

# **Site Selection Topic Paper**

Uttlesford Local Plan 2021 – 2041 (Regulation 19)

July 2024

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# 1. Introduction

- 1.1 This Topic Paper summarises Uttlesford District Council's approach to selecting strategic sites proposed for housing allocation within the Publication (Regulation 19) version of the Uttlesford Local Plan 2021 to 2041. It was published alongside the draft Plan for Regulation 18 Consultation in November 2023 and has been subsequently updated, taking into account representations submitted to the Regulation 18 Consultation and new or updated evidence base documents.
- 1.2 Uttlesford District Council has prepared a new Local Plan to replace the existing Uttlesford Local Plan 2005. The Uttlesford Local Plan 2021-2041 (hereafter referred to as the Plan) puts forward the spatial vision and strategic objectives for achieving sustainable development. It plans for at least 14,937 homes within the District over the plan period, including around 3,777 homes on strategic allocations. This is above the housing requirement of 13,500 homes in the interest of providing for flexibility and contingency.
- 1.3 The Plan proposes to allocate 7 strategic housing sites that represent the most sustainable locations to deliver the housing requirement of the District and meet the objectives of the Plan. For the purpose of the Plan, a strategic site has been defined as a site (or a cluster of adjacent sites) that could deliver 100 dwellings or more.
- 1.4 These sites have been selected following a five-stage evidence-led and proportionate assessment in line with national policy and guidance. This Topic Paper explains what the Plan considered in identifying, assessing and selecting strategic sites, and how it has narrowed down reasonable site options, resulting in the recommendation of the proposed allocations.
- 1.5 All site options considered have been tested through the Sustainability Appraisal of the Uttlesford Local Plan (July 2024). It is a legal requirement for the Local Plan under the Planning and Compulsory Purchase Act 2004 (as amended) and has taken place alongside the preparation of the Plan. The Sustainability Appraisal identifies Reasonable Alternatives to help inform the selection of site options, overall spatial strategy and direction of the Plan.
- 1.6 This Topic Paper is published alongside the Local Plan for consultation. It should be read in conjunction with a series of complementary topic papers and evidence studies, including the Uttlesford Housing and Economic Land Availability Assessment, Sustainability Appraisal of the Uttlesford Local Plan, Neighbourhood Plan and Larger Villages Housing Requirement Topic Paper, and Employment Land Site Selection Topic Paper.
- 1.7 The Topic Paper consists of the following sections:
  - **Section 2 Policy Context** provides a summary of the relevant national policies and guidance relevant to the selection of residential development sites
  - **Section 3 Site Selection Methodology** explains our approach to identifying, assessing and selecting strategic sites for proposed allocations in the Plan
  - **Section 4 Recommendations** sets out the strategic sites proposed for allocation in the Plan
- 1.8 The detailed outcomes of site selection are presented in **Appendix A Stage 1 to Stage 5 Site Selection Assessment** of this Topic Paper. Appendix A provides the

assessment outcomes of all sites considered within or adjacent to the top two-tier settlements, including Key Settlements and Local Rural Centres.

- 1.9 The draft Local Plan does not identify any non-strategic sites below 100 dwellings for allocation; but does identify housing requirement figures for our Larger Villages. The Council invited Parish Councils and neighbourhood planning groups, through the Regulation 18 Consultation, to consider if they wished to take responsibility for planning for any non-strategic development in their villages through a future Neighbourhood Plan or Neighbourhood Plan update.
- 1.10 Following the Regulation 18 Consultation and further engagement with the relevant Parish Councils, all Larger Villages have now confirmed that they wish to plan for the housing requirement in their villages and therefore this Local Plan does not need to consider any non-strategic sites in Larger Villages in further detail beyond the Housing and Economic Land Availability Assessment (HELAA). The Neighbourhood Plan and Larger Villages Housing Requirement Topic Paper provides further information on the housing requirement figures for our Larger Villages and next steps for considering non-strategic sites in Neighbourhood Plans.

## 2. Policy Context

### National Planning Policy Framework (NPPF)

2.1 The National Planning Policy Framework (NPPF) (December 2023) sets out the government's planning policies for England and how they are expected to be applied. It provides a framework within which locally prepared plans can provide for sufficient housing and other development in a sustainable manner. The policies of relevance to site selection are set out below, but the Plan has regard to all other aspects of relevant national policy, where appropriate.

2.2 At its heart the Framework requires all plans and decisions to apply a presumption in favour of sustainable development. For plan-making, this means that:

*All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

*Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses...<sup>1</sup>*

2.3 The NPPF further expands on the role of local planning authorities in planning and allocating sufficient sites to deliver the strategic priorities of the area and meet objectively assessed needs over the plan period through strategic policies:

*Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies)<sup>2</sup>.*

*Strategic policy-making authorities' should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability<sup>3</sup>.*

2.4 The NPPF also sets out, at a high level, key considerations which should be taken into account when identifying and selecting suitable locations for development in varying contexts. These considerations have been included as part of the site selection methodology assessment criteria, as detailed in Section 3 of this Topic Paper. The key considerations are:

#### **Planning for larger scale development**

*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a*

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<sup>1</sup> Paragraph 11 of the National Planning Policy Framework

<sup>2</sup> Paragraph 23 of the National Planning Policy Framework

<sup>3</sup> Paragraph 69 of the National Planning Policy Framework

*genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*

*a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*

*b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*

*c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;*

*d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*

*e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size<sup>4</sup>.*

## **Rural Areas**

*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby<sup>5</sup>.*

## **Site Assessment**

*In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

*a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

*b) safe and suitable access to the site can be achieved for all users;*

*c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*

*d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree<sup>6</sup>.*

2.5 The NPPF stresses that Local Plans should be informed throughout their preparation by a Sustainability Appraisal (SA) that meets the relevant legal requirements<sup>7</sup>. This should demonstrate how a plan has addressed relevant economic, social and

<sup>4</sup> Paragraph 74 of the National Planning Policy Framework

<sup>5</sup> Paragraph 83 of the National Planning Policy Framework

<sup>6</sup> Paragraph 114 of the National Planning Policy Framework

<sup>7</sup> Paragraph 32 of the National Planning Policy Framework

environmental objectives. The SA process has been integral to the site selection process, as detailed in **Section 3** of this Topic Paper.

