



REPORT TO: Scrutiny and Overview Committee
Cabinet

12 July 2018
26 July 2018

LEAD OFFICER: Joint Director for Planning and Economic Development

Response to consultation on Pre-Submission Draft Uttlesford Local Plan (Reg 19)

Note that this report has been amended for Cabinet following its consideration by Scrutiny and Overview Committee.

Purpose

1. To consider the contents of the Pre-Submission Uttlesford Local Plan (Regulation 19) consultation as they affect South Cambridgeshire and agree an appropriate response.
2. This is a key decision because following this formal stage in the preparation of the Uttlesford Local Plan, Uttlesford District Council proposes that the Pre-Submission Draft be submitted for examination and therefore representations made at this stage will be considered by the independent Inspector. The report addresses the potential effects of the Uttlesford Local Plan, including a proposed new settlement to the north east of Great Chesterford, on adjoining wards within South Cambridgeshire. It was first published in the June 2018 Forward Plan.

Recommendations

3. It is recommended that this Council make representations on the Uttlesford Local Plan Regulation 19 consultation consistent with this report and particularly paragraphs 22-62.

Reasons for Recommendations

4. To respond to the consultation from Uttlesford District Council (UDC) having regard to the content of their draft Local Plan and its implications for South Cambridgeshire.

Executive Summary

5. Uttlesford District Council is consulting on their Pre-Submission Local Plan (Regulation 19) between the 25th June and 5.00pm on the 13th August 2018. This is the Local Plan that they intend to submit to the Planning Inspectorate for examination and only representations made to this consultation will be taken into account by the Planning Inspector. If representations are not made at this time there will be no further opportunities to do so unless Uttlesford decide to repeat their Regulation 19 consultation. Importantly only those making objections to this consultation have the opportunity to ask to appear at the examination and officers propose to include such a request in our response. This Council could subsequently decide to rely only on its written representations or to withdraw some or all of them as circumstances dictate.

6. The plan proposes a new North Uttlesford Garden Community (NUGC) of up to 5,000 dwellings on land north east of Great Chesterford immediately adjoining South Cambridgeshire (location map at Appendix A).
7. It is accepted that the provision of the homes and jobs needed in Uttlesford for the plan period to 2033 will require hard choices to be made and that choices about where development is located will always have environmental impacts. A key issue is that development proposals must be proposed alongside appropriate planning for necessary infrastructure to support all stages of the development. This report is primarily concerned with the impacts of the NUGC on the residents and businesses of South Cambridgeshire rather than the wider merits of the Uttlesford plan as a whole.
8. One of the key issues identified for South Cambridgeshire in this report is whether appropriate transport infrastructure can be provided to support all stages of delivery of the new settlement. The report considers both the evidence to support the delivery of the full new settlement, including delivery beyond the plan period and whether there could be short term impacts on the continued economic growth in the southern employment cluster of research campuses in South Cambridgeshire. Also, given the elevated location of the NUGC it considers what are its landscape and visual impacts and whether there is evidence that they can be mitigated satisfactorily.
9. This report sets out the background and key proposals of the Uttlesford Local Plan, and identifies a number of matters primarily concerning transport and landscape impacts on which it is considered the plan and its evidence base cannot as yet demonstrate adequate answers. It accordingly proposes that the Council submit representations raising these concerns. It is proposed that the Council continues to work constructively with Uttlesford District Council under the duty to cooperate to explore whether the issues raised can be resolved, and if so the Council can review its representations through the examination process.

Background

10. Uttlesford is a large mostly rural district located in north Essex immediately adjoining a number of South Cambridgeshire parishes between Great and Little Chishill and Castle Camps. The chief urban areas in Uttlesford are Saffron Walden in the north with a 2011 population of 14,313 and Great Dunmow in the south with a population of 8,830. Nearby towns in adjoining districts to the west include Royston, Bishops Stortford and Harlow, and to the east Braintree and Haverhill. Its southern edge contains part of the London Green Belt which also extends around Bishops Stortford and Stansted Airport.
11. Three nationally and internationally significant research institutes and Science Parks are located nearby in South Cambridgeshire – the Wellcome Genome Campus in Hinxton, Granta Park in Great Abington and the Babraham Research Campus in Babraham. The Wellcome Genome Campus is preparing a planning application for submission later in 2018 for a major expansion of their campus to the east of the A1301 for around 175,000 sqm of employment floorspace and 1,500 new homes. In regard to a site just to the north of the Wellcome proposals and south of the A505, in March 2018 Planning Committee refused a planning application for the development of an Agritech Park for up to 112,000 sqm of employment floorspace for around 4,900 jobs. The reasons for refusal included reference to transport and landscape impacts. The period for lodging an appeal has not yet expired.
12. The main transport infrastructure in Uttlesford comprises the north south routes between London and Cambridge (M11 and rail), and the east-west A120 which

connects Bishops Stortford, Stansted, Great Dunmow and Braintree. Three junctions on the M11 serve Uttlesford. Junction 8 with the A120 supports all movements. Junction 9 with the A11 on the border between Uttlesford and South Cambridgeshire does not allow southbound traffic on the M11 to join the northbound traffic on the A11 or southbound traffic on the A11 to join northbound traffic on the M11. These missing movements are provided for at the all movements Junction 10 with the A505 in South Cambridgeshire. The A11 skirts part of the northern boundary of Uttlesford.

13. Preparation of the Uttlesford Local Plan commenced in December 2014 when their previous emerging plan was found to be unsound by a Planning Inspector following a number of examination hearings. There were two main reasons given, first that their housing target was too low, and second that their Elsenham Strategic allocation of 3,000 homes was not justified (located between Stansted Airport and Saffron Walden, close to the M11). It was not justified because there had not been an adequate consideration of alternative sites, the site had access only to inadequate rural roads, there was insufficient capacity at junction 8 on the M11 and no certainty that funding would be available to fund improvements, and only a small proportion of the residents would use Elsenham Railway station for work journeys.
14. Work on their new Local Plan started immediately and Uttlesford consulted on Local Plan Issues and Options between October and December 2015. This included numerous areas of search for new settlements and urban extensions including a location to the north-east of Great Chesterford. At that time their housing need was thought to be no higher than 11,750 dwellings and that two new settlements may be required to help them achieve this scale of growth. This Council submitted representations on the Issues and Options following consideration of a report by the Planning Portfolio Holder at his December 2015 meeting. In regard to a broad area of search for a new settlement north-east of Great Chesterford these representations primarily expressed concerns regarding the transport impacts of such a development on adjoining parts of South Cambridgeshire.
15. In Summer 2017 Uttlesford held a draft Local Plan (Regulation 18) consultation which included provision for a 'North Uttlesford Garden Community' (NUGC) north-east of Great Chesterford for 5,000 dwellings of which 1,900 were to be provided by the end of the plan period in 2033. A report on the consultation was considered by the Planning Portfolio Holder on the 25th August 2017. These representations raised a number of concerns regarding the soundness of the Local Plan and the NUGC proposal in particular, primarily in respect of its transport impacts, deliverability, viability, landscape impacts and downstream flood risks. A copy of the representations submitted by SCDC is attached for reference at Appendix B.

The Regulation 19 Uttlesford Local Plan

16. The current Uttlesford Local Plan consultation (Regulation 19) comprises their draft Local Plan and its supporting sustainability appraisal. Their published plan preparation programme states that they intend to consult on a Proposed Submission Local Plan (Regulation 19) in summer 2018 (current stage), submit the plan for examination in autumn 2018, and have the plan examined and adopted by autumn 2019. The timetable for the preparation of necessary development plan documents to guide the development of their proposed new garden communities has not yet been set out in their statutory development plan work programme (their local development scheme).
17. A number of key considerations have influenced the emerging Uttlesford Local Plan. These include: a housing need target which increased from 12,500 dwellings (2011-

2033) to 14,100 dwellings during the course of its preparation to take account of new national household projections; the constrained transport infrastructure of the district including at Saffron Walden; the fact that many of its residents look to the Cambridge area and London for employment as well as to Stansted Airport; and Green Belt constraints around Stansted and in the south of the district. Whilst Uttlesford forms part of the Cambridge Travel to Work Area it is located within a different Housing Market Area (HMA) with East Hertfordshire, Epping Forest and Harlow District Councils, although it is recognised that because HMA boundaries follow administrative boundaries they cannot provide a perfect fit with market behaviours. Uttlesford is proposing to meet all of its housing need target for the plan period within its own administrative area.

