lane;
- (ii) enhanced Citi7 bus services to operate between NUGC and Great Chesterford Railway Station utilising each of the routes in (i) above;
- (iii) creation of a “transport hub” at Great Chesterford Railway Station;
- (iv) expansion of limited facilities at present available at the Railway Station;
- (v) introduction of a bio bus to operate via Little Chesterford/ Chesterford Research Park and the Railway Station; and
- (vi) creation of walk and cycle routes between NUGC and the Railway Station, as well as to and from local employment opportunities.

D9 In terms of visibility, Bidwells envisage creation of a “buffer zone” to be located at or between the existing Village and the outer edge of the NUGC area around the B184 and Park Road. It is impossible to identify the actual location of this zone because of the imprecision and conflicting pictorial representations that Bidwells have made available to-date. GCPC will insist, in the event of any development at the NUGC site, that this buffer zone includes all land south of the B184 between the new development and the existing village, including the land up to Stumps Cross.

D10 Nor is it possible for GCPC to provide any view at this stage on the issue of infrastructure issues, and the very many concerns that arise, should NUGC proceed. GCPC’s over-riding concern is that Great Chesterford will be overwhelmed in precisely the manner that Bidwells envisages in D2

above. It is clear that existing facilities in Great Chesterford are already overcrowded and struggling to cope; any increase in demand whilst NUGC is developed will clearly overwhelm them. It is simply not good enough for Bidwells to claim that NUGC will “conserve the integrity of existing settlements and communities” at the same time as it advocates establishment of viable public transport links to other settlements such as Great Chesterford, which will completely, and detrimentally, change its character (“NUGV - A Working Garden Village Charter”, 16 January 2016).

D11 With all these caveats in mind, GCPC considers that Great Chesterford’s existing infrastructure, facilities and services will be put seriously at risk in the following manner in the event NUGC proceeds:

In the immediate future

D12

(i) Primary School: its school roll is currently full and there is no room for expansion on the current site. Children from Great Chesterford now have to attend Joyce Frankland Academy, Newport, which is over six miles from Great Chesterford, because the County High School in Saffron Walden is full.

(ii) Two local surgeries: the health facilities are already fully subscribed and, in any event, one is only open on an intermittent part-time basis.

(iii) Railway Station: access is via a narrow, unadopted road; there is no dedicated parking at the Station which in any event serves stopping-trains only. The only space for additional parking is on the far side of the railway line (located across the District and County boundaries) which can only be accessed by bus and larger vehicles via a level crossing because of the low slung bridge on the road between Great Chesterford and Ickleton.

(iv) Local shopping: comprises a small single unit shop in the centre of Great Chesterford supplying high quality foodstuffs, bakery products, fruit and vegetables and a limited range of household requirements, newspapers etc.

(v) Two Public Houses: both traditional and suppliers of meals. A small residential hotel, The Crown House, operates on a part-time basis.

(vi) Community Centre: located on the Recreation Ground, its facilities are currently shared with a pre-school group which limits its overall availability. The size of the Recreation Ground, whilst adequate, is limited.

(vii) Local roads: as described above.

D13 In such circumstances, GCPC regards Bidwells’ suggestion that the Village can provide any meaningful support and additional capacity “until new facilities are completed” at NUGC as both risible and indicative of the cloud - cuckoo land which typifies the explanations it has provided to-date about its proposals. GCPC has no idea whatever what “improvements to the facilities at Great Chesterford such as the Primary School, Health facilities and Railway Station” Bidwells has in mind – nor where the funding for any such improvement will come from, even if they were feasible (which they are not).

In the short to medium term

D14 The impact of any development, let alone one the size suggested for NUGC, on the immediate infrastructure will be immediate, non - reversible and long-lasting. Putting aside the strain caused to the local road infrastructure by construction traffic, implementation of Bidwells

proposals as outlined in D8 above can be expected to have an immediate and accelerating impact on Great Chesterford as follows:

(i) the B184 in particular, but also as regards the B1383, Stump Cross access to/from the M11 and the A11: GCPC has repeatedly objected to UDC about existing traffic conditions on the B184, not least the volume and speed of traffic. GCPC considers it completely unacceptable that UDC should be proposing a major new town having access onto a minor road such as the B184 without even having obtained any detailed traffic assessment “to anticipate travel growth and mitigation measures” (para 13(vii), Appendix 5).

(ii) the proposal to utilise Park Road and Cow Lane as bus routes between NUGC and the Railway Station will inevitably mean that the High Street/South Street/Church Street and Jacksons Lane will become rat-runs for those travelling (mainly by car) between the new town and the Station. The evidence for this already exists, as confirmed by the dedicated taxi service that currently runs on a frequent daily basis between the Station and Chesterford Research Park via the centre of Great Chesterford. The B1383 will be similarly impacted and become a major road, particularly at peak times.

(iii) local services: likely to be overwhelmed: as described in E12 above.

(iv) creeping urbanisation: Great Chesterford is currently located as a self-contained and stand-alone settlement, albeit substantially constrained from further expansion by the B184 and B1383 roads, flooding concerns, the local heritage etc. Provision of a buffer zone, whether or not it is dressed up as a “country park”, cannot prevent an increase in the number of people around in the locality, more traffic, noise, pollution and the like – all of which will impact on the present rural surroundings of Great Chesterford.

In the longer term

D15 It is inevitable that, as NUGC progresses from the existing limitation of 1,900 dwellings up to 2033 to the full 5,000 dwellings envisaged for the new town, all the adverse implications outlined above will increasingly apply, all to the detriment of Great Chesterford as it exists today, and all despite no evidence at all of the need beyond 1,900 houses, or beyond 2033.

Absence of any mitigation proposals

D16 The paucity of information available from Bidwells, and the lack of any indication from UDC as to how it intends to cope with these many adverse consequences, demonstrates that the draft LP as currently proposed, is simply not fit for purpose. In these circumstances GCPC fails to understand UDC’s response to GCPC’s letters dated 5 June 2017 (attached as Appendix 5A) that “where there are adverse impacts ... the Council will look at potential mitigation measures” (letter dated 13 June 2017, emphasis added) – GCPC does not believe that such adverse consequences as it has identified above are capable of any meaningful mitigation. Rather, NUGC and any such measures will inevitably destroy Great Chesterford and the surrounding environment as it exists today.

D17 The detriments identified above by GCPC are many and varied, and cannot in GCPC’s view be readily translated into bankable commitments that will adequately protect Great Chesterford in the event that NUGC were to proceed. GCPC awaits proposals from UDC as to the potential mitigation measures that it has in mind as referred to in its letter to GCPC dated 13 June 2017.

E GCPC specific comments on the paragraphs and Policies of the Regulation 18 Local Plan

Passage/policy in Draft Local Plan	GCPC Comment
1.4 “In developing this Plan the District Council has worked collaboratively with authorities which adjoin or are close to Uttlesford”	We have shown in this Submission, this has simply not been the case in relation to NUGC.
1.7 “Neighbourhood Plans play an important role setting out in more detail how a community wishes to see its area develop”	This community is working on its Neighbourhood Plan. NUGC does not form part of its thinking and the lack of proper consultation by UDC as evidenced above makes a mockery of the whole Neighbourhood Plan process.
1.12 “[in order for the Local Plan to be sound it must be] Justified – The plan is the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence Effective – The plan is deliverable over its period and based on effective joint working on cross-boundary strategic priorities”	This Regulation 18 Local plan is neither Justified nor Effective. There is no evidence of any meaningful consideration of reasonable alternatives, an obvious lack of proportionate evidence, and no joint working at all with South Cambs DC.
1.13 “The aim of the process is to appraise the social, environmental and economic effects of plan strategies and policies and ensure that they accord with the objectives of sustainable development.”	NUGC is not sustainable development. It is not even close. It is wholly reliant on the transport links at Great Chesterford (which, due to the nature, location and layout of the station, mean vehicle trips will be essential for almost all travel, even if it did involve onward rail travel via Whittlesford or Audley End.) The employment offering at NUGC will not be providing sustainable jobs for the residents, they will be commuting to London, Cambridge and the South Cambridgeshire biotech hubs referred to so often by Bidwells and by UDC. Shoppers will inevitably be driving to Saffron Walden.
2.5 “Saffron Walden and Great Dunmow, are market towns with town centres providing a range of services to an extensive rural catchment area. These towns provide vital facilities for the District such as schools, health services and nearly all the District’s food shopping needs.”	Clearly, the shopping needs of NUGC will be met by Saffron Walden. At the very least that means busses along the B184, but in all likelihood huge amounts of additional traffic which has not been adequately assessed by UDC as part of this draft LP preparation.

Passage/policy in Draft Local Plan	GCPC Comment
<p>2.15 “Due to the rural nature of the District car ownership levels are high and public transport is limited. Travel to work is heavily car based at 71% of trips, with journeys by train and by foot around 10% each, and levels of cycling and bus journey are negligible. Carbon dioxide emissions in the District are relatively high compared to other Districts in Essex. Road transport is a major contributor to this and it is exacerbated by the presence of the M11 motorway in the area.”</p>	<p>This paragraph speaks for itself. The evidence is clear and a settlement which is stand-alone and not on a railway line will inevitably make this worse, not better.</p>
<p>2.17 “It is clear from this spatial portrait of Uttlesford District that there is a need to focus new development in locations where there are opportunities to reduce travel between homes, jobs and services and facilities, and where there are alternatives to using the car. A strategy based on these principles will reduce environmental impact whilst helping to meet local housing and employment needs.”</p>	<p>NUGC does not go anywhere near achieving this. Whilst it is a noble aspiration, clearly the basis of success on a policy such as this is the expansion of existing employment and shopping centres.</p>
<p>2.17 Objective 1 (c) “To reduce the need to travel, shorten travel distances and make sustainable travel a priority by:</p> <p>Locating development so that the use of sustainable travel modes such as public transport, cycling and walking can be maximised whilst recognising the continuing role that the car has in meeting transport and accessibility needs in the rural area;”</p>	<p>NUGC does not maximise the use of sustainable development. It is an isolated site, beyond walking and cycling distance of all but the fittest of residents and does not have its own rail station or existing infrastructure.</p>
<p>2.17 Objective 1(c) continued: “To conserve and enhance the locally distinctive and historic character of Uttlesford by:</p> <p>Conserving and enhancing the natural environment and varied landscape character, reflecting the ecological and landscape sensitivity of the District;</p> <p>Conserving and enhancing the District’s heritage assets and their settings; “</p>	<p>As evidenced in this Submission, NUGC does none of these things. Indeed, it is physically incapable of doing so regardless of mitigation proposed.</p>

Passage/policy in Draft Local Plan	GCPC Comment
3.13 “Beyond the existing settlements and the new garden communities development in the open countryside will be restricted in line with Policy SP10 – Protection of the Countryside, which is set out later in this section of the Plan.”	Clearly, in relation to the rest of the district Policy SP10 is important. We firmly believe it is equally if not more so for Great Chesterford.
3.15 “North Uttlesford – The whole garden community will comprise 5,000 new dwellings, of which a minimum of 1,900 homes will be built by 2033 and a range of local employment opportunities and services and facilities including schools, health, retail and leisure. This garden community will maximise opportunities for economic linkages with the Wellcome Genome Campus and Chesterford Research Park.”	We strongly object to NUGC as a settlement option. 5,000 dwellings is enormous, will swamp the countryside, the surrounding villages and is a knee-jerk reaction by UDC to some shaky housing numbers they themselves evidently have no confidence in.
3.19 “Key Villages are a major focus for development in the rural areas – suitable for a scale of development that would reinforce their role as provider of services to a wide rural area. A total of up to 204 dwellings on new site allocations will be provided within the Local Plan period”	If Great Chesterford is a key village, providing services to a wider rural area, how will it cope/compete/serve 5,000 houses? It cannot.
3.24 “With the exception of London Stansted Airport all other areas of the District that are outside the development limits are considered to be in the countryside. In order to protect the intrinsic character and beauty of the countryside development will be restricted to that which supports countryside uses.”	This is a key policy. It should apply to Great Chesterford. Based upon the landscape evidence we provide in this Submission, NUGC flies totally in the face of this.
Policy SP9	We whole-heartedly agree with this policy. NUGC flies in the face of this.
3.40 and 3.41	We have outlined in this response how the housing figures are wrong and unreliable. Cooperation with South Cambridgeshire is virtually non-existent.
Table 3.5	This lists Great Chesterford as having 133 dwellings. Clearly this is incorrect: the intention is for it to take 2033 (1900 plus 133)! Great Chesterford’s status as a key village must be removed unless NUGC is abandoned. We cannot be faced with further growth on top of 1900 houses in the next plan period.

Passage/policy in Draft Local Plan	GCPC Comment
Policy SP3	If NUGC were to remain in the draft LP, the correct figure for Great Chesterford is 2,033 (1,900 plus 133). Until NUGC is built, those houses are being built in "our community"
<p>3.56 " Through the Local Plan the Council is making provision for three new garden communities in the District, providing housing choice and opportunity for current and future residents. The garden communities will be developed in accordance with garden city principles developed by the Town and Country Planning Association. These are:</p> <p>Land value capture for the benefit of the community;"</p>	<p>Land value capture has been discussed in our representations. Alarminglly, Bidwells and UDC's view appears to be that this means "s106". it does not. Section106 (and the viability arguments that always come with them, weakening the package) is about seeking to mitigate the impact of the development and making it acceptable in planning terms. That patently is not happening here, as no amount of s106 monies could make this development acceptable in planning terms. The amount paid for the land will be critical to the success of any s106 package, as the viability arguments always run on the basis of the amount paid for the land counter-balancing the s106 package and usually resulting in a below policy level of affordable housing.</p> <p>Further, this is about "land value capture". i.e., the value of the land uplift must be captured. The amount paid for the land must not be more than 1.5 times current land value. As set out below, the land should be sold to UDC, not a private developer.</p>
"Strong vision, leadership and community engagement;"	Absolutely zero evidence of this to date. We are being rail-roaded, totally against Garden Village Principles.
"Development that enhances the natural environment, providing net biodiversity gains and using zero-carbon and energy-positive technology to ensure climate resilience;"	Given the incredible detrimental transport implications of the proposed NUGC, and the devastating impact on the landscape, any suggestion that this will be a "green" development is frankly laughable.

Passage/policy in Draft Local Plan	GCPC Comment
<p>“Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.”</p>	<p>This cannot and will not happen in this location. It has been chosen because it is near the junction of the M11. There is no ability to walk or cycle to Cambridge or Saffron Walden, or to any centres of employment. It would be too far to walk to any of the local railway stations and too far to cycle anywhere other than Great Chesterford (which has no cycle parking).</p>
<p>3.58 “Delivery of the garden communities will commence in 2020/21. Given the scale of growth these will continue to be built beyond the Local Plan Period, i.e. after 2033, and thus also contribute towards longer-term growth and development objectives for the district.”</p>	<p>It is not right that we are being faced with a 5,000 house development which is designed to run beyond the proposed plan period. No evidence has or will be produced in relation to housing need beyond 2033, nor about transport, infrastructure, employment or retail beyond the plan period.</p>
<p>Policy SP5</p>	<p>For reasons set out in these representations, Policy SP5 should be deleted in regard to NUGC.</p>
<p>3.61 “North Uttlesford Garden Community is located in the north west of the District. It adjoins the boundary of the district with South Cambridgeshire. It has the potential to deliver 5,000 new homes, local employment opportunities, supporting social and community infrastructure. It is anticipated that housing delivery will commence in 2021/22 and continue beyond the Local Plan period.”</p>	<p>Reference to “the potential” of NUGC is wholly unsubstantiated. There is no evidence that the proposed site for NUGC has potential or capacity for up to 5,000 dwellings: in fact, the overwhelming evidence in terms of landscape, transport and heritage, provided by both GCPC (and, indeed, UDC themselves) shows that it does not.</p>

Passage/policy in Draft Local Plan	GCPC Comment
<p>3.62 “The proposed developer funded highway improvements could accommodate up to 3,300 new homes at North Uttlesford which would be expected to come forward in the first 15 -17 years of development. Development beyond that level would depend upon strategic highway improvements such as duelling of the A505 between M11 and A11 junctions. It is proposed that a cap of 3,300 new homes is placed on any allocation at North Uttlesford Garden Community to ensure that development over this figure does not take place until strategic highway improvements have been implemented”</p>	<p>This is a fundamental problem with this section of the draft LP. We have no information as to what the "proposed developer funded highway improvements" are, beyond a new roundabout on the B184. This links very heavily into the transport evidence and the ability of UDC to truly capture land value for the benefit of the community. It is overwhelmingly clear that NUGC is wholly reliant on motor vehicle travel, and that this will have very detrimental impacts on the highways network in both Uttlesford (especially coming into Saffron Walden on the B184 and B1383) and South Cambs (in particular the A505 junction).</p> <p>There is no evidence that further highways improvements are considered, have been costed and are deliverable. Indeed, both Essex County Council and Highways England have expressly stated there is no budget for any such improvements.</p>
<p>Policy SP7 “Permission will be granted for a new garden community in North Uttlesford following approval of a detailed development framework. The new garden community in North Uttlesford will:</p> <p>a. Deliver 5,000 new dwellings, of which 1,900 will be delivered by 2033. A mix of housing sizes and types of housing will be delivered in accordance with housing needs including affordable homes and homes for older people. Specific provision will be made for self and custom build housing.”</p>	<p>There is no evidence that Uttlesford’s Housing needs can or will be met by a 5000 house development in this location. The employment needs of Uttlesford are centred around Stansted Airport, and NUGC will simply serve as a dormitory town for Stansted, with people commuting, by car, through Saffron Walden or down the M11. There is no direct train link from Great Chesterford to Stansted Airport and given the nature of shift working there, the vast majority of journeys will not be made by train.</p> <p>Statements associating the development with the biotech centres in South Cambridgeshire make it self-evident that NUGC is being designed to cater for South Cambs’ housing need, yet there has been no meaningful co-operation between South Cambs and Uttlesford and as far as we are aware, South Cambs have not expressed an interest in NUGC going ahead and indeed have reservations as to the benefits vs the clear negative impacts of it.</p>

Passage/policy in Draft Local Plan	GCPC Comment
<p>Policy SP7 “(b) Deliver a range of local employment opportunities with a particular focus on maximising economic links to the Wellcome Genome Campus and Chesterford Research Park”</p>	<p>There is no evidence that this is realistic or deliverable. In fact, given both the Wellcome Campus and Chesterford Research Park have expansion plans of their own, it is highly likely that they will not support such a venture. As set out elsewhere, sustainable transport links to both of these establishments are likely to only consist of motor vehicles (including buses). Analysis of modal shift presented by UDC is inadequate and highly questionable.</p>
<p>Policy SP7(c) “Include a new local centre incorporating a mix of retail, business and community uses (including A1, A2, A3, A4, A5, B1(a), D1 and D2 uses). Land and financial contributions towards four primary schools (two form entry) and one secondary school (seven form entry) will be provided. Early years and childcare facilities, health care facilities, community and youth centres will also be provided.”</p>	<p>This will in our experience of other major developments in East Anglia and wider afield not detract from the overwhelming truth that Saffron Walden will be the destination for retail trips from NUGC. These trips will overwhelmingly be made by car.</p> <p>As set out elsewhere, school delivery cannot be solely left to s106 to sort out. Land value capture (and the lack therefore of a huge land purchase cost to the developer) is the only way such infrastructure will be provided before such facilities are required. All schools in this area are at, or over, capacity.</p>

Passage/policy in Draft Local Plan	GCPC Comment
<p>Policy SP7(d) “Provide transport choice, including high quality, frequent and fast public transport services to Saffron Walden, Cambridge, Great Chesterford Rail Station and nearby employment parks (including the Wellcome Genome Campus and Chesterford Research Park). A network of safe walking and cycling routes will also be provided, including cycle routes connecting with the employment parks.”</p>	<p>This is undeliverable. Fast high quality transport links to Saffron Walden will consist of vehicle journeys, whether by bus or car. There is simply no other option. Busses and car journeys into Saffron Walden will exacerbate the already significant traffic and pollution problems in Saffron Walden.</p> <p>Public transport links to Great Chesterford Station needs to be dropped straight-away. Great Chesterford has no parking, no ability for busses to turn around and no space to expand. Trains do not all stop at Great Chesterford and there is no access to north-bound platform other than via a steep footbridge including many steps. Any transport links will need to be to either Audley End or Whittlesford to overcome this.</p> <p>Whilst we would welcome cycle access to Chesterford Research Park and to the Genome Campus, the reality of commuting (NUGC is clearly a very large bespoke commuter town) is that most will use a car.</p>
<p>SP7(e) “An access strategy that connects with the A11, A1301 and the Cambridge Park & Ride (on the A1307), with the A11 being the preferred route for northbound travel. Contributions towards capacity improvements along the A505 and junction of the A505 and A1301 will be sought, requiring cross boundary discussion with South Cambridgeshire.”</p>	<p>We see no evidence of this access strategy. There is no evidence of it being realistic and no direct access onto the A11. No link is proposed north to the A11 and Granta Park, which would in our view be essential to the strategy of delivering the housing needs of South Cambridgeshire. “Contributions” towards A505 and A1301 is farcical. No studies have been carried out as to impact, cost, timing and analysis with the proposed hugely significant developments at the Genome Campus and Smithson Hill. “Contributions” will be huge, but delivery is far from certain. This work must be undertaken now, before NUGC can be given the go-ahead, not afterwards, leaving everything completely uncertain as to what might be proposed and when, and how effective that might be.</p>

Passage/policy in Draft Local Plan	GCPC Comment
<p>Policy SP7(k) “Positively respond to the landscape and historic value of this location, with proposals accompanied and influenced by landscape/ visual and heritage impact assessments. Careful consideration will be given to the siting and design of development, the use of building and landscaping materials, the improvement and restoration of degraded landscape features, and new woodland/ tree belt and structural planting within and around the site. The sense of tranquillity within the site should be maintained.”</p>	<p>This is simply unachievable. See GCPC landscape and historic environment / heritage assessments. Mitigation of a scheme which is entirely incongruous with the landscape, settlement type, history, impact on heritage assets and wider impact on the Cam Valley simply cannot be achieved, and UDC has provided no evidence at all that it could.</p>
<p>3.64 “Development limits provide a guide to where the Council considers new development should be located. Development limits mark the existing built form of a town or village and define the boundary between the town or village and the countryside beyond. Development within the development limit is generally considered sustainable and acceptable in principle subject to a detailed assessment of issues such as design, amenity, highways, and impact on heritage assets or the natural environment. Outside the development limit it is considered that development would not be able to meet the principles of sustainable development. In order for development within development limits to be acceptable it will have to comply with Policy SP9 below”</p>	<p>This paragraph is clear, and correct. It should apply to Great Chesterford in equal measure. NUGC does not conform to this.</p>

Passage/policy in Draft Local Plan	GCPC Comment
<p>Policy SP9 - Development within Development Limits</p> <p>“Development will be permitted on land within development limits if:</p> <ul style="list-style-type: none"> a. It is in accordance with any existing allocation; b. It would be compatible with the character of the settlement and, depending on the location of the site, its countryside setting; c. It protects the setting of existing buildings and the character of the area; d. Development provides adequate amenity space and does not result in an unacceptable loss of amenity space; e. It does not result in any material overlooking or overshadowing of neighbouring properties; f. It would not have an overbearing effect on neighbouring properties; and g. It would not result in unreasonable noise and/ or disturbance to the occupiers of neighbouring properties by reason of vehicles or any other cause.” 	<p>NUGC is a clearly at odds with the principles within Policies SP9 (b), SP9(c), SP9(f) and SP9(g) even though it falls outside of settlement boundaries. It is clear what the purpose of this policy is, to protect the amenity of residents. Traffic congestion alone in great Chesterford, Saffron Walden, Hinxton, Abington and Ickleton will be severe and irreversible.</p>
<p>Policy SP10 - Protection of the Countryside</p> <p>“The Countryside is defined as land outside the development limits and identified new garden communities and consists of:</p> <ul style="list-style-type: none"> a. The Metropolitan Green Belt b. London Stansted Airport Countryside Protection Zone c. Countryside beyond both the Green Belt and the Countryside Protection Zone <p>The Countryside will be protected for its intrinsic character and beauty, for its value as productive agricultural land, recreational land and for biodiversity. The landscape character and local distinctiveness of the Countryside will be protected and enhanced. Proposals for</p>	<p>NUGC does nothing to protect the intrinsic beauty, character, agricultural value and local distinctiveness of the landscape surrounding Great Chesterford as set out elsewhere in this Submission. Indeed, it will be highly and significantly damaging and certainly does not take into account the key characteristics, features and sensitivities to change, it completely ignores them.</p> <p>NUGC is not appropriate to a rural area, does not protect the best and most versatile agricultural land and does not focus development in locations with good access to services and facilities.</p>

Passage/policy in Draft Local Plan	GCPC Comment
<p>development will need to take into account the landscape’s key characteristics, features and sensitivities to change in accordance with Policy C1.</p> <p>The Metropolitan Green Belt as defined on the Policies Map will be protected against development in accordance with the latest national policy.</p> <p>The Policies Map defines the London Stansted Airport Countryside Protection Zone. Development will only be permitted within this Zone if new buildings or uses of land do not lead to coalescence between London Stansted Airport and existing development and does not adversely affect the open character of the Zone.</p> <p>Within the Countryside, beyond the Metropolitan Green Belt and the Countryside Protection Zone, planning permission will be granted for development appropriate to a rural area in accordance with Policies C1 – C4. In considering proposals for development in the Countryside the Council will:</p> <p>Protect the best and most versatile agricultural land and which support biodiversity;</p> <p>Support other options such as the use of land within development limits, re-use of existing rural buildings and previously developed land; and</p> <p>Focus development in locations with good access to services and facilities.”</p>	