## Planning Practice Guidance (PPG)

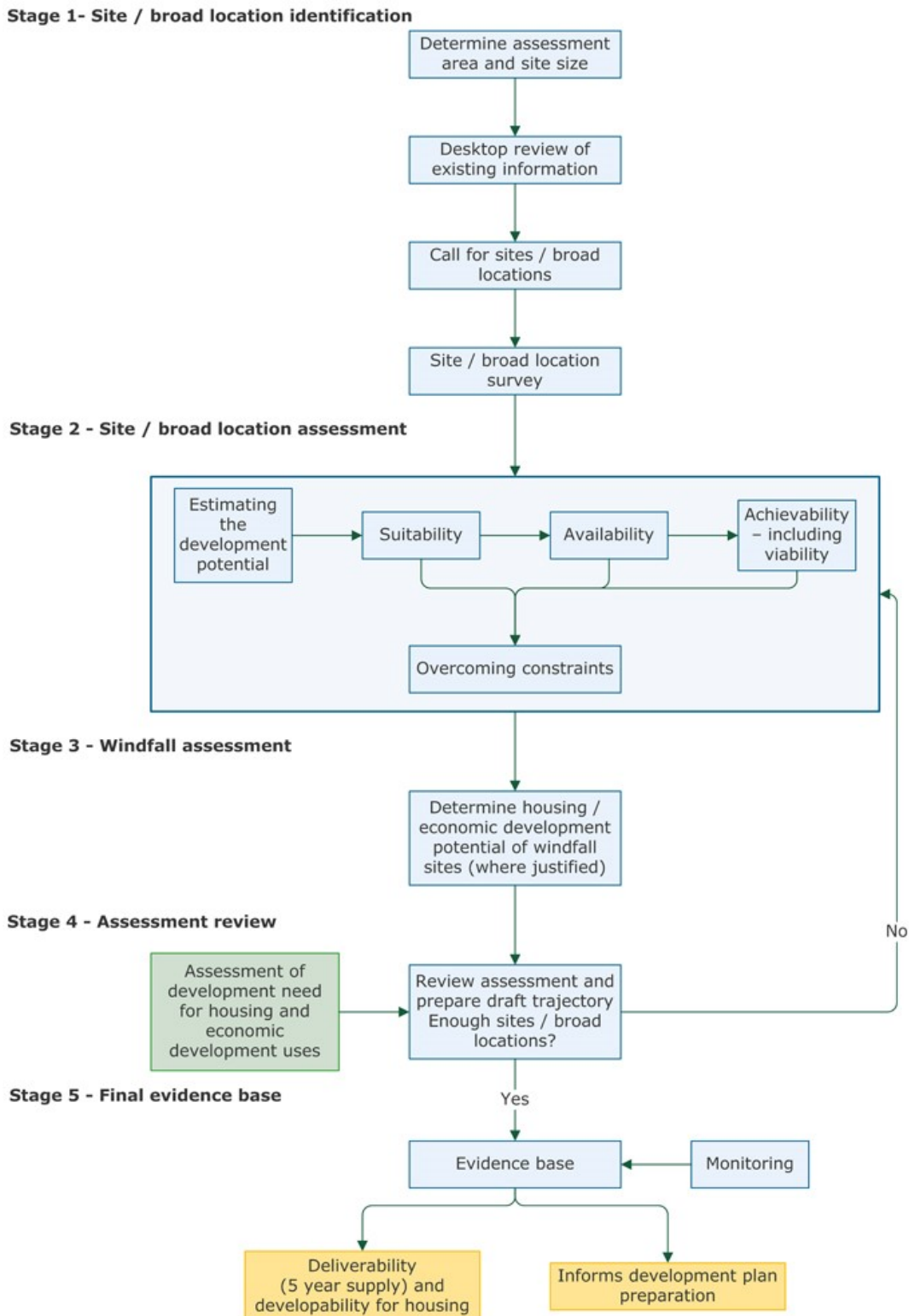
- 2.6 The national Planning Practice Guidance (PPG) provides complementary guidance on key policy themes included within the NPPF. Of relevance to the site selection process, the 'Housing and Economic Land Availability Assessment' chapter sets out the method for assessing housing and economic land availability and guides local authorities in identifying appropriate land to meet development needs.
- 2.7 The PPG states that an assessment of land availability is required to identify the future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period. The assessment is an important source of evidence to inform plan-making and decision-taking, and the identification of a 5-year supply of housing land<sup>8</sup>.
- 2.8 The PPG clarifies that the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority's requirements, but it is for the development plan itself, to determine which of those sites are the most suitable to meet those requirements. Plan-making authorities may carry out land availability assessments for housing and economic development as part of the same exercise, in order that sites may be identified for the use(s) which is most appropriate. An assessment should:
- identify sites and broad locations with potential for development;
  - assess their development potential;
  - assess their suitability for development; and
  - the likelihood of development coming forward (the availability and achievability).
- 2.9 The PPG notes that plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in Footnote 6<sup>9</sup> of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas).
- 2.10 The PPG emphasises the importance of taking a proactive approach when identifying as wide a range of sites and broad locations for development as possible (including those existing sites that could be improved, intensified or changed). It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area.
- 2.11 The assessment of land availability for the Plan is prepared through the Uttlesford Housing and Economic Land Availability Assessment (HELAA) in accordance with national policy and guidance. It has considered key suitability constraints noted in Footnote 7 of the National Planning Policy Framework. The HELAA effectively forms

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<sup>8</sup> Paragraph 001, Reference ID: 3-001-20190722

<sup>9</sup> Now Footnote 7 (previously Footnote 6) of the National Planning Policy Framework. This includes: habitat sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park or defined as Heritage Coast, irreplaceable habitats; designated heritage assets (and other heritage assets or archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

the first stage of the Council’s site selection process and provides the initial long-list of sites for more detailed consideration through the plan making process.



