

# Sustainability Appraisal (SA) of the Uttlesford Local Plan

SA Report (Draft)

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# 1 Introduction

## 1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Uttlesford Local Plan (“the Plan”), which is being prepared by Uttlesford District Council.
- 1.1.2 Once adopted, the Plan will set the strategy for growth and change for the District up to 2041, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.<sup>1</sup>

## 1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives”. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:<sup>2</sup>
- What has Plan-making / SA involved **up to this point?**
    - including appraisal of ‘reasonable alternatives’
  - What are the SA findings **at this stage?**
    - i.e. in relation to the draft plan
  - What are **next steps?**

## 1.3 This SA Report

- 1.3.1 The final draft (‘proposed submission’) version is currently published under Regulation 19 of the Local Planning Regulations, such that representations can be made ahead of the plan being submitted to the Government and subjected to an Examination in Public (EiP) overseen by the Planning Inspectorate.
- 1.3.2 As such, this is the formally required SA Report. It is published alongside the Local Plan in order to inform representations and subsequent plan finalisation as part of the EiP (see discussion of ‘next steps’).

### Structure of this report

- 1.3.3 Each of the three questions introduced above is answered within a discrete ‘part’ of the report.
- 1.3.4 Before answering the first question there is a need to further set the scene by setting out the scope of the plan (Section 2) and the scope of the SA (Section 3).

### Commenting on this report

- 1.3.5 This report can be referenced as part of representations on the Local Plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including under ‘next steps’.

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<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

<sup>2</sup> See **Appendix I** for further explanation of the regulatory basis for presenting certain information within the SA Report.

## 2 The plan scope

### 2.1 Introduction

2.1.1 The aim here is to briefly introduce the: context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion of key issues elsewhere in the report); the plan period; and the objectives that are in place to guide plan preparation (the ‘plan scope’).

### 2.2 Context

2.2.1 A key point to note, by way of context, is that **the adopted Local Plan** dates from 2005, such that it is out-of-date. Since 2005, national planning-related legislation and policy has changed many times, including with the introduction of the National Planning Policy Framework (NPPF) in 2012 and, of course, there have been wide ranging significant changes to the local planning context.

2.2.2 A central requirement of the NPPF is that all local authorities must maintain an up-to-date plan. Where the local plan is out of date the presumption in favour of sustainable development applies, which means that the Council has limited potential to defend against unwanted planning applications. The authority might refuse a planning application only for that application to be granted permission at appeal by a Planning Inspector who applies ‘the presumption’ (or ‘tilted balance’) in favour of development.

2.2.3 There has been wide-spread ‘planning by appeal’ of this nature in Uttlesford over recent years, and there are wide-ranging down-sides. Development can essentially tend to come forward in a relatively piecemeal way, without strategic consideration to factors such as infrastructure capacity, new strategic infrastructure delivery, place-making and the environment. Also, it is important to say that fighting appeals is costly.

2.2.4 In this light, there is now considered to be an urgent need to adopt a new Local Plan. With an up-to-date Local Plan development will occur in a coordinated way that delivers significant benefits to communities over-and-above simply new homes, and it will be possible to confidently refuse unwanted applications. Also, in 2023 the Government [wrote](#) to the Council setting out the need to adopt a Local Plan or otherwise face “intervention”, i.e. a situation whereby the Government intervenes in respect of plan preparation.

2.2.5 Secondly, by way of context, it is important to note that **a Local Plan was submitted in 2019** but later withdrawn following concerns being raised by the appointed Planning Inspectors. Similarly, the District had a Local Plan rejected by Planning Inspectors in 2014. Focusing the 2019 withdrawn plan, the Inspectors’ letter is available on the Council [website](#), setting out key concerns including:

- Reliance on three large garden communities, all associated with significant constraints and infrastructure requirements which, whilst to some extent unavoidable in the context of garden communities, generates a need for detailed work ahead of a conclusion that the site is suitable, viable and able to deliver in the plan period. Related to this, a concern was that the effect of allocation would be to decide the spatial strategy for growth within the District over a period of time extending far beyond the plan period. The Inspectors stated: *“In particular, we are not persuaded that there is sufficient evidence to demonstrate that the Garden Communities, and thus the overall spatial strategy, have been justified.”*
- Insufficient supply from small and medium-sized sites and, in turn, in sufficient supply of new homes in the early years of the plan: *“In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5-year housing land supply”... This would have the benefit of providing... the earlier provision of more affordable housing. It would also... allow for a less steeply stepped housing trajectory... The proposed stepped trajectory, which arises from the strategy’s reliance on the Garden Communities, would result in a worsening affordability problem...”*
- The SA Report included insufficient evidence to demonstrate that all reasonable alternatives had been duly considered (i.e. subjected to appraisal and consultation).<sup>3</sup> The Inspectors stated: *“We believe that the key decisions to be made on the future of the... spatial strategy need to be taken by the Council, in consultation with local residents. The most effective and transparent way to do this would be through the preparation of a new plan, based on a robust SA...”*

<sup>3</sup> The NPPF requires that plans are: *“Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.”*