18. A key item of interest for this district concerns a proposed 'North Uttlesford Garden Community' (NUGC) new settlement for 5,000 homes to the north east of Great Chesterford south of the A11 on the boundary between Uttlesford and South Cambridgeshire. The new settlement is addressed by policies SP5 and SP7 of the emerging Uttlesford Local Plan and their supporting text (attached as Appendix C for information). The policy requires the delivery of 1,925 dwellings on site by 2033 and 5,000 in total. The housing trajectory of the plan assumes that first completions can be delivered on site in 2022/2023, building up to an ongoing completion rate of 250 dwellings per year by 2029/30 (and 300 dwellings in year 2032/2033). It can be noted that achieving first housing delivery at NUGC in 2022/2023 is very ambitious even if the Local Plan is adopted in 2019, because they intend to prepare a separate statutory development plan document for it which it is estimated will take around two years and will also need to consider planning applications and agree necessary planning obligations.
19. The plan includes two further new garden communities: Easton Park west of Great Dunmow on the A120 close to Stansted for 10,000 dwellings (1,925 by 2033), and on land West of Braintree on the A120 for 3,500 dwellings (970 by 2033) which forms part of a larger new settlement of 10,000 dwellings the majority of which being in Braintree District. Easton Park is also scheduled to have first completions in 2022/2023. First completions in Uttlesford on Land West of Braintree are scheduled for 2025/2026.
20. The Pre-Submission Draft Uttlesford Local Plan in general and the NUGC in particular are supported by around 80 studies and evidence documents which include:
 - A Landscape and Visual Impact Assessment of the NUGC site, which identifies that it is of a high landscape and visual sensitivity being on an elevated sloping site visible in long distance views. Assessments of the two other new settlement locations conclude that the sites are less sensitive being of medium to high sensitivity.
 - A district wide Transport study and an addendum which support the provision of the three new garden communities subject to a high modal travel share for sustainable transport modes (public transport, bicycle and on foot).
 - A Saffron Walden Transport Study which identifies that town centre road constraints limit the scope for further peripheral development.
 - A South Cambridgeshire Junction Study. This looks at junctions on the A505 in South Cambridgeshire including with the M11 Junction 10, A1301, A11 and the A1307. The study concludes that the A505 is currently operating close to/at capacity during peak periods. Mitigation measures to Junction 10 of the M11 and to the A1301/A505 junctions are required at an initial estimated cost of between £6.5m and £11m which are stated to ensure 'nil-detriment' or better based on existing conditions plus identified growth in Cambridge, South

Cambridgeshire, Uttlesford, Braintree, Chelmsford, East Hertfordshire, Epping Forest, and Harlow.

- Traffic Assignment Evidence concerning the NUGC submitted by the Uttlesford promoter at the Regulation 18 stage shows that 32% of work commutes would be to Cambridge, 17% to London, 4.79% to Granta Park and 2.75% to the Babraham Research Campus. It also identifies that the A11 and the A1307 would be the preferred routes for northbound traffic with 28% of car trips from the site following this route. The Regulation 19 Local Plan confirms that the A11 remains the preferred route for northbound traffic.
- An A505 Corridor Improvement Feasibility Study which concludes that there are achievable options to improve capacity on the A505 corridor both on-line and off-line.
- A response from Cambridgeshire County Council to the transport evidence states that it is '*reasonably content with the transport evidence presented as it shows that there is deliverable mitigation for the likely impact of the proposed development in the district on Cambridgeshire roads*' saying that '*it is likely that the solution required for the Uttlesford Growth will ultimately form part of a strategic package that is identified by the Combined Authority*' and '*These impacts will need to be mitigated by the developers to Cambridgeshire County Council's satisfaction and in accordance with the proportional impacts of the developments*'.
- An Economic Viability Study regarding the new settlements concludes that they are viable having tested scenarios where s106 and infrastructure contributions were either £40,000 per dwelling or £50,000 per dwelling.
- The Sustainability Appraisal of the Regulation 19 Local Plan whilst being generally supportive of the plan as a whole does identify significant negative impacts in regard to the NUGC proposal in respect of its impacts on landscape character and townscape, and heritage impacts noting that it is uncertain whether suitable mitigation could be provided and in regard to sustainable methods of travel identifying negative impacts on the basis that a large amount of commuting to jobs outside the district would be by car.

21. Scrutiny and Overview Committee deadlines are such that this report is being written relatively early in the consultation period. Officers will continue to consider this extensive body of material, key parts of which have been updated since the Regulation 18 consultation in summer 2017, and it may accordingly be necessary to bring forward supplementary reports concerning the plan and its sustainability appraisal before Scrutiny and/or Cabinet.

Considerations

22. This Council's consideration of the Uttlesford Local Plan is focused on ensuring that the plan is compatible with the interests of South Cambridgeshire both in the short term and in the context of the early preparation of the joint Greater Cambridge Local Plan. A particular focus is on the relationship of the proposed new NUGC with the continued economic success of the southern economic cluster in South Cambridgeshire. The broad implications of the proposed NUGC for South Cambridgeshire are:

Advantages:

- Homes in the NUGC would help to serve the southern employment cluster extending from the Cambridge Biomedical Campus to the Wellcome Genome Campus and Granta Park / the Babraham Research Campus. The NUGC

would provide homes close to the significant jobs existing and proposed in the southern employment cluster, where limited new housing is proposed in the emerging South Cambridgeshire Local Plan.

- The Council could take the opportunity to discuss with Uttlesford District Council under the duty to cooperate, how housing to be provided at NUGC beyond the plan period for the draft Uttlesford Local Plan of 2033, would be apportioned in future local plans in view of the function acknowledged in the Uttlesford evidence that it would play in providing housing close to jobs in South Cambridgeshire. However at this stage discussions have not taken place on this issue and there can be no certainty that agreement would be reached. Even if the dwelling numbers could not be formally counted towards the Greater Cambridge housing requirement, the development of the NUGC would perform a role in serving the southern employment cluster, which could inform the future development strategy for Greater Cambridge.
- A secondary school at the NUGC has the potential to provide local secondary education capacity close to the proposed Wellcome Trust Genome Campus development for 1,500 new homes (if planning permission is granted for that development).

Disadvantages:

- The plan relies on a strategic solution to the A505 being delivered to enable the full delivery of the new settlement beyond the plan period, to which there is currently no commitment by the highway authority. The Local Plan relies on 1,925 homes in the plan period but there is a question over the robustness of the evidence supporting the delivery of the new settlement as a whole and it would not be sustainable development if only a part of the new settlement were to be delivered.
- The early years of delivery of the new settlement would rely on taking up much of the limited capacity that the evidence supporting the Local Plan seeks to demonstrate could be secured in the A505 corridor ahead of a major improvement scheme. This could have impacts on the continued delivery of jobs at existing campuses in South Cambridgeshire in the southern employment cluster. The Wellcome Genome Campus is also developing proposals for a major expansion of the campus and a planning application is anticipated to be submitted this year. The Wellcome proposal will clearly need to be considered on its merits weighing all material planning considerations. The southern cluster is of key importance to the local and national economy. Indeed the Independent Economic Commission in its interim report to the Combined Authority advised that continued success in Greater Cambridge will be essential as part of the ambition to double GVA in the Combined Authority area.
- There is a risk of local traffic problems for nearby South Cambridgeshire villages, especially before any major A505 improvements are implemented, caused by traffic 'rat-running' through village roads to avoid the A505 as much as possible.
- There would be an acknowledged landscape impact for South Cambridgeshire given the location of the new settlement on rising land to the south-east of the A11.

Is the Regulation 19 Uttlesford Local Plan 'sound'?

23. The current National Planning Policy Framework 2012 (NPPF) says that to be 'sound' a Local Plan should be positively prepared (meeting development needs and

infrastructure requirements), justified (the most appropriate strategy compared to reasonable alternatives), effective (the plan is deliverable over the plan period based on effective cross-boundary working on strategic priorities), and consistent with national policy (it will deliver sustainable development as defined in the NPPF).

24. A new NPPF is due to come into force this summer which is likely to make some important policy changes including to these tests of soundness. However transitional arrangements included in the consultation draft NPPF earlier this year stated that the examination of Local Plans submitted for examination before or within 6 months of its introduction will take no account of the new NPPF. This is important because the new tests of soundness no longer require a Local Plan to be '*the most appropriate strategy*' (the new wording is less onerous requiring '*an appropriate strategy*' and require 'statements of common ground' to have been agreed between adjoining districts which can include matters on which no agreement has been reached (such statements are often prepared but are currently discretionary)).
25. A letter from the Planning Inspector considering a Strategic (Section 1) Plan for the North Essex authorities of Braintree, Colchester and Tendring to the Councils on 8th June 2018 raises matters that will be relevant to the 'soundness' of the Regulation 19 Uttlesford Local Plan (a link to the letter can be found in the 'background documents' section of this report). The three local planning authorities involved are taking forward their Local Plans with a common strategic section 1 plan which makes provision for three new garden communities: at the Colchester/Braintree Borders, at the Tendring/Colchester Borders and at land west of Braintree (this site crosses into Uttlesford but the land within Uttlesford was not part of the Strategic (Section 1) plan under examination; it is included as a proposal in the Pre-Submission Draft Uttlesford Local Plan).
26. In summary the letter finds that greater certainty is needed over the provision of trunk road improvements and other transport infrastructure in order to demonstrate that the garden communities are deliverable in full. This is relevant to the Uttlesford Local Plan since the provision of additional transport capacity in and around the A505 corridor is required to demonstrate that the NUGC is deliverable in full, including the cost and funding of such measures and the expected financial contribution from the NUGC towards additional transport capacity in and around the A505 corridor necessary to deliver the full new settlement.
27. The Inspector's letter gives the authorities three options: 1 - to remove the garden communities from the Strategic (Section 1) Plan and commit to an early plan review; 2 - to suspend the examination to allow further development of the evidence base and sustainability appraisal to address identified concerns, or 3 - to withdraw the Strategic (Section 1) Plan and the detailed Section 2 plans of each authority from examination and resubmit them after conducting any necessary revisions including work on the evidence base and Sustainability appraisal. No response has yet been published.
28. The Inspector's comments have been taken into account in the proposed response to the Uttlesford Local Plan in so far as they have implications for the NUGC, which is the focus of South Cambridgeshire's interest. No comment is therefore made on any wider implications for the other two garden communities included in the Draft Uttlesford Local Plan, including reliance in the plan on 970 dwelling completions within Uttlesford on land west of Braintree, which is a matter for Uttlesford District Council.