**Figure 1 Housing and Economic Land Availability Assessment Method Flowchart**  
(Planning Practice Guidance, Paragraph: 005 Reference ID: 3-005-20190722)



## 3. Site Selection Methodology

3.1 The site selection methodology undertaken, as illustrated in **Figure 2**, follows a robust and proportionate five-stage assessment comprising the following stages:

- **Stage 1:** Identification and initial assessment of sites through the Housing and Economic Land Availability Assessment (HELAA). This effectively provides a 'long-list' of sites which have potential to demonstrate suitability, availability and achievability for more detailed consideration from Stage 2 onwards. 452 sites were assessed at Stage 1 with 181 sites identified as appropriate for further assessment at Stage 2. The Uttlesford Housing and Economic Land Availability Assessment (HELAA) is published separately and should be read in conjunction with this Topic Paper.
- **Stage 2:** An initial sift of sites which discounts non-strategic sites or site clusters unable to deliver 100 dwellings or more, as well as strategic growth (excluding standalone Garden Communities) not located at our top two-tier settlements (Key Settlements and Local Rural Centres). In other words, strategic growth at the smaller and less sustainable rural settlements were ruled out for not being consistent with the Plan's objectives of supporting sustainable development. This stage helps to 'filter' the 'long-list' and creates a 'shorter long-list' for further consideration. 181 sites were considered at Stage 2 with 50 identified as appropriate for consideration at Stage 3<sup>10</sup>.
- **Stage 3:** Proportionate assessment of constraints and opportunities based on the available technical evidence base, engagement with selected stakeholders and a review of the relevant planning history. This stage enables us to identify 'Reasonable Alternatives' for further consideration. 50 sites were assessed at Stage 3, with 20 sites assessed as 'Clear Preferred Site Option' or 'Marginal Preferred Site Option'.
- **Stage 4:** Reasonable Alternatives testing through the Sustainability Appraisal. This stage establishes reasonable growth scenarios on the quantum and distribution of growth in Uttlesford within the plan period. It considers the strategic growth context at Uttlesford (top-down) and develops site options at the settlement level (bottom-down), then explores growth options at each of the District's sub area (including growth from sites allocated in combination). 6 Reasonable Growth Scenarios were considered and appraised through the Sustainability Appraisal.
- **Stage 5:** Selection of proposed strategic allocations

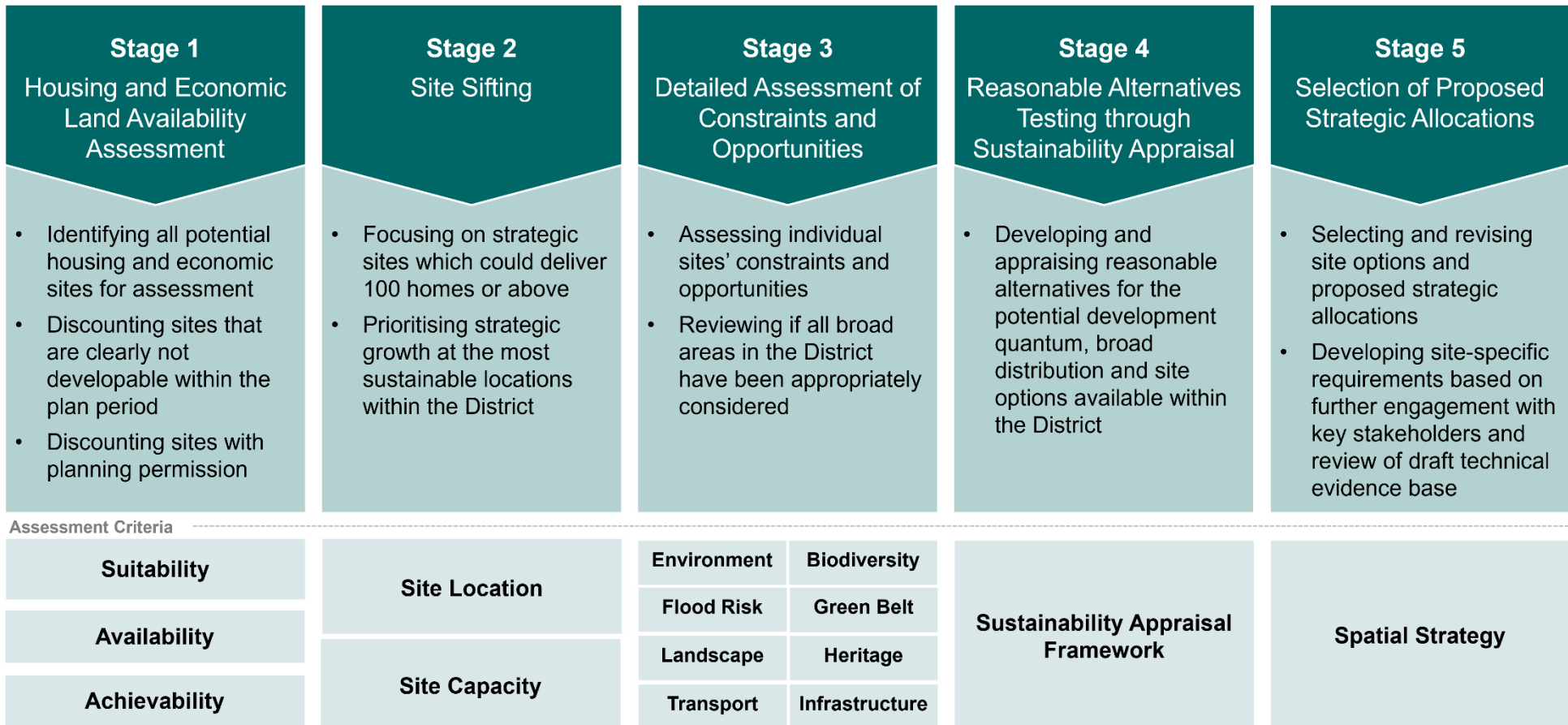
3.2 All sites submitted to the Call for Sites 2021 or actively identified by officers in accordance with the Planning Practice Guidance have been assessed through this process. Detailed outcomes of the site selection process are presented in **Appendix A** of this Topic Paper.