## 2.3 The plan area

- 2.3.1 Located in north west Essex, Uttlesford also borders Hertfordshire, Cambridgeshire and Suffolk. The M11 and associated rail corridor is a key link, including to Cambridge, which is a national growth area.
- 2.3.2 Stansted Airport is England's third or fourth busiest airport and is the single largest employer in the East of England. The airport is located within Uttlesford District, but the largest nearby settlement is Bishop's Stortford, which is within Hertfordshire. Airport-related traffic is a key issue locally.
- 2.3.3 Junction 8 of the M11, which links to the airport, is one of just two M11 junctions locally. As well as serving the airport and Bishop's Stortford, Junction 8 links to the A120 corridor, which is a strategic corridor linking to Braintree and Colchester via Great Dunmow (Uttlesford's second largest settlement) and Takeley.
- 2.3.4 Junction 9 is then located close to the northern extent of the District, serving a rural part of Essex and Hertfordshire, but importantly linking to East Anglia (Norwich) via the A11. The village of Great Chesterford is located close to Junction 9, and there is also a train station here linking to Cambridge.
- 2.3.5 Saffron Walden is located approximately 5km to the south of M11 J9 and is the District's largest settlement. It is a rural market town not served by an A-road, and with a train station located at nearby Audley End.
- 2.3.6 Three final broad areas to discuss, by way of introduction are:
- The railway corridor – to the south of the aforementioned stations at Great Chesterford and Audley End (near Saffron Walden) there are stations at Stansted Mountfitchet (the District's third largest settlement), Elsenham (associated with particularly extensive recent and committed growth); and Newport (a smaller settlement, but still falling within the second tier of the District's settlement hierarchy).
  - South of the A127 corridor – Hatfield Heath is a second tier settlement here, located on the District's only other A-road (the A1060). However, land here falls within the London Metropolitan Green Belt, such that 'exceptional circumstances' must be demonstrated in order to justify growth.
  - Central / eastern Uttlesford – distant from the two main road corridors, is a deeply rural area, with Thaxted a crucial service centre. The far northwest, along the border with Hertfordshire, is also very rural, as is the far south east, although Chelmsford is not far by minor roads.
- 2.3.7 Further key characteristics include:
- Population – the population grew by 15% over the ten years to 2021 (compared to 6.6% growth for England, although Cambridge notably grew by 17.6%) and there has been ongoing growth since 2021, plus and there is very extensive committed growth. The proportion of people aged 65 and over increased by 36% in the ten years to 2021, with the figure now at 20.2%. Uttlesford is the 8th least deprived local authority in England, and the median house price in 2022 was £459,000, which is 67% above the national average. The District has the highest car ownership in Essex; 38% of households own 2+ cars.
  - Historic environment – extensive areas are highly constrained, with the District containing 3,700+ listed buildings (around a third of those in Essex), 38 Conservation Areas and various other nationally designated areas/assets. By way of an example, Saffron Walden is a renowned example of a well-preserved medieval market town, strongly associated with the river Cam and the Audley End Estate.
  - Landscape and the natural environment – the District is mainly associated with the dip slope of the chalk ridge that stretches across England from the southwest to Norfolk. In turn, the land mostly dips to the southeast, with waterways draining to the Essex Estuaries. However, Newport, Saffron Walden and Great Chesterford are associated with the upper reaches of the River Cam, which drains to the Wash. Key assets include chalk streams (a globally rare habitat) and Hatfield Forest, which is nationally renowned and, in turn, suffers from problematic levels of recreational pressure. There are no sites internationally designated for biodiversity within or in close proximity to the District, nor any nationally designated landscapes; however, there are 14 nationally designated Sites of Special Scientific Interest (SSSIs). Another key constraint is very extensive high quality (grade 2) agricultural land.
  - Stansted Airport – gained planning permission (at appeal) in 2021 to expand from 35mppa to 43mppa, along with associated improvements to the road infrastructure and sustainable transport obligations. The expectation is that expansion will deliver 5,000 new jobs and see the airport's economic contribution double to £2 billion annually. As part of the committed expansion, in 2023 planning permission was [granted](#) to expand the terminal building. As well as a need to manage traffic movements, there is a need to capitalise on the airport as a multi-modal transport hub.

## 2.4 The plan period

- 2.4.1 The Local Plan is likely to be adopted in 2026 and must cover a period of 15 years from plan adoption (although NPPF para 22 also encourages a longer term perspective). The plan period start date is 2021 as this is the base date for evidence studies. As such, the plan period is from from 2021 to 2041.
- 2.4.2 A significant amount of development has already come forward since the start of the plan period ('completions') and a very high quantum of development has planning permission such that it will come forward in the early years of the plan ('commitments'). As such, the role of the Local Plan is essentially to identify new supply, including via allocations, to bolster the committed supply and ensure a robust supply of development land, as measured against need / the defined requirement, across the entire plan period as far as possible (noting that NPPF para 69 allows for flexibility in respect of latter years).

## 2.5 Plan objectives

- 2.5.1 The following objectives are in place to guide plan-making:

- Minimise the **environmental impact** of development.
  - Plan for the climate and ecological emergency, avoid or mitigate the environmental impacts from development, including reducing energy usage and embodied carbon of new builds.
  - Protect high-quality landscapes by ensuring new development conserves and enhances landscape assets and achieves high quality design standards.
  - Protect and preserve the natural environment, have full regard to the Essex Local Nature Recovery Strategy. Protect and maximise opportunities for biodiversity net gain and the enhancement of Uttlesford's natural capital assets, including soils, woodlands, hedges and ponds to capture and store carbon as well as providing for appropriate access for health and recreational benefits, together with effective multifunctional Green Infrastructure. Protect and restore the natural ecology and health of the Districts chalk streams and rivers.
  - Protect Uttlesford's water resources by delivering developments that efficiently use local resources, prioritise water resilience, use the latest sustainable consumption techniques and avoid abstraction of chalk aquifers that adversely affects Chalk Rivers and Streams. Ensure new development is resilient to the impacts of climate change including flooding, drought and heatwaves.
  - Pro Protect the best and most versatile agricultural land whilst balancing the needs for local nature recovery, rural employment and diversification.
  - Protect and enhance the historic environment, including protecting and enhancing the significance of heritage assets and their settings, including archaeology.
- Recognise and support the **economic opportunities** in the district.
  - Recognise the influential role of the district's employment offer, including the international gateway of Stansted Airport, including the Northside development and the research and development offer at Great Chesterford Research Park, by embracing the planned expansion, whilst seeking to maximise their sustainability and infrastructure need.
  - Foster sustainable economic development opportunities. By promoting a strong, diverse, resilient, sustainable, and competitive economy. And supported with a range of rewarding employment and learning opportunities and a multi- skilled workforce in a range of sectors including tourism, high-tech, biotech, research and development, aviation, sustainable agricultural and rural business.
  - Allocate sufficient land to accommodate the identified development need.
- Provide adequate and timely **infrastructure** to support development.
  - Help sustain existing and deliver new local community facilities, education, sport, leisure, open space, health and retail through development to promote healthy, sustainable and safe communities.
  - Meet the identified housing needs, including provision for specialist and supported housing needs (e.g., elderly/disabled) and ensure that an appropriate contribution of affordable housing is met.
  - Prioritise increased opportunities for high-quality and safe travel by public transport and active travel encouraging modal shift away from the car.

## 3 The SA scope

### 3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. Further information is presented in a [Scoping Report](#) (2021; N.B. includes settlement-specific information). However, it is important to note that the Scoping Report does not aim to define the SA scope comprehensively. Rather, there is a need for flexibility to respond to the nature of the emerging plan / reasonable alternatives and latest evidence.

### 3.2 Consultation on the scope

- 3.2.1 The Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA Report], the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>4</sup> As such, these authorities were consulted on the SA scope in 2021. Comments were also sought through the Draft Plan / Interim SA Report consultation in 2023 (discussed further below).

### 3.3 The SA framework

- 3.3.1 The primary outcome of scoping is a list of topics/objectives that can then be utilised as a ‘framework’ under which to structure appraisal work (i.e. appraisal of “the plan and reasonable alternatives”). The aim is to ensure that appraisal is well-targeted, concise and engaging. The SA framework is presented below.

**Table 3.1: The SA framework**

Topic	Objective
Accessibility	Ensure good access to existing and planned community infrastructure whilst retaining and protecting settlement identities and rural values.
Biodiversity	Maintain and enhance the extent and quality of biodiversity and geodiversity sites and networks within and surrounding the District. Account for recreational pressure on internationally and nationally designated sites as a key issue.
Climate change adaptation	Increase resilience to the effects of climate change, including increased flooding, droughts and heatwaves. Explore options for natural flood risk management.
Climate change mitigation	Reduce per capita (i.e. per person) contribution to climate change, with a focus on both built environment and transport emissions.
Communities, equality, inclusion and health	Support high quality living environments and strong communities, including good relations fostered between people and groups. Support healthy lifestyles for all groups, reducing health inequalities and delivering positive outcomes, including via access to services/facilities and green infrastructure / open space (including with a focus on key groups such as people with restricted mobility and low-income households) and enabling active travel.
Economy and employment	Grow a sustainable and inclusive economy, building upon strengths and opportunities and increasing long-term economic resilience.
Historic environment	Conserve and enhance valued assets, including their setting, and also conserve / enhance historic character at a range of scales.