29. The main areas of interest in relation to the NUGC proposal as they affect South Cambridgeshire relate to the provision of housing close to jobs in the southern part of South Cambridgeshire, but this must be considered alongside transport and landscape and visual impacts that at this time have not been fully resolved, as was the case at the previous consultation. These impacts are addressed below, as they relate to the tests of soundness that will be the focus of the independent Inspector examining the local plan.

Transport Infrastructure to deliver full new NUGC

Has the Local Plan been positively prepared?

30. The draft Uttlesford Local Plan seeks to meet objectively assessed development requirements for homes and jobs in Uttlesford. South Cambridgeshire District Council understands and supports the need to plan positively for growth. It is particularly important to ensure that growth is accompanied and enabled by the timely delivery of appropriate infrastructure. There are currently uncertainties regarding the provision and funding of additional transport capacity in and around the A505 corridor over the short to long term, addressed below, and this Council has little alternative but to object to the proposed NUGC, at least until such time as there is the necessary certainty in this regard. These soundness focussed transport concerns can be distinguished from the technical response of Cambridgeshire County Council to the Uttlesford transport evidence, who commented that they are reasonably content with their transport evidence, based upon a strategic solution to the A505 and the opportunity to comment on more detailed proposals as they come through the planning system.
31. The Cambridgeshire and Peterborough Combined Authority already considers that a need exists for a transport study to identify strategic solutions in and around the A505 corridor. The study is expected to go out to tender in the near future. However, at this stage there is no commitment by the highway authority to deliver an improvement scheme that can demonstrate that the NUGC as a whole is deliverable.
32. The NUGC itself could only fund a proportion of the costs of such works. In addition to possible funding from the Combined Authority, further funding may include from other local partners, developer contributions, or from government through a Large Local Major Transport Scheme or the Roads Investment Strategy, however funding commitments are not in place at the present time.
33. South Cambridgeshire District Council has been supportive of the need for an A505 corridor scheme and it will be an important issue for the joint Greater Cambridge Local Plan. However, even assuming that the study finds appropriate solutions to transport capacity in and around the A505 corridor, there would need to be commitment from the highway authority to delivery of a scheme, assuming that funding can be secured, before it could be relied on in plan making. In view of the process of gaining development consent for construction of a scheme and a period for construction, major improvements in and around the A505 corridor will not be available to support development for some years into the future.
34. The question arises how to address these uncertainties with regard to the provision of transport infrastructure to support the NUGC as a whole and whether there is evidence to support a full allocation within the Regulation 19 Local Plan.
35. The supporting text to the NUGC policy says that beyond the end of the plan period, a cap of 3,300 new homes should be 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. However this is not included in Policy SP7 for the NUGC. An option would be to amend Policy SP7 to include a cap on development at 3,300 dwellings; although this assumes that any capacity that may be capable of being created is all for NUGC and not to enable further economic development in the southern cluster. Also, even if a cap were included, the uncertainty over full deliverability of the new settlement as a whole remains. This needs to be considered in light of the Inspector's letter into the North Essex Authorities Strategic (Section 1) Plan examination.

36. Another option would be for Policy SP7 to be conditional on a commitment from the highway authority to the delivery of a major scheme for the A505 to provide for the full development of NUGC.
37. Alternatively the policy could be amended to safeguard the site for future development. If other challenges to the NUGC can be overcome or suitably mitigated so that the only uncertainty remains necessary transport infrastructure, the Local Plan could also include a policy commitment to an early plan review to take place once there is more certainty regarding transport capacity in and around the A505 corridor. Such an approach would allow for the Combined Authority to firm up its non-statutory spatial plan and its formal transport strategy for the Combined Authority area which will help to provide the policy context for the future of the adjoining parts of South Cambridgeshire. It would be for Uttlesford District Council to consider whether any marginal loss of dwelling capacity at NUGC during the plan period could potentially be made up through small scale developments elsewhere in Uttlesford.
38. This Council is not advocating any particular means for resolving the challenges presented in relation to transport infrastructure but is suggesting that there are other potential alternatives, and this issue should be carefully explored through the examination of the Regulation 19 Local Plan.

Is the Local Plan effective?

39. A sound plan should be deliverable over the plan period and be based on effective joint working on cross-boundary strategic priorities.
40. As addressed above, there is no evidence that demonstrates that the full NUGC can be delivered due to uncertainties at the present time in the delivery of appropriate solutions to provide the necessary transport capacity in and around the A505 corridor.

Is the Local Plan justified?

41. A sound plan should be the most appropriate strategy, when considered against the reasonable alternatives.
42. This report has already noted that a Planning Inspector has raised concerns about the sustainability of the land west of Braintree garden community (in Braintree), and that the larger new settlement which lies within Uttlesford is relied upon to deliver 970 homes by the end of the plan period in 2033. It is not proposed that this Council offers any comment on the overall soundness of the plan, which will be a matter for the Inspector. However, the North Essex Inspector's concerns about the overall deliverability of the Braintree garden community has parallels with the questions raised in this report around the deliverability of the NUGC as a whole.

Is the Local Plan consistent with national policy?

43. Paragraph 154 of the NPPF requires Local Plans to be aspirational but realistic. In this regard it can be noted that transport solutions to support the full NUGC have yet to be identified. Similarly paragraph 173 requires plans to be deliverable and able to be developed viably. However the full NUGC is not deliverable without major transport capacity improvements in and around the A505 corridor for which no funding source has been secured and there is no commitment by the highway authority to deliver such a scheme at this time.
44. Paragraphs 30 and 34 state that Local Plans should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. The NUGC site is currently poorly served by public transport and not well connected to local employment sites. Policy SP7 on the NUGC does require improved provision and the supporting text to policy SP5 states that 60% of journeys should be by public transport and active modes. However opportunities to improve access to rail are very limited and the relatively elevated and steep slopes on which much of the proposed residential areas will be located are likely to reduce the attractiveness of cycling as a practical means of travel both within and outside the site. It is therefore not clear whether or how this would be achieved.
45. Paragraph 32 seeks cost effective transport improvements to limit significant transport impacts. However policy SP7 paragraph 8 does not specifically require the provision of traffic calming and other mitigation measures to control 'rat-running' in nearby South Cambridgeshire villages as it should. The proposed wording at the end of policy paragraph 8 is too vague and should be strengthened. Similarly the proposed wording in paragraph 6 concerning cycling and pedestrian routes to nearby employment areas is likely to be inadequate to achieve the step change increase in active travel modes needed to help ensure that the development of the NUGC would be sustainable.

Transport Infrastructure to deliver the first 1,925 dwellings at NUGC

Has the Local Plan been positively prepared?

46. The evidence supporting the Local Plan demonstrates that only limited additional capacity could be created in the A505 and key junctions ahead of implementing a major scheme. How such capacity should be used is an important consideration for South Cambridgeshire, even if it is demonstrated that a long term solution will be delivered.

Is the Local Plan effective?

47. UDC have undertaken additional evidence documents since mid 2017 particularly in regard to transport which state that 1,925 dwellings can be accommodated with limited mitigation measures to deliver nil-detriment to local road junctions. The implications of the proposed approach to transport for the early phases of development at NUGC on continued economic growth in South Cambridgeshire in the short to medium term is also of concern.

Is the Local Plan consistent with national policy?

48. A sound Local Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF. In this regard the following concerns have been identified.

49. Paragraphs 18-21 of the NPPF are concerned with building a strong and competitive economy. However the NUGC by adding to the pressure on local transport infrastructure may constrain the scope for the growth of the Greater Cambridge life sciences cluster (including at the CBC, Wellcome, Granta, Babraham and at Great Chesterford sites) described in the May 2018 interim report of the Cambridge and Peterborough Independent Economic Review as 'world-leading'. The success of this sector will be especially important post-Brexit and key to the future doubling of the local economy over the next 25 years which is an objective of the Combined Authority. The potential for the NUGC proposal to constrain delivery of continued economic growth in the southern cluster of South Cambridgeshire would be of significant concern in terms of its impact locally, for the Combined Authority area and for the national economy. The Council has received no reassurance that this would not be the case.