3.3 Following the Regulation 18 Consultation undertaken between November 2023 and December 2023, representations submitted to the consultation and new or updated evidence base documents have also been taken into account throughout the site selection process. This includes the assessment of 31 new HELAA sites and

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<sup>10</sup> Non-strategic growth at Larger Villages, which form the third tier of settlements of Uttlesford's settlement hierarchy, is considered appropriate to support community vitality in accordance with Paragraph 79 of the National Planning Policy Framework. The Neighbourhood Plan and Larger Villages Housing Requirement Topic Paper sets out our approach in considering non-strategic growth at Larger Villages.

consideration of additional supporting information or site boundary amendments submitted during the Regulation 18 Consultation.



**Figure 2 Key Stages in Site Selection**

# Stage 1 Housing and Economic Land Availability Assessment (HELAA)

- 3.4 The first stage of site selection was to identify all potential housing and economic development sites in the District and undertake a high level assessment of suitability, availability and achievability through the Uttlesford Housing and Economic Land Availability Assessment (HELAA) (June 2024).
- 3.5 The HELAA assessed a total of 452 sites across the District from a wide range of sources, including a Call for Sites in Spring 2021 and a desktop review of potential information sources in accordance with the Planning Practice Guidance. The updated Regulation 19 HELAA also included new sites that were submitted during the Regulation 18 Consultation or by email, and considered any additional supporting information or site boundary amendments submitted. Sites that have the capacity to deliver 5 or more dwellings (or 0.2 hectare or above), or 500 sqm or more economic floorspace (or 0.25 hectares) are considered in the HELAA.
- 3.6 Whereas in the Regulation 18 HELAA a 'policy off' position was applied with relation to adopted and emerging Local Plan policy, the Regulation 19 HELAA applies a 'policy on' position since the draft policies have been tested through the Regulation 18 Consultation and the earlier HELAA has identified sufficient available land to meet the District's housing requirement without the need for amendments to the Green Belt. This has resulted in local policy constraints including Green Belt and Protected Open Spaces being considered as 'showstopper constraints'.
- 3.7 The emerging settlement hierarchy has also been applied to the Regulation 19 HELAA, and the consideration of 'Settlement Development Limits' which appeared in the Regulation 18 HELAA has been replaced with a consideration of the site's location in relation to the built extent of the settlements identified in the top three tiers of the settlement hierarchy set out in Core Policy 3.
- 3.8 Some sites have been submitted for consideration as new standalone communities. Where these sites are outside and not adjacent to the settlements listed above, they are not considered developable according to the emerging settlement hierarchy in the same manner that small sites in the open countryside have been classified as unsuitable for the purposes of the Local Plan.
- 3.9 A total of 172 sites, including 131 sites proposed for residential or mixed use development, with a 'theoretical' capacity of approximately 61,271 dwellings (including 32,770 dwellings within the plan period) are considered deliverable within 0-5 years (Category A) or have the potential to demonstrate suitability, availability and achievability within 5-15 years (Category B) for further consideration at Stage 2.
- 3.10 It is important to stress that the HELAA provides a high-level consideration of potential future supply of land and does not in itself determine whether a site should be allocated for development. Nonetheless, its findings continuously demonstrate that there is more than sufficient land available in the District to meet the development requirements of the Plan. This has been used as the 'long-list' of potential development sites for consideration.
- 3.11 Sites that are not considered developable within the plan period through the HELAA<sup>11</sup>, including sites which are unable or unlikely to address physical constraints;

<sup>11</sup> Category C within the Uttlesford Housing and Employment Land Availability Assessment (HELAA)(October 2023)

where development is unlikely or will not take place within the plan period; or, unable or unlikely to address achievability issues, are excluded from further consideration. It is considered that these sites have no potential for housing and economic development within the plan period and are therefore not taken forward to Stage 2.

- 3.12 Sites with planning permission are also discounted at this stage as they do not need to be allocated within the Local Plan. However, they have been taken into account in as any 'commitments' (sites with planning permission that will deliver within the Plan period) are discounted from the 'additional' housing that the Council needs to plan for.
- 3.13 Full details of the HELAA assessment methodology and outcomes, including the long list of detailed assessment criteria of suitability, availability and achievability, are provided in the Uttlesford Housing and Economic Land Availability.

## Stage 2 Site Sifting

- 3.14 The long-list of sites identified at Stage 1 was subject to a high-level assessment to establish which sites could be reasonably taken forward for a further detailed assessment of constraints and opportunities. The initial sift focused on:

### **Site capacity threshold for strategic sites**

- 3.15 To differentiate between strategic and non-strategic sites, only sites that could potentially accommodate 100 dwellings or more<sup>12</sup> were considered. Where individual sites were too small to accommodate 100 homes, consideration was given to whether the site could be joined with neighbouring sites to deliver strategic development in combination. As explained above and in line with national policy, it is considered that Neighbourhood Plans provide an appropriate approach for planning for non-strategic sites (below 100 dwellings). These are considered separately in the Neighbourhood Plan and Larger Village Housing Requirement Topic Paper.

### **Prioritising the most sustainable locations**

- 3.16 The initial sift was based on prioritising the most sustainable locations in the District, to reflect the inherent need to support sustainable development. Strategic sites within or adjoining the top two-tier settlements of the District, are taken forward for further consideration. This includes three Key Settlements (Saffron Walden, Great Dunmow and Stansted Mountfitchet) and six Local Rural Centres (Takeley, Thaxted, Hatfield Heath, Elsenham, Newport and Great Chesterford). These settlements are the most sustainable settlements in the District to support growth, containing the highest level of services with a relatively high level of connectivity to the transport network.
- 3.17 Strategic growth at smaller and less sustainable rural settlements were discounted, as this does not align with the council's commitment to deliver sustainable development and support the climate change agenda. Non-strategic development at appropriate Larger Villages in accordance with Paragraph 79 of the NPPF is discussed separately in the Neighbourhood Plan and Larger Village Housing Requirement Topic Paper.
- 3.18 Following the Regulation 18 Consultation and further engagement with the relevant Parish Councils, all Larger Villages have now confirmed that they wish to plan for the

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<sup>12</sup> Based on calculated theoretical capacity. The density multipliers used, ranging from 35 dwellings per hectare to 45 dwellings per hectare, are detailed in Table 2 of the Uttlesford Housing and Economic Land Availability Assessment (October 2023).

housing requirement in their villages and therefore the Local Plan does not need to consider those non-strategic sites in any more detail.