Passage/policy in Draft Local Plan	GCPC Comment
<p>6.10 “The Uttlesford Retail Study (2016) provides an up to date assessment of retail needs in the District and in its town and local centres to inform decisions that impact on their vitality and viability. It concludes caution is needed especially beyond 2026 on setting floor space requirements to take account of market volatility and to provide a town centre first approach in line with national policy. Rather than specify a specific floor space amount for the four existing centres in Policy SP5, the retail study directs applicants to meeting identified need arising in the Study. This approach would apply equally to retail proposals in garden communities to ensure provision meets need generated by the settlement that is most sustainably met locally and does not harm existing retail centres. The Retail Study (Addendum Note 9) has tested potential retail provision for garden communities in order to show that local provision can be sustainable. The Note also suggests in broad terms the scale and form that may be acceptable. As above this will be subject to needs including those arising from the new garden community.”</p>	<p>It is noted that a “town centre first” approach is adopted. NUGC will therefore be reliant on Saffron Walden for retail. This is the predictable outcome. “Out of Town” retail cannot be encouraged at NUGC to the detriment of Saffron Walden (and the inevitable traffic consequences for all). It is therefore highly unrealistic to suggest that NUGC can have a sustainable retail offering. It may well have local shops/chemists etc, (as backed up by paragraph 6.17) but independent shops of the depth and history of Saffron Walden will not be achieved at NUGC and so the retail focus will, rightly, remain at Saffron Walden. The traffic consequences will be significant and adverse.</p> <p>Policy RET1 specifically states that retail development will need to ensure the totality and viability of Uttlesford’s existing town and local centres and the scale of development will need to be consistent with the hierarchy which has Saffron Walden at the top.</p>
<p>7.5 “It is important that the pattern of Local Plan growth minimises the need to travel and offers the best opportunities for sustainable transport modes. Saffron Walden and Great Dunmow both provide key services to a wide rural hinterland but have constraints to how much further growth can be accommodated especially the former. New garden communities have therefore been identified along with some growth in towns and villages to provide a sustainable pattern of growth and minimise the need to travel.”</p>	<p>It is absurd to suggest that NUGC provides a sustainable pattern of growth and minimised the need to travel. It does no such thing. It creates a dormitory town for employees of research parks in South Cambridgeshire and shoppers in Saffron Walden. It is not directly connected via rail to any other retail centres and will be almost exclusively reliant on car journeys. Any retail offering or employment offering on site will be limited, and local in nature.</p>

Passage/policy in Draft Local Plan	GCPC Comment
<p>7.7 “Beyond this scale of development [150 dwellings] more sophisticated modelling would be required to justify development in terms of impacts that would normally fall to developers to produce. The scale and cost of such work is beyond the current round of plan making and will be a matter for a Local Plan review. As a result the County Council and UDC are exploring ways of looking at longer term growth via a separate Saffron Walden Town Transport Study that would inform such a review.”</p>	<p>An extraordinary admission by UDC. No modelling has been carried out to consider the impact of 5000 dwellings 4 miles from the town centre. The people of Saffron Walden may not be aware of this fact, but it is self-evident that supporting NUGC without such modelling will be potentially devastating for traffic movement in Saffron Walden.</p>
<p>7.9 “Car ownership in the District is high. In a rural District like Uttlesford where many people live in smaller settlements and facilities are concentrated in centres outside of the District and in Saffron Walden, Great Dunmow and the larger villages the strategy needs to provide access to alternative modes of travel while at the same time recognising that the car will continue to play an essential role in the daily lives of most residents. Equally the use of active sustainable travel modes varies greatly across the District. On average for travel to work 11% is by active mode of which 91% is walking. However</p> <p>22% is by active modes in Saffron Walden 13% in Great Dunmow with 5% in most villages and less in more isolated parts of the district.”</p>	<p>This paragraph is very clear, and points to the overwhelming fact that NUGC is and will be a car-reliant proposal. Any other suggestion is not based on any evidence which has been presented to date.</p>

Passage/policy in Draft Local Plan	GCPC Comment
<p>Policy TA1 - Accessible Development</p> <p>“Development and transport planning will be co-ordinated to reduce the need to travel by car, increase public transport use, cycling and walking and improve accessibility and safety in the District while accepting the rural nature of the District. The overall need to travel (especially by car) to meet the day to day service needs will be minimised. Development proposals will be located in close proximity to services and make use of sustainable forms of travel (walking, cycling and public transport) to fulfil day to day travel needs as a first requirement. To achieve this:</p> <p>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 severe congestion;</p> <p>Development will be managed so that it improves road safety and takes account of the needs of all users, including mobility impaired users;</p> <p>New development should be located where it can be linked to services and facilities by a range of transport options including safe and well designed footpaths and cycle networks, public transport and the private car;</p> <p>Travel Plans and Transport Assessments/ Statements will be required for specific development proposals to demonstrate how a reduction in car travel will be achieved/sustainable travel behaviour a priority.”</p>	<p>Transport planning for NUGC has not been properly assessed or considered by UDC, and is very far from co-ordinated to reduce the need to travel by car. In fact, it is located and designed to be a development to and from which people will have to drive.</p> <p>It is demonstrable that the road network is not capable of accommodating the thousands of peak and even off-peak trips 5000 houses would create, whether in Saffron Walden, Great Chesterford or the villages in South Cambridgeshire.</p> <p>NUGC is not located where it can be linked to services and facilities via a range of transport options. As set out elsewhere in this Submission, the reality is that buses can provide a limited service, which will in of itself create issues in Saffron Walden and Great Chesterford, rail travel is only utilisable if cars are used to access the appropriate stations (Great Chesterford not being one of these) and cycling and walking will have limited appeal, not least for commuters.</p> <p>Clearly, road safety cannot be improved by the NUGC development, it will be worsened.</p> <p>Travel plans and transport assessments have not been provided for NUGC. Clearly, before such a huge development can be approved, the travel implications need to be thoroughly assessed. They demonstrably have not.</p> <p>Very similar issues are applicable to Policy TA2 in relation to sustainable development. Aspirational statements concerning accessibility and integration into the wider community and existing networks have not been tested and are plainly inconsistent with the concept of NUGC which is isolated, does not have direct rail access and relies so heavily on the car.</p>

Passage/policy in Draft Local Plan	GCPC Comment
<p>Policy INF1 - Infrastructure Delivery</p> <p>“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 the development. This is particularly important for the new garden communities.</p> <p>Each development must address physical, community, social and green infrastructure.</p> <p>In assessing capacity, developers will provide evidence as to whether existing infrastructure can be used more efficiently, or whether the impact of development can be reduced through promoting behavioural change.</p> <p>New development will only be permitted if the necessary on and off-site infrastructure that is required to support it, and mitigate its impact, is either already in place, or there is a reliable mechanism in place to ensure that it will be delivered.</p> <p>A combination of funding sources will be sought to deliver the infrastructure required to deliver the spatial strategy. Developers will either make direct provision or contribute towards the provision of infrastructure required by the development either alone or cumulatively with other developments.</p> <p>Planning obligations and phasing conditions will be required where necessary to ensure that development meets the principles of this policy.”</p>	<p>Timely delivery of infrastructure cannot be achieved unless and until the infrastructure requirements have been properly assessed and costed.</p> <p>NUGC will create a huge infrastructure cost, and require infrastructure the likes of which we haven’t seen in north Uttlesford for over a hundred years. No studies have adequately assessed the impact on Saffron Walden, Great Chesterford, the A11/M11, the railway or the villages and roads of South Cambridgeshire. Deciding on NUGC before this work is carried out is absurd given the potential cost could very easily cripple any development.</p> <p>Securing the site for no more than 1.5 times agricultural land value in accordance with Garden City principles is the only way there is even a fighting chance of this happening. A s106 package would be far too large if commercial land value is paid for the site by a developer, so corners will be cut, and infrastructure back-filled once the inevitable problems are encountered.</p> <p>In the case of most of the issues identified, solutions are not likely to be able to be delivered for a whole host of reasons including lack of national funding, no local support, no network rail support, land ownership issues, County Council funding and the need to develop housing much faster than the pace of infrastructure delivery which is always very slow and hugely costly.</p> <p>Most if not all of the key infrastructure players have not even been consulted on NUGC let alone given any kind of assurances that the necessary infrastructure (once identified and costed) will be delivered. No timescale is even remotely possible as a result.</p>
<p>Policy EN1 - Protecting the Historic Environment</p> <p>“Development will be supported where it protects and enhances the significance of any heritage asset and makes a positive contribution to the street scene and/ or landscape.”</p>	<p>Clearly, as we demonstrate elsewhere in this Submission, NUGC does not protect or enhance the significance of the heritage assets either on-site, or in Great Chesterford. Any suggestion that it does is a nonsense.</p>

Passage/policy in Draft Local Plan	GCPC Comment
<p>Policy EN3 - Protecting the Significance of Conservation Areas</p> <p>“Development outside of the conservation area which might otherwise affect its setting will only be permitted where it is not detrimental to the character, appearance or significance of the Conservation Area and does not adversely affect listed buildings.”</p>	<p>Clearly, as we demonstrate elsewhere in this Submission, NUGC will be damaging to the character, appearance and significance of the Conservation Area within Great Chesterford.</p>
<p>Policy C1: Protection of Landscape Character</p> <p>“Development will be permitted provided that:</p> <p>Cross-valley views in the river valleys are maintained with development on valley sides respecting the historic settlement pattern, form and building materials of the locality;</p> <p>Panoramic views of the plateaux and uplands are maintained especially open views to historic buildings and landmarks such as churches;</p> <p>No material harm is caused to the historic settlement pattern, especially scale and density, and that it uses materials and colours that complement the landscape setting and landscape character. Such development should be well integrated with the surrounding landscape;</p> <p>No material harm is caused to the landscape pattern and structure of woodland areas, hedgerows and individual trees and does not diminish the role they play in views across the landscape;</p> <p>No material harm is caused to the historic landscape character of field patterns and field size, greens, commons and verges;</p> <p>No material harm is caused to the form and alignment of protected historic lanes.”</p>	<p>NUGC is completely at odds with this important policy. As we set out in our representations, NUGC will have a significant adverse impact on cross-valley views, settlement pattern and form of this part of Uttlesford, which is cherished by all, including those who have drafted this policy of the draft LP.</p> <p>Material harm will be caused, to historic settlement pattern, in scale and density, to landscape patterns and landscape character, field patterns and to historic lanes.</p>

PART 2: PROCEDURAL ISSUES

F Lack of transparency and absence of due process¹

F1 Appendix 5 contains a full record of GCPC's involvement with UDC since initiation in early 2015 of the Local Plan process. In this Section GCPC highlights the many deficiencies in the process, and the failure of UDC to engage with GCPC in any meaningful manner as NUGC emerged as a possible settlement site. It is noted that this failure to engage with GCPC and the residents of Great Chesterford more broadly (and the clear opposition of residents to what is now proposed by UDC in the draft LP) entirely undermines the requirement for community engagement set out in the Garden Community Principles – see further the text at Section C(f) above. Appendix 5 also highlights the absence of any material engagement by UDC with South Cambs District Council as work on the Plan has proceeded.

F2 It is immediately clear from Appendix 5 that (a) the possible inclusion of Great Chesterford as a settlement site in addition to Little Easton and Braintree only emerged following UDC's pause in the Local Plan process in early November 2016 (A5.9 - 10); and (b) identification of Great Chesterford by PPWG as a front-runner became apparent from January 2017 onwards (A5.13(i),(ii)).

GCPC's experience of its dealings with UDC

F3 The record – as detailed below and in Appendix 5 – also shows that UDC:

- (i) ignored repeated requests from GCPC for information relevant to Great Chesterford in the context of the emerging Plan;
- (ii) in its dialogue throughout 2015-2017 (A5.5, A5.13(ii)) with Bidwells (acting on behalf of the NUGC landowners concerned), UDC both disregarded all opportunities to maintain any meaningful dialogue with GCPC, and disclosed Neighbourhood Plan reports prepared by consultants appointed by GCPC;
- (iii) appointed Troy Navigus as a consultant to UDC knowing that it was already advising GCPC on spatial strategy aspects of its emerging Neighbourhood Plan, resulting in the need for GCPC to appoint alternative advisers on account of the conflict of interest thereby created; and
- (iv) provided GCPC with no information about the possible structure of NUGC other than via PPWG agenda documents to enable GCPC to prepare and present considered comments at forthcoming PPWG meetings.

GCPC requests for information ignored

F4 In April 2016 GCPC provided UDC with a full response to its draft Assessment of responses received to its Call for Sites insofar as concerned Great Chesterford (A5.3). No response of any kind was received from UDC (A5.4). In fact, throughout the entire period during which the draft LP has been in preparation, UDC has maintained a position of dealing with such views and concerns of GCPC by the simple expedient of ignoring them. The record shows that:

¹ Note: For the sake of convenience, references to "UDC" below may refer, or include reference, to "UDC", "PPWG" or "officers" as the context requires. Numbers contained in the text that follows refer to relevant paragraphs in Appendix 5 (for example, "A5.1" is a reference to Appendix 5, paragraph (1)).

- (i) there has been no consultation on GCPC's concerns about the change in UDC's Vision and Development Strategy as set out in 2015 in UDC's Public Consultation document (A5.3(i)), and the apparent intention now "to make the Cambridge/Stansted/ London corridor ever more viable" (A5.13(ii));
- (ii) UDC failed to consult with GCPC at any time about the designation of Great Chesterford as a Key Village despite GCPC producing evidence to the contrary (A5.3(ii));
- (iii) UDC failed to supply GCPC with documents on which UDC relied in reaching conclusions in its draft Assessment of the Call for Sites, in particular those relating to landscape, historic settlement character and transport information, and as to the suitability of the NUGC site (A5.3(iii)), and ignored subsequent written reminders from GCPC in May and June 2016 that a full response was awaited (A5.4);
- (iv) UDC rejected GCPC's Freedom of Information request for disclosure of documents produced to participants at the Local Plan workshops held on 11 and 17 October 2016, and also the agenda papers relating to the cancelled PPWG meeting scheduled for 25 October 2016 (A5.11);
- (v) UDC failed to disclose to GCPC any transport assessment or other information received by UDC and relied on by officers at PPWG meetings (A5.13(iv) and (vii)) in support of the decision to recommend NUGC for selection; and
- (vi) UDC failed generally to provide GCPC with any information about the prospective plan and set-up of the NUGC settlement, whether from information provided by Bidwells as part of, or arising out of, its Call for Sites submission or the Prospectus presented to UDC members on 27 March 2017 (A5.13(iii)).

Bidwells' information not shared with GCPC; disclosure to Bidwells of GCPC's reports

F5 Throughout 2015 and until March 2017 Bidwells was in close and constant contact with UDC, whether at meetings, by means of submission of documents (A5.1, A5.5) or presentations (A5.13(iii)); neither Bidwells or its clients considered it necessary at any time to inform GCPC about the emerging NUGC proposals. Whilst UDC might reasonably have concluded that there was no necessity to do so prior to the pause announcement in November 2016, once it was clear that Great Chesterford was in serious contention by early 2017 there was every reason to take GCPC into its confidence both as to that likelihood, and also to learn about the main concerns for Great Chesterford that might result. UDC chose to do nothing, even after Bidwells made its presentation to UDC members on 27 March 2017 (A5.13(iii)). GCPC only heard from UDC and Bidwells about the proposal at a presentation on 24 May 2017 when it attended, together with representatives of Little Chesterford and Hinxton Parish Councils, a briefing organised at UDC's offices (A5.13(v)).

F6 UDC's very close working relationship with Bidwells, in contrast to its virtually non-existent involvement with GCPC, is illustrated by UDC's request to GCPC (A5.7) to provide it with a copy of two documents prepared by GCPC's consultants in connection with the Chesterfords' emerging Neighbourhood Plan, namely assessments on the Historic Environment and Landscape Character of the Chesterfords. GCPC was also requested to send a representative to answer any questions on either document at a meeting of PPWG to be held on 23 August 2016. Both documents were immediately disclosed by UDC without any prior consultation with GCPC, resulting in Bidwells submitting a detailed letter disputing the content of both documents in a number of material respects. GCPC's representative was not even called to speak in rebuttal at the meeting. Officers had no authority to disclose either report to Bidwells without the express authority of GCPC.

UDC's appointment of GCPC's Neighbourhood Plan consultants

F7 UDC's total disregard of GCPC's interests, and its cavalier attitude generally, is further illustrated by the fact that, despite knowing that GCPC had retained Troy Navigus to act as its consultant adviser on spatial strategy aspects regarding the Chesterfords' emerging Neighbourhood Plan, with effect from 5 October 2106 it appointed the same consultants to provide UDC with ongoing support in preparing its own Local Plan (A5.8). On being told that GCPC already existed as a client, UDC officers informed Troy Navigus that they had "no problem", and that they "did not see it as a conflict at this stage". GCPC, which had paid £2,123 for services already rendered, took a contrary view and considered that it had no alternative but to terminate its contract with Troy Navigus and to appoint an alternative consultant. Apart from UDC benefitting from much source material accumulated by Troy Navigus in its original role – paid for by residents of the Chesterfords, from Parish Council funds of Great and Little Chesterford – GCPC believes that discussion of this appointment between UDC and GCPC would have been considerably more professional and constructive.

UDC's general failure to keep GCPC informed

F8 The experience of GCPC throughout the entire Local Plan process to-date has been that UDC, in gathering evidence, has adopted an inward-looking and wholly non-transparent process. It appears to have had no mechanism to market-test that evidence and conclusions to be derived from it, a matter which has particular significance in the context of all transport issues related to NUGC, especially the total absence of any detailed assessments relating to the B184, and the access proposals put forward by Bidwells (A5.13(vii)). The significance of this omission for Great Chesterford, with all the implications overall and in particular for traffic congestion and rat-runs through the village, should be self-evident, yet UDC has proceeded blithely ahead. Further, the failure by UDC to obtain a full transport assessment means that it has not yet obtained an unqualified financial assessment (A5.13(viii)) – a fact conveniently obscured at the PPWG meeting of 20 June 2017 which recommended that NUGC should be included in the draft Plan, the Agenda note limiting itself to the comment that the site has "been subject to a Sustainability Assessment" (A5.13(ix)).

F9 Add to the above UDC's refusal to respond to legitimate questions of fact relating to Great Chesterford, its failure to keep detailed notes of meetings or to make available any other information about forthcoming meetings, and the clear impression emerges that UDC has been overwhelmed by the scope and complexity of the task in which it has been engaged. In this connection the detailed comments of a PPWG member in a note dated 25 November 2016 addressed to officers (attached to PPWG Agenda papers for its meeting of 10 January 2107) are particularly revealing. The note sets out in considerable detail many criticisms regarding the lack of evidence then available relating to the spatial strategy under consideration, as well as the non-availability of evidence concerning air quality, infrastructure assessment, education strategy and sustainability assessment.

Inadequate Duty to Cooperate

F10 The PPWG member (above) was especially critical in November 2016 of the fact that UDC's cooperation with South Cambs DC had "been effectively non-existent". The note lists the alarmingly limited contact that had taken place by that time. The same concerns are evident from the PAS report (at paragraph 5.2) prepared for UDC and presented to the PPWG at its meeting on January 2017. Since then, and other than conversations between respective officers, it appears that there

have been only three meetings between UDC and South Cambs (11 and 13 January, and 1 February 2017); only notes of the January meetings currently appear on UDC's website.

F11 In view of Great Chesterford's close proximity to the Essex/Uttlesford and Cambridgeshire/South Cambs border, it is inevitable that South Cambs has a very close interest in any major development on its doorstep – so much so that in March 2012 South Cambs officers recommended members to oppose any such development, and South Cambs DC has now identified a number of concerns relating to the draft LP in a note dated 25 August 2017 prepared by planning officers for the South Cambs Planning Portfolio Holder. It is equally obvious that transport issues are likely to be of major concern given the already over-crowded local road network, and also relating to the M11/J9, where no access north/exit south exists. Whilst such transport concerns clearly require to be addressed, it nevertheless remains extraordinary that the totality of UDC's efforts in this regard have been solely directed at solving South Cambs road network overcrowding, and that absolutely nothing has been proposed by UDC in relation to the B184 between Stump Cross and Saffron Walden other than a suggested roundabout at the entrance to Park Road.

Conclusion

F12 GCPC identified its many concerns and criticisms about the NUGC proposal in its letters dated 5 June 2017 (A5.13(vi)); no substantive response has been received from UDC other than a statement that "where there are adverse impacts ...the Council will look at potential mitigation measures" as part of the formal consultation. The papers relating to PPWG meetings held in 2017 (A5.13), taken together with this exchange of correspondence – and UDC's reply in particular – make clear beyond argument that UDC had decided on the selection of Great Chesterford despite the fact that it did, and still does, not have the evidence to support that decision. Given the emergence of NUGC as a front-runner in early 2017, it is difficult to challenge the PPWG member's strongly expressed conclusion in his note of November 2016 that, in this instance, UDC had adopted a "process of the evidence following the decisions already taken".

F13 Section 33A of the Planning and Compulsory Purchase Act 2004 requires UDC to "engage constructively, actively and on an ongoing basis" with (among others) adjoining district councils, and GCPC does not believe that this duty has been properly discharged in relation to the proposed NUGC.

APPENDICES

Appendix 1 – East Herts DC Housing Topic Paper, August 2017
(extract)

(As referred to in Pegasus' Report (Section B) at paragraphs 3.2 and 3.3)

2 . Establishing the Objectively Assessed Housing Need



2.38 For East Herts the level of need is identified as being **18,396** dwellings between 2011 and 2033, which equates to a need for **836** dwellings per year. The District Plan will need to be updated to reflect this position.

11

Memorandum of Understanding on Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area (included in SOC/001)

2.39 A Memorandum of Understanding (MoU) has been signed that commits all four Councils within the HMA to meeting their individual housing needs (as identified in the original SHMA (**HOP/001**)) within their own administrative boundaries. The preparation of the MoU followed the completion of work from consultants AECOM, which assessed the sustainability of strategic spatial options for meeting the overall OAHN within the HMA. The conclusion of this study was that the 'Spatial Option' set out in Table 2.3 below represented the most sustainable spatial distribution of the OAHN identified in the original SHMA.

2.40 The MoU currently confirms that the four Councils are committed to delivering ~51,100 dwellings across the HMA in the period 2011-2033.

2.41 The four Councils are also committed to updating the MoU in due course to reflect the latest agreed position across the HMA.

Table 2.3: The 'Spatial Option' of OAHN 2011-2033 (Figure 5 of the MoU)

Local Authority	Net new dwellings 2011-2033
East Hertfordshire District Council	~18,000
Epping Forest District Council	~11,400
Harlow District Council	~9,200
Uttlesford District Council	~12,500
Total across the HMA	~51,100
.....of which the area in and around Harlow will provide ⁽¹⁾	~16,100

2.42 It should be noted that on the 12 July 2017 Uttlesford District Council published a Regulation 18 Plan for consultation which includes a housing target of 14,100 dwellings.

¹ 'In and around Harlow' refers to Harlow town as well as around Harlow in adjoining districts

Appendix 2 – Transport: COTTEE Transport Planning

GREAT CHESTERFORD PARISH COUNCIL

DRAFT LOCAL PLAN CONSULTATION REPRESENTATIONS

TRANSPORT MATTERS

1758/MAC

August 2017

CONTENTS

1. Introduction
2. Route Stress Levels
3. Sustainable Travel
4. Traffic Flow Increases
5. Regulation 18 Local Plan – Transport Policy
6. Summary and Conclusions

Status	Author	Date	Check	Date	Authorised	Date
Final	M Cottee	22.08.2017	A Firmin	22.08.2017	M Cottee	22.08.2017

COPYRIGHT © COTTEE Transport Planning
 This document has been prepared in accordance with the instructions of our client and must not be assigned, copied or reproduced in whole or in part without the written consent of COTTEE Transport Planning.

1. INTRODUCTION

- 1.1 COTTEE Transport Planning (CTP) are instructed by Great Chesterford Parish Council (GCPC) to examine the Transport related documents associated with Uttlesford District Council's (UDC) consultation on the Draft Local Plan following Councillors' approval of the draft plan for public consultation on 11 July 2017.
- 1.2 UDC's consultation seeks views on the proposed site allocations and the associated policies which will guide future development within the district up to 2033.
- 1.3 These representations relate to the transport impact of the proposed North Uttlesford Garden Village (NUGV) to the north east of Great Chesterford.
- 1.4 The key transport studies relating to the NUGV are those prepared for UDC's Local Plan by WYG (on behalf of the UDC), in particular the most recent which are the Addendum report dated June 2017 and the South Cambridgeshire Junction Assessments dated May 2017.
- 1.5 **Following a review of the WYG reports CTP's interpretation differs substantially from that of UDC's Planning Policy Working Group (PPWG) as set out in their reports dated 17 May 2017 and 22 June 2017. The 17 May 2017 PPWG note states that:**
- 'The emerging findings of this work indicate that with mitigation works at these junctions the proposed growth can be accommodated.'*
- 1.6 The PPWG 22 June 2017 note states that:
- '6.7.13 The study has identified key infrastructure including an acceptable approach to mitigation at the M11 J8 interchange and to strategic junctions in South Cambridgeshire on the A505 corridor.'*
- '6.9.2. The M11 junction 10 and A505/A1301 roundabout were found to be currently near capacity or already over capacity. However, with the range of improvements identified, the situation is mitigated. The mitigation identified can also provide for capacity at these junctions beyond the plan period with up to 3300 dwellings possible at Great Chesterford, subject to delivery of successful modal shift measures and more detailed Transport Assessment work....'*
- '6.9.3. Cambridgeshire County Council with the support of Essex County Council and Highways England are investigating a bid to fund a full A505 study that would look at the long-term implications of growth impacting the corridor including the need for dualling.'*
- 1.7 **The PPWG statements relate to mitigation at junctions but there is no proper consideration of the serious issues identified by WYG relating to route corridors in the vicinity of the proposals which they have found significantly exceed capacity. Nor is there an appropriate consideration of the cost of such works in relation to viability.**
- 1.8 **UDC's PPWG refer to 'investigating of a bid to fund a full A505 study'. However, no funding has been identified and there is no certainty that major improvements will come forward in the timeframe associated with the proposed NUGV.**

- 1.9 The NPPF requires Local Plan proposals to be deliverable and viable. However, there is no evidence that the costs of the major junction and route corridor improvements can be sustained by the development scenarios analysed. As will be seen later in these representations WYG considered 1,400 units in their analysis of the South Cambridgeshire junctions but extrapolate the results of their analysis to a figure of 3,294 units with no justification in terms of route corridors.
- 1.10 Furthermore, in the minute of the 22 June 2017 PPWG meeting WYG stated that:
- ...at this stage of the Local Plan, work had not occurred at such a high level of detail to anticipate traffic growth and mitigation measures on the B184'*
- 1.11 This admission by WYG reinforces the concern of GCPC that notwithstanding the detailed work on the South Cambridgeshire junctions there has been little regard as to the impacts on the B184 in Uttlesford itself; the B184 being one of the principal access routes to and from the proposed NUGV.
- 1.12 In order to target the key transport features of the proposals reference is made to paragraph 5.2.16 of the WYG Addendum report – June 2017 which states (COTTEE underlining):
- '5.2.16 Based on the assessment of the scenarios that feature significant development at these locations (scenarios 18, 19, 20, 27 & 28) the quantum and distribution of development assessed in scenario 28 is considered most favourable in terms of managing traffic impacts at key locations including; the M11 motorway, M11J8, the A120(T) and local roads within Uttlesford and on the A120, A131 and A505 in neighbouring districts.'*
- 1.13 Accordingly, these representations focus on Scenario 28, which involves 1,460 residential dwellings at NUGV, although as referred to above the South Cambridgeshire Junctions Assessment document suggests a substantially higher numbers of units may be possible.
- 1.14 In the December 2016 report WYG considered 5,000 units in a broad sense but this was not carried forward to the subsequent detailed South Cambridgeshire Junction Assessments in May 2017; the principal focus of which was to examine 1,400 units (another variation in the number of units considered by WYG).
- 1.15 Policy SP7 indicates 1,900 units by 2033 and 5,000 in total. However, there is no evidence presented by WYG to demonstrate that the impacts arising from the proposed allocation of 5,000 units have either been tested or that the relevant mitigation has been planned for.
- 1.16 In summary, WYG referred to 5,000 initially which reduced to 2,800; and then to 1,460 and thereafter to 1,400. Finally, in the words of WYG 'extrapolation techniques' were used to arrive at a figure of 3,294 in their May 2017 report.