Transport – Sustainability Appraisal

50. It can also be noted that the SA appraisal of the NUGC site from page 213 of the SA gives the site a positive score in regard to sustainable travel despite noting in the commentary that 'It would also be expected that there would be a large amount of commuting outside the District for jobs would be by car' (SA Objective 9).
51. In regard to SA Objective 13 (Infrastructure) it can be noted that whilst the objective is to ensure the necessary infrastructure is provided to support each new garden community the site selection criteria and the commentary make no reference to the deliverability of transport infrastructure concentrating only on recreation, allotments and utilities provision.
52. It is not clear how these impacts have been taken into account and mitigated by the Local Plan.

Landscape and Visual Impacts on South Cambridgeshire

Is the Local Plan consistent with national policy?

53. Paragraph 110 of the NPPF states that in preparing plans to meet development needs, the aim should be to minimise pollution, and other adverse effects on the natural environment 'Plans should allocate land with the least environmental or amenity value, where consistent with other policies in the NPPF'. However it is not clear that this is what the Uttlesford Local Plan has done. The NUGC because of its elevated position will inevitably be a source of light pollution from street and other lighting, especially in winter, over a wide area. The landscape evidence relied upon by Uttlesford to support their own plan identifies the site as being of high landscape and visual sensitivity being on an elevated sloping site visible in long distance views. Assessments of the two other new settlement locations conclude that the sites are less sensitive being of medium to high sensitivity. The Sustainability Appraisal of the Uttlesford Local Plan also identifies the significant landscape impacts which arise from the proposal commenting 'it is uncertain at this stage whether suitable mitigation could be provided without affecting the developable area'.
54. The NUGC contains or lies close to a number of designated heritage assets including a scheduled monument. Paragraph 132 of the NPPF states that great weight should be given to the assets conservation and that substantial harm to or loss of scheduled monuments should be wholly exceptional. The Sustainability Appraisal of the Uttlesford Local Plan identifies significant heritage impacts commenting 'Development of the entirety of the site would be unsuitable; however it is theoretically feasible for

potential mitigation to avoid major change to the setting and significance of the scheduled monument' and also identifying cumulative impacts arising from the topography of the site such that it is not known at this stage whether suitable mitigation could be achieved.

55. Paragraph 152 of the NPPF in regard to plan making states that local planning authorities should seek opportunities to achieve each of the economic, social, and environmental dimensions of sustainable development and states that: 'Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued'. However a number of significant harms regarding the NUGC have been identified in regard to transport and landscape. A revised NUGC development could reduce its harm by avoiding any built development on the high plateau / ridgelines on the site or on the slopes facing towards the A11. This could be achieved by reducing the overall scale of the new settlement to that which could be accommodated within the south- west and south facing valleys of the site or amending its southern boundary. The Council does not offer a preference for an alternative site; the issue for South Cambridgeshire District Council is the impact of the current NUGC proposal on its area. The examination of the Regulation 19 Local Plan will need to establish that there are no reasonable alternative options to accommodate development which would eliminate the harms identified to the three dimensions of sustainable development or that the level of harm can be satisfactorily mitigated.
56. The report relied upon by UDC to provide a Landscape and Visual Assessment of the NUGC site has been reviewed by officers and a number of omissions identified particularly in regard to views of the NUGC site from South Cambridgeshire to the north, east and west, particularly of its north west facing slopes but also of its exposed plateau top. This report is the same evidence that supported the last consultation and they have not undertaken any additional landscape work to support the NUGC allocation or seek to address the concerns this Council raised at the last consultation.

Landscape – Sustainability Appraisal

57. The Sustainability Appraisal (SA) of policy SP7 regarding the NUGC at pages 75/76 states in relation to its landscape / visual and heritage aspects of the policy that 'the potential for impacts to be significant cannot be ruled out until further details are known', and that no proposal would be permitted unless it satisfies policy requirements for mitigation. However this assumes that there will be effective mitigations available given that the SA appraisal of the NUGC site in Appendix 1 of the SA (as opposed to the appraisal of policy SP7) identifies significant adverse impacts in regard to landscape and heritage of which there can be no certainty that appropriate mitigation can be achieved.
58. In regard to SA objective 7 concerned with pollution it can be noted that the appraisal does not take light pollution into account when the NUGC could be expected to be highly visible on winter evenings and mornings.

Other concerns

59. Following consideration by Scrutiny and Overview Committee, a number of our representations made in response to the Regulation 18 Uttlesford Local Plan consultation in summer 2017 are considered to merit inclusion in this response to the Regulation 19 consultation, suitably updated to reflect changes in the Local Plan and its evidence base.

Effect on the potable water supply for Greater Cambridge

60. The potable water supply for Cambridge and South Cambridgeshire delivered by the Cambridge Water Company is all derived from groundwater supplies including from the aquifer which underlies the site of the NUGC. Given planned future growth in the population and economy of Greater Cambridge and the uncertain effects of climate change on rainfall levels and patterns, it is important that the NUGC not jeopardise or reduce this supply. The Council does not yet consider that the consistency of the NUGC proposal with the environmental policies of the NPPF has been demonstrated.

Secondary school capacity

61. A sustainable garden community would have a secondary school at its heart. It is unclear to SCDC whether a development capped at 3,300 homes by the capacity of the local roads would be large enough to support a secondary school or that its provision would be viable and so deliverable. This would be important for the consistency of the NUGC proposal with the social and place making policies of the NPPF to be demonstrated. The timing and pace of housing delivery at the NUGC will have implications for existing secondary schools in the area. SCDC is concerned that if a secondary school is not provided early in the NUGC development some children would need to travel to the Cambridgeshire Village Colleges in Sawston and Linton (if they have any capacity to accommodate them), adding to the traffic on local roads especially in the morning peak.

Build out rates

62. To be effective a Local Plan must be deliverable over the plan period. The Uttlesford Local Plan Housing Trajectory at Appendix 3 of the Local Plan assumes that first completions can be achieved at the NUGC by 2022/2023 which seems optimistic given the need to complete the examination of the Local Plan, prepare a Strategic Growth Development Plan Document, determine planning applications and agree a package of planning obligations. It is also necessary to consider if it is realistic to assume that 300 dwelling completions can be achieved at the NUGC in 2032/2033 when our own demonstrable evidence from Cambourne shows that an average rate of around 220 homes a year over several economic cycles can be justified for South Cambridgeshire. This evidence was accepted by objectors at the South Cambridgeshire Local Plan Examination who proposed that 250 dwellings a year would be a reasonable assumption in relation to Northstowe, Waterbeach and Bourn Airfield new settlements.

Duty to Cooperate

63. Cross-boundary strategic priorities include the delivery of homes and jobs, transport infrastructure, and the conservation and enhancement of the natural and historic environment, including landscape impacts on South Cambridgeshire. In this regard a number of duty-to-cooperate meetings have been held between Uttlesford and SCDC around our previous representations to their emerging Local Plan (including those from August 2017 set out in Appendix B). As yet no agreed position has emerged with regard to the NUGC and especially regarding its transport and landscape impacts on South Cambridgeshire. This Council will continue to work with Uttlesford on an on-going basis under the duty to cooperate.

Options

64. Members may decide to:
- agree the proposed representations;
 - amend some or all of the representations; or
 - agree that no representations should be made to the Uttlesford Local Plan consultation.
65. In their consideration of these options members should have regard to the Uttlesford consultation deadline of 5.00pm on the 13th August, that the report for Cabinet has to be finalised by 5pm on the 16th July and that only representations made in respect of this Regulation 19 consultation will be considered by the Planning Inspector conducting the examination into the soundness of the Uttlesford Local Plan.

Implications

66. In the writing of this report, taking into account financial, legal, staffing, risk management, equality and diversity, climate change, community safety and any other key issues, the following implications have been considered: -

Financial

67. There are no direct financial implications arising from this report. There may be indirect and potential financial future implications if it is determined that the Councils case could be strengthened by the use of expert consultants or legal representation at any future examination of the Uttlesford Local Plan.

Legal

68. There are no direct legal implications arising from this report.

Staffing

69. There are no direct staffing implications arising from this report.

Risk Management

70. No direct risks to this Council or to South Cambridgeshire residents and businesses have been identified.

Equality and Diversity

71. There are no direct equality and diversity implications arising from this report.

Climate Change

72. There are no direct climate change implications arising from this report.

Effect on Strategic Aims

A. LIVING WELL Support our communities to remain in good health whilst continuing to protect the natural and built environment

73. This report has identified potential impacts on the landscape affecting this district.

B. HOMES FOR OUR FUTURE

Secure the delivery of a wide range of housing to meet the needs of existing and future communities

74. The provision of sufficient homes in Uttlesford to meet their objectively assessed housing need will contribute to meeting housing needs across south-east England and so help contain development pressures on South Cambridgeshire.