### **Approach to standalone Garden Communities (1500+ dwellings)**

- 3.19 Strategic sites, which could deliver standalone Garden Communities of 1500 dwellings or more, were considered during Stage 3 of the site selection process at Regulation 18. This capacity is deemed the minimum requirement to support a new primary school and local centre at a standalone location not associated with an existing top two tier settlement. These sites were considered capable of delivering a minimum critical mass, capable of providing the necessary infrastructure and facilities, including a genuine choice of transport modes, to support a sustainable community.
- 3.20 However, as outlined in Stage 1 of the methodology, the Regulation 19 HELAA has now adopted a 'policy on' approach. Consequently, sites located outside and not adjacent to the top three tier settlements, including new standalone communities, are not considered developable according to the emerging settlement hierarchy and would not have advanced to Stage 2.
- 3.21 Overall, Stage 2 resulted in 50 potential strategic sites being identified for further consideration at Stage 3.

## **Stage 3 Detailed Assessment of Constraints and Opportunities**

- 3.22 Stage 3 focused on a more detailed assessment of constraints and opportunities associated with each of the 'shorter long-list' of sites identified at Stage 2. This helped to establish the sites suitability for development and consistency with the draft Plan's spatial strategy and objectives to deliver sustainable development. The assessment was informed by a proportionate range of available technical evidence<sup>13</sup>, engagement with selected stakeholders and the review of relevant planning history.
- 3.23 The information collected for each site included:
- Whether the site is located within or adjacent to important environmental or biodiversity designations and their impact risk zones or Zone of Influence. This included Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites, (including the Essex Coast RAMS Zone of Influence), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) (including Hatfield Forest) and Local Wildlife Sites (LWS)
  - Whether the site contains irreplaceable habitats such as Ancient Woodland and ancient or veteran trees. Paragraph 180 of the NPPF resists development resulting in the loss and deterioration of irreplaceable habitats.
  - Whether the site is subject to risks of flooding, including whether it falls within Flood Zone 2 and 3, based on the Uttlesford District Council Strategic Flood Risk Assessment conducted by JBA Consulting
  - Whether the site is located within the Green Belt

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<sup>13</sup> This included evidence prepared as part of the current Development Plan (including 'made' Neighbourhood Plans), new evidence base prepared for the Plan published alongside this Topic Paper and, where applicable, submitted through a planning application or Call for Sites submission.

- Landscape sensitivity of the site, as assessed through the Uttlesford Landscape Sensitivity Assessment conducted by LUC and informed by the updated Landscape Character Assessment. As detailed in Chapter 2 of the Landscape Sensitivity Assessment, the study considers the landscape susceptibility and value of land parcels taking into account their physical character (landform, scale and field pattern); natural character; sense of time depth and historic landscape character; settlement character; visual character (including skylines); and perceptual and scenic qualities (including recreational value)
- Heritage sensitivity of the site, including high-level considerations of development impacts on the significance and setting of heritage assets, based on the Uttlesford Heritage Sensitivity Assessment
- Whether a potentially suitable access could be achieved based on high level desktop assessment and site visits working in partnership with Essex County Council (ECC) as the Highway Authority
- Whether the site may put unacceptable pressure on the local highway network based on high level desktop assessment working in partnership with ECC as the Highway Authority
- Whether the site is well located to the rail network to promote sustainable travel based on high level desktop assessment working in partnership with ECC as the Highway Authority
- Whether the site is in an area subject to potential water supply, wastewater and environmental capacity issues, as investigated through the Water Cycle Study conducted by JBA and consulted with the relevant infrastructure providers
- Whether the site is likely to be subject to abnormal significant infrastructure requirements and costs, beyond the developer's ability to address, for example, mitigation required to address cumulative impacts on the strategic road network, as informed by engagement with selected stakeholders, including ECC
- Whether the site may be subject to challenges in primary and secondary education provision, considering the location and capacity of existing and committed education infrastructure and the potential for improved or new facilities. This is informed by engagement with education officers at ECC
- Relevant planning history of the site

3.24 Each site was assessed against the topic areas above based on their impacts and capacity to accommodate development, considering any potential mitigation measures that are likely to be required. It is informed by informal consultation with selected stakeholders, including ECC and consultants undertaking the Sustainability Appraisal. Subsequent to the Regulation 18 Consultation, this has also considered representations submitted to the consultation and new or updated evidence base documents available.

3.25 An overall 'traffic light' rating (**Table 1**) is given to indicate if the site is an appropriate candidate as part of the Preferred Site Option to support the draft Plan. A total of 20 sites were considered as either 'Clear Preferred Site Options' or 'Marginal Preferred Site Options' to inform Stage 4.



**Table 1 Stage 3 Assessment Rating Descriptors**

<b>Overall Rating</b>	<b>Description</b>
<b>Clear Preferred Site Option</b>	The site or site cluster is in a sustainable location for strategic growth, consistent with the objectives and broad spatial strategy of the Plan. The assessment may have identified potential constraints, however there is a reasonable prospect for the identified constraints to be mitigated successfully. The site is recommended for further consideration in Stage 4.
<b>Marginal Preferred Site Option</b>	The site or site cluster is in a relatively sustainable location for strategic growth, largely consistent with the objectives and broad spatial strategy of the Plan. The assessment may have identified potential constraints, however whilst there may be reasonable prospect for the identified constraints to be mitigated, the site is considered to meet the Plan objectives to a more marginal extent. The site is recommended for further consideration in Stage 4.
<b>Marginal Omission Site Option</b>	The site or site cluster is subject to one or multiple, and more significant development constraints and aligns to a more marginal extent with the objectives and spatial strategy of the Plan. The site is discounted from further consideration.
<b>Clear Omission Site Option</b>	The site or site cluster is subject to one or multiple, and more significant development constraints that are unlikely to be overcome through potential mitigation strategies and does not meet the objectives and broad spatial strategy of the Plan. The site is discounted from further consideration.

3.26 There is no weighting system for the different technical areas assessed and a degree of planning balance and professional judgement has been applied in relation to the broad spatial strategy of the Plan. It is important to recognise that this stage does not attempt to assess all the potential effects a development may have, but aims to identify, following a robust and proportionate approach, key constraints and opportunities critical to the broad spatial strategy of the Plan and/or ‘showstoppers’ to development.