2. ROUTE STRESS LEVELS

- 2.1 The WYG Addendum Report analysed the 'Stress' on each main link in the vicinity of the proposed NUGV for the reference case 2033 (No Local Plan Growth). The extract below from the WYG report shows that the **A505, M11 and A1307 will exceed 100% stress by a considerable margin in 2033 without any Local Plan Growth added** (Great Chesterford is the grey shaded area in the lower central area of the diagram).



- 2.2 Paragraph 4.2.4 of the WYG report defines 'Stress': A stress level of 100% is the critical point at which link flows break down resulting in queuing and reduced throughput. WYG adopted the following stress thresholds to identify when links approach, or exceed their theoretical maximum capacity:

- **Less than 90% stress** - the link operates within capacity, although journey times may become less reliable over 75% stress (see below).
- **Between 90% and 100% stress** - The link is approaching capacity and is increasingly susceptible to flow breakdown.
- **Greater than 100% stress** - The link operates over capacity and is likely to experience flow breakdown on a regular basis.

- 2.3 At paragraphs 4.2.5 / 4.2.6 WYG refer to: 100% stress as being when link capacity is approaching critical conditions. However even at 75% stress journey time reliability can be adversely affected. Links with 75% to 99% stress will experience less reliable journey times than on links with less than 75% stress.

- 2.4 Junctions will reach operational capacity and suffer congestion and delays before a link reaches capacity. Therefore where links are at, or close to capacity junctions on the link are also likely to experience problems.

- 2.5 Paragraph 4.2 of the WYG report refers to (COTTEE emphasis and underlining): When hourly traffic demand exceeds maximum sustainable hourly throughput of the link the effects on traffic flow are likely to be one or more of the following:

- Flows break down with speeds varying
- Average speeds drop
- Journey times become longer and unreliable
- Sustainable throughput is reduced; and/or
- Queues are likely to form

2.6 Paragraph 4.2.2 sets out the implications of the above as follows:

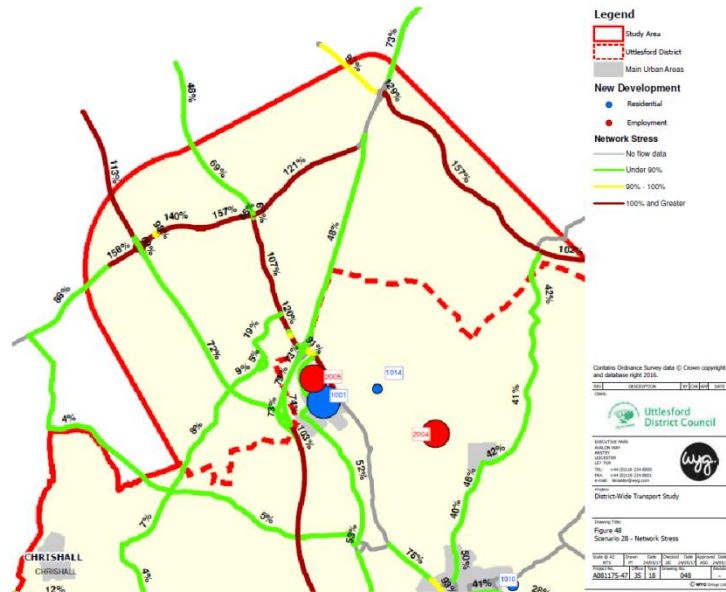
- Increased frequency of accidents due to unpredictable queuing on links,
- Peak spreading as drivers travel earlier or later than the 'traditional' highway peak periods to avoid delays, and
- Trips re-assigning onto alternative routes to avoid congestion (i.e. 'rat-running') where alternative routes are available.

2.7 The PBA note dated 9 June 2017 states that:

- *From the work undertaken, it is apparent that local routes through adjacent villages are not forecast to be impacted by development in this location. However, it should be noted that the assignment undertaken is based on an 'all or nothing' fastest route method which is not sensitive to congestion and driver behaviour. Any subsequent work and analysis will use more comprehensive transport models that are capable of identifying this more dynamic driver responses. Such models would be the ECC VISSUM model or the CCC CSR.*
- *Rat running is usually the result of delays or congestion to the primary routes which people would normally use or be expected to use if delay and congestion were not an issue. A strategic development such as this, will require a comprehensive mitigation strategy to be delivered to ensure that journeys using the primary route network are viable and not subject to excessive delay or congestion meaning that alternative or less suitable routes are used.*

2.8 **Many links in the vicinity of the NUGV proposal are predicted to exceed 100% stress without any Local Plan Growth and others are close to this level leading to one or more of the issues identified by WYG above. It is also noted that where links are approaching, or at capacity 'rat running' will occur impacting villages. This impact has not been modelled by WYG. The analysis undertaken by WYG has demonstrated that main links and junctions will be overcapacity even with the mitigation proposed. Therefore 'rat running' through villages is a very likely consequence of the Local Plan proposals.**

2.9 **The extract below from the WYG Addendum report (Figure 48) shows the link stress for Scenario 28 (1,460 units at NUGV referred to earlier). It can be seen that more links will exceed the 100% threshold when compared to the reference case discussed above. Using WYG's stress level guide this will lead to the further serious effects on traffic flow that they refer to.**



3. SUSTAINABLE TRAVEL

- 3.1 **At paragraph 4.6.2 WYG refer to the NPPF:** In accordance with the NPPF the new Local Plan will ensure that developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. **Garden communities will be required to deliver a mix of uses and key facilities such as employment, education and retail within walking distance of most residential properties to minimise the need to travel.**
- 3.2 **Table 5 sets out the number of person trips by mode and in particular for Scenario 28 it can be seen that over 7,000 AM peak person trips by car would be added to the local road network. Nearly 1,000 additional rail trips would also be added.**

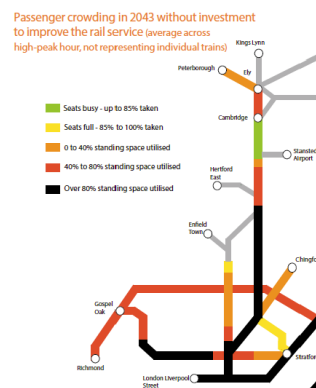
Table 5 – Total Two-Way Person Trips by Mode – AM Peak

No.	Scenario	Total 2-Way Person Trips by Mode – AM Peak							Total
		Train	Bus	Car	M/cycle	Bicycle	Walk	Other	
13	West of Great Dunmow; West of Braintree	809	126	5,999	51	98	798	51	7,932
14	Little Dunmow; Great Chesterford	882	138	6,535	55	107	870	55	8,641
15	Little Dunmow; West of Great Dunmow	864	135	6,402	54	104	852	54	8,465
16	North of Takeley; Great Chesterford	817	128	6,057	51	99	806	51	8,009
17	West of Great Dunmow; Takeley	806	126	5,973	50	97	795	50	7,896
18	Great Chesterford; West of Great Dunmow; West of Braintree	1,139	178	8,443	71	138	1,123	71	11,163
19	Great Chesterford; West of Great Dunmow; West of Braintree	1,129	176	8,370	71	137	1,114	71	11,067
20	Great Chesterford; West of Great Dunmow; West of Braintree	1,104	172	8,184	69	134	1,089	69	10,822
21	Great Chesterford; West of Braintree; Takeley (NE)	1,060	165	7,854	66	128	1,045	66	10,385
22	West of Braintree; Takeley; Little Dunmow	1,103	172	8,173	69	133	1,088	69	10,807
23	West of Great Dunmow; West of Braintree; Little Dunmow	1,178	184	8,734	74	143	1,162	74	11,548
24	Great Chesterford; Takeley; Little Dunmow	1,103	172	8,177	69	133	1,088	69	10,812
25	Great Chesterford; West of Great Dunmow; Little Dunmow	1,143	178	8,474	72	138	1,128	72	11,205
26	West of Great Dunmow; Takeley (NE); Little Dunmow	1,168	182	8,657	73	141	1,152	73	11,447
27	Great Chesterford; West of Great Dunmow; Takeley	1,167	182	8,651	73	141	1,151	73	11,438
28	Great Chesterford; West of Great Dunmow; Takeley	953	149	7,062	60	115	940	60	9,338

Notes: 1. Train includes train, underground, light rail and tram; 2. Bus includes bus, minibus and coach; 3. Motorcycle includes motorcycle, scooter and moped; 4. Car includes car and van drivers, car passengers and taxi.

- 3.3 **At Paragraph 4.6.5 WYG comment that:** Based on Essex County Council guidance a 10% modal shift away from car use towards more sustainable modes of travel is considered a reasonable 'rule of thumb' for the purposes of estimating the effects of modal shift on existing transport infrastructure, although this is probably conservative when the benefits of new mixed-use communities designed to minimise the need to travel are considered.
- 3.4 **However, WYG provide no evidence that a 10% modal shift can be achieved in this location. Later WYG use a 15% modal shift when they apply 'extrapolation techniques'.**
- 3.5 **At paragraph 4.6.7 WYG refer to Scenario 23 and a total increased demand of 1,563 two-way person trips travelling by train in the AM peak. They state:** 'Splitting this in half (as a rough approximation) to reflect inbound and outbound trips and assuming all outbound persons catch the train at Audley End station and are split equally between the four peak hourly services that currently travel between Audley End and London Liverpool Street Stations, this would equate to approximately 16 additional passengers per carriage, assuming 12 car length trains.'

- 3.6 **However, 'splitting in half' is considered unlikely since it is usual for the out commute in the AM peak to be higher than the inbound. Furthermore, there appears to be no data to support the 12 carriage train length assumption, nor whether additional passengers can be accommodated based on projected demand from committed development and Local Plan growth along the train route corridor. If trains are formed of less than the 12 carriages referred to; the split is different to 50/50; the modal split is higher to train; committed development / Local Plan has not been properly considered then train capacities could be a cause for concern.**
- 3.7 **At paragraph 4.6.8 WYG state:** This is a very approximate estimation and in practice demand would be spread across more stations and other destinations (e.g. trips to Cambridge) but the estimate suggests that the approximate scale of additional rail demand anticipated should be accommodated by existing / proposed infrastructure and services.
- 3.8 **No information is provided on existing and proposed levels of capacity on trains or at stations. Furthermore, there is no evidence on how many commuters would park at the stations concerned and how that parking would be accommodated in terms of land and access and whether it is deliverable. Furthermore, there is little information on how rail users would travel to and from the station. Whilst it is understood that Local Plan analysis cannot examine full details, a sufficient level of detail must be considered before significant decisions affecting the local community are made.**
- 3.9 The Anglia Route Study Long Term Planning Process Summary Document - March 2016 provides information on predicted capacity as set out below. The diagram shows that substantial investment will be needed to ensure rail represents a reasonable / attractive travel option. If appropriate investment is not available then the modal shifts used by WYG will not support the traffic figures used and more car based travel will occur.



- 3.10 **At paragraph 4.6.9 WYG state:** Similarly, the levels of increased walking, cycling and bus trips that are estimated across the district would be accommodated by existing infrastructure / services with local improvements to enhance connectivity to new developments.
- 3.11 **Again the WYG report provides no substantive evidence of improved sustainable access.**

4. TRAFFIC FLOW INCREASES

- 4.1 At paragraph 4.7.4 WYG state: As can be seen from Table 6 and Table 7 the anticipated additional traffic flows due to Local Plan development in the AM peak are low in many locations across all of the scenarios and would be difficult to differentiate from typical daily fluctuations in traffic flow. For example, a two-way flow of 360 VPH would be equivalent to one vehicle passing every 20 seconds, on average, in each direction during the peak hour.
- 4.2 Table 7 is repeated below. The above method used by WYG to examine the increased flows is inappropriate as it does not reflect actual conditions that would be seen on road links. The appropriate method of presenting the data is to state the existing traffic flow; add the proposed flow to this; and then calculate the number of seconds for one vehicle to pass in the combined flow. From the foregoing review it is apparent that many links will in fact exceed capacity so will be very slow moving or stationary.

Table 7 – Total Two-Way Vehicle Trips – AM Peak

Link Description	District	March 2017 Scenarios										
		18	19	20	21	22	23	24	25	26	27	28
Poet's Brook Road north of A120(T)	Brintree	88	95	103	83	170	159	108	112	145	77	90
A131 north east of Brintree	Brintree	36	36	39	32	56	55	39	41	53	35	35
A120(T) east of Brintree	Brintree	167	168	175	153	200	201	162	169	190	162	152
B1018 south east of Brintree	Brintree	47	50	54	43	84	78	54	56	73	43	46
A131 Great Leighs to the B1008	Chelmsford	71	118	172	71	169	70	0	0	0	0	115
B1008 (Rampton Ln B1417)	Chelmsford	116	109	104	106	93	110	100	105	113	123	104
A131 Essex Regiment Way S of B1008	Chelmsford	237	245	240	203	508	427	252	255	371	151	236
A120 Bishop's Shortford Bypass	East Herts/Utlesford	394	369	336	382	458	508	359	360	566	443	320
M11 south of J7	Epping Forest	871	861	814	781	995	1099	801	847	1095	910	744
A414 Southeast of M11 J7	Epping Forest	28	28	29	45	25	17	36	28	32	36	24
M11 J7 to J8	E Forest/Utlesford	1148	1127	1058	1042	1287	1430	1056	1110	1448	1317	975
M11 north of J9	South Cambs	125	117	104	105	174	205	117	130	210	140	106
A505 between the M11 and the A11	South Cambs	499	500	500	500	159	158	499	499	158	499	360
A505 west of M11 at Duxford	South Cambs	141	139	136	138	56	62	137	139	66	145	100
A1307 between the A11 and Linton	South Cambs	229	232	235	230	121	114	224	224	110	224	185
M11 J8 to J9	Utlesford	744	731	717	723	323	359	739	750	371	765	522
A120(T) M11 J8 to Stansted Airport	Utlesford	1814	1736	1560	1656	2261	2596	1633	1714	2754	2049	1515
A120(T) north of Takeley	Utlesford	1623	1543	1367	1738	2256	2455	1576	1520	2886	1995	1343
B1256 west of Great Durrum	Utlesford	576	548	522	578	482	537	520	516	582	631	527
B1383 Stansted Mitchell (S of B1051)	Utlesford	394	400	409	446	485	444	445	418	484	408	404
B1052 Saffron Walden	Utlesford	176	166	148	132	135	175	126	148	160	181	156
B184 Saffron Walden	Utlesford	396	390	377	363	229	265	360	376	252	400	327
B1383 Newport village	Utlesford	440	427	404	385	351	416	381	408	397	450	398
B1051 Stansted Mitchell	Utlesford	341	347	356	393	431	391	392	366	431	355	350
B1383 Stansted Mitchell (N of B1051)	Utlesford	53	54	53	54	54	54	53	53	53	54	54
B1256 Takeley village	Utlesford	193	220	258	194	559	496	310	311	455	149	220
B1008 Great Durrum	Utlesford	103	109	120	140	240	207	168	149	234	112	108

Note: Highest values for each link shown in red, lowest in green

- 4.3 At paragraph 4.7.8 WYG refer to: Potential traffic impacts on the A505 corridor within South Cambridgeshire have been examined separately and the findings from this work are summarised in the report titled “South Cambridgeshire Junction Assessments”, dated May 2017 (also see paragraph 4.8.14). Paragraph 4.8.13 states: Other junctions known to experience congestion are the; M11 Junction 10 at Duxford and the A505/A1301 roundabout to the east of M11 Junction 10, both of which are located within South Cambridgeshire.....these junctions are at-grade priority roundabouts that are known to experience congestion and queuing in the peak periods.
- 4.4 WYG confirm that two key junctions close to the proposed NUGV already experience congestion.
- 4.5 Paragraph 4.8.16 states: The study identified that the A505 corridor between the M11 Motorway and the A11(T) is already operating very close to its theoretical link capacity. Which means, in the absence of any delays at junctions, motorists can expect to experience less reliable journey times

and congestion in the peak periods due to the volume of traffic using the A505. **Paragraph 4.8.17 states:** Committed development traffic was also shown to place significantly more pressure on the operation of the A505 corridor and the junctions along it than Local Plan growth within Uttlesford District.

- 4.6 **WYG confirm that the A505 corridor just to the north of the proposed NUGV already experiences congestion as it is operating close to capacity.**
- 4.7 **WYG's Paragraph 4.8.18 confirms that:** At the end of Plan period (2033) the M11 J10 and A505/A1301 roundabouts are both forecast to operate over capacity without any Uttlesford Local Plan development traffic. With the addition of Local Plan traffic flows the M11 J10 and A505/A1301 roundabouts are both forecast to operate further over capacity.
- 4.8 **At paragraph 4.8.19 WYG refer to:** Preliminary improvement schemes for the M11 J10 and the A505/A1301 roundabouts using signal control. WYG say that the improvements would more than mitigate the impact of Uttlesford Local Plan traffic flows (i.e. deliver better than 'nil detriment').
- 4.9 **At this point it is relevant to cross reference to the WYG report titled "South Cambridgeshire Junction Assessments", dated May 2017 and produced before the WYG Addendum report. WYG suggest in paragraph 4.8.19 above that their improvements more than mitigate the impact of the NUGV proposals, a message that the UDC PPWG seem to have picked up on in their meeting on 17 May 2017 (as referred to earlier). However, reading the detail of their junctions report (see paragraph 8.3.6 below) WYG confirm that the junctions are 'still forecast to operate with significant queuing and delays'. WYG go on to confirm at paragraph 8.3.7 (see below) that a longer term study is undertaken and that Cambridgeshire CC should seek funding for this.**
- 4.10 **At paragraph 8.3.6 WYG confirm that:** The tests undertaken examined the operation of the junctions in isolation and ignored the link capacity issues on the A505 corridor. The existing M11 J10 and A505/A1301 roundabouts are forecast to be over capacity with significant queuing and delays at 2033 with the addition of committed development flows. The 'nil detriment' improvements simply maintain this level of operation with the addition of Uttlesford Local Plan development (i.e. the junctions are still forecast to operate over capacity with significant queuing and delays).
- 4.11 **At Paragraph 8.3.7 WYG state:** It is therefore recommended that for the longer term a detailed A505 corridor study is undertaken to examine link and junction performance to identify a comprehensive solution to address congestion and delays. It is suggested that CCC seek funding from the DfT for such a study that it is understood UDC and ECC can support.
- 4.12 **At paragraph 4.8.20 of the Addendum report WYG state that:** A comparison of the operation of the improved layouts 'with' and 'without' Local Plan traffic flows demonstrates that Local Plan development has minimal impact on the operation of the M11 J10 and the A505/A1301 junctions.
- 4.13 **Whilst WYG cite 'minimal impact' with the addition of Local Plan traffic they conclude junctions and links exceed capacity and would operate with, in their words, 'significant queuing and delay'. In summary, the network will exceed capacity substantially without**

NUGV and even with the WYG improvements they have not been able to demonstrate a solution that provides capacity on key links and junctions.

- 4.14 **At paragraph 4.8.21 of the Addendum report WYG say that:** A test was also undertaken to demonstrate that the improved junctions could accommodate up to circa 3,294 dwellings at a new garden community at Great Chesterford within the Plan Period while still delivering 'nil detriment' performance, subject to delivery of successful modal shift measures and more detailed Transport Assessment work.
- 4.15 **The reasoning for WYG undertaking a further test on the key junctions which they claim shows further capacity for more units at NUGV (i.e. up to 3,294) is counter intuitive, given that they have concluded links and junctions would experience significant queuing and delay with Scenario 28 (1,460 units).**
- 4.16 **At paragraph 5.2 WYG set out their Conclusions - 5.2.1 states that:** The Transport Study identified that all highway links within Uttlesford currently operate within capacity at the 2016 base year and only three links in neighbouring districts (within the study area) were identified as being over capacity (greater than 100% stress). With the addition of Reference Case traffic flows seven links within Uttlesford and 12 links within neighbouring districts are forecast to be over capacity by the end of 2033 (based on the Nov' 2016 / March 2017 Reference Cases) without any Local Plan development.
- 4.17 An extract from Table 7 – Uttlesford Local Plan Transport Study December 2016 is provided below:

Table 7 – Links Close to or Exceeding Capacity in the Base Year

Link Location	Maximum Stress	Local Authority
A505 between the M11 and the A11	98%	South Cambridgeshire
A1307 between the A11 and Linton	94%	South Cambridgeshire

- 4.18 **WYG omit to reference in their commentary the two key links in South Cambridgeshire that are on the cusp of reaching capacity now. These links are included in WYG's Table 7 extract above.**
- 4.19 An extract from Table 23 - Uttlesford Local Plan Transport Study December 2016 is shown below.

Table 23 – Links Close to or Exceeding Capacity in the 2033 Reference Case

Link Location	Maximum Stress	Local Authority
M11 north of J9	107%	South Cambridgeshire
A505 between the M11 and the A11	146%	South Cambridgeshire
A505 east of M11 at Duxford	159%	South Cambridgeshire
A1307 between the A11 and Linton	144%	South Cambridgeshire

- 4.20 **WYG's Table 23 shows that in 2033 four links close to the NUGV proposals will exceed capacity significantly without the addition of any Local Plan development.**

- 4.21 **At Paragraph 5.2.13 WYG state that:** Having regard to link capacity impacts, accessibility and sustainable transport the appraisals have found that the following locations would therefore be preferable for new garden communities: Great Chesterford, Easton Park, West of Braintree.
- 4.22 **WYG say they have had regard to link capacities in reaching their conclusion that Great Chesterford would be preferable for a new garden community. However, based on the link capacities cited in their report and referenced above there can be no justification for this conclusion since in 2033 four key links affected by NUGV will significantly exceed capacity and there are no plans to improve them merely reference to the need for further study by others.**
- 4.23 **Paragraph 5.2.16 states:** Based on the assessment of the scenarios that feature significant development at these locations (scenarios 18, 19, 20, 27 & 28) the quantum and distribution of development assessed in scenario 28 is considered most favourable in terms of managing traffic impacts at key locations including; the M11 motorway, M11J8, the A120 (T) and local roads within Uttlesford and on the A120, A131 and A505 in neighbouring districts.
- 4.24 **WYG confirm that the lowest level of development at NUGV is most favourable (1,460 units) of the 5 considered (the other four involve 2,500 units). However, as shown previously WYG have concluded that this level of development is not sustainable on the road network.**
- 4.25 **Uttlesford Local Plan Transport Study South Cambridgeshire Junction Assessments – May 2017. At paragraph 2.3.3 WYG confirm that at present:** Locations on the A505 / A11(T) corridor exhibit reduced vehicle speeds in the peaks, most notably:
- M11 southbound diverge
 - A505 eastbound between M11 J10 and the A1301
 - A505 westbound between A11 and A1301
 - A1301 Northbound approach to the A505
 - A1301 Southbound approach to the A505
- 4.26 **Table 2 below confirms that key links are on the cusp of exceeding capacity now and at paragraph 2.3.8 WYG confirm that:** The stress plan indicates that the A505 between the M11 Motorway and the A11(T), and the A1307 southeast of the A11(T)/A1307 junction currently operate at greater than 90% stress and could therefore be expected to experience less reliable journey times and congestion in peak periods.

Table 2 – Corridor Links Close to or Exceeding Capacity at 2016

Link Location	Maximum Stress
A505 between the M11(M) and the A1301	98%
A505 between the A1301 and the A11(T)	96%
A1307 southeast of the A11(T)	94%

- 4.27 **This is confirmation that there are problems now on the road network in the immediate vicinity of the NUGV proposal; and added to this will be large areas of committed development. Therefore, it is apparent that adding another 7,000 peak hour person car trips from NUGV is not considered to be sustainable.**

- 4.28 **Table 11 indicates that 10,416 units have been tested in the report with 1,400 units at Great Chesterford, whereas the Addendum report – June 2017 Scenario 28 refers to 11,526 units with 1,460 units at Great Chesterford. Therefore it appears that the junction assessment report has considered a lower number of units.**
- 4.29 It is noted that Table 16 should read A505 not A11(T).
- 4.30 **At paragraphs 7.3.1, 7.3.2 and 7.3.3 WYG confirm the following:**
- **2017 Base position:** The A505/A1301 roundabout operates beyond capacity and experiences significant queuing and delays in both peak periods.
 - **2033 Base + Committed:** The M11 J10 and A505/A1301 roundabouts are both forecast to operate over capacity with the addition of committed development traffic flows in both peaks.
 - **2033 Base + Committed + Local Plan Development:** The M11 J10 and A505/A1301 roundabouts are both forecast to operate over capacity in both peaks with the 2033 Design Year traffic flows.
- 4.31 **WYG have considered mitigation schemes at two junctions with total costs estimated at £6.5 to £11 million. However, these costs exclude third party land which may be needed, acquisition costs and services diversions. Final costs are therefore likely to be considerably more.**
- 4.32 **As indicated earlier the WYG report has been based on 1,400 units at NUGV. However, they seek to show at paragraph 8.3.4 and 8.3.5 that higher numbers could be accommodated, with figures of 5,000 which they subsequently scaled down to 2,800. They also considered 3,294 units using 'extrapolation techniques' (based on a 15% modal shift). However, all of this is predicated on ignoring link capacity issues – see extract from WYG's paragraph 8.3.6 below. Notwithstanding this, WYG conclude that the junctions are forecast to operate over capacity.**
- 4.33 **At paragraph 8.3.6 WYG say that:** The tests examine the operation of the two roundabout junctions in isolation **and ignore the link capacity issues on the A505 corridor discussed earlier in this report.** The existing M11 J10 and A505 / A1301 roundabouts are forecast to be over capacity with significant queuing and delays at 2033 with the addition of committed development flows. The 'nil detriment' improvements simply maintain this level of operation with the addition of Uttlesford Local Plan development (i.e. the junctions are still forecast to operate over capacity with significant queuing and delays).
- 4.34 **At Paragraph 8.3.7 WYG recommend that:** for the longer term a detailed A505 corridor study is undertaken to examine link and junction performance to identify a comprehensive solution to address congestion and delays. It is suggested that CCC seek funding from the DfT for such a study that it is understood UDC and ECC can support.
- 4.35 **Referring to link capacity specifically, WYG confirm at 9.2.1 that:** An assessment of link capacity undertaken as part of the Uttlesford Local Plan Transport Study identified that the A505

corridor between the M11 Motorway and the A11(T) is already operating very close to its theoretical link capacity.