C. CONNECTED COMMUNITIES

Work with partners to ensure new transport and digital infrastructure supports and strengthens communities and that our approach to growth sustains prosperity

75. This report has identified potential impacts on the transport infrastructure affecting the southern part of South Cambridgeshire.

Appendices

<u>Appendix A:</u>	Location Map
<u>Appendix B:</u>	SCDC representations made in response to the Uttlesford Local Plan (Regulation 18) consultation August 2017
<u>Appendix C:</u>	Extracts from the Uttlesford Regulation 19 Local Plan concerning the NUGC

Background Papers

Where [the Local Authorities \(Executive Arrangements\) \(Meetings and Access to Information\) \(England\) Regulations 2012](#) require documents to be open to inspection by members of the public, they must be available for inspection: -

- (a) at all reasonable hours at the offices of South Cambridgeshire District Council;
- (b) on the Council's website; and
- (c) in the case of documents to be available for inspection pursuant to regulation 15, on payment of a reasonable fee required by the Council by the person seeking to inspect the documents at the offices of South Cambridgeshire District Council.

The Proposed Submission Uttlesford Local Plan:

<https://www.uttlesford.gov.uk/article/4684/The-Regulation-19-Pre-submission-Local-Plan-and-how-to-comment>

The evidence base supporting the Proposed Submission Uttlesford Local Plan including its Sustainability Appraisal: <https://www.uttlesford.gov.uk/localplanevidence>

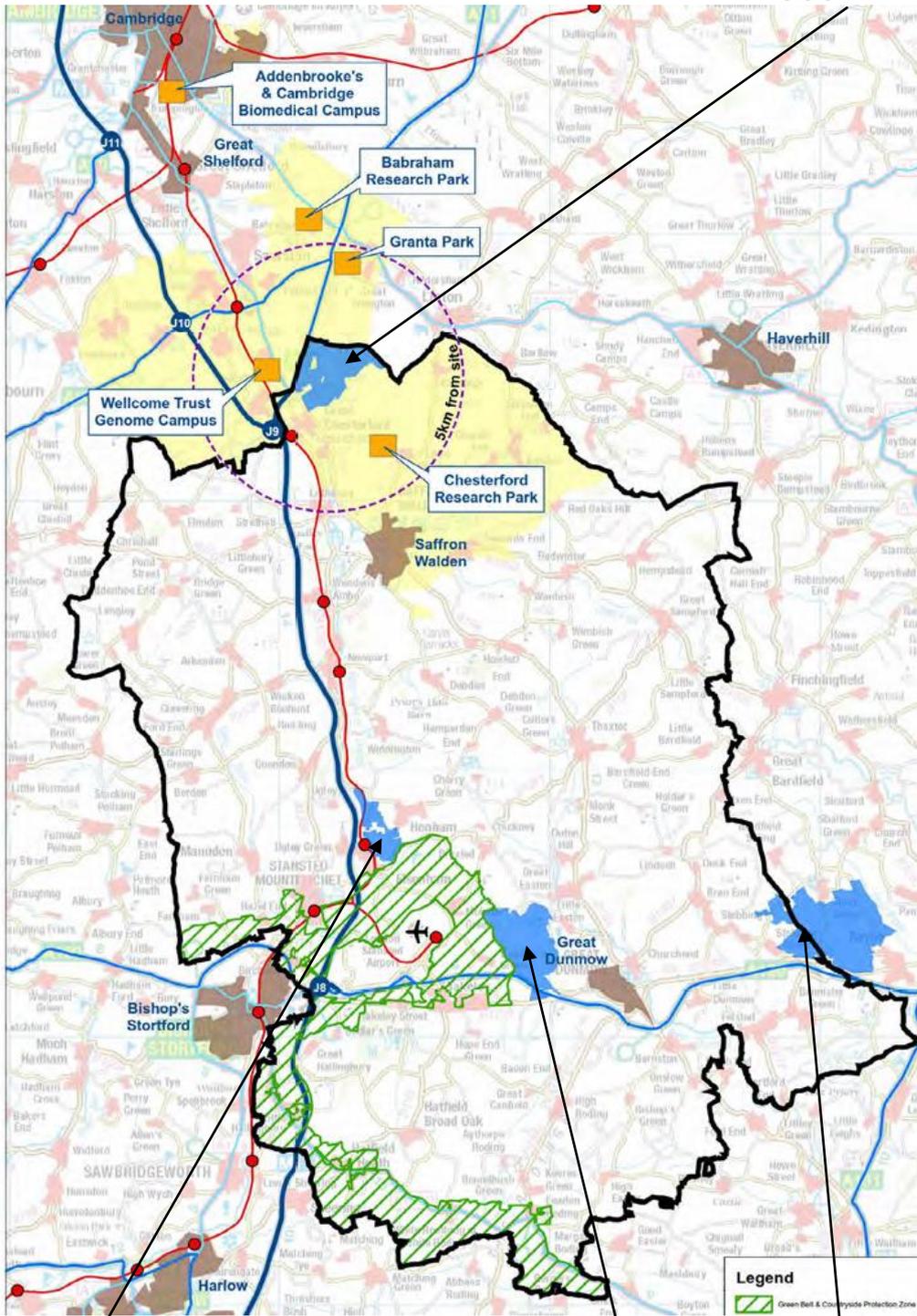
Letter to the North Essex Authorities dated 8th June 2018 from the Planning Inspector examining the Strategic (Section 1) Plan for Braintree, Colchester and Tendring:

https://cornerstonebarristers.com/cmsAdmin/uploads/ied011-inspector-s-section-1-post_hearing-letter-to-neas-june8-18-compressed.pdf

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Appendix A: Location Map

NUGC



Elsenham (new settlement site rejected in 2014)

Easton Park

Land west of Braintree

New settlement proposals are shown in blue
 Green Belt land in Uttlesford is shown in green hatching
 Blue lines show the M11, A10, A11 and A505
 Red lines and dots show rail lines and stations

Appendix B: SCDC representations made in response to the Uttlesford Local Plan (Regulation 18) consultation August 2017

Uttlesford Local Plan Consultation

Response from South Cambridgeshire District Council

76. South Cambridgeshire District Council (SCDC) welcomes the opportunity to comment on the emerging draft Uttlesford Local Plan. The main proposal with implications and impacts for South Cambridgeshire is the proposed North Uttlesford Garden Community (NUGC) and comments are focused on that proposal. Engagement has taken place between officers and Members of the two Councils and with Cambridgeshire County Council to seek to understand the emerging proposals and their potential impacts for South Cambridgeshire and the adequacy of the supporting evidence. A number of questions about the evidence and rationale for the proposed NUGC are raised in these representations to ensure the Council has a better understanding of the case for the new settlement. At this stage, the Council is not convinced that the evidence provided clearly supports the proposal and is concerned that there could potentially be negative implications for South Cambridgeshire. However, the Council wishes to continue to engage positively and productively with Uttlesford District Council (UDC) to develop a clear understanding ahead of the next stage in the plan making process. As such, no view has been expressed to date on the principle of the emerging NUGC proposals.
77. SCDC has based its comments around the National Planning Policy Framework (NPPF) statement that to be 'sound' a Local Plan should be positively prepared (meeting development needs and infrastructure requirements), justified (the most appropriate strategy compared to reasonable alternatives), effective (the plan is deliverable over the plan period based on effective cross-boundary working on strategic priorities), and consistent with national policy (it will deliver sustainable development as defined in the NPPF).
78. The NPPF requires Local Planning Authorities to work collaboratively to ensure that strategic priorities across local boundaries are properly co-ordinated to meet development requirements. Local Planning Authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. These duties apply to both UDC and SCDC. As stated above, SCDC is engaging at officer and Member level with UDC and will continue to do so.
79. A key consideration for SCDC in considering whether the Uttlesford Local Plan is soundly based, is whether it is 'sustainable' in terms of its environmental, social and economic impacts as required by national policy guidance in the NPPF and whether it is supported by robust evidence. Part of this consideration includes taking a strategic view on whether there are potential advantages for South Cambridgeshire arising from the NUGC proposal as well as any potential disadvantages, and also considering the local impacts and implications of the proposal.
80. The NUGC would provide new homes close to existing and planned jobs in regard to the three nearby research institutes and science parks in South Cambridgeshire (Wellcome Genome Campus, Granta Park, and Babraham Institute) and SCDC is aware that they have plans for continued growth. The life sciences cluster extending south from the Cambridge Biomedical Campus is widely recognised as being of international importance and appropriate continued sustainable growth (which the

provision of nearby homes could assist), is considered to be important for both the local and national economy, notwithstanding that some emerging proposals are yet to be considered through the planning process. These new homes have potential to contribute to meeting housing needs in the area, providing local supply of market housing and providing choice. The NUGC could also potentially help to reduce pressures for strategic growth south of Cambridge in the context of next Local Plan for Greater Cambridge, to be prepared jointly between SCDC and Cambridge City Council, work on which is due to commence by 2019 as promised in the Greater Cambridge Partnership (formerly the Greater Cambridge City Deal) agreement.