3.27 Following the detailed assessment, the Council has undertaken an officer-led review of whether all broad areas in the District have been appropriately considered, including land which may not have been promoted for development through the Call for Sites. No additional sites were identified through this process.

3.28 A review of available site options within the District at Stage 3, shows that there is sufficient land outside of the designated Green Belt to deliver the local housing need. This fact limits the progression of any Green Belt development sites in the selection of preferred site options given the requirement under Paragraph 140 of the NPPF to demonstrate ‘exceptional circumstances’ with respect to Green Belt release. As a result, no sites at Birchanger, Hatfield Heath and south of Stansted Mountfitchet are carried forward to Stage 4.



## Stage 4 Reasonable Alternatives Testing through Sustainability Appraisal

- 3.29 At Stage 4, site options were tested through the Sustainability Appraisal (SA), which appraised Reasonable Alternatives for the potential scale and location of growth in Uttlesford that could meet the Plan's objectives.
- 3.30 The Sustainability Appraisal is central to the site selection process and is a legal requirement for the Local Plan preparation. The Sustainability Appraisal of the Uttlesford Local Plan (July 2024) considered the range of development quantum, broad distribution of development and site options available within the district.
- 3.31 It considered the strategic growth context at Uttlesford (top-down) and developed site options at the settlement level (bottom-up). It then identified reasonable alternatives that sites might be allocated in combination and the quantum of homes that are broadly appropriate for the District's sub-areas<sup>14</sup>. **Table 2** provides a summary of site options considered, including reasonable alternatives identified as constant or variable and omitted sites noted.

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<sup>14</sup> The sub-areas considered include Key Settlements (Saffron Walden, Great Dunmow and Stansted Mountfitchet), Local Rural Centres (Thaxted, Takeley, Newport, Hatfield Heath, Elsenham and Great Chesterford) and Larger Villages.

**Table 2 Summary of Site Options**

Category	Description	Sites
1	<b>Proposed allocations</b> that are a <b>constant</b> across the growth scenarios now, and were also at Reg 18.	All proposed allocations bar those below
2	<b>Proposed allocations</b> that are a <b>constant</b> across the scenarios now but were a variable at Reg 18.	South Saffron Walden; North Stansted Mountfitchet
3	<b>Proposed allocations</b> that are a <b>variable</b> across the RA growth scenarios now.	East and NE Great Dunmow
4	<b>Omission sites</b> that feature (as a <b>variable</b> ) in the RA growth scenarios.	SE GD, East of Thaxted
5	<b>Omission sites</b> that do not feature in the RA growth scenarios now (i.e. are a <b>constant</b> ) but did at Reg 18.	Ugley GC; West Pennington Lane
6	<b>Omission sites at Newport</b> which were explored at Reg 18 and will now be reconsidered through the NP.	West/SW Newport; SE Newport
7	<b>Other omission sites 'noted'</b> as part of SA work at either Reg 18 or 19 but not progressed to the RA growth scenarios.	Sites at Great Chesterford; Great Chesterford GC (1,500); South-south Saffron Walden; NE Stansted Mountfitchet; North Elsenham.
8	<b>Two notable large garden community options</b> that could be reconsidered through a Local Plan Review	Great Chesterford GC (4,500); Easton Park
9	<b>Other omission sites</b> that could deliver a <b>strategic</b> scheme and are developable in the HELAA but not perform poorly in light of plan-making.	All other strategic site options
10	<b>Other omission sites</b> that could deliver a <b>non-strategic</b> scheme and are developable in the HELAA.	All non-strategic site options

3.32 A total of six district-wide Reasonable Alternative growth scenarios were developed and tested through combining sub-area scenarios, illustrating a range of lower to higher growth scenarios across the district between 3,777 homes and up to 4,802 homes to be delivered strategic allocations (including a potential housing requirement at Thaxted), including:

- Scenario 1: Constants plus strategic growth to the northeast of Great Dunmow
- Scenario 2: Scenario 1 plus strategic growth to the east of Thaxted
- Scenario 3: Constants plus strategic growth to the southeast of Great Dunmow
- Scenario 4: Scenario 3 plus strategic growth to the east of Thaxted
- Scenario 5: Constant plus strategic growth to the southeast of Great Dunmow plus low growth to the northeast
- Scenario 6: Scenario 5 plus strategic growth to the east of Thaxted

**Table 3 Reasonable Alternative Growth Scenarios**

Supply component	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Completions, permissions & windfall	10,193	10,193	10,193	10,193	10,193	10,193
Larger villages allowance	900	900	900	900	900	900
Takeley	1,546	1,546	1,546	1,546	1,546	1,546
Saffron Walden	879	879	879	879	879	879
Stansted Mountfitchet	325	325	325	325	325	325
Elsenham	110	110	110	110	110	110
Great Chesterford	0	0	0	0	0	0
Hatfield Heath	0	0	0	0	0	0
Great Dunmow	<b>917</b>	<b>917</b>	<b>1,250</b>	<b>1,250</b>	<b>1,453</b>	<b>1,453</b>
Thaxted	0	<b>489</b>	0	<b>489</b>	0	<b>489</b>
<b>Total</b>	<b>14,870</b>	<b>15,359</b>	<b>15,203</b>	<b>15,692</b>	<b>15,406</b>	<b>15,895</b>
<b>% above LHN (13,500)</b>	<b>10</b>	<b>14</b>	<b>13</b>	<b>16</b>	<b>14</b>	<b>18</b>

3.33 The Sustainability Appraisal then appraised the six district-wide growth scenarios on their likely significant effects against 13 sustainability objectives under the 'SA Framework' and ranked them by their performance. **Table 4** provides an extract of the summary appraisal findings of the Sustainability Appraisal.