<sup>4</sup> In-line with Article 6(3) of the SEA Directive, these bodies were selected because *‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’*



Topic	Objective
Homes	Provide for housing needs as far as possible, increase access to high-quality housing of the right type and tenure, including affordable housing.
Land, soils and resources	Ensure the efficient and effective use of land, including accounting for the grade of productive agricultural land.
Landscape	Protect and enhance the character and quality of the diverse landscapes at a range of scales, e.g. river valleys, chalk influenced landscapes, ancient farmed landscapes, wooded landscapes and settlement gaps. Support strategic green / blue infrastructure, including long distance walk/cycle routes.
Transport	Promote modal shift away from the private car and reduce the need to travel, whilst protecting residents and the natural environment from the impacts of congestion, air pollution and noise pollution. Preserve areas of rural tranquillity.
Water	Protect and enhance water quality, including by careful consideration of wastewater treatment capacity, and recognising existing issues of water courses not achieving target status. Account for water resource / supply constraints in the context of increasing demand and the importance of water levels for habitats.

## 3.4 Integrating equalities and health

3.4.1 The SA framework has been designed to integrate both health and equalities considerations, with a view to the SA process integrating Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).

3.4.2 In particular, see discussion under the “Communities, equality, inclusion and health” heading within **Section 9**, which presents and appraisal of the Local Plan as a whole.

3.4.3 Further points to note are:

- **EqIA** – the Equality Act 2010 (the Act) introduced a Public Sector Equality Duty, which covers the following protected characteristics: age, disability, gender re-assignment, marriage / civil partnership, pregnancy, maternity, ethnicity, religion/belief, sex and sexual orientation. Under the Duty the Council must, in the exercise of its functions, have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not. EqIA is often used by public sector organisations to demonstrate how this duty has been met. However, there are no procedural requirements specific to EqIA over-and-above those relating to SA, hence integrating EqIA simply involves ensuring that the SA scope has a good focus on equality matters.
- **HIA** – addressing the determinants of good health is increasingly a focus of local plan-making, e.g. a recent [study](#) on *Integrating Health into Local Plans* identified five key themes: Healthy neighbourhood design; Healthy housing; Healthier food environments; Natural and sustainable environments; Healthy transport. HIA is a tool for integrating health-related considerations in local plan-making. As per EqIA, there are no procedural requirements specific to HIA over-and-above those for SA, hence integrating EqIA simply involves ensuring that the SA scope has a good focus on health determinants.
- **Limitations** – for plans such as the Uttlesford Local Plan (less so plans that deal with urban areas), it can be a challenge to confidently identify and evidence a causal link between key strategic choices on the one hand and both equalities and health-related issues/outcomes on the other. In particular, this is the case because the plan focuses on detailed matters relating to development management only to a limited extent, leaving considerable flexibility for matters to be explored in detail at subsequent stages of the planning process. However, there is nonetheless a range of key strategic choices to explore from both an equalities and a health perspective, including relating to meeting development needs, spatial strategy and site selection.

## **Part 1: What has plan-making / SA involved up to this stage?**

## 4 Introduction to Part 1

### 4.1 Overview

- 4.1.1 Work on the Local Plan began in 2020, following withdrawal of the previously submitted plan. Since then work has been ongoing to gather evidence and explore issues, opportunities, options etc. A milestone was reached in 2023 with a Draft Local Plan published for consultation alongside an Interim SA Report.
- 4.1.2 The focus here, within Part 1, is not to relay the entire ‘story’ of the plan-making/SA process, nor to provide a comprehensive ‘audit trail’ of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** ahead of the current ‘publication’ stage. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with - see **Section 5**
  - present an appraisal of the reasonable alternatives - see **Section 6**
  - explain the Council’s reasons for selecting the preferred option - see **Section 7**

### 4.2 Reasonable alternatives in relation to what?

- 4.2.1 The legal requirement is to examine reasonable alternatives (RAs) taking account of “*the objectives and geographical scope of the plan*” (see Section 2). Following discussion of the plan objectives with UDC officers, it was determined appropriate to focus on the **spatial strategy**, i.e. providing for a supply of land, including by allocating sites (NPPF paragraph 68), to meet objectively assessed development needs whilst also delivering on wider plan objectives. A key outcome of ‘spatial strategy-making’ is a **key diagram**.
- 4.2.2 Establishing a spatial strategy / key diagram is clearly a primary objective of the Local Plan. As such, it is reasonable to focus on exploring alternatives (see Sections 5 and 6) so as to inform a final decision on the preferred spatial strategy (see Section 7) and to inform the current consultation.<sup>5</sup>
- 4.2.3 The decision was made to refer to the alternatives as “**growth scenarios**”.

#### What about site options?

- 4.2.4 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans, because they are not mutually exclusive, i.e. the aim of plan-making is not to select just one site for allocation. Rather, the objective is to allocate a *package* of sites, hence RAs should be in the form of alternative *packages* of sites. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.

#### Is the focus on housing sites?

- 4.2.5 Establishing a supply of land to meet housing needs is typically a focus of attention, but local plans are also tasked with meeting wider development needs. This includes needs in respect of employment land, which is a key consideration for Uttlesford. The discussion presented below is somewhat housing-led, but employment land issues / options are considered throughout, and a summary is presented in Section 5.5.

#### What about other aspects of the plan?

- 4.2.6 As well as establishing a spatial strategy, allocating sites etc, the local plan must also establish policy on thematic district-wide issues, as well as site-specific policies to guide decision-making at the planning application stage. Broadly speaking, these can be described as development management (DM) policies.
- 4.2.7 However, it is a challenge to establish DM policy alternatives that are genuinely reasonable.<sup>6</sup> Consideration was given to possible reasonable DM policy alternatives; however, on balance, it was determined appropriate to focus attention only on appraising the emerging preferred options (Section 9). Comments on reasonable DM policy alternatives were sought through the consultation in 2023.

<sup>5</sup> It was also considered appropriate to focus on ‘spatial strategy’ given the potential to define “do something” alternatives that are meaningfully different, in that they will vary in respect of ‘significant effects’ (mindful that SA must focus on significant effects).

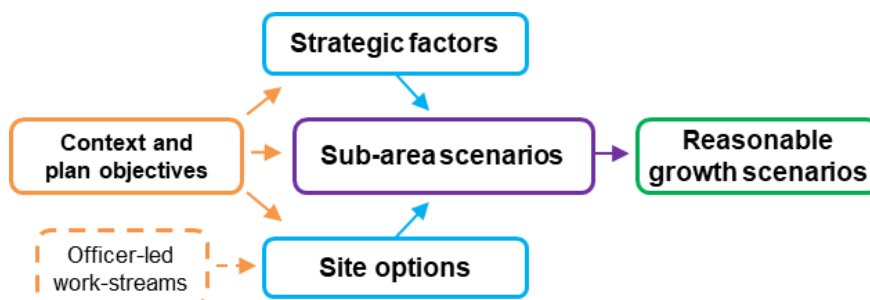
<sup>6</sup> To be ‘reasonable’ alternatives must be meaningfully different to the extent that it is possible for an appraisal to differentiate between them in terms of significant effects. Also, it is important to bear in mind that ‘no policy’ is not a reasonable alternative to ‘a policy’. This is because ‘no policy’ is the baseline (and so cannot lead to significant effects *on the baseline*).