81. Alternatively, the Council considers that there is a risk that 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 or committed funding). All of the sites have growth aspirations, for example the Wellcome Trust Genome Campus have published a 25 year vision for growth on land located to the east of the existing campus. Whilst this proposal currently has no planning status, it would be of concern if a NUGC were to constrain proper consideration of this potentially nationally important proposal at the appropriate time. There is also a risk that NUGC could 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.
82. SCDC is of the view that even if the NUGC were demonstrated to have considerable advantages for both districts, it should not be allocated for development unless it can be demonstrated that its allocation in the Uttlesford Local Plan would be both sound and sustainable.

Is the draft Uttlesford Local Plan and the NUGC proposal sound and sustainable?

83. National policy considerations place considerable emphasis on the three components of sustainable development (social, environmental and economic). SCDC recognises that the emerging Uttlesford Local Plan is positively prepared in the sense that it seeks to meet objectively assessed development needs, but considers that questions remain in particular over the transport and landscape implications and impacts of the proposal.
84. SCDC has outstanding concerns that the NUGC proposal may not be able to deliver all the necessary transport infrastructure to enable its development, both in relation to the complete 5,000 dwelling garden community or for the 1,900 dwellings proposed by the emerging Uttlesford Local Plan for delivery by 2033.
85. It is particularly important that any new settlement is supported by appropriate transport infrastructure and that the impacts of development can be adequately and appropriately mitigated. This view is informed by considerable experience in South Cambridgeshire in planning and delivering new settlements. A number of concerns have been identified with the transport evidence supporting the NUGC which, unless capable of being satisfactorily addressed, would in SCDC's view call into question whether its inclusion in the Local Plan would meet the NPPF tests of being justified or effective. SCDC is involved in ongoing discussions with Uttlesford District Council, and including Cambridgeshire County Council, which aim to fully understand the assumptions made and their potential implications for understanding the transport impacts on South Cambridgeshire.

86. SCDC considers it important that transport evidence for the emerging Uttlesford Local Plan takes full account of the fact that the highway network in this area of South Cambridgeshire already experiences severely congested conditions at peak times, with the A505 between Royston and the A11 being one of the most heavily trafficked routes in Cambridgeshire. In addition many of the junctions in the area are already extremely congested at peak times, particularly around the junction with the A505 and A1301 and at Junction 10 of the M11. This congestion already results in rat-running through local villages to avoid the A505 including in the villages of Hinxton, Ickleton and Duxford.
87. The transport studies informing the emerging Uttlesford Local Plan should also take full account of growth that is already planned not only in Uttlesford but in the area surrounding the NUGC and potentially affected by it, in order to properly understand the impacts arising from the new community.
88. Based on our understanding of the transport evidence, it currently appears to SCDC that the district wide Transport study and the South Cambridgeshire Junction Study have not taken account of the full extent of planned employment growth in Cambridge and South Cambridgeshire. The junction study states that it has taken account of 24,042 new jobs across the two districts, whereas the two Local Plans are planning to provide for the 44,100 jobs forecast by our economic evidence. This means that the transport studies that are intended to support the emerging Uttlesford Local Plan appear not to have taken account of 20,058 planned extra jobs in Cambridge and South Cambridgeshire. SCDC is concerned that this is potentially a significant flaw, especially in the context of the growth aspirations of the three research institutes and Science Parks in the south of the district.
89. It seems that the studies have not taken any account of planned growth in West Suffolk at Haverhill on the A1307 for 5,000 homes over the plan period, much of which will rely on the A1307 to access jobs in the Greater Cambridge area and especially at the Cambridge Biomedical Campus. The importance of this link and its inadequate capacity explains its inclusion in the Greater Cambridge Partnership's A1307 project. This is important because the NUGC is also stated to rely on the A1307 for the majority of vehicle journeys to the north towards Cambridge. Those residents who need to access the employment areas to the west and north of Cambridge via the A505 and M11 will add to the pressure on the A505 and lead to additional village rat-running.
90. SCDC also notes that the junction study does not seem to take account of planned growth around Royston in North Hertfordshire when it does take account of distant growth in Harlow, Chelmsford and Epping Forest.
91. There are therefore a number of technical queries in relation to the transport evidence SCDC wishes to follow up with Uttlesford District Council through continued engagement, which we consider could have implications for the soundness of the evidence and influence our other comments.
92. SCDC has also considered the proposed NUGC proposal in the context of the NPPF requirement for Local Plan proposals to be deliverable and viable. The South Cambridgeshire Junction Study states that road mitigations exist to support the delivery of 3,300 homes at the NUGC site, for which it provides initial costings of £7.5m to £11m. However, no mitigations for the full 5,000 home site have been identified which in SCDC's view raises questions about its deliverability and therefore the effectiveness of the Local Plan. It also seems clear that the viability evidence

supporting the NUGC site has not taken account of up to £10m of mitigation measures. Setting aside questions about the robustness of these figures, it appears that the viability study has not taken account of a considerable additional expense and SCDC urges UDC to consider carefully whether there is robust evidence to show that the NUGC is deliverable and that the plan including the NUGC is effective.

93. 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, ahead of considerations of the development strategy looking beyond the current emerging South Cambridgeshire Local Plan time horizon of 2031. The Mayor of the new Greater Cambridge and Greater Peterborough Combined Authority has identified as a priority preparation of a non statutory spatial plan for the area and Cambridge City and South Cambridgeshire District Councils have committed to starting work on a joint Greater Cambridge Local Plan by 2019.
94. UDC recognises that for the full NUGC development to come forward it is likely to require a major upgrade to the A505. Upgrading of the A505 is recognised as being an important scheme for the southern part of South Cambridgeshire, but there is currently no scheme or identified funding and therefore no certainty that major improvements will come forward in the time frame to deliver the full NUGC. Under these circumstances SCDC understands that only a smaller new settlement would be able to be delivered. If this were to be the case, SCDC has questions about the sustainability of a smaller settlement, including whether it would be able to support a secondary school, which the council regards as a fundamental requirement of achieving a sustainable new settlement.
95. SCDC acknowledges that the proximity of the NUGC to the station at Great Chesterford is a potential advantage; however the station currently supports only a limited number of stopping services unlike the stations at Whittlesford Parkway and Audley End. SCDC considers that development of NUGC could be expected to add to the pressure on those stations and on the local roads providing access to them.
96. The development of the NUGC, according to the evidence supporting the draft Uttlesford Local Plan, would have significant negative impacts on landscape. SCDC does not consider that it has 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. The Council considers that 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. SCDC has not been able to identify anywhere in the evidence supporting the emerging Uttlesford Local Plan where it has been demonstrated that reasonable alternatives do not exist which would have a reduced impact on the landscape. For SCDC, these points call in question whether a Local Plan including the NUGC would meet the NPPF test of being appropriately justified.
97. Turning to other infrastructure issues. There are known downstream flood risks below the NUGC site and potential impacts on the aquifer which underlies the site. Both are matters which are the statutory responsibility of the Environment Agency who will consider both matters in their comments on the Local Plan. The potable water supply for Cambridge and South Cambridgeshire delivered by the Cambridge Water Company is all derived from groundwater supplies and SCDC considers that it must be demonstrated that the NUGC would not jeopardise or reduce this supply. The Council does not yet consider that the consistency of the NUGC proposal with the environmental policies of the NPPF has been demonstrated. The Water Cycle Study

reports that a new or extensively upgraded water recycling centre will be required to serve the NUGC but there appears to be no mention of this in the New Settlement Economic Viability Study entry for the NUGC, nor is any allowance made for the cost of supplying potable water to the site.