**Table 4 Extract of the Summary Appraisal Findings of the Sustainability Appraisal**

	Scenario 1: GD low Thax low	Scenario 2: GD low Thax high	Scenario 3: GD med Thax low	Scenario 4: GD med Thax high	Scenario 5: GD high Thax low	Scenario 6: GD high Thax high
Topic	Rank of preference (numbers) and categorisation of effects (shading)					
Accessibility	★1	4	2	5	3	6
Biodiversity	★1	★1	2	2	2	2
Climate change adaptation	=	=	=	=	=	=
Climate change mitigation	2	2	2	★1	2	2
Communities, equality, health	4	★1	5	2	6	3
Economy and employment	2	2	★1	★1	★1	★1
Historic environment	3	4	★1	3	2	3
Homes	6	5	4	3	2	★1
Land and soils	★1	2	★1	2	★1	2
Landscape	=	=	=	=	=	=
Transport	★1	2	★1	2	2	3
Water	★1	2	3	4	5	6

3.34 The summary appraisal matrix shows a very mixed picture, serving to highlight that the choice between the Reasonable Alternative growth scenarios is potentially quite finely balanced. Scenarios 1 and 3 are found to be the best performing scenarios under the highest number of sustainability topic headings and these two scenarios are also associated with the most predicted positive effects.

3.35 In consideration of the appraisal outcomes, the Council considers that the preferred scenario is Scenario 1, which the appraisal shows to perform reasonably well relative to the alternatives, to the extent that it can clearly be argued to be “an appropriate strategy” (Paragraph 35 of the NPPF).

- 3.36 At Great Dunmow, it is recognised that the choice between growth to the northeast and growth to the southeast is quite finely balanced, but the site to the southeast does not relate well to the settlement edge and growth to the northeast will deliver valuable new strategic green and blue infrastructure. Also, the site to the southeast is considerably larger but would likely deliver little in the way of additional infrastructure.
- 3.37 At Thaxted there is a clear case for growth, other than in respect of the primary school viability issue, and notwithstanding this is a rural village with high car dependency. However, the primary school capacity issue is understood to be a barrier to growth that cannot be overcome, in the context of the current Local Plan (but it is important to recall that there will be a Local Plan Review within five years, which could potentially direct further growth to Thaxted, to assist with school viability).
- 3.38 With regards to higher growth, the preferred scenario is considered to represent a suitably proactive approach to both housing and employment growth, and there have been few calls for higher growth other than from the development industry. However, the Council will remain open to evidenced reasons in support of higher growth.
- 3.39 Large Garden Communities capable of delivering 5,000 homes or above are considered inappropriate for further consideration in this Local Plan, to avoid over-relying on the delivery of single sites above the identified need to be accommodated on strategic sites without adequate evidence to demonstrate their viability. This reflects the Inspector's comments<sup>15</sup> on previously rejected plans, which stresses the need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the five year housing land supply. This does not mean larger scale development would not be appropriate for consideration in the longer term through the next Plan.

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<sup>15</sup> Paragraph 114 of the Inspector Report (10 January 2020) on the Examination of the Uttlesford Local Plan

# Stage 5 Selection of Proposed Strategic Allocations

- 3.40 The final selection of proposed strategic allocations is based on the information collected from Stages 1 to 4. A total of 7 sites were selected for inclusion in the Plan as the most sustainable and deliverable locations for development and consistent with the Spatial Strategy. This stage included the further development of indicative masterplans and identification of any infrastructure requirements and/or mitigation strategies as part of the policy requirements, where required. These are presented as Site Development Frameworks in Appendix 2-4 of the Plan.
- 3.41 The proposed strategic allocations selected has considered the Regulation 18 Consultation comments and were subject to further engagement with the site promoters and key stakeholders to help refine the exact nature of any proposals and the policy requirements for each site. This included engagement with Essex County Council, Natural England, the Environment Agency, Historic England, Highways England and the Integrated Care Board and our neighbouring authorities in terms of Duty to Co-operate. The Duty to Co-operate Topic Paper sets out the detail in relation to the efforts undertaken to incorporate joint working with key stakeholders on the Plan. The development of the detailed policy requirements was supported by a series of evidence base documents published alongside the Local Plan.
- 3.42 It is perhaps helpful to provide some additional explanation for why there are no proposed strategic allocations at Great Chesterford, Newport, Thaxted or Hatfield Heath given that these are four of our six Local Rural Centres, which form the second tier of most sustainable settlements in our Settlement Hierarchy:

## **Great Chesterford:**

- 3.43 There were a number of sites considered at Great Chesterford, but these were all ruled out for various reasons as explained in Appendix A Stage 1 to Stage 5 Site Selection Assessment. In some cases, some of the sites in question may be suitable for consideration in a future Local Plan but were not considered deliverable in the current Plan.

## **Hatfield Heath:**

- 3.44 As has already been explained, this settlement falls entirely with the Green Belt and as such has not been considered for strategic development. It is demonstrated by this paper that there are more than sufficient sites available to meet the housing need elsewhere in the District and for that reason, it is considered that 'exceptional circumstances' would not exist to justify development in the Green Belt.

## **Newport:**

- 3.45 Newport has been identified as a suitable location for sustainable development. The Regulation 18 Consultation and further transport evidence development have however shown that additional traffic generated from the proposed Regulation 18 site allocations, which are concentrated at the east of the settlement, would exacerbate the anticipated traffic issues at the B1383 High Street / Wicken Road junction. The three tested access strategies were unable to mitigate these impacts to an acceptable level. A scaled down growth of approximately 300 homes, to be delivered by smaller, more dispersed non-strategic sites through the Neighbourhood Plan, is considered to provide a more appropriate and balanced strategy. This approach can

support the vitality of Newport and provide essential new facilities while also being well integrated into the town and protecting its important historic character. Consequently, no strategic development site allocations are proposed at Newport.