# 5 Defining growth scenarios

## 5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios. To reiterate, reasonable growth scenarios equate to the formal **reasonable alternatives**.

Figure 5.1: Establishing reasonable growth scenarios



### Structure of this section

- 5.1.2 This section explains a process to define reasonable growth scenarios as follows:
- **Section 5.2** – explores **strategic factors** (issues / opportunities / options) that are a ‘top down’ input.
  - **Section 5.3** – considers individual **site options** that are ‘bottom up’ input (‘building blocks’).
  - **Section 5.4** – explores growth options and scenarios for **sub-areas**.
  - **Section 5.5** – combines sub-area scenarios to form borough-wide **reasonable growth scenarios**.

### A note on limitations

5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the definition of reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence-gathering and analysis that is proportionate, also recalling the legal requirement, which is to present an *“outline of the reasons for selecting alternatives...”* [emphasis added].

## 5.2 Strategic factors

### Introduction

- 5.2.1 The aim of this section of the report is to explore strategic issues, opportunities and options with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:
- Quantum – *how many* new homes are needed (regardless of capacity to provide them)?
  - Spatial strategy – broadly *where* is more / less suited to growth and what *types* of growth are supported?

### Quantum

5.2.2 This section sets out the established Local Housing Need (LHN) figure for the District, before exploring arguments for the Local Plan providing for a quantum of growth either above or below LHN.

### Background

5.2.3 A central tenet of the plan-making process is the need to **A)** establish housing needs; and then **B)** develop a policy response to those needs. The Planning Practice Guidance (PPG) explains (emphasis added):

*“Assessing housing need is the first step in the process of deciding how many homes [to plan for]...”*

- 5.2.4 With regards to (A), the NPPF (2023) is clear that **LHN** should be calculated on the basis of an “assessment conducted using the standard method” other than in “exceptional circumstances”.
- 5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting the housing **requirement** at LHN and identifying a **supply** through policies sufficient to deliver this housing requirement on an annual basis over the plan period (which will invariably necessitate a supply ‘buffer’ to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that *departs* from LHN.

### Uttlesford’s Local Housing Need (LHN)

- 5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020 (the ‘cities uplift’), but this does not apply to Uttlesford.<sup>7</sup>
- 5.2.7 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method, since the method was first introduced. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent household projections (with reasons set out clearly at [paragraph 5](#) of the PPG on housing needs assessment). Updates to the PPG in late 2020 confirmed this approach and this approach was also [reconfirmed](#) in December 2022.
- 5.2.8 The standard method derived LHN for the District is currently **675 dwellings per annum** (dpa), or 13,500 homes in total over the plan period. This is a ‘capped’ figure, meaning that Step 3 of the standard method (“Capping the level of any increase”) does apply. The uncapped figure is 729 dpa, and it should be noted that the PPG states: “Where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered.”
- 5.2.9 With regard to Step 2 (adjustment for affordability), this involves accounting for the latest (2023) [ratio](#) of median workplace earning (i.e. the median earnings of those who work in Uttlesford) to median house price, which is 12.18%. This latest ratio is a notable drop from 2022, when it stood at 13.85, and results in a drop to Uttlesford’s standard method LHN figure. The ratio has not been this low since 2014, but it should be noted that the ratio was at 10% as recently as 2011.

### Is it reasonable to explore setting the housing requirement at a figure [below](#) LHN?

- 5.2.10 Paragraph 11 of the NPPF states: “... *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*” [emphasis added]
- 5.2.11 Uttlesford is overall not heavily constrained by NPPF “*policies... that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area*”. The London Metropolitan Green Belt constrains the southern part of the District, and SSSIs are a significant constraint (including Hatfield Forest). However, there are extensive parts of the District that are relatively unconstrained in the terms described by the NPPF.
- 5.2.12 For this reason alone the possibility of setting the housing requirement at a figure below LHN can be ruled out as ‘unreasonable’. Also, there is a need to consider constraints to growth affecting Uttlesford not only in an absolute sense, but also relative to neighbouring areas that would come under pressure to provide for unmet need from Uttlesford.
- 5.2.13 Furthermore, there are many positive arguments in favour of providing for LHN. As part of this, it is important to recognise that meeting housing need is important not only in and of itself, but also due to highly significant secondary benefits, for example in terms of supporting communities, health and wellbeing, strategic infrastructure delivery and the local economy.
- 5.2.14 This position – that growth scenarios that would necessitate setting the housing requirement at a figure below LHN are unreasonable – was taken at the Regulation 18 Draft Plan / IIA Report stage in 2023, and few if any significant concerns were raised with this approach through the consultation.

<sup>7</sup> See [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments).

## Is it reasonable to explore setting the housing requirement at a figure above LHN?

- 5.2.15 There are four key reasons for considering the possibility of setting the housing requirement above LHN.

### *Local housing need*

- 5.2.16 As discussed above, the 'uncapped' LHN figure for Uttlesford is higher than the figure derived from the standard method (which involves applying a cap).

### *Affordable housing need*

- 5.2.17 This is quite high locally, and the PPG states: "An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes." However, the Local Housing Needs Assessment (LHNA, 2024) explains:

*"Despite the level of need being high in relation to the Standard Method, it is not considered that this points to any requirement for the Council to increase the Local Plan housing requirement due to affordable needs. The link between affordable need and overall need is complex... it must be remembered that many of those picked up as having an affordable need are already in housing (and therefore do not generate a net additional need for a home) – indeed removing households from the modelling who are already in accommodation reduces the need to 221 per annum. That said, the level of affordable need does suggest the Council should maximise the delivery of such housing at every opportunity."*