98. A sustainable garden community would have a secondary school at its heart. As referred to above, it is unclear to SCDC whether a development capped at 3,300 homes by the capacity of the local roads would be large enough to support a secondary school or that its provision would be viable and so deliverable. This would be important for the consistency of the NUGC proposal with the social and place making policies of the NPPF to be demonstrated. The timing of delivery and implications for existing secondary schools in the area, including on South Cambridgeshire is not clear. SCDC is concerned that if a secondary school is not provided early in the NUGC development some children would need to travel to Cambridgeshire Village Colleges in Sawston and Linton (if they have any capacity to accommodate them), adding to the traffic on local roads especially in the morning peak.
99. SCDC notes that the Uttlesford Local Plan Housing Trajectory assumes that no more than 175 dwellings a year can be delivered at the NUGC and Easton Park Garden Communities and 150 dwellings on Land West of Braintree. It has been said that these rates are supported by evidence but it remains unclear at this stage what this evidence consists of. The annual delivery rates assumed for large scale developments that will build out beyond the plan period are an important consideration because of their implications for overall housing delivery. NUGC is located in a desirable location and SCDC considers it is worth questioning carefully whether the assumed annual average completion rates are the most appropriate. The site developers state that they can deliver homes at higher annual rates. SCDC's own demonstrable evidence from Cambourne shows that average rates of around 220 homes a year over several economic cycles can be justified for South Cambridgeshire. This evidence was accepted by objectors at the South Cambridgeshire Local Plan Examination who proposed that 250 dwellings a year would be a reasonable assumption in relation to Northstowe, Waterbeach and Bourn Airfield new settlements. It is also noted that the emerging Braintree Local Plan itself allows for 250 completions per year on its portion of the Land West of Braintree garden community site.
100. One implication of the build-out rate assumed for NUGC is that NUGC residents will remain dependent for longer upon Saffron Walden and other settlements for access to services and facilities. The Local Plan is unclear on how this impact is proposed to be mitigated.
101. SCDC suggests that a reasonable alternative option which could be explored would be to increase the delivery rate at Easton Park to 250 homes a year which could boost delivery by 675 homes by 2033 which in combination with other alternative sites could mean that the NUGC site would not be needed. This may not prove to be the most appropriate strategy for the Uttlesford Local Plan but this has not yet been demonstrated as part of evidence supporting the NUGC proposal. It could also potentially allow for first completions on one or both of the other new settlements proposed for first completions in 2021/2022 to be set back by a number of years to be more realistic and in alignment with evidence from elsewhere on the time taken to get first completions at major new settlements.
102. At the earliest, adoption of the Uttlesford Local Plan is not expected until Spring 2019, and it is not clear whether any decision has yet been made whether NUGC policy

SP7 will be supplemented by preparation of an Area Action Plan or a Supplementary Planning Document (the preparation of which will take up at least a year). Whilst some time can be saved by twin tracking planning processes there are practical limitations to what can be achieved by doing so. SCDC is also expecting first completions on new settlements at Bourn Airfield and Waterbeach New Town in 2021/22. However, the South Cambridgeshire Local Plan was submitted for examination in 2014, adoption is expected in Spring 2018, the site promoters have been in place for many years, and SPDs are already in preparation for both sites. SCDC suggests that UDC gives further consideration to these questions and whether it is realistic to depend upon first completions at the NUGC in 2021/2022.

103. If the NUGC allocation is retained in the emerging Uttlesford Local Plan moving forward, SCDC proposes that the following changes to Policy SP7 should be considered by UDC:
- (a) Paragraph 4 - include a requirement for 'reliable and high quality' public transport services and make explicit mention of Granta Park, the Babraham Research Campus and Whittlesford Parkway Station as destinations and employment parks.
 - (b) Paragraph 5 - make explicit reference to junction improvements at junction 10 on the M11, and also to improvements to the junction of the A1307 and A505 that may be required once proper consideration has been given to growth at Haverhill and job growth in Cambridge and South Cambridgeshire. The wording that transport contributions 'will be sought' is also not a clear requirement and should be strengthened. The policy should commit to the development mitigating its impact on these junctions, and also to the provision of mitigation measures in villages all around the site. Paragraph 5 should also be clear it is referring to Babraham Park & Ride.
 - (c) Paragraph 7 – amend to commit to providing sustainable drainage systems which limit downstream runoff to existing greenfield rates as a minimum and to providing appropriate betterment as a planning gain for communities downstream.
 - (d) Paragraph 11 - include a policy requirement to prevent the development of ridgelines and elevated valley sides, given that the NUGC proposal is not supported by evidence which demonstrates that it would have an acceptable impact on the local landscape.
104. SCDC intends that the above comments are constructive and helpful to UDC as it moves forward with the emerging Local Plan, and wishes to continue to engage with UDC during the plan making process.

Appendix C: Extracts from the Uttlesford Regulation 19 Local Plan concerning the NUGC

Garden Communities

3.78 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:

1. Land value capture for the benefit of the community;
2. Strong vision, leadership and community engagement;
3. Community ownership of land and long-term stewardship of assets;
4. Mixed-tenure homes and housing types that are genuinely affordable for everyone; A wide range of local jobs within easy commuting distance from homes; Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy, vibrant communities and including opportunities to grow food;
5. Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains and using zero-carbon and energy-positive technology to ensure climate resilience;
6. Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods; and
7. Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

3.79 The new garden communities will be located at Easton Park, West of Braintree and North Uttlesford. They are shown as broad locations on the Key Diagram and the Policies Map.

3.80 Delivery of the garden communities will commence in 2022/23. 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.

3.81 Policies for the garden communities are presented below. These must be read in conjunction with policies in the Local Plan as a whole.

3.82 Development Plan Documents will be prepared for each Garden Community. Part of the role of Garden Community Development Plan documents is to determine the full extent of land required for each Garden Community. In order to determine the full extent of the land required it is necessary to consider the nature of the existing area and the level of land uses and infrastructure required to serve the Garden Community.

3.83 Options for the extent of the boundary will be considered as part of the preparation of the Garden Community DPDs but will include:

1. Identification of clear and defensible boundaries (watercourses, roads, woodland belts);
2. Appreciation of distance and separation of communities (physical, visual and perceived);
3. Relationship to existing settlements;

4. Nature of land that will perform the role of a 'green buffer' which will define an envelope within which a new community can be accommodated and that remains distinct from other existing settlements; and
5. Planning policy protection (how might this land be protected 'in perpetuity' from built development whilst allowing complementary activities that support both the new community and existing communities).

3.84 The effects of constraints on potential land use will be identified through consideration of the evidence base and by engagement with landowners, statutory agencies, utility service providers and others. Based on this process, absolute constraints on development, such as easements and buffers to existing settlements can be defined and removed from the boundary of the Garden Community altogether or from the developable area if they remain within the boundary. Remaining constraints, such as areas of high landscape sensitivity will influence decisions on proposed land uses and potential residential densities.

Policy SP 5

Garden Community Principles

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

The garden communities will be developed in accordance with the following garden city principles defined by the Town and Country Planning Association and the wider definition of sustainable development outlined in the National Planning Policy Framework.

1. **Land value capture for the benefit of the community**
2. **Strong vision, leadership and community engagement**
3. **Community ownership of land and long-term stewardship of assets**
Mixed-tenure homes and housing types that are genuinely affordable for everyone
4. **A wide range of local jobs within easy commuting distance from homes**
5. **Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy, vibrant communities and including opportunities to grow food**
6. **Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains and using zero-carbon and energy-positive technology to ensure climate resilience**
7. **Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods**
8. **Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.**

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 plan documents will establish the

layout, mix and quantity of future development, including key urban design principles that will guide development.

Prior to any planning applications being considered detailed Development Plan Documents for each of the garden communities will be prepared and adopted by the local planning authority.

The development plan documents 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 plan document, 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 by separating construction access to the site from residential access. The delivery of physical, social and green infrastructure, and the trigger points for these, will form part of the phasing and delivery plan. The phasing of all forms of infrastructure will meet the needs of the new community as they arise and will not exacerbate existing problems.

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.

The Council is confident that the new garden communities can be delivered. The exact delivery model for each garden community will be determined separately from the land-use planning process, however the Council will need to be satisfied that any proposed delivery model will realise all the garden city principles and a test will be established in the Development Plan Document to enable this to be determined. Delivery models could range from privately led arrangements to locally-led development corporations with compulsory purchase powers. If necessary, the Council will consider intervening directly to ensure the garden city principles are met within the proposed timetable set out within the Local Plan.

The Development Plan Document for each Garden Community will set out the criteria that the Council will need to be sure are satisfied in relation to the delivery model for that development. The criteria will be designed to ensure, for example, that the development will meet garden city principles and will secure the delivery of housing throughout market cycles.

North Uttlesford Garden Community

3.94 North Uttlesford Garden Community is located in the north west of the District. It adjoins the northern 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 2022/23 and continue beyond the Local Plan period.

3.95 A Development Plan Document (DPD) will be prepared for the garden community and adopted by the Local Planning Authority. The DPD will set out the development framework against which any planning applications for the garden community will be considered. The DPD will be a detailed and site-specific document for the North Uttlesford Garden Community. In addition to the DPD, a local economic strategy will be established for North Uttlesford Garden Community.

3.96 This Local Plan sets out the principle of development at North Uttlesford within a broad area of search and identifies the form of the development, i.e. the type of land uses, the scale of development and the overall timing of the development. This Plan also sets out specific infrastructure that the garden community must provide and identifies other requirements that the development must meet. These requirements are based on the evidence available at this time. More detailed site-specific evidence will be prepared as part of the preparation of the DPD and will refine the content of this Plan. Evidence has already been collected to inform this Plan in relation to infrastructure, through the preparation of the Infrastructure Delivery Plan, and constraints to development through analysis of a range of evidence including specific studies.