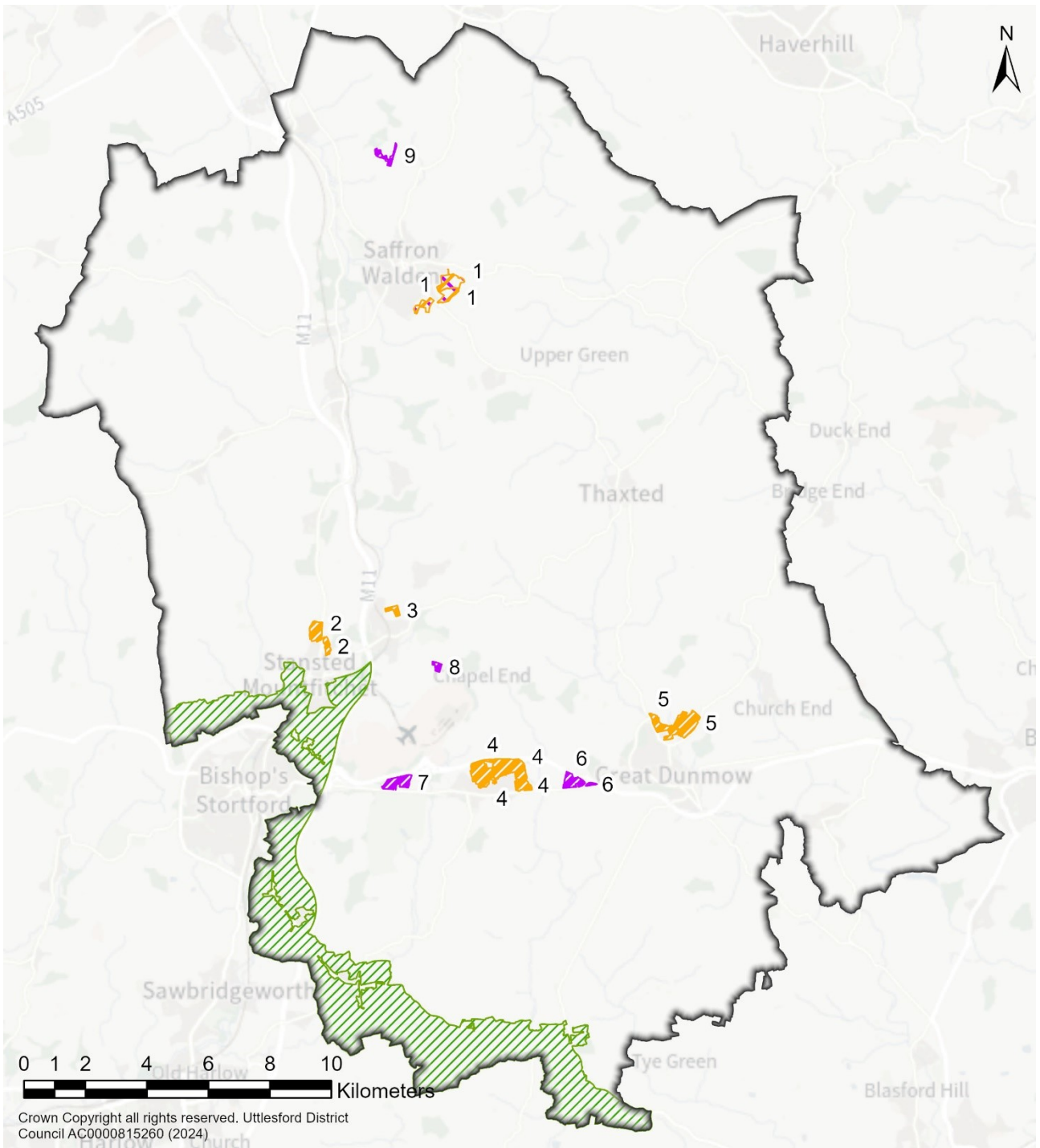
**Thaxted:**

- 3.46 There are no allocations, either strategic or non-strategic, made at Thaxted within the Local Plan. This is principally because further consultation with Essex County Council shows that the scale of growth needed to deliver a viable primary school would be in excess of what the Council consider would be appropriate in this settlement, and especially considering some of the constraints to development that affect Thaxted, such as its landscape setting, historic environment and falling within noise restrictions relating to Stansted Airport flight paths. However, the Council would support the community to continue to explore if smaller scale development could come forward without negatively impacting infrastructure provision and the presumption in favour of sustainable development within the existing built area of Thaxted, will apply in accordance with the Plan.

## 4. Recommendations






- 4.1 This Topic Paper summarises the site selection process Uttlesford District Council has undertaken to identify strategic housing sites proposed for allocation within the draft Uttlesford Local Plan 2021 to 2041 as proposed in the Regulation 19 Plan.
- 4.2 A proportionate and robust site selection process has been followed in accordance with national policy and guidance. It was informed by a wide range of available technical evidence and engagement with key stakeholders including site promoters and infrastructure providers. The approach has been integral to the broad Spatial Strategy and the importance of supporting sustainable development. The work was undertaken iteratively and informed by the Sustainability Appraisal and Regulation 18 Consultation Responses.
- 4.3 The staged process described in this paper illustrates a comprehensive yet proportionate approach. Sufficient sites were identified that could meet the identified housing need at the top-tier and most sustainable settlements such that less sustainable options did not need to be considered in more detail.
- 4.4 Non-strategic development is supported at Larger Villages, but this is discussed more within the Neighbourhood Plan and Larger Village Housing Requirement Topic Paper. This is important to support the vitality of our larger and more sustainable rural communities in accordance with Paragraph 79 of the National Planning Policy Framework.
- 4.5 The Plan includes 7 proposed strategic housing sites concentrated at five locations, as highlighted in **Figure 3**. The Council considers that, collectively, the strategic housing sites proposed are a sustainable approach to meeting the objectively assessed housing need for the District. The proposed allocations are of varying sizes, types and geographical locations and can contribute to housing delivery in the first five years of the Plan and beyond.





### Strategic Allocations

#### Legend

-  District Boundary
-  Strategic Allocation - Residential
-  Strategic Allocation - Mixed Use
-  Strategic Allocation - Employment
-  Metropolitan Green Belt

Label	Site Address	Proposed Land Use
1	Land east of Shire Hill Farm and south of Radwinter Road	Mixed Use
2	Land east of High Lane, Stansted Mountfitchet	Residential
3	Land East of Station Road, Elsenham	Residential
4	Land at Warrens Farm, Little Canfield	Residential
5	Land off The Broadway, Great Dunmow	Residential
6	Land between A120 and Stortford Road B1256	Employment
7	Land Noth of Takeley Street, Takeley	Employment
8	Land at Guants End, Elsenham	Employment
9	Land at Little Chesterford Research Park	Employment

**Figure 3 Strategic Sites Proposed for Allocation**