- 4.36 **At 9.2.2 WYG state that:** This means motorists can expect to experience less reliable journey times and congestion in peak periods due to the volume of traffic using the A505 corridor.
- 4.37 **At 9.2.4 WYG state that:** The obvious solution to address this existing link capacity issue would be widening of the A505 corridor between the M11 and the A11 (T) to dual two-lane carriageway standard.
- 4.38 **It is clear from the Council's own evidence that the routes around Great Chesterford will be under considerable stress by 2033 (even without factoring in growth associated with this Plan). The analysis also fails to factor in emerging schemes in nearby South Cambridgeshire (the proposed AgriTech scheme) as well as any potential for future development on the South Cambridgeshire side of the nearby district boundary.**
- 4.39 **WYG's overall conclusion points to any development at NUGV being reliant on:**
- **Widening of the A505 to dual two – lane carriageway;**
 - **Large scale improvements to Junction 10 of the M11; and**
 - **Large scale improvements to the A505 / A1301 junction.**
- 4.40 **Based upon the review of the evidence prepared by WYG it is considered that the smallest size development i.e. 1,400 units cannot be sustained at NUGV. Furthermore, since the local network is already close to capacity (and is forecast to exceed capacity with committed development) until large scale infrastructure improvements are fully analysed / costed and delivered there should be no prospect of any development at NUGV. The comment by WYG to PPWG at the 22 June 2017 meeting regarding the lack of consideration of the B184 is also of major concern to GCPC since this is a main access route to the site.**

5. REGULATION 18 LOCAL PLAN – TRANSPORT POLICY

- 5.1 Policy TA1 - Accessible Development (extract from the document is provided below): The proposed NUGV development does not satisfy this policy as it stands. The proposals fail to satisfy bullet point 1 for the reasons cited previously. It follows that bullet point 2 cannot be fulfilled because a congested road network will lead to increased propensity for accidents. Bullet point 3 has yet to be demonstrated by WYG. The developer would need to show how non-car travel options could be achieved.

Policy TA1 - Accessible Development

Development and transport planning will be co-ordinated to reduce the need to travel by car, increase public transport use, cycling and walking and improve accessibility and safety in the District while accepting the rural nature of the District. The overall need to travel (especially by car) to meet the day to day service needs will be minimised. Development proposals will be located in close proximity to services and make use of sustainable forms of travel (walking, cycling and public transport) to fulfil day to day travel needs as a first requirement. To achieve this:

- 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 severe congestion;
- Development will be managed so that it improves road safety and takes account of the needs of all users, including mobility impaired users;
- New development should be located where it can be linked to services and facilities by a range of transport options including safe and well designed footpaths and cycle networks, public transport and the private car;
- Existing rights of way, cycling and equestrian routes (designated and non-designated routes and, where there is evidence of regular public usage, informal provision) will be protected and, should diversion prove unavoidable, provide suitable, appealing replacement routes to equal or enhanced standards ensuring provision for the long-term maintenance of any of the above
- Travel Plans and Transport Assessments/ Statements will be required for specific development proposals to demonstrate how a reduction in car travel will be achieved/sustainable travel behaviour a priority.
- Appropriate and safe networks will be provided to allow for increasingly independent travel by vulnerable road users to allow such individuals to provide for their own travel needs.

- 5.2 WYG have provided no evidence that Sustainable transport can be achieved at this location therefore Policy TA2 will not be satisfied until specific deliverable measures have been identified.

Policy TA2 - Sustainable Transport

Sustainable modes of transport should be facilitated through new developments to promote accessibility and integration into the wider community and existing networks. Priority should be given to cycle and pedestrian movements and access to public transport. Development proposals should provide appropriate provision to maximise modal shift potential for all the following transport modes:

- Pedestrian (including disabled persons and those with impaired mobility), through safe, accessible, direct and convenient design and layout of routes within the new development and wider pedestrian network. Safeguarding existing Public Rights of Way and promoting enhancements to the network, where appropriate, to offer multi-user routes for walking, cycling, horse riders and recreational opportunities;
- Cycling, through safe design and layout of routes integrated into the new development and contributing towards the development and enhancement of the cycle network and provision of secure cycle parking and where appropriate, changing and shower facilities;
- Public transport, through measures that will improve and support public transport and provide new public transport routes;
- Community transport, through measures that will promote car pools, car sharing and voluntary community buses, community services and cycle schemes;
- Servicing, refuse and emergency vehicles where viable and practical; and
- Facilities for charging plug-in and other ultra-low emission vehicles (see Policy TA3 below)

- 5.3 **It is apparent from the work undertaken by WYG that congestion exists and that committed and Local Plan development would increase congestion rather than reduce it. There is a suggestion by WYG that 10% modal shift may be possible; and an even higher figure of 15% has been cited by WYG in arriving at their 'extrapolated figure', but there is no evidence to support this.**

6. SUMMARY AND CONCLUSIONS

- 6.1 WYG have identified capacity issues as a result of the proposed NUGV, which have not been adequately addressed by subsequent evidence. Furthermore, the evidence used to justify the allocation is based on a significantly smaller development at the NUGV. In the December 2016 report WYG undertook a high level review of 5,000 units but this was not carried forward to the subsequent detailed South Cambridgeshire Junction Assessments in May 2016; **the principal focus of which was to examine 1,400 units.**
- 6.2 There is no evidence presented to demonstrate that the impacts arising from the proposed allocation have either been tested or that the relevant mitigation has been planned for. Policy SP7 indicates 1,900 units by 2033 and 5,000 in total. WYG referred to 5,000 initially which reduced to 2,800; and then using 'extrapolation techniques' WYG arrived at a figure of 3,294 in their May 2017 report. However, WYG only undertook junction modelling and ignored capacity issues on route corridors. This is not considered to be a logical approach as junction capacity cannot be considered in isolation and without due consideration being given to mitigating the impact on route corridors. **Therefore the number of units cited by WYG is unjustified and cannot be relied upon.**
- 6.3 It is clear from the Council's own evidence that the routes around Great Chesterford will be under considerable stress by 2033 (even without factoring in growth from the Plan). This also fails to factor in emerging schemes in nearby South Cambridgeshire as well as any potential for future development on the South Cambridgeshire side of the nearby district boundary.
- 6.4 **The consequence of this is that capacity will be at critical conditions as SP7 is delivering.** Although the policy requires contributions towards resolving capacity issues, limited evidence is presented about what this work will involve. For example, WYG have identified some junction improvements and have costed those but they have not identified measures to improve route corridors nor have those been costed meaning that, at the very least, the implications on the viability of the scheme cannot and have not been tested. **This calls into question the deliverability of the scheme.**
- 6.5 Of further concern is the unknown impacts of such mitigation measures. Without a scheme for mitigation it is impossible to understand the wider implications, for example, on ecology, landscape and heritage. As such the full impacts of the proposal cannot and have not been properly taken into account when selecting this option for development. **This is a failing of the process that raises serious soundness issues.**
- 6.6 This is further complicated by the apparent contradiction in the evidence base regarding the recognised capacity constraints without planned development and the subsequent conclusion of minimal impact with planned development.
- 6.7 As regards sustainable modes there is lack of evidence to support the 10% and 15% modal shifts assumed by WYG when considering transport impact. GCPC fully supports the idea of encouraging non-car modes of transport but it must be based on a realistic prospect of achieving this.

- 6.8 The NUGV will need to be supported by public transport connections that provide new residents with an alternative to the private car. There is no evidence to demonstrate how this will be achieved in this location or the costs of delivering this vital element of the infrastructure. Furthermore, there is no evidence about how the impact of the capacity of existing public transport provision and the extent to which it can be upgraded to cope with an increased demand. As such, neither reality of the modal shift or the costs of facilitating this have been tested. **This is a fundamental flaw in the site selection process.**
- 6.9 The concern of GCPC is that policy SP7 causes severe transport impact for both the village and the wider area, which would give rise to adverse environmental, economic and social impacts. These impacts have not been adequately tested and the mitigation measures have not been adequately developed such that the deliverability of the proposal can be deemed as realistic. **The transport issues arising from this proposed allocation mean that it cannot be considered as delivering sustainable development – in clear contradiction to the requirement of the NPPF.**
- 6.10 It is noted that the Sustainability Appraisal considers no impacts to arise from this policy in terms of SEA objectives 6 (climatic change) and 7 (pollution). In terms of SEA objectives 9 (sustainable transport) and 12 (meeting housing needs) no impacts are predicted over the short to medium term; with significant positive impacts in the long term. **However, for the reasons set out above, it is unclear how such an assessment can be made in light of the evidence available.**
- 6.11 No alternatives are put forward as the Sustainability Appraisal considers that the policy delivered sustainable development. **The evidence in terms of transport impact suggests otherwise.**
- 6.12 **The WYG analysis has not demonstrated sustainable transport modes are accessible, nor how safe access would be achieved for all modes. Analysis has shown that traffic impacts cannot be accommodated with spare capacity. Consequently the development of NUGV should be rejected on transport grounds, as the projected traffic conditions are severe with no identified prospect of the severity reducing.**

Appendix 3 – Landscape: HD Associates



**LANDSCAPE AND VISUAL REPRESENTATIONS
FOR UTTLESFORD DISTRICT COUNCIL REGULATION 18 LOCAL PLAN CONSULTATION, ESSEX**

on behalf of
Great Chesterford Parish Council

**HDA ref: 752.2 v3
September 2017**

hankinson duckett associates
t 01491 838175 f 01491 838997 e consult@hda-enviro.co.uk w www.hda-enviro.co.uk
The Stables, Howbery Park, Benson Lane, Wallingford, Oxfordshire, OX10 8BA

Hankinson Duckett Associates Limited Registered in England & Wales 3462810 Registered Office: The Stables, Howbery Park, Benson Lane, Wallingford, OX10 8BA

Contents	Page
1 Introduction	2
2 Background	3
3 Great Chesterford Parish Published Landscape Character Analysis	6
4 Great Chesterford Parish Local Landscape Character Analysis	15
5 Parish Landscape Character Areas: Analysis	18
6 Landscape Capacity	19
7 Visual Appraisal	24
8 Summary and Conclusions	27
9 References	28

Plans

- HDA 1 Published Landscape Character Areas
- HDA 2 Landscape Designations
- HDA 3 Topographical Analysis
- HDA 4 Parish Landscape Character Areas and Capacity

Appendices

- Appendix 1 – Wording of Policies SP2, SP3, SP5 and SP7 from the UDC Reg 18 Local Plan
- Appendix 2 – Extract from Essex Landscape Character Assessment for Landscape Character Area C1 – Cam Valley (pages 69-74)
- Appendix 3 – Extract from the Landscape Character of Uttlesford District for Landscape Character Area A1 – Cam River Valley (pages 274-277)
- Appendix 4 – Methodology for Analysis of Landscape Capacity
- Appendix 5 – Parish Character Area Analysis Sheets (1-13)
- Appendix 6 – Tables of Landscape Sensitivity, Landscape Value and Landscape Capacity for the Parish Character Areas

1 INTRODUCTION

1.1 Hankinson Duckett Associates (HDA) has been working with The Chesterfords Neighbourhood Plan Steering Group since May 2015 and has prepared a Landscape Character Assessment (HDA LCA) to help inform the preparation of The Chesterfords Neighbourhood Plan. The LCA, issued in February 2017, sought to assess the landscape character of Great Chesterford and Little Chesterford Parishes, which lie within the Uttlesford District of Essex. The HDA LCA determined the parishes' local landscape character, identifying key characteristics and sensitivities, both in terms of character and visibility. The HDA LCA also sought to set out landscape capacity across the parishes, to guide potential development should sites come forward in the future.

1.2 This report is to support Great Chesterford Parish Council's representations to the Uttlesford District Council draft Regulation 18 Local Plan 2017 (Reg 18 LP), and in particular to object to the proposed new Garden Community of North Uttlesford which lies wholly within the boundaries of the parish. Uttlesford District Council's (UDC) consultation website, states:

The purpose of this plan is to allocate sites which meet the requirements for new homes, jobs and infrastructure for the district up to 2033; and policies to protect the historic, natural and environmental characteristics of the District. The plan proposes that there will be three new garden communities which will be central to accommodating the majority of the housing needs of the district. The remainder of the homes will be distributed across the district, with some being in Saffron Walden, Great Dunmow and the key villages, and the rest in smaller villages.

1.3 This report will draw upon the conclusions derived from the HDA LCA, (the HCA LCA is filed under the Historic Environment section of the UDC evidence base documents) which divided the parishes into areas of common landscape character, set out each area's key characteristics and identified the landscape and visual sensitivities of each area. The assessment then highlighted those areas of the parishes which would be sensitive and of low capacity for development, and where future development would be inappropriate. Landscape sensitivity and value is unlikely to be completely uniform across an entire character area and therefore the capacity across a character area may vary slightly (and this is commented upon later; refer to Section 6)). The HDA LCA was based on current good practice and a recognised methodology (Ref 1).

1.4 The policies of relevance to this report within the draft Reg 18 LP are as follows:

- Policy SP2 - The Spatial Strategy 2011-2033;
- Policy SP3 - The Scale and Distribution of Housing Development;
- Policy SP5 – Garden Community Principles;
- Policy SP7 – North Uttlesford Garden Community

1.5 The full wording of these policies is included at **Appendix 1**.

2 BACKGROUND

2.1 Great Chesterford Parish Context

2.1.1 The parish of Great Chesterford is located approximately 4 miles north of the nearest town of Saffron Walden and approximately 11 miles south of Cambridge. The Parish is centred on the nucleated settlement of Great Chesterford, located within the River Cam valley, between the B184 Walden Road and B1383 London Road. The Parish boundary extends north along a ridge of high ground, including the southern edge of Hildersham Wood (the wood is within Hildersham parish in Cambridgeshire), and to the east to Great Chesterford Common (adjoining Hadstock and Saffron Walden parishes in Essex). The parish's southern boundary, adjoining Little Chesterford, lies to the south of the Ickneild Way Trail. The western boundary of the parish is, for the majority of its length, defined by the Cambridge to London mainline railway and the A11. However, the boundary extends west beyond the railway to incorporate Smock Mill House and a section of the M11 motorway, and it also extends west beyond the M11 (spur onto the A11) to the west of the Stump Cross junction into a triangular piece of land with a sewage works on its northern edge. (See Plans HDA 2 and HDA 4).

2.1.2 The nearest villages to Great Chesterford are as follows (working from the south and then anticlockwise around the parish boundary):

- Little Chesterford – 0.9 miles to the south-east (in Uttlesford District);
- Littlebury – 2 miles to the south (in Uttlesford District);
- Strethall – 2 miles to the south-west (in Uttlesford District);
- Ickleton – 1 mile to the west (in South Cambridgeshire District);
- Hinxton – 1.6 miles to the north-west (in South Cambridgeshire District);
- Great Abington – 4.3 miles to the north (in South Cambridgeshire District);
- Hildersham – 4.4 miles to the north (in South Cambridgeshire District);
- Linton – 4.2 miles to the north-east (in South Cambridgeshire District);
- Hadstock – 3.5 miles to the east; and
- Little Walden – 2 miles to the south-east (in Saffron Walden parish in Uttlesford District).

2.1.3 Chesterford Research Park (abutting Saffron Walden parish in Essex) lies 1.8 miles to the south-east of Great Chesterford, within the parish of Little Chesterford. Other research establishments in the area include the Wellcome Trust Genome Centre at Hinxton, Granta Park at Abington and the Babraham Research Park.

2.2 Proposals for Garden Community

2.2.1 The proposed new Garden Community of North Uttlesford, is being promoted by Bidwells on behalf of the three landowners. The Garden Community would occupy 461 hectares (with about 135ha for residential uses of up to 5,000 dwellings), and is located 5km to the

north-west of Saffron Walden, on a site immediately to the east of the A11, to the north of its junction with the B184 Walden Road. The site lies wholly within the parish of Great Chesterford within the county of Essex, though it is bordered immediately to the north by South Cambridgeshire District, in Cambridgeshire.

- 2.2.2 Great Chesterford Parish Council has grave concerns relating to the proposed new settlement known as North Uttlesford. Great Chesterford Parish Council set out in a letter (dated 5 June 2017) to Councillor Howard Rolfe, the Chair of the Planning Policy Working Group, its objections to the proposals, including the following two points which are specifically concerned with the landscape and visual aspects of the proposals:

The landscaping of the Settlement as indicated in Bidwells' "Prospectus for Delivery" (presentation to UDC, 27 March 2017) will destroy the existing uplands and valleys, and in a manner which is likely permanently to scar the sky-line; reworking the present siting of the development to make it less obvious from Great Chesterford will merely expose the development to settlements in South Cambs, in particular Hinxton and Ickleton.

Provision of a buffer zone ostensibly to provide green space between Great Chesterford and the Settlement is promised and would be essential, together with proposals to re-site the development so that it is not visible from Great Chesterford. We are not satisfied, however, that sufficient work has been done to ensure that the surrounding area does not suffer avoidable and undesirable urbanisation – whether from the proposed use by Citi7 buses utilising Park Road and Cow Lane as part of the claimed sustainable transport facilities that will serve the Settlement, or the inevitable use of Great Chesterford High Street/South Street/Church Street as a rat-run by cars of those driving between the Settlement and the station at Great Chesterford.

2.3 UDC Landscape and Visual Appraisal of Land at Great Chesterford

- 2.3.1 Chris Blandford Associates (CBA) was appointed by UDC to undertake a landscape and visual appraisal (CBA LVA, Ref 2) of the site proposed for the new settlement. The appraisal concluded (para 6.4.1):

"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 with 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."

- 2.3.2 The CBA appraisal despite recognising the "high landscape and visual sensitivity of the Site as a whole" does not go so far as to dismiss the proposals outright, and states that "it is particularly desirable that potential landscape and visual impacts of any development proposals are mitigated by a strong commitment to good design in line with Chapter 7 of the NPPF and its supporting Planning Practice Guidance on Design". It is considered extremely doubtful whether the impacts on landscape character and visual amenity that

are likely to arise from these development proposals could be adequately mitigated. Further reference will be made to this document in the assessment below.

- 2.3.3 Prior to the preparation of the CBA LVA, the Council's landscape officer (Ben Smeeden) prepared a report titled "New Settlement Proposals: Landscape and visual impact" (Ref 3), which considered all six sites being promoted as new settlements, including the proposals at Great Chesterford. The officer's report provided the following conclusion:

"I am of the view that this site cannot accommodate the development shown in the illustrative masterplan submitted in the North Uttlesford Garden Village Prospectus of Delivery document, as presented to Members of the District Council on 27th March 2017, without causing significant and unacceptable harm to the important visual qualities of the site and the wider landscape".

- 2.3.4 The officer's report goes on to suggest "*that the development of a garden village may be achievable on parts of the proposal site without unacceptable harm*" but that this had not "*been satisfactorily demonstrated by the current submission by Bidwells*". The officer's report recognises that "*development on the western (facing) slopes of the site would need to be avoided in the greater part, or significantly restricted, in order to reduce the potential visual impact of the development on the wider landscape*". The officer suggests that "*this would potentially necessitate a reduction in the number of dwelling units that can be satisfactorily accommodated on site*" and that "*the height of buildings would need to be restrictedacross the site as appropriate*" as determined "*by a detailed visual impact analysis to establish potential intervisibility*".

- 2.3.5 As with the CBA LVA (Ref 2), the Council's officer's report (Ref 3) does not dismiss the possibility of some development on the NUGC site. These representations will demonstrate through reference to the published landscape character assessments for the area (section 3) and HDA's assessment of the local landscape character (sections 4 and 5), and analysis of the landscape's capacity (section 6.1) to accept development, that development of this site would be inappropriate, given its landscape sensitivity and low capacity to accept development.

2.4 Bidwells Landscape and Visual Appraisal and Capacity Study for Land at Great Chesterford, Uttlesford

- 2.4.1 Bidwells produced a 'Landscape and Visual Appraisal and Capacity Study' (Bidwells LVA, Ref 4) based upon the initial draft concept masterplan produced in April 2016 (Figure 2, page 9, thus a different illustrative masterplan to that presented on 27 March 2017 to UDC). This representation focuses on a critique of the Bidwell LVA. Initial criticisms of the Bidwell LVA are that the baseline appraisal is based on 'Landscape Character Assessment Guidance' from 2002 (as referred to on page 7), though this should be read in conjunction with updated guidance published in 2014 (Ref 1). In addition, the only site visit undertaken

on 8 April 2015 (page 9) took place more than a year before the report was published (in May 2016) without checks if there had been changes on the site in the interim.

- 2.4.2 Section 1.3 of the Bidwells LVA (page 8) sets out "*the defined aims and objectives of the Garden Village*". Some of these are contrary to what is proposed. For example, the first bullet states that it is intended to "*create small-scale development*" when evidently the creation of a village of 5,000 homes cannot be perceived as small-scale development no matter how is it sub-divided. The proposals would not "*protect long range views and (would cause) impact from the ridge lines*" (second bullet). It is questionable that the proposed Garden Community would "*retain the integrity of agricultural land*" (seventh bullet) when only a relatively small proportion of the land within the red line boundary of the site would be retained as agriculture. It is suggested that the new settlement is to have "*character appropriate to the location*" (eighth bullet), but it is held that this is not an appropriate location for built development.

3 GREAT CHESTERFORD PARISH PUBLISHED LANDSCAPE CHARACTER ANALYSIS

3.1 Introduction

- 3.1.1 The aim of this chapter is to identify the main elements which contribute to the character, structure and setting of the site and the existing settlement of Great Chesterford (and of Hinxton, Ickleton, Great Abington and Linton). This section includes an evaluation of the existing published Landscape Character Assessments (sections 3.2, 3.3 and 3.4, Plan HDA 1 and Appendices 2 and 3) and the local landscape context of the Parish, (section 4), focusing on Great Chesterford Parish (thus excluding Little Chesterford which was previously included in the HDA LCA) and sets out HDA's initial analysis of the area (Plans HDA 1 – 3). The parish of Great Chesterford is covered by national, regional (two) and district scale published landscape character assessments, which provide descriptions of the landscape within and around the site.

3.2 National Character Area

- 3.2.1 At the national scale, Great Chesterford Parish lies on the southern edge of National Character Area 87: 'East Anglian Chalk', very close to the northern boundary of NCA 86: 'South Suffolk and North Essex Clayland'. These NCAs cover large geographical extents and it was this constraint that precluded them from further analysis in the HDA LVA, as it was considered that more detailed data on the character of the area was available in the regional and district assessments. However, the description of the key characteristics for NCA 87 (as set out in Natural England's 2015 report (Ref 5), not the 1999 book 'Countryside Character Volume 6 East of England, from which Figure 5 in the Bidwells LVA is taken) does set out some of the more obvious elements of the character of the area that the development proposals would be contrary to.

3.2.2 The description of key characteristics for NCA 87 has therefore been included here for completeness, and as the descriptions were included in both the CBA LVA and the Bidwells LVA, this report comments on the emphasis placed upon these descriptions in the other two reports.

3.2.3 In the summary section (Ref 5, page 3) it states that NCA 87:

"is characterised by the narrow continuation of the chalk ridge that runs south-west/north-east across southern England. The underlying geology is Upper Cretaceous Chalk, which is covered in a surface deposit of ice and river-deposited material laid down during the last ice age. This creates a visually simple and uninterrupted landscape of smooth, rolling chalkland hills with large regular fields enclosed by low hawthorn hedges, with few trees, straight roads and expansive views to the north.

3.2.4 The key characteristics include (those that are a repeat of the list in the Bidwells LVA are underlined, and text that is additional to that report, but considered to be as important, is not underlined):

- The rolling downland, mostly in arable production, has sparse tree cover but distinctive beech belts along long, straight roads. Certain high points have small beech copses or 'hanger', which are prominent and characteristic features in the open landscape. In the east there are pine belts;
- Remnant chalk grassland, including road verges, supports chalkland flora and vestigial populations of invertebrates, such as great pignut and the chalkhill blue butterfly;
- Archaeological features include Neolithic long barrows and bronze-age tumuli lining the route of the prehistoric Ickniel Way; a distinctive communication network linking the rural Roman landscape to settlements and small towns, such as Great Chesterford....;
- Brick and 'clunch' (building chalk) under thatched roofs were the traditional building materials, with some earlier survival of timber frame. Isolated farmhouses built of grey or yellowish brick have a bleached appearance.
- Settlement is focused in small towns and in villages. There are a number of expanding commuter villages located generally within valleys; and
- The NCA is traversed by the Ickniel Way, an ancient route that is now a public right of way. Roads and lanes strike across the downs perpendicularly and follow historical tracks that originally brought livestock to their summer grazing. Today major roads and railways are prominent landscape characteristics of the NCA.

3.2.5 The summary and key characteristics above provide descriptions of the landscape that are of relevance to the site, particularly that it is "a visually simple and uninterrupted landscape of smooth, rolling chalkland hills with large regular fields enclosed by low hawthorn hedges, with few trees, straight roads and expansive views". These key characteristics will be lost if built development is allowed to take place upon the site. The sparseness of tree cover is also a key characteristic of the site and the introduction of large scale planting to help mitigate the effects of the proposed development would be contrary to the site's inherent open character. The NCA description is helpful in pointing out that settlement is restricted to small towns and in villages, and that the villages (admittedly expanding as commuter

villages) are “located generally within valley”. The proposals due to their elevated location, would be completely contrary to this key characteristic regarding the accepted location of settlements.

3.2.6 The Bidwells LVA provides no analysis of the NCA document (Ref 5) other than listing the key characteristics, however, the CBA LVA goes on to list the following landscape opportunities from the NCA document (page 36 and 37), which are of relevance to the site and its surrounding area (only the underlined text is actually included within the CBA LVA):

- *Protect the character and integrity of the rural landscape by conserving its mosaic of cultural heritage and natural assets.....;*
- *Identify and conserve views to and from key viewpoints and landmarks by careful design and vegetation management, minimising the visual impact and effects of development, woodland planting and scrub encroachment;*
- *Conserve and enhance land use pattern, valued farmland species and productivity of the landscape by securing sustainable forestry and agricultural activity.....;*
- *Secure sustainable development which also reflects traditional local building styles and materials. Where landscape character and features are degraded by development, identify opportunities to redevelop areas and infrastructure;.....*
- *Conserve, enhance and create new public access infrastructure, access links and accessible natural and cultural features, especially near settlements, in order to enhance the transitional areas between urban landscape and countryside.....*
- *Conserve ancient routeways.....; and*
- *Protect and enhance chalk streams and wetlands.*

3.2.7 It is questionable whether some of these landscape opportunities have relevance to the character of the site, though reference to conserving views to and from key viewpoints is certainly important with regard to the site.