3.97 The Landscape and Visual Appraisal finds that land at North Uttlesford 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. The Heritage Impact Assessment concludes that development of the North Uttlesford site has the potential to harm the significance of heritage assets on the site and surrounding the site. There is also evidence of significant buried archaeology on the site and in the wider area. The HIA concludes there is some scope for development of the site and suggests measures for avoiding and mitigating harm to the significance. The policy wording for North Uttlesford includes appropriate wording to mitigate landscape and heritage impacts.

3.98 The detailed Water Cycle Study (April 2018) found no showstoppers preventing timely delivery of at least one feasible technical solution for this Garden Community by upgrading the impacted Wastewater Recycling Centre (WRC) infrastructure.

3.99 A step change increase in sustainable travel modes will be expected with the aim to achieve significant use of sustainable transport, with trips by active modes and public transport making up 60% of all trips. The DPD will set detailed targets for this Garden Community for Active Modes, and Rapid Transit and the policies/measures for achieving these.

3.100 The strategy for the development will ensure the A11 is the preferred route for northbound travel, this is to minimise impacts on the A505. This strategy should explore the possibility of a northbound access to the old A11 and onwards to Granta Park and the proposed new Park and Ride in this vicinity. A northbound public transport, walking and cycling link to this destination has the opportunity to deliver considerable benefits to the scheme.

3.101 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 dualling of the A505 between M11 and A11 junctions. It is proposed that beyond the end of the plan period, 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.

Policy SP 7

North Uttlesford Garden Community

Permission will be granted for a new garden community in North Uttlesford of 5,000 homes. The details and final number of homes will be set out in a Strategic Growth Development Plan Document.

The Strategic Growth Development Plan Document will set out the nature and form of the new community. The DPD will be produced in consultation with stakeholders and will include a concept plan showing the disposition and quantity of future land-uses, and give three dimensional indication of the urban design and landscape parameters which will be incorporated into any future planning applications; together with a phasing and implementation strategy which sets out how the rate of development will be linked to the necessary social and physical infrastructure to ensure that the respective phases of the development do not come forward until the necessary infrastructure has been secured.

The DPD will provide the framework for the subsequent development of more detailed masterplans and other design and planning guidance for the North Uttlesford Garden Community. The DPD will set out mitigation measures relating to the criteria and text of this policy. Planning applications will be consistent with the approved DPD which will need to be in place before any consent is granted for the new Garden Community.

The new Garden Community in North Uttlesford will:

Land Uses

1. Deliver 5,000 new dwellings to the North-East of the B184, of which 1,925 will be delivered by 2033. A mix of housing sizes and types of housing will be delivered in accordance with housing needs including 40% affordable homes and homes for older people, including residential care and nursing home accommodation. Specific provision will be made for self and custom build housing.

2. Deliver a range of local employment opportunities integrated into the new community, with a particular focus on maximising economic links to the Wellcome Genome Campus and Chesterford Research Park and other nearby centres of employment. The development will be informed by the Uttlesford Economic Development Strategy for North Uttlesford and will be phased in line with the residential elements of the development. Floorspace allocations to be defined within the Strategic Growth Development Plan Document.

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⁽¹⁴⁾). Deliver appropriate civic buildings at the heart of the community, for example a town hall. Land and financial contributions towards four primary schools and one secondary school will be provided. Early years and childcare facilities, community and youth facilities will also be provided. Increased primary healthcare capacity will be provided to serve the new development as appropriate. This may be by means of new infrastructure or improvement, reconfiguration, extension or relocation of existing medical facilities.

4. Provide allotments, open space, sports facilities, play, leisure and recreation in line with standards established in the Local Plan and the Essex Design Guide and the Strategic Growth Development Plan Document.

5. Provide natural, semi-natural and amenity green space in accordance with standards established in the Local Plan and the Essex Design Guide and the Strategic Growth Development Plan Document.

Transport

6. Incorporate, from the early delivery phase of the garden community, a package of measures to provide transport choice, including the delivery of high quality, frequent and fast public transport services to Saffron Walden, Cambridge, Whittlesford Rail Station, Audley End Rail Station, Great Chesterford Rail Station and nearby employment parks (including the Wellcome Genome Campus and Chesterford Research Park). A network of direct, high quality, safe walking and cycling routes will also be provided to enhance permeability within the site and to access nearby employment areas, transport hubs and communities, including linking the existing cycle path from Hinxton to Saffron Walden and linking to Great Chesterford Rail Station via the PROW adjoining Great Chesterford to the North-West of Jackson's Lane.

7. Deliver other specific transport-related infrastructure requirements identified through the Development Plan Document in a phased manner.

8. Mitigate the transport impacts of the proposed development on the strategic and local road network including on the B184 and B1383. 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. The access strategy will explore the potential of a northern access for the site. The primary southern access into the site will be via Field Farm Drive, access via Park Road will be limited to ensure the character of Park Road is protected. There will be no vehicular access to the site from Cow Lane. Access for construction traffic will be via Field Farm Drive. Contributions towards capacity improvements along the A505 and junction of the A505 and A1301 will be sought, requiring cross boundary agreement with South Cambridgeshire District Council, Hertfordshire, Cambridgeshire, Essex County Councils and Highways England. Other specific transport related infrastructure requirements identified through the Strategic Growth Development Plan Document and masterplans for the Garden Community will be delivered in a phased manner. The development will avoid the use of unsuitable roads by car through existing communities.

Historic Environment

- 1. 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.**
- 2. Proposals Shall:**
 - a. Respond positively to the landscape character and significance of the historic environment, including designated and non-designated heritage assets.**
 - b. Conserve, and where appropriate enhance, the significance of heritage assets and their settings both within the site and the wider area including The Roman Temple (scheduled monument) and Park Farmhouse (Grade II listed) and the Roman Town and Fort (both scheduled monuments).**
 - c. Be informed by appropriate landscape/visual and heritage impact assessments, the latter to include the results of archaeological field evaluation as required by the Local Authority.**
- 3. Conserve and where appropriate enhance the significance of heritage assets and their settings both within the site and the wider area Where mitigation is required, measures will have regard to the HIA and include:**
 - a. Density, scale, form, materials of new development against existing in the area;**
 - b. Existing boundaries, routes reflected in new development; and**
 - c. Appropriateness and working with the topography and geology when planning buffer zones.**
- 4. Conserve and where appropriate enhance the significance of heritage assets and their settings, both within the site and in the wider area. Where mitigation is required, measures will have regard to the HIA and include:**
 - a. Reinforce screening where appropriate along site boundaries;**
 - b. Provide soft transition zones around the boundaries of the deer park, open tree screens and ditches. This is particularly important along the northern boundary of the deer park which abuts the County boundary and Hildersham Wood, an area of ancient woodland;**
 - c. The creation of buffer zones incorporating areas of open land;**
 - d. Consider development on the lower slopes to reduce visual impact;**
 - e. Protect the Scheduled Monument onsite and its setting;**
 - f. Retain visual and historic association between the Roman Temple and the Roman Town;**
 - g. Detailed design informed by archaeology investigations of the site this may involve evaluations, geo physical surveys or trenching; and**
 - h. As far as possible retain the character of existing historic routes through the site, narrow lanes and mature tree lines.**

Natural Environment

13. Careful consideration will be afforded to the improvement and restoration of degraded landscape features, and new woodland / tree belt and structural planting within and around the site. The sense of tranquillity within the site should be maintained.
14. Protect the separate identity of the nearby community of Great Chesterford as an existing community close to but separate from North Uttlesford Garden Community. The nature of the transition between North Uttlesford and the nearby existing community of Great Chesterford will be an important element of the design of the new Garden Community and the development will provide a strategic landscaped buffer.
15. Enhance wider green infrastructure and networks including maintenance and enhancement of existing watercourses, ponds and lakes within the site.
16. Careful consideration will be afforded to the improvement and restoration of degraded landscape features, and new woodland / tree belt and structural planting within and around the site. The sense of tranquillity within the site should be maintained.

Utilities

17. Ultrafast broadband will be provided throughout the Garden Community and homes will include specific spaces to enable working from home.
18. Enhance the water recycling centre at Great Chesterford, new connections, network upgrades and reinforcements to the sewerage network. The delivery of smart, innovative and sustainable water efficiency/re-use solutions that fosters climate resilience and a 21st century approach towards water supply. Provision of improvements to waste water treatment and off-site drainage improvements aligned with the phasing of the development within the plan period and that proposed post 2033.
19. Provide Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood reduction whilst ensuring that there is no harm to nationally important archaeological assets whether scheduled or not.
20. Include new network or primary substations in the medium to long term, and reinforcements to the energy network in the shorter term to meet the needs of the development.

Governance and Stewardship

21. Establishment at an early stage in the development of the Garden Community of appropriate and sustainable long-term governance and stewardship arrangements for community assets including green spaces, public realm areas and community and other relevant facilities; such arrangements to be funded by the development and include community representation to ensure residents have a stake in the long term development, stewardship and management of their community.