### *Unmet housing need from elsewhere*

- 5.2.18 The NPPF states: "Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (**and any needs that cannot be met within neighbouring areas**) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment." [emphasis added]
- 5.2.19 The fact that the District is located at the edge of the London Metropolitan Green Belt serves as a reason to remain alive to the possibility of unmet need from the south, including recognising that the London Plan does not provide for London's housing need in full (i.e. there is unmet need). It is also the case that a number of Green Belt authorities to the north of London are generating or are considering generating unmet need, although this is more to the northwest rather than to the northeast / along the M11 corridor.
- 5.2.20 However, the simple fact is that there has been no clear request made from the Greater London Authority, nor any local authority more constrained by Uttlesford by the London Metropolitan Green Belt, that Uttlesford give detailed consideration to providing for unmet needs arising from their area. Equally, it is the case that no authority has approached Uttlesford regarding the possibility of providing for their unmet needs on the basis of constraints other than the Green Belt (including Essex Coastal authorities).
- 5.2.21 Focusing on East Herts and the Essex authorities to the south of Uttlesford, a key point to note is that Harlow is a tightly bounded urban authority. However, in 2017 a Memorandum of Understanding was signed by Uttlesford, Harlow, Epping Forest and East Herts agreeing that Uttlesford would provide for its locally arising needs only, i.e. would not make provision for Harlow's unmet need. Harlow (2020), Epping Forest (2023) and East Herts (2018) then subsequently adopted Local Plans, and the outcome was not to generate unmet need, including on account of [Harlow Gilston Garden Town](#) (16,000 homes) to the north of Harlow. None of the three authorities have made significant progress on a local plan review, hence it is not possible to speak of future unmet need risk with any confidence. However, it is recognised that a precautionary and proactive approach means remaining alive to the possibility of future unmet need. As part of this, it is also recognised that Bishops Stortford is a constrained town. However, East Herts includes significant land beyond the Green Belt, and is the District is working collaboratively with the four other north east and central Hertfordshire authorities in respect of long term growth strategy.
- 5.2.22 Finally, there is a need to consider Greater Cambridge, to the north. A key study exploring 'Employment Land, Economic Development and Relationship with Housing' was [published](#) in January 2023 setting out a recommendation that, whilst standard-method directed LHN is 1,769 dpa, the authorities should "consider planning for 2,463 dwellings per annum to support... jobs growth." This is an ambitious strategy, but the latest situation, as reported on the Local Plan [website](#), is that the plan is paused on account of unresolved major issues in respect of water supply, wastewater treatment, transport and national planning reforms (also the Government's strategic direction for growth in the Cambridge area).

- 5.2.23 In this light there is uncertainty regarding the potential to adopt a plan that provides for 2,463 dpa. However, whether this serves to indicate a significant risk of unmet need to be provided for in Uttlesford is a separate question, and whether any risk is a matter for the *current* Uttlesford Local Plan is another question still. The *next* Uttlesford Local Plan – to be adopted in c.2030/31 – will be better placed to support any strategic growth ambitions for Cambridge, subsequent to work to address strategic constraints.
- 5.2.24 Regardless, it is evidently the case that the Uttlesford Local Plan must be prepared mindful of the need to deliver new homes to support jobs and economic growth in Greater Cambridge, including mindful that a new Cambridge South Station will soon open that is very well linked to Uttlesford. The Network Rail website explains that the aim is to “*support the vitally important biomedical campus and serve a growing community of science and health care specialists, employees and hospital visitors.*”

#### *Economic development or infrastructure investment*

- 5.2.25 There is a lack of clarity nationally regarding whether any such uplift should be made as part of objectively establishing LHN or as a subsequent a policy choice. Regardless, there is no case for an uplift in the Uttlesford context. The Uttlesford LHNA (2024) explains that under Standard Method LHN:

*“As a final test on exceptional circumstances, the Standard Method projection was used to look at potential changes to the resident labour supply and the number of additional jobs that might be supported. Overall, it was projected the labour supply would increase by around 25% over the 2024-41 period and that this could support around 13,000-14,200 additional jobs – this is higher than the job growth forecast by the 2023 Employment Need Assessment (10,600 additional jobs in the 2022-41 period) and therefore does not point to a need to plan for housing in addition to the Standard Method.”*

- 5.2.26 It is recognised that a number of consultation responses received from the development industry suggest a need to account for higher jobs growth associated with Stansted Airport, but this was factored into the Employment Need Assessment (2023), and there is a need to recognise a trend towards demand for industrial and warehousing land close to Stansted more so than (higher jobs density) office space. Also, there is the potential to respond to a need to support growth at Stansted through spatial strategy – i.e. by weighting growth in proximity to Stansted – as well as through total growth quantum, as discussed below.

#### **Conclusion on housing quanta options**

- 5.2.27 The **high level** discussion above serves to suggest that, in addition to a focus on growth scenarios that would enable the housing requirement to be set at **LHN** (675 dpa), there is also a need to remain open to the possibility of setting the housing requirement at a figure **above LHN**.
- 5.2.28 However, the high level case for setting the housing requirement above LHN is not strong (including, and most notably, because no neighbouring authority has requested that Uttlesford make provision for unmet housing need), which serves as a reason to rule-out scenarios that aim to support a housing requirement well-beyond LHN (e.g. >10%). With regards to growth scenarios that would necessitate setting the housing requirement at a figure below LHN, such scenarios can be ruled out at this stage in the process.
- 5.2.29 The question of precise quanta figures to reflect across the growth scenarios is returned to within **Section 5.5**, subsequent to consideration of broad distribution, site options and sub-area scenarios.

#### **Box 5.1: A note on employment land need**

The Employment Land Review (ELR, 2024) provides the following summary of the recommendations set out in the Employment Needs Update (ENU, 2023) in respect of residual needs to be provided for by the Local Plan:

- R&D: 25,000 sq.m to be met at Chesterford Research Park;
- Office: 3.2-6.5 ha – windfall can provide general local requirements, in addition to a 3-5ha allocation;
- Industrial: There is a significant supply shortfall within 10 miles of Bishops Stortford (99.6% occupancy). Having accounted for commitments including Northside,<sup>8</sup> there is a residual need for 30.4ha, which breaks down as 5-10ha at Great Dunmow, up to 5ha at Saffron Walden and 15ha in the vicinity of Stansted.

<sup>8</sup> 61.9ha at Stansted Business Park to provide 195,100 sq.m of commercial floorspace, predominantly B8, B2 and E(g); see [UTT/22/0434/OP](#). It is anticipated to generate around 3,000 jobs, but timings remain uncertain.

## Broad spatial strategy

### Introduction

5.2.30 This is the second of two sections examining ‘strategic factors’ of relevance to the matter of defining reasonable growth scenarios for the Local Plan. The aim is to explore broad distribution issues / options as well as the question of broad growth typologies that are supported, e.g. strategic versus non-strategic.

### Focus of this section

5.2.31 There is a wide range of important ‘broad spatial strategy’ factors with a bearing on reasonable growth scenarios. This is particularly the case for Uttlesford, as a large District that is relatively free from headline constraints (NPPF footnote 7) and with good transport links to key areas including London and Cambridge. Also, there are wide-ranging broad spatial strategy factors that stem from locally established objectives and aspirations, not least in respect of achieving net zero carbon emissions district-wide by 2030.