3.3 Regional Landscape Character Assessments

3.3.1 At the regional level, the Bidwells LVA refers to the 'East of England Landscape Character Typology' (2011, Ref 6), whereas the CBA LVA and the HDA LVA refer to the 'Essex Landscape Character Assessment' (Essex LCA) undertaken in 2003 (Ref 7). The East of England study covers the area of the site and land within Cambridgeshire to the west of the site, whereas the Essex LCA only includes land within the county boundary (which forms the western boundary of the site). A LCA has been prepared for Cambridgeshire County Council, but this is quite dated, from 1993.

East of England Landscape Framework

3.3.2 Despite the large geographical extent of the East of England study, it is remarkably detailed. The site is split into three different Regional Landscape Character Types, which broadly align with the different contour bands covering the site (as shown on Plan HDA 1). The three landscape character types are described in the Bidwells LVA as follows (from highest elevation to lowest):

Wooded Village Farmland (the farmed plateau and most elevated areas of the site)

Overall Description: A gently rolling, elevated arable landscape with ancient woodland blocks and small, nuclear villages. Often an open landscape with long distance views, although woodland contains views particularly around settlements.

Landform: Elevated, gently rolling landscape typically associated with broad, glacial plateaux.

Tree Cover: A wooded landscape with many ancient woodlands and frequent hedgerow trees (oak and ash).

Enclosure Pattern: A mixture of small scale, sub-regular and sinuous fields (often with tall hedgerows) alongside areas of planned geometric fields, reflecting the late enclosure of former commons and waste.

Settlement Pattern: Low density small nuclear villages, often arranged around a central village green, with occasional outlying farms often set in fields away from road. Minimal 20th (century) expansion of settlement. Building materials include timber framed and rendered cottages, often with thatched roofs.

Tranquillity: Peaceful and rural character.

Views: Elevation and openness means this landscape offers some long ranging views across lower lying areas. Woodland screens views in places creating more intimate feel particularly around settlements.

Chalk Hills and Scarps (the central slopes of the site)

Overall Description: Prominent chalk hills, in places forming a distinct edge, elsewhere incised by dry valleys to create a rounded rolling landform. Often well wooded with long distance views, this is a large scale landscape with an ordered pattern of fields and woodlands.

Landform: Comprises an elevated rolling chalk landscape exhibiting a rounded, rolling, 'downland' topography, with localised steep-sided scarp slopes.

Tree Cover: Ancient semi-natural beech, lime and sycamore woods on summits and slopes, with more recent woodland blocks (and shelterbelts around Newmarket).

Enclosure Pattern: A medium to large scale, regular field pattern defined by hedgerows, with post and wire fences on steeper slopes. Fields show a mix of rectilinear and sinuous pattern reflecting the process of planned surveyor enclosure from common fields.

Settlement Pattern: Low density settlement, rural in character comprising discrete historic villages and a scattering of large farms. General absence of settlement on steeper scarp slopes. Urban development associated with larger towns impinges on this landscape.

Tranquillity: A rural landscape which can feel empty and unpopulated in places.

Views: A simple, open landscape affording long distance panoramic views.

The Lowland Village Chalklands (southern edge of site bordering Great Chesterford)

Overall Description: Low lying, but gently rolling arable landscape, dissected by small streams, with a distinctive pattern of nucleated villages and a patchwork of woodlands and shelterbelts.

Enclosure Pattern: Medium to large sized fields enclosed by hawthorn hedges. Field structure is a mix of rectilinear and sinuous patterns, reflecting the process of planned surveyor enclosure from common fields.

Settlement Pattern: A distinctive pattern of historic, nucleated villages with prominent churches. Some villages have grown bigger in the 20th century, while larger towns contribute to an urbanising influence. Building materials include flint, clunch and pale brick.

Tranquillity: A settled landscape yet one where tranquillity can readily be perceived.

Views: An open landscape with long distance views.

- 3.3.3 The Bidwells LVA provides no commentary on these published descriptions. It is evident from these descriptions that the rurality and openness of the landscape are abiding characteristics of the site. It is notable that the “*absence of settlement on steeper scarp slopes*” is specifically referred to.

Essex Landscape Character Assessment

- 3.3.4 The county-wide Essex LCA places the Parish primarily within the Cam Valley (C1), with the south-east corner of the Parish lying within the North Essex Farmlands (B2). The site, however, coincides only with Area C1. The key characteristics of Area C1, as described within the Essex LCA (page 69 of Ref 7), are as follows, though an extract from the LCA for this Character Area is included at **Appendix 2**:

- *Broad valley. Strongly rolling valley sides in the north, gentler slopes to the south;*
- *Predominantly large-scale, open arable farmland on the valley slopes;*
- *Enclosed character of the valley floor with lush riverside vegetation;*
- *Nucleated settlement pattern; and*
- *Extensive historic parkland between Littlebury and Newport.*

- 3.3.5 In the section of the Essex LCA on ‘overall character’ (page 69), the Cam Valley is described as

“a wide and relatively deep valley, with distinctive smooth undulating chalkland hillslopes.....Large regular arable fields on the valleysides are divided by very broken hedgerows with few hedgerow trees. In contrast, the valley floor has a more enclosed intimate character with dense riverside trees and small fields”.

- 3.3.6 The Essex LCA describes the ‘landscape condition’ of the Cam Valley character area (page 72) as follows:

- *Hedgerows on some valley sides are in poor condition due to lack of management and intensive arable farming practices;*
- *Some valley floor pastures are in poor condition due to overgrazing;*
- *The extensive areas of historic parkland are in good condition (though these are located outside the Parishes);*
- *The condition of the settlements is good; and*
- *Gravel workings, chalk pits, pylons and the M11 currently create some localised visual intrusions in the landscape.*

- 3.3.7 As noted in the CBA LVA, the ‘Sensitivity Evaluation’ (page 74 of Ref 7) identifies that the landscape sensitivity of Area C1 to major urban extensions (> 5ha) and new settlements is ‘High’, citing the ‘key landscape sensitivity and accommodation of change issues’ as “*some visually exposed valley sides; integrity of undisturbed valley floor and of historic parklands; and coalescence of small settlements*”.

3.3.8 Within paragraph 1.4.16 of the Essex LCA (page 7, Ref 7) a table sets out the sensitivity criteria for three levels of landscape sensitivity; high, medium and low. The sensitivity criteria for 'High' is described as follows:

"The landscape is very sensitive to this type/scale of development/change due to the potential for very adverse impacts on:

- *Distinctive physical and cultural components or key characteristics;*
- *Strength of character/condition of the landscape;*
- *Landscape of high intervisibility/visual exposure;*
- *Tranquil area*

With very limited opportunities for mitigation".

3.3.9 The final column of the table (on page 7, Ref 7) describes the 'ability of the landscape to absorb impacts of development and other change'. A 'High' landscape sensitivity level is described as being *"unlikely to be capable of being absorbed. Presumption against development unless over-riding need."* In summary, the Essex LCA is therefore very clear about the inability of Area C1 to absorb large scale development of the type proposed, namely a new settlement. In comparison, the Essex LCA describes the landscape sensitivity of Character Area B1 to major urban extensions (page 51, Ref 7), being the area within which the Easton Park and west of Braintree proposed new settlements lies, as Moderate. The definition of a Moderate sensitivity landscape in the Essex LCA (page 7, Ref 7) is still described as sensitive to this type/scale of development, however, it suggests that *"there may be more opportunities to overcome these through appropriate siting, design and other mitigation measures"*.

3.4 District Landscape Character Assessments

3.4.1 At the district level, the Bidwells LVA, the CBA LVA, the UDC landscape officer's report and the HDA LVA all refer to the joint Landscape Character Assessment which was commissioned by Braintree District Council, Brentwood Borough Council, Chelmsford Borough Council, Maldon District Council and Uttlesford District Council in 2006 (Ref 8 – The Uttlesford LCA). With the site abutting the district boundary of South Cambridgeshire District, reference should also be made to 'District Design Guide SPD' (adopted March 2010, Ref 9), however, none of the LVAs listed above consider this assessment.

Uttlesford (et al) Landscape Character Assessment

3.4.2 The Uttlesford LCA (Ref 8) places Great Chesterford Parish within one Landscape Character Type A – River Valley, and specifically in Landscape Character Area A1 – Cam River Valley. The area's key characteristics, as described within the Uttlesford LCA, are as follows, (with an extract from the LCA for this Character Area included at **Appendix 3**):

- *Rolling, open landscape of chalky boulder clay with wide views from higher ground;*
- *Well vegetated riverbanks, with shrubs, trees and water meadows along the winding narrow river corridor;*

- *Large-scale downland reflecting late enclosure, with rectilinear field pattern;*
- *Low hedges and few trees mainly in small copses;*
- *Ancient town of Saffron Walden; and*
- *Dispersed settlements on valley sides connected by busy B roads.*

3.4.3 The CBA LVA, the UDC officer's report and the Bidwells LVA all refer to the 'Visual Characteristics' section of Area A1 as set out in the Uttlesford LCA. The full list from the District-wide assessment, as set out in the Bidwells LVA, is repeated below, with the reduced list, as referred to in the CBA LVA (and UDC officer's report), underlined below:

- *Attractive panoramic views from the eastern slopes to western valley slopes framed by distant blocks of trees;*
- *Views of towns and villages from higher ground;*
- *Valley sides descend quite steeply from rolling arable fields to the river and its tributaries and dramatic views are possible from the ridges;*
- *Large ancient town of Saffron Walden, and its distinctive church spire can be seen from many directions due to its position on the higher slopes;*
- *Intimate views on the lower slopes of wooded river valley floor;*
- *Intimate scale of villages and towns contrasts with large-scale modern agriculture;*
- *Hedgerow loss is visible in the landscape; and*
- *Urban fringe settlement often not well integrated into the landscape.*

3.4.4 It is interesting to note those visual characteristics which have been highlighted in the CBA LVA (and UDC officer's report), as these appear to have been chosen to emphasise the attractiveness of existing views of the steeply sloping land of the site when viewed across the valley and the ability to view existing settlements from the higher land of the site. The Bidwells LVA goes on to state that "*the following statements and criteria should be considered when designing and assessing the proposed garden village at the full LVIA stage*". The Bidwells LVA then lists seven of the 'Key Planning and Land Management Issues' from the more extensive list of eleven bullets set out in the Uttlesford LCA. All eleven bullets from the 'Key Planning and Land Management Issues' section of the Uttlesford LCA are set out below for completeness, with those referred to in the Bidwells LVA underlined (these issues are not referred to in the CBA LVA or the UDC officer's report):

- *Potential for erection of new farm buildings, which would be conspicuous on the skyline;*
- *Potential pressure for increased use of narrow and minor lanes especially during peak tourist periods;*
- *Potential pressure from urban extensions on the edges of Great Chesterford and Saffron Waldon;*
- *Potential pressure for increased use of narrow and minor lanes due to development of Chesterford Park;*

- Pressure from potential extension of villages within adjacent areas infringing upon the generally open character of the area;
- Potential further decrease in hedgerows and tree cover due to agricultural practice;
- Potential for pollution of the River Cam from fertiliser and pesticide run-off from surrounding valley side and farmland plateau areas;
- Potential decrease in hedgerows and tree cover due to pressure from adjacent agricultural land use;
- Potential loss of riverside marshland and pastures due to agricultural encroachment;
- Visual intrusion of potential road expansion linked to pressure of traffic on minor roads, especially during busy tourist periods; and
- Intrusion on tranquillity with potential of increasing traffic on minor roads due to proposed development at Chesterford Park.

3.4.5 We suggest that these statements should have been considered at the initial promotion of the site and if they had, then it would have been realised that development on this site would be so contradictory to this list of issues, that the site's promotion would not have been pursued any further.

3.4.6 In the 'Sensitivities to Change' section of the Uttlesford LCA (page 276, Ref 8), Character Area A1 is described as follows, with the underlined text being that which appears in the Bidwells LVA and text in bold being that which appears in the UDC officer's report and the CBA LVA:

"Sensitive key characteristics and landscape elements within this character area include the patchwork of pasture and plantation woodlands, which would be sensitive to changes in land management. The open skyline of the valley slopes is visually sensitive, with new development potentially being highly visible within panoramic inter and cross-valley views. Intimate views from lower slopes to the wooded river valley floor and views to the valley sides from adjacent Landscape Character Areas are also sensitive.....Overall, this character area has relatively high sensitivity to change."

3.4.7 The penultimate section of the Uttlesford LCA for Character Area A1 sets out the following 'Suggested Landscape Planning Guidelines', which are as listed (though in a shortened form) in the Bidwells LVA, though only those that are underlined are included in the CBA LVA:

- Conserve and enhance the landscape setting of settlements;
- Maintain cross-valley views;
- Consider the landscape pattern (and structure) of large woodland areas and the role that they have in the composition of views to and from the area;
- Ensure that new woodland planting is designed to enhance landscape character and that species composition reflects local character;
- Ensure any new development on valley sides is small-scale and that it responds to historic settlement pattern, form and building materials; and
- Encourage the re-use of redundant agricultural farm buildings, especially red brick or black timber-framed and boarded barns.

3.4.8 The final section of the Uttlesford LCA for Character Area A1 sets out the following 'Suggested Landscape Management Guidelines', though these are not considered within the Bidwells LVA and only those underlined are included in the CBA LVA:

- *Develop strategies to deal with peak flows of traffic in tourist season, particularly near Audley End;*
- *Conserve and enhance existing hedgerows and restore where possible;*
- *Establish arable field margins;*
- *Conserve and manage areas of ancient woodland as historical landscape and nature conservation features;* and
- *Consider the visual impact of new farm buildings on the valley slopes and encourage the planting of tree groups around visually intrusive buildings.*

South Cambridgeshire District Council 'District Design Guide SPD'

3.4.9 The South Cambridgeshire 'District Design Guide' (DDG, Ref 9) divides the district into broad landscape character areas based upon the Countryside Agency's 'Countryside Character for East of England' (now superseded by the web-based Joint Character Areas, however, the areas identified in Figure 3.1 of Ref 9 have been retained). The area of South Cambridgeshire adjacent to the site is shown as lying within the broad area of 'The Chalklands'. The DDG includes a section on 'Village Landscape and Settlement Analysis' (Chapter 3, Ref 9). The key characteristics relating to landscape character of 'The Chalklands' of relevance to this report are as follows:

- *A distinctive landform of smooth rolling chalk hills and gently undulating chalk plateau;*
- *A mostly large-scale arable landscape of arable fields, low hedges and few trees, giving it an open, spacious quality;*
- *Small beech copses on the brows of hills, and occasional shelterbelts, are important features;*
- *Shallow valleys of the River Granta and River Rhee have a rich mosaic of grazing meadows and parkland; and*
- *Mostly strong rural character, though this is disrupted immediately adjacent to major roads such as the A505 and M11.*

3.4.10 The section in the DDG on 'Settlement Character' describes small villages being "*located on gentle slopes along spring lines, or on hilltops, such as Great Chishill*", whereas other villages "*are located within the river valleys on lower valley side slopes, sometimes related to crossing points and fords*". The distinctive settlement pattern of the area is thus contrary to the size and location of the settlement pattern proposed for the new Garden Community of North Uttlesford. New developments in the area should reflect the form and scale of existing settlements, which are often linear in nature, following river valleys along which the main transport routes are also aligned.

4 GREAT CHESTERFORD PARISH LOCAL LANDSCAPE CHARACTER ANALYSIS

(See Plans HDA 2 - 4)

4.1 Topography and Hydrology (in CBA LVA Landform and Land Use are combined)

4.1.1 The topography of the parish of Great Chesterford is split between the river valley, within which the village is located, and the steep slopes and high ground of the plateau, which form the north-eastern and eastern parts of the parish. The high ground (generally above 50m Above Ordnance Datum (AOD)) is devoid of settlement, other than occasional farmsteads. For the purposes of this report, the plateau forming the north-eastern part of the parish is referred to as the Chesterford Ridge, and the plateau and slopes to the south-west, beyond the parish, are referred to as Strethall Ridge (including Coploe Hill and Heavy Hill) on the opposite side of the Cam valley. The area of the parish to the east of the B184 Walden Road is visually dominated by the chalk downs and Chesterford Ridge, whereas to the west of the B184, the landscape is more visually contained and influenced by urbanisation. The landform and drainage of the Parish is an integral part of the local landscape character and provides a unique sense of place.

4.1.2 The River Cam (or Granta) flows south to north through the Parish. A corridor of land, between 4m and 200m wide, forms the extent of the 1 in 100 year flood zone of the River Cam (as defined on the Environment Agency website). The river is a significant feature within the village and has shaped its settlement pattern, transportation routes and the open spaces within the village. The Parish contains numerous other minor watercourses including streams, field drains and ponds. Within the site, the valley between Park Road and Cow Lane contains a drain (liable to flooding), but generally the valleys within the site are dry (along Park Road and the Field Farm access).

4.2 Vegetation Cover

4.2.1 There is a paucity of blocks of woodland within the Parish, with Burton Wood being the only one recorded as ancient woodland, as listed by Natural England (Ref 10), though this lies outside the site, on the southern edge of the parish. The closest ancient woodland to the site is Hildersham Wood, which is also a SSSI, and adjoins the northern site boundary, within in the parish of Hildersham. Other woodlands in the parish are of less historic importance, being more modern or associated with the major road network. In such an open landscape, small parcels of woodland and plantation belts within the site provide a limited amount of enclosure. In contrast, Chesterford Research Park, in the parish of Little Chesterford, is surrounded by mature belts of woodland which, despite its ridge top location, provide a high degree of screening, so that buildings within the park are barely visible from the wider surroundings. This wooded parkland is not a common characteristic of the local landscape

4.3 Land Use and Settlement

4.3.1 The land use within the Parish is predominantly arable agriculture, with some grazing pastures adjacent to the river and to the south of Great Chesterford Community Centre. These latter fields are generally horse paddocks and are of a much smaller scale than the arable fields, which are large, open and expansive. The arable agriculture is intensive, which has led to the large field sizes with few boundaries. Where boundaries do exist these are generally hawthorn hedgerows.

4.3.2 Great Chesterford is a fairly compact, nucleated settlement, located in the valley of the River Cam, to the west of a ridge of high ground forming part of the Great Chesterford Common. The village lies between the B184 and B1383 and is bound on the western edge by the Cambridge to London mainline railway. Proposals for a new crematorium site have been granted permission, to be located adjacent to the A11, to the north of the Stump Cross junction (accessed off the track to Field Farm). No dwellings can be located within 188m of the proposed crematorium, and it cannot be located within 46m of a public highway, which would form a constraint on adjacent proposed development.

Heritage Assets

4.3.3 The parish of Great Chesterford has a number of heritage assets, including four Scheduled Monuments and the historic core of Great Chesterford village itself, much of which is designated as a Conservation Area. The remnants of the Roman fort and town (1-3 on Plan HDA 2) are designated as Scheduled Monuments, as are the remains of a Romano-Celtic temple (4) which lies within the site boundary of the proposed Garden Community. The Conservation Area covers the majority of Great Chesterford village and contains approximately 65 listed buildings (mostly Grade II), which showcase a range of styles and reflect different time periods.

4.3.4 There is one listed building within the site, Park Farm Cottages off Park Road (referred to on older maps as The Limes). The Church of All Saints in Great Chesterford (Grade I) dates back to the 13th Century and the village has been in existence since at least the Saxon Period. There has been a school in Great Chesterford since 1514. Great Chesterford (population of 1,494 at 2011 census) has a number of local amenities including a doctor's surgery, primary school, church, community centre, local store and pubs. The community centre also provides outdoor facilities for village residents.

4.4 Access and Public Rights of Way

4.4.1 Numerous public rights of way cross the Parish allowing public access and enjoyment of the landscape. These include the Icknield Way National Trail, which crosses the parish on an east-west alignment between Great Chesterford Common and west beyond Junction 9 of the M11 (not within the site). Where the Icknield Way crosses the high slopes of the

Chesterford and Strethall ridges, it is often open, affording users panoramic views across the Cam valley. The site is crossed by only one road, Park Road, which continues northwards beyond Park Farm Cottages as Footpath 17-1 towards Great Abington. Cow Lane is the only other road to the east of the B184, Walden Road, which affords access onto the Chesterford ridge. A short section of Cow Lane forms part of the southern boundary of the site. Other than these routes which provide access up and over the Chesterford ridge, most rights of way through the parish follow the alignment of the vegetated watercourses, and have a much more intimate and enclosed character than those routes up and over the ridge.

4.4.2 In addition to the connections provided between villages in the area by the local, though busy, road network, there are public rights of way that connect the villages. From Rose Lane, on the south side of Great Chesterford, Footpath 17-7 heads southwards towards Little Chesterford (listed as Footpath 34-1 south of the parish boundary) along the eastern banks of the River Cam. The Icknield Way Trail, a nationally promoted long distance route, also passes through Great Chesterford. From the network of public rights of way, non-motorised users enjoy views of the countryside through which the paths pass, though on this whole the paths cross private land. Although this private land is enjoyed for recreational purposes as afforded by the paths which cross it, this land cannot be included as open space for the purposes of this assessment. However, any development proposals that may come forward that affect the enjoyment of views from these paths would need to consider the sensitivity of footpath users.

4.5 **Great Chesterford Parish– Key Elements**

- **Water:** Great Chesterford is a riverside village. The River Cam, and its use as a water source, is a principle reason for the village's location and why it became settled. The pattern of the village, though focused on the river, has also expanded perpendicular to the river, between the railway to the west and the A184, Walden Road, to the east. The routes of all the major roads and the railway are aligned parallel to the landform of the river valley and have had a strong influence on the settlement pattern.
- **Heritage:** There is a considerable amount of historic interest, both within the village as part of its built form, and present in the surrounding landscape, as exemplified by the four Scheduled Monuments. The built heritage is reflected in the local vernacular and the materials used in construction including brick, thatch and pargetting.
- **Location and character:** The village is nestled in the River Cam valley. The plateaus and ridges above the village help to visually contain its settlement pattern, with other villages along the valley, such as Little Chesterford to the south and Ickleton and Hinxton to the north. The M11, which runs to the west of the parish, cuts through the Strethall ridge, predominantly in cutting, but for some sections, traffic is visibly prominent from some viewpoints in the parish on the distant eastern side of the valley. The characteristics of the landscape within the village is a key contributor to the 'sense of place' of Great Chesterford.
- **Views:** Due to the open nature of the landscape and the dramatic changes in topography, there are important views from the village up to Chesterford Ridge and

to the opposite valley side to Strehall Ridge. From the ridges, there are impressive views across the valley landscape, to which the village contributes.

- Nucleated and compact settlement pattern largely contained by a mature landscape structure.

5 PARISH LANDSCAPE CHARACTER AREAS: ANALYSIS

5.1 Landscape Characterisation

5.1.1 The landscape of the parish was divided into parish-scale landscape character areas, possessing homogenous characteristics, as part of the process to produce the 'Landscape Character Assessment' as part of the Neighbourhood Plan. Great Chesterford parish has been divided into the following thirteen Parish Landscape Character Areas, as shown and listed on Plan HDA 4:

- 1 Chesterford Ridge
- 2 Chalk Upper Slopes
- 3 Chalk Lower Slopes
- 4 River Cam Floodplain
- 5 Transport Corridor Farmland
- 6 Great Chesterford Historic Core
- 7 Great Chesterford Archaeological Farmland
- 8 Great Chesterford Housing (Northern)
- 9 Great Chesterford Industry
- 10 Great Chesterford Housing (Southern)
- 11 Mill House Farmland
- 12 Great Chesterford Backlands
- 13 The Chesterfords Hinterland

5.2 Analysis of Parish-Scale Landscape Character Areas

5.2.1 The characteristics of each Parish-scale landscape character area have been analysed against criteria identified in Topic Paper 6 of the Countryside Agency's Landscape Character Assessment Guidance (Ref 11), along with identification of any designations, and consideration of the historic landscape characterisation of the area. This information forms the basis for the landscape sensitivity, value and capacity assessments. A detailed methodology for the analysis can be found in **Appendix 4**.

5.2.2 Detailed analysis sheets for each Parish-scale character area can be found in **Appendix 5**. For each character area there is list of relevant designations and planning policies, an analysis of landscape character, the key issues and management prescriptions for each character area, and a breakdown of landscape sensitivity, the landscape value of the area and the resulting landscape capacity. The tables setting out how the judgements for landscape sensitivity, landscape value and landscape capacity have been derived are included at **Appendix 6**.

6 LANDSCAPE CAPACITY

6.1 HDA Landscape Capacity

- 6.1.1 Landscape capacity is defined as the extent to which the landscape is able to accommodate change without significant effects on landscape character, reflecting the inherent sensitivity and value of the landscape. A landscape of high sensitivity or value therefore has a low landscape capacity.
- 6.1.2 The sensitivity of the Great Chesterford Parish character areas to development was assessed in the HDA LVA, and as part of this process, assumptions were made as to the likely built form of any new residential development (potential for industrial/commercial development has not been assessed). It was assumed that dwellings would generally be a maximum of two storeys in height. There would be an expectation for open space provision and a landscape framework to be incorporated, with tree planting of appropriate scale, building on an existing landscape framework which could achieve a good fit in the landscape and form a logical extension to the village, in keeping with the existing settlement pattern.
- 6.1.3 Sensitivity and value ratings range from Major, Substantial, Moderate to Slight. Areas judged to have Major or Substantial sensitivity or value indicate that development would have significant detrimental effect on the character of the landscape. Development in these character areas should only be on a very small scale and proposals would need to demonstrate no adverse impacts on the setting to the settlement or the wider landscape, and be consistent with Local Plan policy. The landscape sensitivity and landscape value tables, along with assessment criteria and scoring for each character area are shown in **Appendix 6** (Tables 1 and 2). Of the thirteen Parish character areas identified (for Great Chesterford), it was considered that those primarily of built development (four areas consisting of Areas 6, 8, 9 and 10), thus areas of townscape, would not lend themselves naturally to landscape capacity assessment. In these areas, the only capacity for development would be minor infilling or redevelopment of currently occupied plots (which may result in loss of employment land if this is replaced by residential uses).
- 6.1.4 The landscape sensitivity of the Parish is mixed, ranging between Slight to Major. Of the nine Parish character areas assessed, one had Major sensitivity (Area 1), five had Substantial sensitivity (Areas 2, 3, 4, 5 and 13), two had Moderate sensitivity (Areas 7 and 11), and there was one character area with Slight sensitivity (Area 12).
- 6.1.5 The landscape value of the Parish was also assessed as mixed, with one area (Area 7) being assessed as having Substantial landscape value, six areas (Areas 1, 2, 3, 4, 11 and 13) having Moderate landscape value and two areas (Areas 5 and 12) having Slight landscape value. There were no character areas with Negligible or Major landscape value.

- 6.1.6 The resultant landscape capacity is listed in **Appendix 6**, Table 3 and indicated on Plan HDA 4. Landscape capacity ratings range from Negligible (unlikely to absorb development without unacceptable adverse effects), Negligible/Low, Low, Low/Medium, Medium, Medium/High, High, High/Very High and Very High. A capacity rating of Medium or above identifies a landscape character area with the capacity for limited development, having regard for the setting and form of existing settlement and the character and sensitivity of adjacent local landscape character areas.
- 6.1.7 No Parish character areas were assessed as having High/Very High landscape capacity. One Parish character area was assessed as having High capacity (Area 12) and one area having Medium capacity (Area 11). Whilst these areas may have some capacity for residential development without significant harm to the local landscape character, careful consideration must be given to the extent and design of any developments within these areas, taking into account landscape conditions to avoid harmful effect on the surrounding landscape character. There may be capacity within the village and around the settlement edge of the village for small-scale residential additions, which would have significantly lower impacts on the character and appearance of the area than a large village extension.
- 6.1.8 At this point, it is worth summarising those sites for which planning applications have recently been submitted and are committed, and thus are helping to satisfy the need for new houses in Great Chesterford. The table below lists recent planning applications pertaining to the sites indicated on Plan HDA 6 of the original HDA LVA:

Table of Recent Planning Applications (in Great Chesterford) - For locations of Sites, refer to Plan HDA 6 in the original HDA LVA

Site Ref Plan HDA 6	Name of Site	Character Area	Reference to adopted Local Plan 2005	Description
1	Land south of Stanley Road and Four Acres	8	Part of Site GiCHE2 in 2014 Local Plan for 60 dwellings	Bellway Site 50 dwellings now built - 12/5513/OP granted on 12 July 2013 with RM, ref: 13/3444, approved 13 February 2014
2	Land off Bartholomew Close	8	Part of Site GiCHE2 in 2014 Local Plan for 60 dwellings	12 dwellings granted on 16 October 2014, ref: 14/0425 with RM refused, ref: 16/1247 on 1 September 2016 and appeal, ref 17/00007/REF, also dismissed on 12 April 2017
3	Land behind Acre Croft	12		3 dwellings 15/1424, RM 16/0328
4	Land behind Gelderds	12		Ashbee House and Webb House built – 12/6006 April 2013
5	Land east of Rose Lane	12		Morris House and Ruskin House built – 0742/12 granted September 2012
6	Thorpe Lea, Walden Road	12		31 dwellings 15/2310/OP granted on 13 June 2016
7	The Nursery, London Road and New World Timber Site	10	Site GiCHE1 in the 2014 Local Plan	42 dwellings was approved on 8 December 2014 (ref: 14/0174/FUL).
	Land off A11	2 & 3		Crematorium ref: 15/3782 granted 8 April 2016, RM 17/0099 discharged conditions (nos 2, 3, 5, 6, 7 and 8) in part on 26 May 2017.

- 6.1.9 The following paragraphs assess the landscape capacity of the three Parish character areas within which the NUGC is proposed. The Parish character area with Negligible/Low landscape capacity is Area 1, the open plateau of the Chesterford Ridge, which is visually exposed, with wide ranging views and too remote from existing settlements to be suitable for development. Development within this Character Area should be avoided as it would be out of character with the openness of the landscape in Area 1.
- 6.1.10 The areas with Low landscape capacity are Area 2 (Chalk Upper Slopes), Area 3 (Chalk Lower Slopes), Area 4 (River Cam Floodplain), Area 7 (Great Chesterford Archaeological Farmland) and Area 13 (The Chesterfords Hinterland). Development within these Character Areas should be avoided as it would be out of character, though there may be limited capacity for small amounts of development (for example, in association with existing farmsteads). Area 2 is a broad swathe of land from the northern edge of the parish through to the south-east. Any development in this area will be highly visible from the village and the Strethall Ridge. Development would also be out of character within the open landscape of the area. There is also limited infrastructure with only minor roads/tracks through the area.
- 6.1.11 Area 3 (Chalk Lower Slopes) is a large area of fairly low-lying land to the east of Great and Little Chesterford, adjacent to their settlement edges. The landscape character is influenced by views towards the villages and the B184 that forms the western boundary of the area. The northern end and eastern fringes of the area gradually gain height and any development would have to consider views from the Strethall ridgeline. A crematorium has recently been granted permission to the north of the Stump Cross junction, at the northern end of Area 3 (ref: 15/3782). There is also a Scheduled Monument (Romano-Celtic temple (4)) within the northern part of Area 3, near Dell's Farm, that would need preservation. The B184 restricts connectivity between this area and the existing settlements and provides a clear, defensible boundary to potential development.
- 6.1.12 This previous study has identified that a large proportion of the landscape of Great Chesterford parish has substantial landscape sensitivity and moderate landscape value, which is consistent with the contrasting landscape of open chalk uplands and the more intimate Cam Valley, though this is a landscape that is not designated. It follows therefore, that in a landscape of such contrasts there will be, throughout the parish, large areas that have negligible/low to low/medium landscape capacity for future development. The landscape east of the B184 (Character Areas 1, 2 and 3), which corresponds with the area of the proposed Garden Community, is largely open, rural in character and exhibits many of the key characteristics of the agriculture-dominated chalk farmlands. Development in these character areas would be inconsistent with the existing settlement pattern of the parish. To the west of the B184, there is potential for some small-scale development,

though this should be contiguous with the settlement and where settlement edges are currently ill-defined. Character Areas on the periphery of Great Chesterford, in particular, have been subject to several new developments (in Areas 8, 10 and 12).

6.2 Landscape Capacity in the Bidwells LVA

- 6.2.1 Section 5 of the Bidwells LVA is an Analysis of Site Capacity. Table 4 (page 50) defines Visual Sensitivity, but provides definitions that appear to be the complete opposite of that provided in the guidance. The guidance states that visual sensitivity of the landscape needs to be assessed, which “*means that the potential visibility of the development must be considered, together with the number of people of different types who are likely to see it*” (para 5.4, Ref 11). The HDA methodology considers visual sensitivity within the assessment of landscape sensitivity under the heading “*visual contribution (of an area) to the distinctive setting of the settlement*”. A site with high visual sensitivity is normally one that is “*highly visible due to the open, exposed nature of the surroundings*”, that “*might be visible from long distances*”, and would be “*seen by a large number of viewers*”. These statements are the definitions for ‘Low’ visual sensitivity in Table 4, and therefore the methodology needs to be treated with caution.
- 6.2.2 Table 5 (page 50 of the Bidwells LVA) is equally confusing particularly if the definitions in Table 4 are applied. It is assumed that Table 5 is based upon Figure 3a of the guidance (page 16, Ref 11) which combines landscape character sensitivity and visual sensitivity to give overall landscape sensitivity. Figure 3a in the guidance supports the understanding that a landscape with High visual sensitivity in combination with any level of landscape character sensitivity will give an overall High landscape sensitivity.
- 6.2.3 It is also assumed that Table 6 (page 51 of the Bidwells LVA) is based upon Figure 3b of the guidance (page 16, Ref 11), which combines landscape sensitivity and landscape value to give landscape capacity. It is agreed that a landscape with low capacity is “*unlikely to absorb housing development without unacceptable adverse effects on landscape character*” (page 15, Bidwells LVA). Thus an area with Low capacity for development has a higher than average overall landscape sensitivity “*due to certain physical characteristics, such as adverse topography*”, for example, a landscape that is highly exposed and prominent in long distance views, in combination with a higher than average landscape value, one that has high scenic quality and tranquillity, etc. (assessed using the landscape attributes in Table 1, Section 2.4 of the Bidwells LVA).
- 6.2.4 On this basis, the landscape capacity mapping for the site at Figure 14 (page 51; not Table 14) of the Bidwells LVA, is contrary to the guidance. This plan suggests the highest parts of the site, and thus those areas that are most open, have the highest tranquillity and though intensively farmed, are in good condition and well maintained, have high capacity

for development. This is evidently incorrect. Within Bidwell's own assessment, the site has medium landscape sensitivity and medium landscape value (though it is understood that these assessments are variable across such a large site) and thus the site as a whole is unlikely to have a landscape capacity for development higher than Medium (with reference to Table 6).

- 6.2.5 The description for the High capacity areas is given as those areas "*away from the sensitive visual receptor locations and beyond the highly visible slopes of the ridge*" (page 52 of the Bidwells LVA). It cannot be assumed that just because an area has no sensitive visual receptors, and thus potentially could be a remote area without existing dwellings, roads or paths, that it would therefore be acceptable to locate development in this area. Those areas assessed as having High capacity (in Figure 14, page 51 of the Bidwells LVA) also appear to coincide with 'the highly visible slopes of the ridge', rather than being beyond these slopes, as suggested.
- 6.2.6 The description for the Low capacity areas suggests these are located "*on the visually prominent side slopes of the ridge lines and the tops of the ridges which form the skyline*". This description seems to fit all areas of the site, and certainly not just those areas coloured red on Figure 14 of the Bidwells LVA. The HDA LVA judged the area of the site to fall within character areas with Low and Low/Negligible capacity to absorb development.

7 VISUAL APPRAISAL

7.1 Introduction

- 7.1.1 Areas of built development within the proposed Garden Community would occupy land over 60m AOD, up to 100m AOD where adjacent to Hildersham Wood. Proposed built development would lie to the south of the main ridgeline, which would restrict its visibility from viewpoints to the north, such as from Abington, however, there would still be the potential for built development to be visible from the settlements in the Cam Valley (Great Chesterford (700m between the edge of the site and the existing settlement edge), Hinxton and Ickleton), particularly in views towards the north-east, up the minor valleys which lie between the minor ridges which split off from the main ridge (refer to Plan HDA 3). There is also the potential for long range views from the higher ground on the opposite side of the Cam Valley at Strethall of proposed built development to the north-east.

7.2 Visual Assessment in the CBA LVA

- 7.2.1 The CBA LVA states in the Visual Baseline (Section 4.3 of Ref 2) that "*due to the elevated and sloping nature of the Site and the potential for long distance cross-valley views towards the Site, the visual sensitivity of the Site is high*". The Summary (Section 4.4) reinforces this, stating "*the Site is located on part of a ridgeline formation, which extends south-eastwards. The majority of the Site is located on the rolling slopes to the south of the*

ridgeline, resulting in open cross-valley reciprocal views from the Site to the south". In the Conclusions section (para 6.2.3), these two statements are reiterated by concluding that *"due to the elevated and sloping nature of the Site and the potential for long distance cross-valley views towards the Site, the visual sensitivity of the Site is high"*.

7.2.2 Despite identifying that the site has high visual sensitivity, the CBA LVA suggests that any potential visual impacts arising from the development proposals could be mitigated, but this is challenged particularly where development is proposed on the highest parts of the site and where it would be visible from existing settlements such as Great Chesterford, Hinxton and Ickleton. It is also questionable whether new planting in such a currently open landscape would be appropriate to the current landscape character. Large blocks of planting have the potential to have an adverse impact on the landscape in themselves, and may be difficult to establish in these exposed locations, particularly given the poor moisture retentive qualities of the local soils.

7.3 Visual Assessment in the Bidwells LVA

7.3.1 The Bidwells LVA also recognises the visual prominence of the site stating *"the valley slopes and the skyline on the edges of the higher ground are visually prominent, particularly when viewed from the lower lying populated areas. Building on the side slopes, or ridge lines would be very prominent and likely to result in adverse visual effects from within the study area"* (page 47 on potential visual effects). This section goes on to states that *"the introduction of buildings towards the edge of the upper plateaus would be very prominent on the skyline"*.

7.3.2 The Bidwells LVA includes two 'Zone of Theoretical Visibility' (ZTV) mapping plans, Figure 12 on page 29 and Figure 13 on page 13. Figure 12 is described as *"showing potential visual prominence of the site and surrounding topography"*. It is unclear how the degrees of visual prominence have been arrived at. It is assumed that a person standing within the site boundary is likely to experience a 'high visual prominence' of at least that part of the site closest to them. It is noteworthy that the location chosen for a radio mast, set on the highest part of the site, to the north-east of Park Farm and which is a feature that is visible from within and beyond the site, sits in an area of low visual prominence. There is also no explanation how the degrees of potential visibility in Figure 13 have been derived. In those areas of the site where development is proposed, that development would have a 'high potential visibility' to a viewer standing within or adjacent to that development. However, Figure 13 does seem credible in identifying those areas outside the site boundary that have 'high potential visibility' of the site, thus from high ground at Heavy Hill and Coploe Hill to the south-west of the site.

- 7.3.3 Other visual constraints of the site are highlighted in the report. In the section describing 'Areas of Low Capacity' (page 52) it is stated that views from the Icknield Way Path, an important recreational route located to the south of the site and with 'high potential visibility of the site' (as demonstrated by Figure 13 of the Bidwells LVA), should be protected. It is agreed that views experienced by the high sensitivity users of this well-used trail would be adversely affected by the proposed development, with those areas on the rising valley side to the north-west of Cow Lane being particularly visible.
- 7.3.4 This section of the Bidwells LVA goes on to suggest that "*a suitable buffer between proposed development and the existing settlement of Great Chesterford*" should be maintained (page 52). It is assumed that such a buffer is to fulfil the objective to "*conserve the integrity of existing settlements and communities*" (page 8) and to "*improve separation between the existing and proposed development (preventing the coalescence of settlements)*" (page 53). The Bidwells LVA recognises the potential inappropriateness of planting to mitigate the development's prominence, as large areas of woodland planting would be contrary to the existing open agricultural landscape character of the surrounding area. Design Action 6 (page 53) states that "*proposed tree planting close to the Walden Road*" would, when it matures "*enclose the area, which could result in a negative change from the current open character*". It is therefore challenged that the adverse visual effects of the proposed development could not be mitigated in a manner that would be appropriate to the local landscape character of the area.
- 7.3.5 The adverse visual effects of the proposed development are summarised in the Overall Conclusions (Section 7.1, page 55) of the Bidwells LVA, which states "*the appraisal identified a number of areas where proposed buildings are sited on 'outward facing slopes', or ridge lines and consequently these would be prominent on the skyline, particularly when viewed from the surrounding lowlands*". This is a very damning statement of the potential adverse visual effects that this development, if granted permission, would cause. The UDC officer's report also picked out the quotation above from the Bidwells LVA, thus recognising that this development, if permitted, would have particular difficulties as far as assimilation into the landscape. The officer also recognises that the suggested mitigation measures, particularly extensive planting, could in themselves be visually intrusive, and concludes "*such planting would in itself have a significant and detrimental effect on the historic pattern and character of the existing landscape*". The officer's report also concludes that potential visual impacts of the development "*would need to be determined by a detailed visual impact analysis to establish potential intervisibility*". Given such inadequacies in the evidence base, as identified by the Council's officer, it calls into question why the proposals have progressed thus far.

8 SUMMARY AND CONCLUSIONS

- 8.1 This report is to support Great Chesterford Parish Council in its representations to the Uttlesford District Council draft Regulation 18 Local Plan and considers the proposed landscape and visual effects of the proposed new Garden Community of North Uttlesford. This report has drawn upon the conclusions of the HDA Landscape Character Assessment which was prepared for The Chesterfords Neighbourhood Plan Steering Group (in February 2017, in conjunction with Little Chesterford Parish Council). This report has assessed Uttlesford District Council's baseline assessments, which included the landscape officer's report (5 May 2017) and a landscape and visual appraisal undertaken on behalf of the Council by Chris Blandford Associates (CBA LVA, June 2017). A 'Landscape and Visual Appraisal and Capacity Study' prepared by Bidwells on behalf of the developers (27 May 2016), has also been assessed and critiqued.
- 8.2 Both the officer's report and the CBA LVA recognise the "*high landscape and visual sensitivity of the Site as a whole*" and that the development as proposed could not be accommodated on this site "*without causing significant and unacceptable harm to the important visual qualities of the site and the wider landscape*". Despite these damning statements, both reports suggest that any potential visual impacts arising from the development proposals could be mitigated, and yet recognise that mitigation measures, in the form of extensive planting "*would in itself have a significant and detrimental effect on the historic pattern and character of the existing landscape*".
- 8.3 Even the developers' LVA recognises the considerable constraints to development due to the topographical form of the site. It states that "*the valley slopes and the skyline on the edges of the higher ground are visually prominent, particularly when viewed from the lower lying populated areas. Building on the side slopes, or ridge lines would be very prominent and likely to result in adverse visual effects from within the study area*". The HDA LVA judged the area of the site to fall within character areas with Low and Low/Negligible landscape capacity to absorb development, whereas the Bidwells LVA appears to have applied the methodology for assessing landscape capacity wrongly. The Bidwells LVA describes those areas that are the most open, have the highest tranquillity and are in good condition as having a High capacity for development, which is evidently incorrect.
- 8.4 It is concluded from assessment of the available evidence not only from the Council, but also from the developer, and our own assessment, that development of this site would result in irreversible and significant harm to the landscape character of the parish of Great Chesterford and to the visual amenity of its residents.

9 REFERENCES

- Ref 1 - Countryside Agency (now Natural England)/Scottish Natural Heritage (April 2002), *'Landscape Character Assessment – Guidance for England and Scotland'* as updated by Natural England (Christine Tudor) (October 2014) *'An Approach to Landscape Character Assessment'*
- Ref 2 - Chris Blandford Associates for Uttlesford District Council (June 2017) *'Land at Great Chesterford - Landscape and Visual Appraisal'*
- Ref 3 - Uttlesford District Council Landscape Officer (Ben Smeeden) (5 May 2017) *'New Settlement Proposals: Landscape and visual impact'*
- Ref 4 - Bidwells (27 May 2016); *'Land at Great Chesterford, Uttlesford – Landscape and Visual Appraisal and Capacity Study'*
- Ref 5 - Natural England (16 March 2015) *'National Character Area Profile: 87. East Anglian Chalk'* (NE529)
- Ref 6 - Landscape East (forum mainly of County Council officers) (2011) *'East of England Landscape Character Typology'*
- Ref 7 - Chris Blandford Associates for Essex County Council and Southend-on-Sea Borough Council (the Joint Structure Plan Authorities) (February 2003) *'Essex Landscape Character Assessment'*
- Ref 8 - Chris Blandford Associates (September 2006); *'Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessments'*
- Ref 9 - South Cambridgeshire District Council (adopted March 2010) *'District Design Guide – Supplementary Planning Guidance'*
- Ref 10 - Natural England/Defra Magic Map Website (2015); *'www.magic.gov.uk'* (for Ancient Woodlands)
- Ref 11 - Countryside Agency (2002) *'Landscape Character Assessment Guidance for England and Scotland – Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity'*
- Ref 12 - Uttlesford District Council (approved April 2007) *'Great Chesterford Conservation Area Appraisal and Management Proposals'* (CAA)

HDA Document Control and Quality Assurance Record

Project Title: Reps to Uttlesford District Council Regulation 18 Local Plan Consultation
Project Reference: 752.2
Document Title: Landscape and Visual Representations
Commissioning Party: Great Chesterford Parish Council

Issue	Description	Date of Issue	Signed
1	First draft (v.1)	August 2017	<i>C Marsh</i>
2	Version 2	September 2017	<i>C Marsh</i>
3	Version 3	September 2017	<i>C Marsh</i>
4			

	Personnel	Position
Author	Christine Marsh	Associate Landscape Architect
Approved for issue	Brian Duckett	Director

© Hankinson Duckett Associates. All rights reserved

No part of this report may be copied or reproduced by any means without prior written permission from Hankinson Duckett Associates. If you have received this report in error, please destroy all copies in your possession or control and notify Hankinson Duckett Associates.

This report has been prepared for the exclusive use of the commissioning party and unless otherwise agreed in writing by Hankinson Duckett Associates no other party may use, make use of or rely on the contents of the report. No liability is accepted by Hankinson Duckett Associates for any use of this report, other than for the purposes for which it was originally prepared and provided.

Opinions and information provided in the report are on the basis of Hankinson Duckett Associates using reasonable skill, care and diligence taking into account the manpower, resources, investigations and testing devoted to it by agreement of the client, and no explicit warranty is provided as to their accuracy. It should be noted and it is expressly stated that no independent verification of any of the documents or information supplied to Hankinson Duckett Associates has been made.

The report and any dispute or claim arising out of or in connection with it or its subject matter shall be governed by the law of England and the courts of England shall have exclusive jurisdiction to settle any dispute or claim that arises out of or in connection with the report, or its subject matter.

Appendix 1 – Policy Wording from UDC Reg 18 Local Plan

Appendix 1 – Policy Wording from Uttlesford District Council draft Regulation 18 Local Plan

Policy SP2 – The Spatial Strategy 2011-2033

Development will be distributed on the following basis:

1. The majority of development will be focused at the towns of Saffron Walden and Great Dunmow and the new Garden Communities at Easton Park, West of Braintree and North Uttlesford;
2. Key Villages will be the major focus for development in the rural areas reflecting their role as provider of services to a wide rural area;
3. New development in the Type A and Type B Villages will be limited with the emphasis being on:
 1. Enhancing and maintaining the distinctive character and vitality of local rural communities;
 2. Shortening journeys and facilitating access to jobs and services; and
 3. Strengthening rural enterprise and linkages between settlements and their hinterlands.

Elsewhere development will be restricted in accordance with Policy SP10 - Protection of the Countryside.

The growth of London Stansted Airport will be supported subject to conformity with the environmental and transport framework set out in Policy SP11 – London Stansted Airport.

Policy SP3 - The Scale and Distribution of Housing Development

Provision will be made for about 14,100 net additional dwellings in Uttlesford during the Local Plan period 2011 to 2033. Of this total:

- 2,468 dwellings have already been built 2011-2016.
- 1,190 dwellings will be provided on small unidentified windfall sites between 2016 and 2033.
- 4,513 dwellings are already identified in outstanding planning permissions at 1 April 2016 in the towns and villages listed below.
- 5,926 dwellings will be provided in the following locations between 2016 and 2033:

Settlement	Dwellings
Saffron Walden	240
Great Dunmow	743
Key Villages (note)	
Elsenham	40
Great Chesterford	31
Stansted Mountfitchet	62
Takeley	42
Thaxted	54
Type A and Type B Villages	44
Easton Park Garden Community	1,800
North Uttlesford Garden Community	1,900
West of Braintree Garden Community	970

(Note – No allocations are proposed at Newport)

Policy SP5 - Garden Community Principles

Three new garden communities will be delivered in Uttlesford, at Easton Park, North Uttlesford and West of Braintree.

Prior to any planning applications being considered detailed development frameworks for each of the garden communities will be prepared as development plan or supplementary planning documents and adopted by the local planning authority, demonstrating how the development accords with the garden city principles defined by the Town and Country Planning Association (or subsequent updated guidance) and wider definition of sustainable development outlined in the National Planning Policy Framework. Each garden community will demonstrate high levels of self-containment.

The garden communities will be underpinned by high quality urban design and placemaking principles. Streets and spaces will be designed to allow for safe and easy movement by a variety of modes, balancing placemaking and movement functions. Opportunities for smarter and sustainable travel will be maximised, with links to neighbouring settlements provided that reduce the reliance on the private car. The development frameworks will establish the layout, mix and quantity of future development, including key urban design principles that will guide development.

The development frameworks and subsequent planning applications must be prepared in consultation with residents, wider stakeholders and interested parties. This consultation will need to extend beyond the district boundaries to address cross-boundary matters.

Comprehensive development is required. Phasing, infrastructure and delivery plans will form part of the development framework, establishing the scale and pace of growth, where development will take place and when. The garden communities must be built out in a logical order so that ongoing construction does not undermine the quality of life of the first residents to move into the garden community. The delivery of physical, social and green infrastructure, and the trigger points for these, will form part of the phasing and delivery plan.

Measures to support the development of each new community including the provision of community development support workers (or other provision) and other appropriate community governance structures will be an integral part of the delivery of each new garden community.

Policy SP7 - North Uttlesford Garden Community

Permission will be granted for a new garden community in North Uttlesford following approval of a detailed development framework. The new garden community in North Uttlesford will:

1. Deliver 5,000 new dwellings, of which 1,900 will be delivered by 2033. A mix of housing sizes and types of housing will be delivered in accordance with housing needs including

affordable homes and homes for older people. Specific provision will be made for self and custom build housing.

2. Deliver a range of local employment opportunities with a particular focus on maximising economic links to the Wellcome Genome Campus and Chesterford Research Park.
3. Include a new local centre incorporating a mix of retail, business and community uses (including A1, A2, A3, A4, A5, B1(a), D1 and D2 uses). Land and financial contributions towards four primary schools (two form entry) and one secondary school (seven form entry) will be provided. Early years and childcare facilities, health care facilities, community and youth centres will also be provided.
4. Provide transport choice, including high quality, frequent and fast public transport services to Saffron Walden, Cambridge, Great Chesterford Rail Station and nearby employment parks (including the Wellcome Genome Campus and Chesterford Research Park). A network of safe walking and cycling routes will also be provided, including cycle routes connecting with the employment parks.
5. An access strategy that connects with the A11, A1301 and the Cambridge Park & Ride (on the A1307), with the A11 being the preferred route for northbound travel. Contributions towards capacity improvements along the A505 and junction of the A505 and A1301 will be sought, requiring cross boundary discussion with South Cambridgeshire.
6. Include new network or primary substations in the medium to long term, and reinforcements to the energy network in the shorter term.
7. Enhancements to the water recycling centre at Great Chesterford, new connections, network upgrades and reinforcements to the sewerage network.
8. Provision of Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood risk management.
9. Provide allotments, open space, play, leisure and recreation in line with standards established in the Local Plan.
10. Provision of natural, semi-natural and amenity green space in accordance with standards established in the Local Plan.
11. Positively respond to the landscape and historic value of this location, with proposals accompanied and influenced by landscape/ visual and heritage impact assessments. Careful consideration will be given to the siting and design of development, the use of building and landscaping materials, the improvement and restoration of degraded landscape features, and new woodland/ tree belt and structural planting within and around the site. The sense of tranquillity within the site should be maintained.

**Appendix 2 – Extract from Essex Landscape Character Assessment for Landscape Character
Area C1 Cam Valley**

**Appendix 3 - Extract from Landscape Character of Uttlesford District for Landscape Character
Area A1 Cam River Valley**

Appendix 4 – Methodology for Analysis of Landscape Capacity

Appendix 4 – Methodology for Analysis of Landscape Capacity

Analysis of Parish-Scale Landscape Character Areas

The characteristics of each Parish-scale landscape character area is analysed against criteria identified in Topic Paper 6 of the Countryside Agency's Landscape Character Assessment Guidance, along with identification of any designations, relevant planning policy, and consideration of the historic landscape characterisation of the area. This information is then fed into the landscape sensitivity and landscape value assessments.