5.2.32 The following list of evidence-gathering workstreams informing Local Plan-making provides a further indication of the breadth of issues/opportunities that could potentially be discussed here:

- Housing
- Employment
- Retail
- Gypsy and Travellers
- Infrastructure
- Transport
- Landscape
- Green infrastructure
- Hatfield Forest, LWSs
- Flood risk
- Water
- Viability
- Leisure and sports
- Air quality
- Green Belt

5.2.33 There is the potential to explore all of these matters within the sections of this report that follow. However, it is considered appropriate to focus this section on a specific fundamentally important question: *Is it reasonable to consider a focus on large garden communities as per the withdrawn plan?*

### Is it reasonable to consider a focus on new settlements?

5.2.34 As discussed above (Section 2), the District submitted a Local Plan in 2019, only to then withdraw the plan in 2020 after the appointed Planning Inspectors raised a series of concerns, particularly in respect of the proposed focus on three large new settlements. By way of further context, it is also important to note that one of the three previously proposed new settlements (West of Braintree) was also being taken forward via a separate joint plan by the North Essex Authorities (NEA), such that the Uttlesford Inspector’s Report (2020) did not reach detailed conclusions. However the NEA Inspector’s report was then published in December 2020, finding the West of Braintree proposal to be “not justified or deliverable”.

5.2.35 The current situation is that there is an urgent need to adopt a Local Plan, for reasons that are introduced above (Section 2). Essentially, there is an urgent need for a plan-led approach to housing and jobs growth. This serves as an argument against a focus on new settlements, given that any new settlement allocation through a local plan requires a large amount work, which would take time (and, of course, resources).

5.2.36 Furthermore, the current situation is that the ‘numerical’ argument for a focus on large new settlements is not strong. This reflects three factors: 1) after having accounted for supply from completions since the start of the plan period, sites with planning permission and a windfall assumption, the quantum of new supply to be identified through the Local Plan is *at most* ~6,000 homes; 2) it is essential that a good proportion of this supply comes from small and medium sized sites; and 3) there are a range of settlement-specific arguments for growth via urban extensions (as discussed in Section 5.4).

5.2.37 In **conclusion**, there is a high level case to rule out any large garden community, as follows: 1) there is a need to avoid a rushed plan that would be at risk of failing; 2) time is of the essence for the Uttlesford Local Plan, and hence there is a need to avoid undue delay; and 3) there is a weak numerical argument.

5.2.38 Also, it should also be noted that Local Plans must be reviewed every five years, such that work to consider new settlement options could begin in perhaps 2026, prior to adoption of a new Local Plan in 2031 and potentially delivery of one or more new settlements in the mid-2030s. It is fully acknowledged that there is a national and local case to be made for garden communities, including new settlements.

5.2.39 The next Local Plan will also have the benefit of building upon an up-to-date plan, which will make the process easier and increase potential to effectively explore new settlement options. This is in contrast to the current plan, which is setting out to remedy issues created a lack of plan-led growth over many years.



## 5.3 Site options

### Introduction

- 5.3.1 The aim of this section is to introduce the long list of available site options feasibly in contention for allocation and the work that has been undertaken to appraise and 'sift' site options, in order to arrive at a manageable shortlist that can then be a focus of work to explore sub-area scenarios in Section 5.4.
- 5.3.2 To recap, this is a 'bottom-up' workstream undertaken as a component of the wider process of defining reasonable alternative (RA) growth scenarios for appraisal and consultation (see Figure 5.1).
- 5.3.3 This section covers: The Housing and Economic Land Availability Assessment (HELAA); Officer-led site-sifting and assessment; and Garden community options.

### HELAA

- 5.3.4 The starting point for the HELAA was a long list of over 400 site options identified from a range of sources. The HELAA assesses these sites finding that the vast majority are 'available, achievable and suitable' such that they are deliverable (potentially able to deliver within five years) or developable (potentially able to deliver later in the plan period). Of these, ~ 1 in 4 has planning permission. Focusing only on sites without permission, the combined *theoretical* capacity of the deliverable/developable sites is well over 100,000 homes, which is obviously many times more homes than needed under any reasonable scenario.

### Officer-led site-sifting and assessment

- 5.3.5 Taking the 300+ non-permitted deliverable/developable HELAA sites as a starting-point, the **first step** involved sifting-out 'non-strategic' sites unable to deliver 100 homes (either alone or in combination with another site or sites). The approach is to focus on the allocation of 'strategic' sites only through the local plan has been reached on balance, including on the basis of responses to the Draft Plan consultation in 2023 and subsequent discussions with Town and Parish Councils. It reflects a view that:

- Key settlements and local rural service centres – the Local Plan aims to deliver on local objectives for all nine of these settlements through strategic allocations, in so far as possible. In turn, there is no strategic case for non-strategic allocations at these settlements, also recognising considerable non-strategic completions and commitments. Furthermore, each of the Town and Parish Councils will be able to consider the possibility of non-strategic allocations through forthcoming neighbourhood plans.

Having said this, there are barriers to allocating strategic sites at Great Chesterton, Hatfield Heath and Thaxted, such that the question of making one or more non-strategic allocations through the Local Plan does arise. However, in practice each of these settlements is also associated with barriers to non-strategic allocations. Matters are discussed in Section 5.4, but in short: schools capacity is an issue at Great Chesterton and Thaxted; whilst Hatfield Heath is within the London Metropolitan Green Belt.

- Larger villages – it is recognised that there is a need to take steps through the Local Plan to ensure that all eight of the larger villages see an appropriate quantum of growth over the plan period. The NPPF encourages local authorities to "*identify opportunities for villages to grow and thrive, especially where this will support local services*", and there are known issues locally around housing affordability and maintaining bus services, plus maintaining viable numbers at rural primary schools is an issue nationally.

As such, each of the larger villages has been examined in order to establish: A) the appropriate number of homes for the plan period; B) completions and commitments; and, in turn, C) a residual figure. The outcome is an understanding that all eight larger villages would ideally see further homes within the plan period over-and-above completions and commitments. However, two of these villages are constrained by Green Belt, and there are not exceptional circumstances to justify Green Belt release.

In turn, there is a need for non-strategic allocations at six larger villages. However, in each case it has been established that the village in question is ready and willing to prepare a neighbourhood plan to deliver the allocation(s) required. This is an appropriate mechanism for making non-strategic allocations, albeit this will mean a delay of perhaps up to two years before the allocations are in place.

The implication is that the Local Plan need not concern itself with allocating non-strategic sites at larger villages but does need to assign the six non-Green Belt larger villages a housing requirement and demonstrate confidence that the requirements will be met. This is discussed further in Section 5.4.

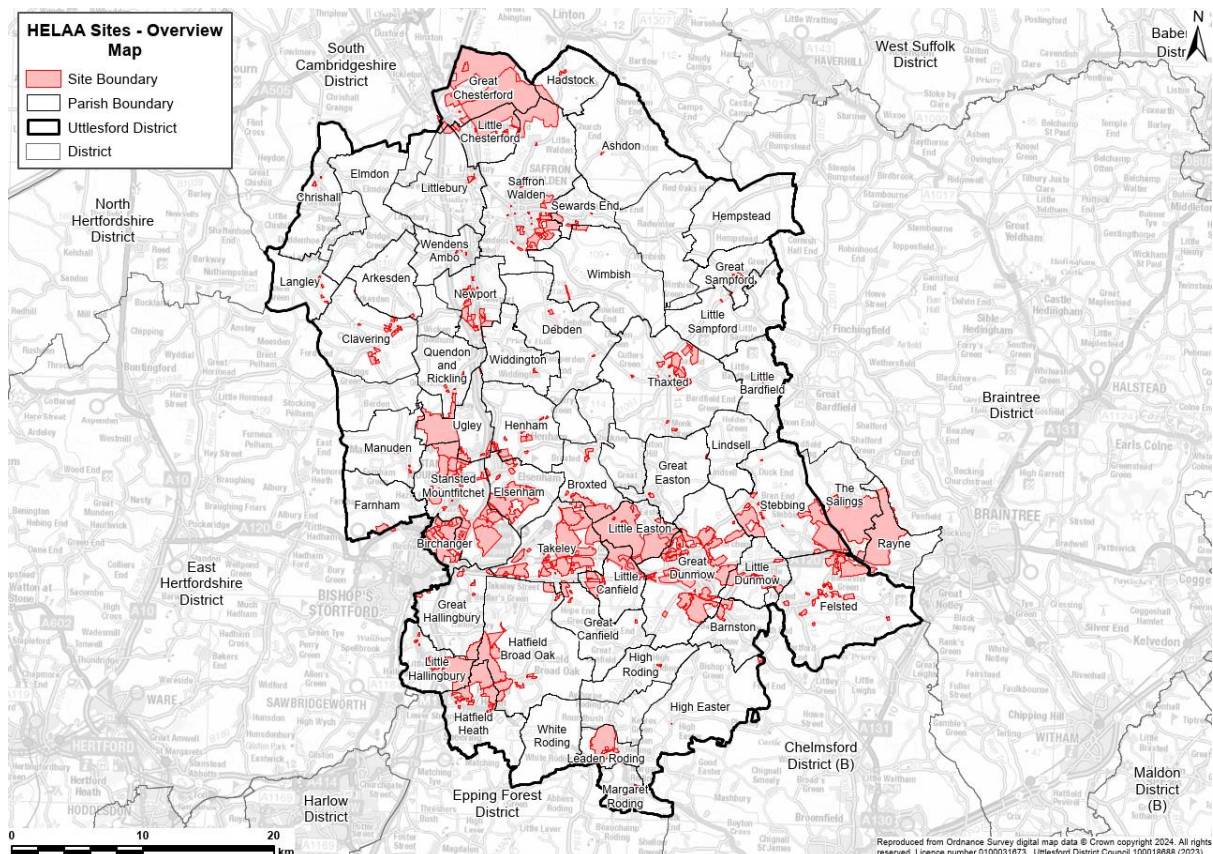
- 5.3.6 The **second step** was to sift-out sites not associated with a settlement falling within one of the top two tiers of the settlement hierarchy (other than garden community options; discussed below). None of the lower tier settlements are suited to a strategic allocation, given: A) relatively high car dependency; B) none are known to be associated with a clear case for strategic growth (e.g. to deliver a primary school); and C) the lack of a ‘numerical argument’ as per the case against garden communities (see Section 5.2).
- 5.3.7 The remaining site options (strategic sites associated with a higher order settlement plus new settlement options) were then subjected to assessment of development related constraints and opportunities, as reported in the Site Selection Topic Paper (SSTP) that is available at the current time.
- 5.3.8 All of these site options are discussed in Section 5.4, informed by the officer-led assessment.

## Garden community options

- 5.3.9 As discussed in Section 5.2, there is little strategic argument for giving further detailed consideration to new settlement options at the current time, particularly larger options. This was the position taken in 2023, when preparing the Draft Local Plan / ISA Report, and it is even more so the case now, given the imperative or progressing the Local Plan, as understood on the basis of the December 2023 “intervention letter”. However, that is not to say that options need not be discussed further. It is still appropriate to give proportionate consideration to options on their merits, for the reasons set out in Section 5.2.
- 5.3.10 Figure 5.2 shows all site options considered through the HELAA, and from this figure it is apparent where land has been submitted that could conceivably deliver a new settlement, namely: 1) Great Chesterford; 2) North of Stansted Mountfitchet; 3) several locations along the A120 corridor between Birchanger and Great Dunmow; 4) the eastern extent of the District / west of Braintree; and 5) north of Hatfield Heath (also perhaps Leadon Roding). These new settlement options are being actively promoted to greatly varying extents, and it should be noted that two of the options being promoted most actively are two of the three new settlement options that featured in the withdrawn local plan, namely the option to the north of Great Chesterford (‘North Uttlesford’) and the option to the west of Great Dunmow (‘Easton Park’). It is important to account for the degree of active promotion, given the work involved with progressing a new settlement.

- 5.3.11 Further targeted and proportionate discussion is presented in Section 5.4.

**Figure 5.2:** All site options considered through the HELAA



## 5.4 Sub-area scenarios

### Introduction

5.4.1 Discussion has so far focused on A) ‘top down’ considerations of housing quantum and broad distribution issues / options; and B) ‘bottom-up’ consideration of site options. The next step is to consider each of the District’s sub-areas in turn, exploring growth options, including growth from sites allocated in combination.

#### What sub-areas?

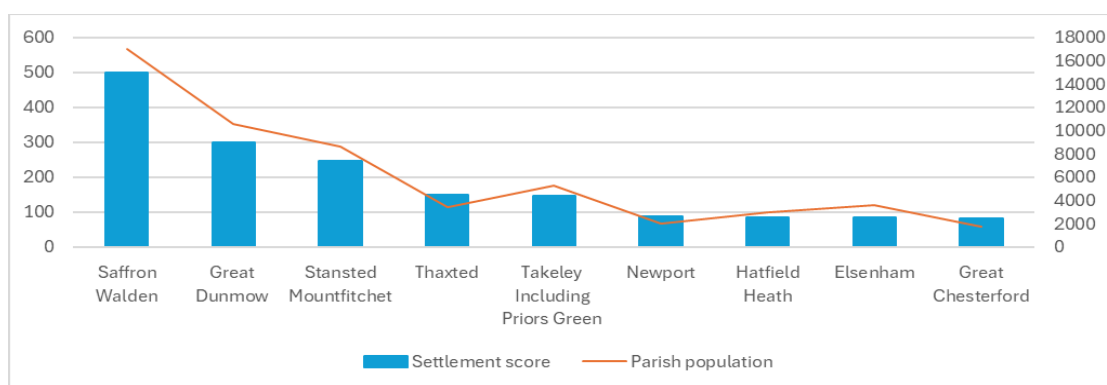
5.4.2 In the Uttlesford context it is clearly the case that each of the higher order settlements warrants being considered in turn, with a final discussion then dealing with ‘the rest of the District’.

5.4.3 Hence sub-areas are as follows:

- Key Settlements (Saffron Walden, Great Dunmow and Stansted Mountfitchet)
- Local Rural Centres (Thaxted, Takeley, Newport, Hatfield Heath, Elsenham and Great Chesterford)
- Larger villages

5.4.4 Settlements are discussed in order of ‘service score’, as set out in the Settlement Hierarchy Study (2024).

**Figure 5.3: Key findings of the Settlement Hierarchy Study (2024)**



### Methodology

5.4.5 The aim is to conclude on reasonable ‘sub-area scenarios’ that need to be taken forward to Section 5.5 of the report, where sub-area scenarios are combined in order to arrive at reasonable growth scenarios.