Landscape Sensitivity

LCA	Inherent Landscape Qualities (Intactness and Condition)	Visual Contribution to the Distinctive Setting of the Settlement	Inconsistency with Existing Village/Settlement Form/Pattern	Contribution to Rurality of Surrounding Landscape	Sensitivity	Final Assessment Landscape Sensitivity
	low high				1-4 Negligible 5-8 Slight 9-12 Moderate 13-16 Substantial 17-20 Major	
					4 8 12 16 20	

Landscape Value

LCA	Landscape Designation	Other Designation (Nature Conservation, Heritage, Amenity, Flooding, including Flood Zone)	Contribution to Setting of Village/Settlement/ Outstanding Assets	Special Cultural/Historic Associations	Perceptual Aspects (e.g. Scenic Beauty, Views, Tranquillity, Wildness)	Landscape Value	Final Assessment Landscape Value
	low high					1-5 Negligible 6-10 Slight 11-15 Moderate 16-20 Substantial 21-25 Major	
						5 10 15 20 25	

In order to assess the sensitivity of the landscape to development, assumptions have been made as to the likely built form of any new development areas. It has been assumed that buildings would be two storeys in height. There would be open space provision and a landscape framework with tree planting of appropriate scale, area and design to ensure that the development achieves a good fit in the landscape.

Sensitivity and value ratings range from Major, Substantial, Moderate, Slight and Negligible. Areas judged to have Major or Substantial sensitivity or value indicates that development would have significant detrimental effect on the character of the landscape. Development in these character areas should only be on a very small scale and proposals would need to demonstrate no adverse impacts on the setting to settlement or the wider landscape.

Combining Landscape Sensitivity and Landscape Value to give Landscape Capacity

The landscape sensitivity and landscape value ratings are combined to give an overall assessment relating to landscape capacity. Landscape capacity is defined as the extent to which the landscape is able to accommodate change without significant effects on landscape character, reflecting the inherent sensitivity and value of the landscape. A landscape of high sensitivity or value therefore has a low landscape capacity:

		Landscape Value				
		Major	Substantial	Moderate	Slight	Negligible
Landscape Sensitivity	Major	Negligible	Negligible	Negligible/ Low	Low	Low/ Medium
	Substantial	Negligible	Negligible/ Low	Low	Low/ Medium	Medium
	Moderate	Negligible/ Low	Low	Medium	Medium/ High	High
	Slight	Low	Low/ Medium	Medium/ High	High	High/Very High
	Negligible	Low/ Medium	Medium	Medium/ High	High/Very High	Very High

Landscape capacity ratings range from Negligible, Low, Medium, High and Very High (and intervals between). A capacity rating of Medium, in relation to a village settlement, identifies a landscape character area with the capacity for limited development, say of up to 30 dwellings, having regard for the setting and form of existing settlement and the character and sensitivity of adjacent local landscape character areas. A capacity rating of Low identifies a landscape character area with a very limited capacity for development, with a potential for up to 10 dwellings, where the setting and form of the existing settlement would be maintained. Negligible capacity would not accommodate new development and re-use of existing buildings would need to be compatible with the character of the surrounding landscape and land use.

The landscape value, sensitivity and capacity assessments of each Parish scale character area are summarised in tabulated form in Appendix 5 below. Landscape sensitivity and value may not be completely uniform across an entire character area and therefore the capacity across a character area may vary slightly. This is commented on in Section 5 of the report, where particularly relevant.

A final assessment of each character area is then undertaken to assess the landscape capacity in relation to the overall settlement pattern and morphology of the village to ascertain whether development would form a logical extension to the village, consistent with the existing settlement pattern.

Appendix 5 – Parish Character Area Analysis Sheets

**Appendix 6 – Tables of Landscape Sensitivity, Landscape Value and Landscape Capacity for
the Parish Character Areas**

Appendix 6 - Table 1 Landscape Sensitivity

No	Landscape Character Area	Inherent Landscape Qualities (Intactness' and Condition)		Visual Contribution to the Distinctive Setting of the Settlement	Inconsistency with Existing Village/ Settlement Form/ Pattern	Contribution to Rurality of Surrounding Landscape	Sensitivity					Final Assessment Landscape Sensitivity		
		Low	High				1-4 Negligible	5-8 Slight	9-12 Moderate	13-16 Substantial	17-20 Major			
1	Chesterford Ridge	X	X	X	X	X	X	X	X	X	X	X	X	Major
2	Chalk Upper Slopes	X	X	X		X	X	X	X	X		X		Substantial
3	Chalk Lower Slopes	X	X	X		X	X	X		X	X	X		Substantial
4	River Cam Floodplain	X	X	X		X	X	X		X	X	X		Substantial
5	Transport Corridor Farmland	X	X			X	X	X	X	X		X		Substantial
6	Great Chesterford Historic Core													
7	Great Chesterford Archaeological Farmland	X	X	X		X	X	X		X	X		X	Moderate
8	Great Chesterford Housing (Northern)													
9	Great Chesterford Industry													
10	Great Chesterford Housing (Southern)													
11	Mill House Farmland	X	X			X	X	X		X	X	X		Moderate
12	Great Chesterford Backlands	X	X			X				X	X		X	Slight
13	The Chesterfords Hinterland	X	X	X		X	X	X	X	X	X	X	X	Substantial

¹ From visual, functional and ecological perspectives" p53 The Countryside Agency and Scottish Natural Heritage 'Landscape Character Assessment Guidance for England and Scotland, 2002

Appendix 6 - Table 2 Landscape Value

No	Landscape Character Area	Landscape Designation		Other Designation (Nature Conservation, Heritage, Amenity, Flooding, Including Flood Zone)	Contribution to Setting of Village/ Settlement/ Outstanding Assets	Special Cultural/ Historic Associations	Perceptual Aspects (e.g. Scenic Beauty, Views, Tranquillity, Wildness)	Landscape Value					Final Assessment Landscape Value	
		low	high					1-5 Negligible	6-10 Slight	11-15 Moderate	16-20 Substantial	21-25 Major		
1	Chesterford Ridge	X			X	X	X	X	X	X	X	X	X	Moderate
2	Chalk Upper Slopes	X			X	X	X	X	X	X	X	X	X	Moderate
3	Chalk Lower Slopes	X			X	X	X	X	X	X	X	X	X	Moderate
4	River Cam Floodplain	X			X	X	X	X	X	X	X	X	X	Moderate
5	Transport Corridor Farmland	X			X	X		X		X		X		Slight
6	Great Chesterford Historic Core													
7	Great Chesterford Archaeological Farmland	X			X	X	X	X	X	X	X	X	X	Substantial
8	Great Chesterford Housing (Northern)													
9	Great Chesterford Industry													
10	Great Chesterford Housing (Southern)													
11	Mill House Farmland	X			X	X	X	X	X	X	X	X	X	Moderate
12	Great Chesterford Backlands	X			X	X		X	X	X		X		Slight
13	The Chesterfords Hinterland	X			X	X	X	X	X	X	X	X	X	Moderate

Appendix 6 - Table 3 Landscape Capacity

No	Landscape Character Area	Landscape Sensitivity	Landscape Value	Landscape Capacity
1	Chesterford Ridge	Major	Moderate	Negligible/Low
2	Chalk Upper Slopes	Substantial	Moderate	Low
3	Chalk Lower Slopes	Substantial	Moderate	Low
4	River Cam Floodplain	Substantial	Moderate	Low
5	Transport Corridor Farmland	Substantial	Slight	Low/Medium
6	Great Chesterford Historic Core			
7	Great Chesterford Archaeological Farmland	Moderate	Substantial	Low
8	Great Chesterford Housing (Northern)			
9	Great Chesterford Industry			
10	Great Chesterford Housing (Southern)			
11	Mill House Farmland	Moderate	Moderate	Medium
12	Great Chesterford Backlands	Slight	Slight	High
13	The Chesterfords Hinterland	Substantial	Moderate	Low

Note: Character Areas shading in pink are primarily of built development, thus as areas of townscape, do not naturally lend themselves to Landscape Capacity Assessment.

Appendix 4 – Historic Environment: Place Services

Great Chesterford Local Plan Review: Historic Environment



Client
Great Chesterford Parish
Council

Date:
16/08/2017





Contents

1. Introduction	3
2. UDC Evidence Base	4
3. Site Analysis	6
Designated Heritage Assets	6
4. Conclusion	12
References and Sources	13
Appendix A.: Glossary (National Planning Policy Framework)	15





1. Introduction

- 1.1. This assessment has been commissioned by Great Chesterford Parish Council, pertaining to a new garden village to the north west of Great Chesterford (hereafter referred to as the 'Site'). The Site has been brought forward in the draft Uttlesford Local Plan for development as the North Uttlesford Garden Village.
- 1.2. This report has been undertaken to form part of a Regulation 18 response and will consider whether the Historic Environment has been appropriately considered. This document will first consider Uttlesford District Council's baseline assessments and documentation which evaluate the Site's appropriateness for development with regard to the historic environment. This document will then use the available information to provide summaries and broad conclusions as to the level of impact a development within the Site will have upon the Historic Environment.
- 1.3. Sources consulted are located in the bibliography of this document.



2. UDC Evidence Base

- 2.1. The Historic Environment has a dedicated page on Uttlesford District Council's (UDC) website with regard to Local Plan Evidence and Background Studies¹. Whilst there are a number of baseline studies listed, the document which pertains to the development of this specific Site is UDC's Brief Heritage Impact Assessment. This was completed in 2017 by an unknown author.
- 2.2. The Brief Heritage Impact Assessment is described on the website as a document *which highlights any heritage assets that could potentially be impacted by development in response to the call for sites, undertaken as part of the draft Local Plan. It considers the significance of these heritage assets, the contribution that setting makes to their overall significance and the likely effect of the proposed development on their setting and overall significance*².
- 2.3. For the reasons noted below, the Brief Heritage Impact Assessment is found to be of a detail which is inadequate, in places technically incorrect and fails to provide an understanding of the significance of heritage assets, their settings and the impact of any future development.
- 2.4. For succinctness, issues with Uttlesford's Brief Heritage Impact Assessment are outlined in the bullet points below:
 - Whilst Historic Environment Record (HER) reference numbers are included in the document, the detail is inadequate and many of the relevant numbers are missing. It is unclear from this document whether the HER data has been assessed. In summary Only the HER record numbers are identified, and many relevant records are missing. There is no detail of what individual monuments or events are and no indication of their significance;
 - The assessment fails to recognise any non-designated heritage assets;
 - The assessment references the existence of the Great Chesterford Conservation Area, but fails to consider its significance or the impact a development within the Site would have;
 - The assessment has only referenced the Scheduled Monument of the Roman Temple and has failed to recognise other relevant Scheduled Monuments in the immediate environs of the Site such as the Roman Fort/Town (List Entry ID 1013484);
 - Paragraph 1.5.2 of the assessment provides little information regarding the important views and does not specifically refer to any viewing places. There is no assessment of how the views contribute towards the settings or significance of heritage assets. Scheduled Monuments, Listed Buildings and the Conservation Area, which are important in the views, are not referenced;
 - With regard to the setting assessment the document states: *The following assessment follows the staged approach to proportionate decision taking, as set out in the Historic England guidance document: The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3 Published 2015 (GPA 3)*. The guidance has been poorly followed and the high-level of detail outlined is not proportionate to either the significance of the heritage assets affected or the decision it informs;
 - With regard to Section 2 of the assessment and the setting of heritage assets:
 - There is no reference to the setting of the conservation area;

¹ <https://www.uttlesford.gov.uk/article/41119/Historic-environment> (Accessed 14/08/2017)

² Ibid



- There is no reference to the setting of the additional Scheduled Monuments which may be affected;
 - No assessment of the relationship between Scheduled Monuments
 - No detailed understanding of the setting of individual heritage assets or how this contributes towards their significance; and
 - No reference to archaeological assets.
- The introduction to Section 3 of the assessment states a number of heritage assets have been omitted from further assessment as the impact is considered negligible. This element of the assessment is not adequately qualified;
 - The impact assessments in Section 3 are not detailed and in some cases incorrect, particularly with regard to the Roman Temple Scheduled Monument;
 - The impact assessment fails to consider the church, conservation area, the numerous listed buildings in the conservation area or the Roman Town Scheduled Monument;
 - There is no assessment of impact upon archaeological features, some of which are of high significance, such as burial mounds and Saxon burials which are known to be located within the Site;
 - The impact assessment notes a number of harmful effects. A more detailed assessment of these impacts is required; and
 - The reference to the Roman Temple in the table in Section 4 highlights the lack of understanding of the monument and also lack of consultation which has taken place.
- 2.5. The reasons above highlight some of the inadequacies of the Brief Heritage Impact Assessment which has informed decision making. However, given that this very high-level appraisal did not get to grips with the significance of heritage assets, the impact of a development within the Site and missed many other relevant heritage assets, it still found that development would cause significant harm. The conclusion of the assessment states:
- 2.6. *It is strongly recommended that a full Heritage Impact Assessment be commissioned with regards to the proposed development if this site is to be recommended. 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).*
- 2.7. Whilst an archaeological desk-based assessment has been completed for the Site (this was available at the time of UDC's assessment but does not appear to have been consulted no known additional *full Heritage Impact Assessment* has been undertaken. As such the harm of development within the Site has been recognised as significant from the high-level appraisal. No detailed assessment of this harm, which would hopefully address the above inadequacies, has been forthcoming to inform UDC's decision.



3. Site Analysis

- 3.1. A number of studies have been produced pertaining to Great Chesterford and its significance with regard to the historic environment which, based on a review of the Brief Heritage Impact Assessment, do not seem to have been consulted. A list of relevant heritage assets and summaries of relevant and existing historic environment assessments are outlined below.

Designated Heritage Assets

- 3.2. A With regards to this development, we consider the following designated heritage assets (as a minimum) to be relevant:

3.3. **Within the Site (Direct Impact)**

- Scheduled Monuments:
 - Romano-Celtic temple 400m south of Dell's Farm: List entry number: 1017453.
- Listed Buildings:
 - Park Farmhouse, Grade II Listed: List entry number: 1322523.

Outside the Site (Indirect Impact)

- Scheduled Monuments:
 - Roman fort, Roman town, Roman and Anglo-Saxon cemeteries at Great Chesterford: List entry number: 1013484;
 - Brent Ditch List entry number: 1006929.
- Listed Buildings:
 - Hinxton Grange, Grade II Listed: List entry number: 1318208;
 - Stable and Coach House to north east of Hinxton Grange, Grade II Listed: List entry number: 1128074;
 - Chesterford House, Grade II Listed: List entry number: 1171482;
 - Stable Block to west of Chesterford House, Grade II Listed: List entry number: 1322519.
- Conservation Areas:
 - Great Chesterford Conservation Area.

Archaeological Baseline

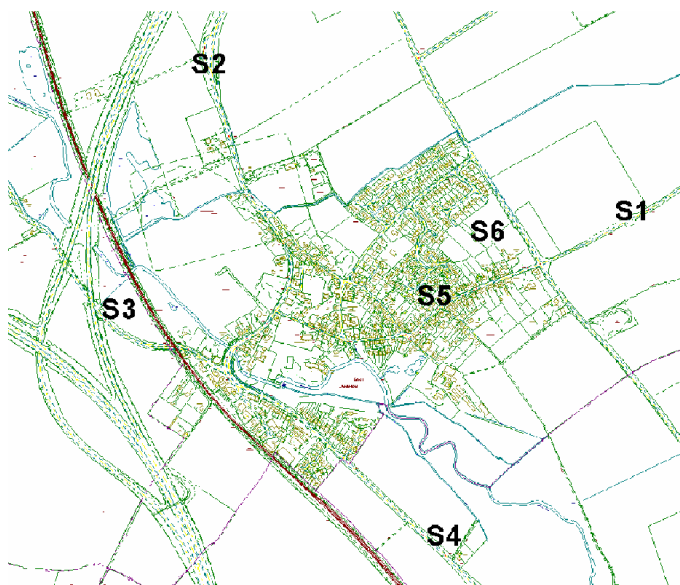
- 3.4. An archaeological Desk-Based Assessment was undertaken by Oxford Archaeology East in April 2016, on behalf of Bidwells. The assessment highlighted that the Site and surrounding area have high levels of known archaeology and therefore identified the Site as having significant archaeological potential.



- 3.5. Archaeological remains have been recorded from all periods from the Palaeolithic through to modern day. Cropmarks and known activity from the Bronze Age and Roman periods have been located within the Site and to the immediate north and west. A Scheduled Monument, which consists of the remains of a Roman Temple complex, is located within the Site and therefore there is a high likelihood for further associated remains within the surrounding area. The assessment highlights the negative impact that would arise from development due to severing the relationship between the scheduled temple remains within the Site and the scheduled fort, town and cemeteries to the north-west of Great Chesterford village.
- 3.6. Cropmark evidence for Bronze Age barrows and sub-surface remains of high status Iron Age burials have also been identified within the Site and surrounding area, which make up part of a wider funerary landscape. There is potential for the remains of a Roman Road to exist across the southern extents of the Site, evidenced by cropmarks and geophysical survey results. The eastern part of the Site contains an informal deer park, the field boundaries of which are still present today, and historic maps illustrate that the field divisions within the Site have essentially remained unchanged for over 200 years.
- 3.7. The baseline archaeological assessment provided by Oxford Archaeology East clearly demonstrates that the Site contains evidence of multiple phases of occupation which would be significantly and adversely impacted by development here.

Historic Character Settlement Assessment

- 3.8. A Historic Settlement Character Assessment for Great Chesterford was carried out by Uttlesford District Council in 2007. The assessment identifies Great Chesterford as a key rural settlement, which has three distinct areas. The document gives a general overview of the character of the village, which lies in the valley of the River Cam, and describes the village as surrounded by 'attractive open undulating countryside'.
- 3.9. The assessment also identifies six sectors of land (noted on the map overleaf) in and adjacent to the village and gives an outline of the quality and general function of the landscape for each. A broad statement as to the effect of development in each sector is then set out. It is identified that sector 6 is the only area where the effect would 'at worst be neutral and at best improve the sense of place and local distinctiveness of the settlement'. It also highlights that new development in all sectors, except for sectors 3 and 4, would have a detrimental impact on the historic core of the village to varying degrees. The assessment concludes that, for the reasons outlined in the document, development in all sectors aside from sector 6 would 'diminish the sense of place and local distinctiveness of Great Chesterford'.



Uttlesford District Historic Environment Characterisation Project

- 3.10. Uttlesford District Council commissioned Essex County Council to produce a Historic Environment Characterisation Project, published in 2009. The project was primarily developed to serve as a tool for Uttlesford District to use in the creation of the Local Development Framework and identifies the sensitivity, diversity and value of the historic environment resource within the District.
- 3.11. The report provides a summary description of Great Chesterford Area. The Site is located within two areas: Great Chesterford Roman Town and Great Chesterford Ridge. The study outlines its historic landscape character and archaeological character as below:

Great Chesterford Roman town, Settlement and Temple

- 3.12. **Summary:** *The area is situated on the chalk ridge on the boundary with Cambridgeshire. It is bisected by the River Cam which has formed a natural routeway since earliest times, as well as a series of ancient roads and tracks. Historically and geographically the area is more akin to Cambridgeshire and northeast Hertfordshire than the rest of Essex. The historic field pattern is a mixture of large open common fields and a more enclosed pattern of irregular fields. The main settlement is Great Chesterford which has its origins in the Late Iron Age developing into a major Roman town/fortified settlement. Extensive cropmarks are recorded showing occupation from the Bronze Age period onwards.*
- 3.13. **Historic Landscape Character:** *The geology is dominated by the chalk, which outcrops in the valleys of the Cam and its lateral streams and on the escarpment along the Cambridgeshire*



boundary. The remainder of the area is covered by a skim of very chalky boulder clay with alluvial and glaciofluvial deposits in the valley floor. Large common-fields developed here, of the Cambridgeshire and Midland type, a field-type that is rare in the rest of Essex. Some of these were enclosed by agreement in the early post-medieval period. The remainder were enclosed in the 18th and 19th centuries, as part of the parliamentary enclosure act. On the higher land, the landscape is more typical of Essex than Cambridgeshire with winding lanes, dispersed hamlets and greens and ancient woodlands, as well as Little Chesterford Park. There are important areas of enclosed meadow pasture adjoining the River Cam. The main settlements within the area are the villages of Great Chesterford and Littlebury.

- 3.14. **Archaeological Character:** The area contains extensive crop-mark evidence with many probable Bronze Age burial mounds (represented by ring ditches), prehistoric and Roman settlement enclosures. In addition, the distribution of individual finds and sites attests to human occupation of the area from the Palaeolithic period onwards, intensifying in density from the Bronze Age onwards. The excavated evidence includes an important Early Bronze Age burial at Bordeaux Farm, Littlebury, which has few parallels in Essex.
- 3.15. The large Roman town at Great Chesterford (now mainly a green-field site) is sited on the Essex side of the county boundary with Cambridgeshire. It is a strategically important site, straddling the entrance to the Fens through the gap in the low chalk hills as well as a number of significant route-ways and the tribal boundary between the Trinovantes and the Catuvellauni. The town had its origins in the Late Iron Age before being considerably expanded in the Roman period, culminating in the erection in the later 4th century of a substantial flint rubble town wall. Outside the town were extensive cemeteries and evidence for extra-mural settlement. A kilometre to the east of the town was a Late Iron Age shrine/Roman temple. Anglo Saxon occupation continued in the area, as evidenced by an extensive Anglo-Saxon cemetery excavated immediately to the north of the Roman town, as well as Saxon settlements and cemeteries are known from Littlebury and Little Chesterford.
- 3.16. The medieval settlement of the area comprised the villages of Great and Little Chesterford and Littlebury, together with more dispersed settlement in the form of small hamlets, isolated farms, manors and moated sites. There was a large medieval park at Chesterford Park. The northern boundary of the county has medieval lynchets preserved as cropmark evidence. During the post-medieval period, changes in agricultural production are reflected in the changing design of farm complexes with the development of the 'Victorian High Farming' tradition and the enclosure in the 18th and 19th centuries of the former common fields."

Great Chesterford Ridge

- 3.17. **Summary:** The zone is situated on the chalk ridges to the north-east of Great Chesterford, on the border with Cambridgeshire. Historically the zone is more akin to Cambridgeshire and Hertfordshire than Essex. The settlement pattern is highly dispersed. Extensive cropmarks survive across the zone indicating occupation from the Bronze Age through to the modern day.
- 3.18. **Historic Landscape Character:** The geology is dominated by the chalk, which outcrops on ridge slopes; the remainder of the zone is covered by a skim of very chalky boulder clay. Large common-fields developed within this zone, of the Cambridgeshire and Midland type, rare in the rest of Essex. Some of these were enclosed by agreement in the early post-medieval period. The remainder were enclosed in the 18th and 19th centuries, as part of the parliamentary enclosure act. The zone includes the former Chesterford and Hadstock Commons, areas of open rough grazing and scrub. These were also enclosed in the 19th century, and much of Hadstock Common is now



under Hadstock Airfield. The landscape was historically very open, with large rectangular fields, extensive views and sparse settlement; this pattern persists into the modern day. The medieval settlement pattern was both sparse and highly dispersed, comprising individual farms and cottages, a pattern which has persisted into the modern period.

- 3.19. **Archaeological Character:** *The area contains crop-mark evidence, including probable prehistoric ring-ditches, prehistoric or Roman enclosures and later field boundaries. There is good documentary evidence for the area and it is possible to reconstruct much of the medieval landscape elements. During the post-medieval period, changes in agricultural production are reflected in the changing design of farm complexes with the development of the 'Victorian High Farming' tradition and the enclosure in the 18th and 19th centuries of the former common fields. In the south-east corner of the zone is the remains of the World War II Hadstock Airfield on the site of the former Hadstock Common.*
- 3.20. The report also set out summaries of archaeological character areas and describes Great Chesterford as follows:

- *"This area comprises the chalk ridge on the border with Cambridgeshire and part of the Cam valley;*
- *The large Roman town at Great Chesterford (now a green-field site) is a strategically important site, straddling the entrance to the Fens through the gap in the low chalk hills as well as a number of significant routeways and the tribal boundary between the Trinovantes and the Catuvellauni;*
- *The town of Great Chesterford has its origins in the Late Iron Age before being considerably expanded in the Roman period, culminating in the erection in the later 4th century of a substantial flint rubble town wall;*
- *Outside the town were extensive cemeteries and evidence for extra-mural settlement;*
- *A Late Iron Age shrine/Roman temple was sited a kilometre to the east of the town;*
- *Anglo Saxon occupation comprises an extensive Anglo-Saxon cemetery excavated immediately to the north of the town;*
- *Other Saxon settlements and cemeteries are known from Littlebury and Little Chesterford;*
- *The medieval settlement of the area comprised the villages of Great and Little Chesterford, Littlebury and Strethall, together with more dispersed settlement in the form of small hamlets, isolated farms, manors and moated sites. There was a large medieval park at Chesterford Park; and*
- *During the post-medieval period, changes in agricultural production are reflected in changing farm complexes with the development of the 'Victorian High Farming' tradition 'when new ideas culminated in significant alterations in the design and layouts of buildings.'*

The Roman Town of Great Chesterford

- 3.21. In 2011 the culmination of a 5 year project, funded by English Heritage, was the report on 200 years of excavations in and around the Roman Town of Great Chesterford. This report provides a detailed assessment of the town, fort and temple and its associated landscape. This report should have been used in creating any heritage assessment of this area but there is no evidence that this was consulted. The report highlights the relationship between the town and the associated temple



indicating the level of understanding there is of these monuments and the associated non-designated heritage assets within the area.



An interpretation of Roman Great Chesterford ©Peter Froste



4. Conclusion

- 4.1. This assessment has been undertaken to form part of the Regulation 18 response and considers the historic environment in relation to the proposed Garden Village at Great Chesterford. This document assesses Uttlesford District Council's baseline assessments and documentation which evaluate the Site's appropriateness for development with regard to the historic environment. This document has used available information to provide summaries and broad conclusions as to the level of impact a development within the Site will have upon the Historic Environment.
- 4.2. A *Brief Heritage Impact Assessment* was produced by UDC to inform the appropriateness of the Site for development. This assessment has been found to be of poor quality without sufficient detail. It does not consider all relevant heritage assets and fails to adequately understand the significance of heritage assets effected or the level of impact development would have. Even though UDC's baseline information was unsound, it still made a conclusion that development within the Site would cause substantial harm. A full Heritage Impact Assessment was recommended but not undertaken, considering built heritage and the setting of heritage assets.
- 4.3. UDC's website contains a number of documents which were available at the time of the compilation of the Brief Heritage Statement, although they do not appear to have been consulted. Little assessment has been made of the archaeological potential of the Site and the Historic Environment Record does not seem to have been consulted. Section three of this document outlines the summary and conclusions of some of the available assessments as well as the Archaeological Desk Based Assessment, by Oxford Archaeology East, pertaining to the Site.
- 4.4. Assessments pertaining to the Site to date have drawn the following broad conclusions:
 - The Site contains significant archaeology, from multiple phases, which would be subject to substantial harm as a result of development;
 - The historic environment within the Site and its environs is significant. Development will have an adverse direct and indirect impact on a number of heritage assets; and
 - Development within the Site would have a significant adverse impact upon the setting of heritage assets and views across the settlements which are significant.
- 4.5. A Site visit was undertaken during the compilation of this report. The topography of the Site does not lend itself to residential development. Based on a review of available desk-based resources and a site visit, conclusions can be drawn that should a full heritage impact assessment be undertaken it will determine that development of the Site will have a substantial and adverse impact upon a number of heritage assets of high significance. In many cases this impact will not be mitigatable. Available assessments have suggested that the Site is not suitable for residential development. Conclusions resulting from the information consulted in forming this document, suggest that the development of the Site would result in irreversible and significant harm to a number of significant designated heritage assets and their settings.



References and Sources Bibliography

Ancient Monuments and Archaeological Areas Act 1979

Department for Communities and Local Government, March 2012. *National Planning Policy Framework*

English Heritage, April 2008. Conservation Principles – Policies and guidance for the sustainable management of the historic environment

Essex County Council, 2009, *Historic Environment Characterisation Project*

Medlycott, M. 2011, *The Roman Town of Great Chesterford; East Anglian Archaeol.* 137

Oxford Archaeology, May 2016, *Desk Based Assessment: North Uttlesford Garden Village, Essex*

Planning (Listed Buildings and Conservation Areas) Act 1990

Uttlesford District Council, 2017 *Historic Environment Characterisation Project*

Uttlesford District Council, 2017, *Brief Heritage Impact Assessment*



APPENDICES



A. Glossary (National Planning Policy Framework)³

Archaeological interest	There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.
Conservation (for heritage policy)	The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
Designated heritage asset	A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
Heritage asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).
Historic environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
Historic environment record	Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.
Setting of a heritage asset	The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
Significance (for heritage policy)	The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

³ Department for Communities and Local Government, March 2012. *National Planning Policy Framework*

Client:
Error! Reference source not found

Local Planning Authority:
Utilesford District Council



For further
information

Insert here



Place Services

Essex County Council
County Hall, Chelmsford, Essex CM1 1QH

T: +44 (0)333 013 6840
E: enquiries@placeservices.co.uk

www.placeservices.co.uk

[@PlaceServices](https://twitter.com/PlaceServices)



Appendix 5 – Record of GCPC’s involvement with UDC

GCPC/UDC involvement

The position of GCPC during preparation of the draft Local Plan, and the response of UDC/PPWG or officers (as appropriate), has been as follows:

- (1) Following rejection in 2014 by the Planning Inspector of its previous Local Plan, UDC’s Call for Sites took place in the first half of 2015; responses received were not published by UDC on its website until late December 2015/January 2016.
- (2) UDC’s public consultation on a new Local Plan was conducted between October - December 2015, GCPC submitted its response in due time ahead of the deadline for replying; it did so in ignorance of the fact that the NUGC site had been identified in the Call for Sites.
- (3) The responses to the Call for Sites having been published, in early 2016 UDC published on its website its draft Assessment of the sites submitted. On 7 April 2016 GCPC submitted to UDC its detailed comments on the three principal sites affecting Great Chesterford, namely 06 - 07GtChe15 (Stump Cross), 08 - 19GtChe15 (NUGV) and 03 - 04 LtChe15 (London Road). In its response GCPC:
 - (i) challenged the compatibility of the NUGC and Stump Cross sites with UDC’s Call for Sites criteria as contrary to its stated Vision and Development Strategy for Uttlesford since new houses on these sites were specifically proposed to satisfy the commercial employment needs of the research business community in South Cambs rather than the housing needs of Uttlesford;
 - (ii) objected to the identification by UDC of Great Chesterford as a Key Village without any reference to GCPC or the wider village despite the fact that Great Chesterford is smaller than some Type A villages identified by UDC;
 - (iii) requested UDC to “disclose to GCPC documents relied on [by UDC] in support of expressions of opinion relating to (1) Uttlesford’s Landscape and Historic Settlement Character Assessments; (2) the Accessibility Criteria relating to the existence of “a viable route from each [site] to the principle (sic) or strategic road network (B roads, A roads and M11)” and (3) all paragraphs in the Assessments entitled “Suitability Conclusions” and “Availability Conclusions””.
- (4) No response having been received to these requests, GCPC e-mailed UDC on 18 May and repeated its request in full, stating that GCPC considered “that it is unable fully to respond to UDC’s draft Assessments in the absence of such documents”; other than a computer generated acknowledgement no response was received, nor was any reply received to a follow-up request sent on 16 June;
- (5) At all relevant times GCPC was unaware of the existence of a document dated 16 January 2016 (but only published on UDC’s website in 2017) submitted to UDC by Bidwells, acting on behalf of the NUGC landowners, which set out the terms of its proposed “Working Garden Village Charter” for NUGC;
- (6) GCPC responded promptly to UDC’s letter dated 27 July 2016 requesting information about recent and proposed residential developments in Great Chesterford;

(7) In August 2016 GCPC responded to a request from UDC to supply it ahead of the August PPWG meeting with two reports (Historic Environment Assessment and Landscape Character Assessment) prepared by Consultants instructed by GCPC in connection with preparation of Great/Little Chesterford's Neighbourhood Plan; GCPC was also requested to send a representative to the meeting to explain the documents and/or answer any questions raised. Despite the presence of District Councillor Redfern (also a member of GCPC) at the meeting, she was not called upon to speak. Instead, Bidwells tabled a letter dated 23 August objecting to various issues raised in the reports, and the fact that neither document had been subject to local public consultation. Bidwells letter concluded:

"...if the Panel are minded to accept the officer recommendation to include these documents within the evidence base for the draft Local Plan then we specifically request that they be clearly indicated as documents produced by a third party in order to inform an emerging Neighbourhood Plan and are not documents commissioned by the District Council to inform the emerging District Local Plan. Furthermore we request that that it should be clearly indicated that these documents carry no greater weight or authority than any other representations from a third party, including those submitted by Bidwells on behalf of landowners as referenced above. Finally, should the Council accept these documents within their evidence as third party representations, we request that it is made clear that the District Council are not indicating that they have agreed the brief, methodologies or findings of the reports or are taking on responsibility for defending such documents at any future examination of the draft Local Plan which might otherwise be implied by such an action."

Minute PP20 of the PPWG meeting states:

"The Chairman said the Group was only noting the studies, similar to other Neighbourhood Plan documents. The letter from Bidwells would be kept on file and the Neighbourhood Plan itself would be subject to independent examination. The working group NOTED the documents to be included in the Local Plan evidence base."

(8) On 12 October 2017 GCPC was informed by Troy Navigus, which was advising GCPC on spatial strategy issues in the context of the Neighbourhood Plan in preparation, that it had been retained by UDC to advise it in connection with preparation of the emerging Local Plan. In view of the obvious potential conflicts of interest likely to arise, GCPC was obliged to terminate its contract with Troy Navigus, and to appoint alternative advisers in their place.

(9) On 20 October UDC/PPWG issued a briefing pack "to help the media when reporting on the Local plan" ahead of proposed discussions of the draft on 25 October and finally at Full Council on 8 November. The media pack states that UDC's Strategic Housing Market Assessment ("SHMA") suggested that Uttlesford needed to provide 12,500 homes between 2011 and 2033, the A120 options scored best in terms of additional traffic congestion, that there was to be no reasonable new settlement proposal adjacent to Saffron Walden and that two new settlements - at Easton Park and west of Braintree - were proposed by officers. The media pack further stated that Great Chesterford could provide 83 additional residential sites over the Plan period.

(10) On 7 November 2016 UDC announced that it was "pausing" the Local Plan process in order to enable it to undertake additional preliminary work on the sites under review.

(11) GCPC made a Freedom of Information request to UDC on 23 October, with particular reference to the supply of all documents/ presentations provided to UDC at Local Plan workshops held on 11 and 17 October 2016; it further requested, in relation to the PPWG meeting scheduled for 25 October 2016 that had been cancelled, copies of the draft uncirculated papers. The requests

were refused by UDC on 15 November 2016 on the grounds, inter alia, that at the present formative stage in developing its proposals UDC needed “safe space”, that disclosure might have a chilling effect in view of the potentially controversial ideas that might be put forward, and because disclosure could also give a misleading impression of UDC’s Local Plan proposals.

(12) In a report dated 28 December 2016 prepared for UDC by the Planning Advisory Service (“PAS”) regarding the emerging Local Plan (published on UDC’s website as an attachment to the papers considered by PPWG at its meeting held on 20 January 2017), PAS informed UDC that in relation to possible site allocations the necessary evidence was not all in place (para 4.1), that some significant gaps in the published evidence existed (para 4.2), that the evidence base did not include a revised SHMA, including the fact that the author had seen no explanation as to how the revised SHMA/OAHN figure of 54,600 houses across West Essex/East Herts resulted in UDC’s component of 14,100 had been apportioned (para 4.3) even if staying with the 12,500 figure would be a serious risk to the soundness of the Plan (para 4.3). In determining viability of schemes proposed, the report emphasised the need for the Inspector to be concerned about (1) viability (para 4.4) and; (2) transport implications, including the cost of new highways or improvements to existing roads, especially the strategic road network (para 4.5). The PAS report also commented adversely on the nature and content of paperwork relating to UDC’s Duty to Cooperate with South Cambs DC (para 5.2).

(13) The emergence of Great Chesterford as a possible location for a new settlement can be traced mainly through the Agendas/Minutes of PPWG meetings held between January - July 2017:

(i) Duty to Cooperate meeting with South Cambs, 13 January 2017 - UDC informed South Cambs that “a proposed new settlement at Great Chesterford had been brought into play”;

(ii) PPWG, 22 February 2017: “Chesterford was also being looked at ... the overall tone of the meeting was that Chesterford would be considered as part of the sites... more than Chesterford was back on the table as work was needed to make the Cambridge/Stansted/London corridor ever more viable” [PPWG Minute PP46]. GCPC received no notification from UDC of this development. Agenda Item 5 states “...work is focussed on examining strategic alternative proposals at...Great Chesterford...Officers intend to reach a definite recommendation on the proposed spatial strategy for the whole district, at least in principle for a draft Plan report in June 2017 [para 3.3] and “in relation to the Duty to Cooperate, the main issue is...completion of the traffic modelling work... the transport position and any other strategic issues will need to be resolved in principle before June 2017” (para 3.6);

(iii) Presentation on 27 March 2017 by Bidwells to UDC members - New Settlement Proposal Summaries. GCPC was neither informed that the presentation was to be made, or sent a copy of the prospectus and accompanying slides presented to members;

(iv) PPWG, 17 May 2017, Agenda Item 4: Transport Study briefing - states that six new settlement locations (Great Chesterford, Elsenham, Easton Park, Braintree, Chelmer Mead and north of Takeley) have been tested, and that “the emerging findings of the study indicate that none of the scenarios resulted in unacceptable increased traffic flows.” GCPC made brief presentations (three minutes only permitted), submitting that the traffic assessments (such as they are) for Great Chesterford, landscape and other grounds did not in any way support selection, and expressing astonishment that such traffic mitigation measures as had been identified were all in South Cambs rather than related to the B184 and B1383, being the local roads most adversely affected;

(v) On 24 May 2017 GCPC was invited by the PPWG Chairman to attend a presentation about NUGC given by Bidwells. Whilst this afforded GCPC (and representatives of Little Chesterford and Hinxton Parish Councils also present) an opportunity to raise questions, no papers were circulated ahead of, or at, the meeting, which centred around the content and illustrations contained in the Bidwells prospectus presented to UDC members on 29 March. No record of the meeting was subsequently sent by UDC to GCPC following the meeting;

(vi) On 5 June 2017, in light of the emerging indications of selection of Great Chesterford as a settlement site, GCPC sent two letters to UDC which detailed all its objections to inclusion of the site in the draft Local Plan (these, together with the response from UDC, are included as Appendix 5A). On 13 June UDC responded that “Where there are adverse impacts from any potential allocation the Council will look at potential mitigation measures”; as regards GCPC’s objections, UDC’s response states that “the opportunity to raise many of the points will be as part of the formal consultation. If the site is allocated...we will engage with you in relation to these specific topics which we have covered as part of the Local Plan evidence base.”

(vii) PPWG 22 June 2017, Agenda Item 3, Uttlesford Transport Study - refers to existing stress on the highways network in the study area, but makes no mention of the B184. The study asserted that sites under review “have good access to the Strategic Road Network, are accessible to jobs and settlements with services. Great Chesterford has good access to walking and cycling facilities and is close to a railway station” (paras 6.7.11 and 6.7.12). It continues: “The M11J10 and A505/A1301 roundabout were found to be currently near capacity or already over capacity. However with the range of improvements identified, the situation is mitigated. The mitigation identified can also provide for capacity at these junctions beyond the Plan period with up to 3,300 dwellings possible at Great Chesterford, subject to delivery of successful modal shift measures and more detailed Transport Assessment work” (para 6.9.2). As GCPC pointed out in the limited time available for presentations, the assertion that “Great Chesterford would use M11/J9 rather than J8” took no account of the fact that there is no access north at J9. Further, in response to a question from GCPC, UDC’s transport consultants confirmed that “...at this stage of the Local Plan work had not received such a high level of detail to anticipate travel growth and mitigation measures on the B184” (PPWG Minute PP73);

(viii) PPWG 29 June 2017 - draft Local Plan tabled. GCPC pointed out, in the limited time permitted, that UDC’s Economic Viability Study of the financial viability assessment for the Great Chesterford site was conditional as “a full transport assessment would be required i.e. a standard requirement for larger schemes like this” [para 9.7 and appendix A, Malin’s Study];

(ix) PPWG 20 June 2017, Agenda Item 3 - recommended three new settlements: NUGC, Easton Park and Braintree - all of which sites have been “subject to a Sustainability Assessment” (para 12);

(x) Full UDC Council, 29 June 2017 - unanimous Council approval that draft LP be published for consultation.

Duty to Cooperate

(14) Since UDC paused preparation of the draft Local Plan in November 2016 it has held three meetings with South Cambs District Council – on 11 and 13 January 2017 and 1 February 2017: the minutes of the January meetings have been published on UDC’s website as part of the January 2017 PPWG Agenda papers, but those of the February meeting have not been published.

(15) In June 2017 GCPC made a Freedom of Information request for disclosure of all working papers relating to all meetings between UDC and South Cambs; the request was refused by UDC in an undated letter received by GCPC on 4 August 2017.

Appendix 5A – Copies of correspondence between GCPC and UDC



GREAT CHESTERFORD PARISH COUNCIL
5 South Street, Great Chesterford, Saffron Walden, Essex, CB10 1NW
Tel: 01799 531265 Email: clerk@greatchesterford-pc.gov.uk

Clr. Howard Rolfe
Chair, Planning Policy Working Group
Uttlesford District Council
London Road,
Saffron Walden
Essex CB11 4ER

5 June, 2017

Dear Howard,

North Uttlesford Garden Village ("the Settlement")

This letter is sent on behalf of Great Chesterford Parish Council following Bidwells' presentation to the meeting you chaired on 24th May 2017 about the proposed Settlement.

As Bidwells made clear, their purpose in siting the Settlement at Great Chesterford is primarily to meet the housing needs resulting from potential employment growth (some 18,100 jobs) in the developing life sciences industry located in South Cambs; at most, job opportunities to be served in Uttlesford amount to a few hundred. It was emphasised by Bidwells that the proposed location is unique because of existing transport connections in relation to the science parks etc located within the Cambridge cluster.

The Parish Council objects to the proposals as they have been presented to date on the following principal grounds:

- The Settlement does not meet the housing and other needs of Uttlesford as envisaged in UDC's stated Local Plan Vision and Development Strategy;
- Significant and substantial additional work would be required to upgrade the road and rail networks in order to ensure that the Settlement does not add to existing congestion. There would need to be (i) direct access to the A11; (ii) improvements to the M11 at Junction 9 (including access north by means of the M11 to alleviate and avoid significant additional use of already congested main roads and rat-runs via local villages to reach the M11/Junction 10); and (iii) something more is required than reliance on Field Farm, Park Road and Cow Lane as the principal Settlement entry/egress points onto the B184, an already busy road which will become even more dangerous than it is today. The only suggestion of mitigation measures to cope with the current level of traffic on the B184 is an additional roundabout, presumably at the Park Road entrance to the Settlement site, which we regard as insufficient and unrealistic given the volume of additional traffic which is likely to be generated. As regards rail links, commuters will either drive to Audley End or Whittlesford to catch fast trains, or to the station at Great Chesterford for local services - the Settlement is too distant from the station to be conveniently walked, and any bus link is unrealistic unless the service is provided on a very regular basis. Further, additional train services and capacity would be required to meet increased passenger demand, which may not be possible given existing congestion of train services on the Liverpool Street/Cambridge line;

Chairman – Neil Gregory

- Villages in the vicinity of the Settlement are already affected from time to time by flooding, a problem that will be greatly exacerbated by the very extensive high density development that is proposed and in regard to which no assurances have yet been provided. In the case of Great Chesterford, part of the village has already been identified by the Environment Agency as at significant risk from flooding, which itself is having a detrimental effect on property transactions in the affected area;
- Very significant archaeological features and heritage assets are located in and around Great Chesterford, all of which have their place in the surrounding countryside and which will inevitably be adversely impacted by the development. Suitable protection measures for these heritage assets would have to be brought forward, yet there is already evidence (see attachment) of failure to address such issues properly and in disregard of standard safeguard procedures;
- The landscaping of the Settlement as indicated in Bidwells' "Prospectus for Delivery" [presentation to UDC, 27 March, 2017] will destroy the existing uplands and valleys, and in a manner which is likely permanently to scar the sky-line; reworking the present siting of the development to make it less obvious from Great Chesterford will merely expose the development to settlements in South Cambs, in particular Hinxtton and Ickleton;
- Provision of a buffer zone ostensibly to provide green space between Great Chesterford and the Settlement is promised and would be essential, together with proposals to re-site the development so that it is not visible from Great Chesterford. We are not satisfied, however, that sufficient work has been done to ensure that the surrounding area does not suffer avoidable and undesirable urbanisation - whether from the proposed use by Citi7 buses utilising Park Road and Cow Lane as part of the claimed sustainable transport facilities that will serve the Settlement, or the inevitable use of Great Chesterford High Street/South Street/Church Street as a rat-run by cars of those driving between the Settlement and the station at Great Chesterford;
- The Parish Council has repeatedly raised with UDC and the Highways Authorities its existing concerns about the volume and speed of traffic already using the B184. Major transport concerns have been identified regarding proposed substantial developments at Wellcome Genome and an Agrihub research park near Hinxtton. Traffic from the Settlement will seriously worsen a situation that is already bad. Saffron Walden will inevitably be the town of first choice for shopping and culture, so adding further to the already high level of use of the B184 and the unacceptable traffic and parking conditions in the town; at present, we have not seen any proposals that alleviate our ongoing concerns in that regard. In our view, traffic entering and exiting Saffron Walden from the B184 cannot be mitigated without a bypass to the North and East of Saffron Walden, and any-thing less will simply be inadequate;
- Locating the Settlement anywhere in the vicinity of Great Chesterford will have an immediate and significant impact on the existing infrastructure within the village, in particular presently available facilities for education, health care and the like; such facilities are already stretched to breaking point, and, in the absence of immediate provision of new facilities as the development proceeds, services in Great Chesterford will be overwhelmed.

As recently as 2012 officers of South Cambs DC recommended members to object to a new Settlement north east of Great Chesterford on grounds that the "harm of such a large-scale development outweigh identified advantages and should be resisted". The recommendation cites many reasons why such a development is unacceptable to South Cambs, including that the site has "...no credible public transport link with Cambridge or with other settlements in the M11 corridor". Reference is made to the adverse landscape impact of development that "...would be clearly visible in much valued and much enjoyed views from the Cambridge Green Belt - particularly from Magog Down". The report concludes "A new town north west of Chesterford would share many ... site

Chairman – Neil Gregory

specific objections but would have the advantage of being served by Chesterford railway station and be delivered by local authorities outside Cambridgeshire. On balance the harm of such a large-scale development outweigh these advantages and should be resisted" [Report from Corporate Manager (Planning & New Communities) to Northstowe & New Communities Portfolio Holders, South Cambs DC, 6 March 2012].

As a final comment, the Parish Council understands that UDC's Consultants, Malin Associates Limited, have advised [Economic Viability Study, New Settlement and Neighbourhood Proposals, October 2016] that the Settlement site is suitable to be taken forward for possible inclusion in the Local Plan. However, no named developer is yet backing the Settlement, which is being promoted by Bidwells on behalf of the landowners concerned, there is no indication in the Study that the scheme will in any way be compliant with the Town and Country Planning Association Garden City Principles, and no support is provided in the Study for the assumption [at paragraph 9.6] that the Settlement is viable because "...all large infrastructure costs [will] have been carried in their entirety by the residential elements of the scheme[]". In these circumstances we fail to understand the basis on which the Settlement can be included in the Local Plan as viable or suitable.

The Parish Council has demonstrated in recent years its willingness to accept an increase of appropriate development within Great Chesterford (resulting in an actual or projected increase in the past five years in the size of the village by 25%), and accepts that additional housing is required in Uttlesford in the coming years. Whilst the Parish Council could be supportive of some further significant development outside the confines of the present village, it could do so only if its concerns regarding transport, flood risk, landscape character, visual amenity and excessive urbanisation etc referred to above are satisfactorily dealt with. However, given the present lack of any meaningful evidence that these concerns will be addressed in the near-term, as matters stand the Parish Council does not believe that the site displays anything like the necessary degree of evidence-based advantages and sustainability claimed by its promoters. It therefore requests PPWG and UDC to reject Great Chesterford as a site for further consideration, and to exclude the Settlement from the draft Plan that is shortly to be adopted.

A copy of this letter goes to Richard Fox and to Gordon Glenday.

Yours sincerely,

A handwritten signature in black ink, appearing to read "A. Gregory", is written above a horizontal line.

pp Neil Gregory
Chairman, for and on behalf of Great Chesterford Parish Council

Chairman – Neil Gregory



GREAT CHESTERFORD PARISH COUNCIL

5 South Street, Great Chesterford, Saffron Walden, Essex, CB10 1NW
Tel: 01799 531265 Email: clerk@greatchesterford-pc.gov.uk

Cllr Howard Rolfe
Chair, Planning Policy Working Group
Uttlesford District Council
London Road
Saffron Walden

5 June 2017

Dear Howard

I read with interest the recent papers to the PPWG, especially those relating to heritage and landscape assessments of the new settlement proposals.

I am sure that you will agree with me that ensuring the Working Group have the most up to date and robust information before them is vitally important to ensure an evidence led plan.

It was therefore rather disappointing to note that the Historic Environment report did not reference the Historic Environment report on Great and Little Chesterford from Essex County Council Place Services (which is adopted by the Working Group and on the Council's website). As a Parish Council we sent a copy to both the Landscape and Conservation officers and it is clear that the Conservation Officer did not read the report and adopted evidence base.

I am also somewhat surprised, given the importance of the topic and process, that no contact was made with Essex County Council Place Services, as the Council's retained Historic Environment advisor, nor to Historic England the Government's Statutory Historic Environment advisor.

Given the range of Listed Buildings, Conservation Area and a high number of Scheduled Ancient Monuments I would have thought this would have been fundamental - unfortunately therefore the report is fundamentally flawed.

Both Essex County Council Place Services and Historic England have expressed their severe concerns regarding a new settlement in the Great Chesterford location and to not consult them or present the information to the Working Group is a serious error of judgement and process.

I am also aware that Essex County Council Place Services contacted Richard Fox and Gordon Glenday after the publication of the Working Group papers and before the Working group itself to express their concerns about the report and its findings - but there was no reply.

Chairman – Neil Gregory

Given the stated aim of holding a Regulation 18 consultation in the summer I would suggest that an urgent consultation is carried out with Essex County Council Place Services and Historic England to fully understand their concerns relating to a new settlement in the Great Chesterford location.

I look forward to your detailed reply and I am, of course, more than happy to meet further to discuss the harm to the historic environment and landscape that the proposal would cause - not to mention highways, flooding etc...

Yours truly

A handwritten signature in black ink, appearing to read 'A. Gregory', is written above a horizontal line.

pp Neil Gregory
Chair
Great Chesterford Parish Council

cc Ms D French, CEO, UDC

Chairman – Neil Gregory



UTTLESFORD DISTRICT COUNCIL

Council Offices, London Road, Saffron Walden, Essex CB11 4ER
Telephone (01799) 510510, Fax (01799) 510550
Textphone Users 18001
Email uconnect@uttlesford.gov.uk Website www.uttlesford.gov.uk

Chief Executive: Dawn French

Mr N Gregory
Great Chesterford Parish Council
5 South Street
Great Chesterford
Saffron Walden
Essex CB10 1NW

please ask for: Richard Fox

13 June 2017

Dear Mr Gregory

North Uttlesford Garden Village

I refer to your letters of 5 June to Cllr Rolfe. I have been asked to reply on his behalf.

As you know I attended the presentation and question and answer session chaired by the Leader on 22 May so I am familiar with the key issues raised and the debate that followed.

The first point I would make is that what is being promoted by Bidwells is a potential allocation in the Local Plan for a new settlement not a site specific proposal. The illustrative masterplan supporting that potential allocation should not be construed in the same way as a planning application. It is subject to change and is regarded as supporting material by the Council. In deciding whether to allocate the site near Great Chesterford the Council will need to consider the overall need for housing in the District and balance that against the suitability of specific sites given their constraints and opportunities. Where there are adverse impacts from any potential allocation the Council will look at potential mitigation measures.

I note your specific grounds of objection to the proposals. As we are now close to the commencement of consultation on the draft plan the opportunity to raise many of the points will be as part of the formal consultation. If the site is allocated as a potential new settlement we will engage with you in relation to those specific topics which we have covered as part of the Local Plan evidence base.

As regards the points raised in your separate letter about landscape and heritage impact it was made clear at PPWG that the reports represented were the views of the Council's own landscape and heritage officers and that the views of other parties such as Essex Place Services and Historic England would be sought. Reference was also made to the landscape and heritage studies submitted by Great Chesterford Parish Council to PPWG. Finally, the heritage report made clear that a further full and comprehensive Heritage Impact Assessment will be required, from an independent viewpoint.



UTTLESFORD DISTRICT COUNCIL

Council Offices, London Road, Saffron Walden, Essex CB11 4ER
Telephone (01799) 510510, Fax (01799) 510550
Textphone Users 18001
Email uconnect@uttlesford.gov.uk Website www.uttlesford.gov.uk

Chief Executive: Dawn French

I am unaware of any direct approach to Gordon Glenday or myself by Essex Place Services following the publication of the PPWG papers.

I trust I have clarified matters.

Yours sincerely

Richard Fox

Planning Policy Team Leader