5.4.6 The aim is *not* to present a formal appraisal of reasonable alternatives. Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment. The aim is not to discuss all site options to precisely the same level of detail, but rather to focus attention on those *judged to be more marginal*, i.e. where the question of whether or how to take the option forward is more finely balanced. This aligns with the legal requirement to explain reasonable alternatives in “outline” terms.

5.4.7 For each sub-area, the first task is to introduce the key strategic issues and opportunities, and the level of recent and committed growth. The primary task is then to place non-committed sites / site combinations in a broad sequential order of preference. As part of this, reliance is placed on officer-led site assessment work discussed above and a range of other sources of available evidence.

5.4.8 It is naturally the case that site options low down the order of preference can be discussed relatively briefly where it is the case that better performing sites would together a quantum of homes in line with what would be required under a reasonable high growth scenario, given:

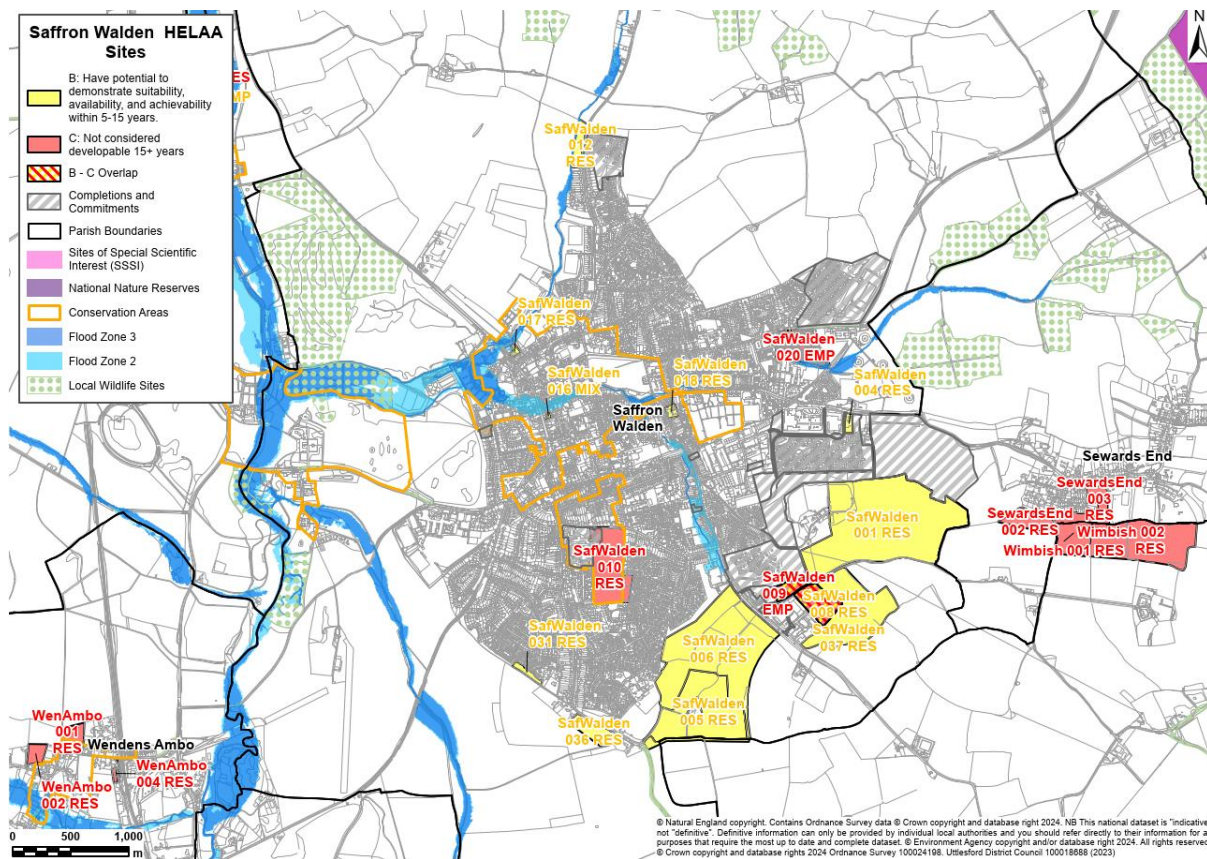
- clear arguments for distributing growth broadly in line with the settlement hierarchy (see Figure 5.3); and
- understanding of the total quantum of homes needed from ‘new supply’ district-wide (*max* ~6,000).

5.4.9 Each section ends by concluding on reasonable growth scenarios to progress to Section 5.5. This inevitably involves applying a degree of pragmatism, i.e. there is a need to avoid progressing too many sub-area scenarios to Section 5.5, in order to aid the final step in the process (defining growth scenarios).

## Saffron Walden

- 5.4.10 Saffron Walden is comfortably the highest order centre in the District and so is well-suited to receiving a good proportion of growth over the plan period. The town is located in the north of the District, in relative proximity to Cambridge, and is located along the M11 / rail corridor (and, in turn, the River Cam corridor).
- 5.4.11 However, M11 Junction 9 is ~7km distant and the train station is ~3km to the west of the town. There is also an inherent transport constraint, with no A-road link or orbital routes / bypasses to the town centre. As well as inherent transport challenges, there is a clear heritage constraint (including given traffic through the historic town centre) and the town is surrounded by a valued rolling chalk influenced landscape.
- 5.4.12 The Chesterford Research Park is located to the north of Saffron Walden, where there is an opportunity for significant investment and growth. Also, the Wellcome Genome Campus is located adjacent to M11 Junction 9 (within South Cambs), with consent for up to 150,000m<sup>2</sup> of employment floorspace and up to 1,500 homes. Further significant employment growth to the south of Cambridge can also be anticipated.
- 5.4.13 **Completions** since the start of the plan period were quite low, but **commitments** are fairly high: 1,020 homes as of April 2023. In total, completions and commitments amount to 7% of the population, which is mid-ranking when compared to the other higher order settlements discussed within this section.<sup>9</sup>
- 5.4.14 Additionally, there was a significant amount of expansion in the years preceding the start of the plan period, and there is a general perception that **infrastructure** provision alongside growth has been sub-optimal.
- 5.4.15 The **HELAA sites** at Saffron Walden are shown below alongside completions and commitments. It can be seen that there are extensive completions and commitments to the east of the town. Also, by way of orientation, it should be noted that the western part of Site 006 was permitted in 2023 ([UTT/22/3258/PINS](#)).
- 5.4.16 After having discounted non-strategic sites (see Section 5.3), attention focuses on land to the **east and south east**. There are six sites here, stretching from the Debden Road in the south, via the Thaxted Road (B184) to the Swards End / Radwinter Road (B1053) in the north.

Figure 5.4: HELAA sites at Saffron Walden



<sup>9</sup> N.B. figures for completions and commitments by settlements will be updated prior to publication.

- 5.4.17 A logical starting point is the two central sites **adjacent to the north of Thaxted Road (B184)**. In particular, a starting point is Site 008/9, which was allocated in the Draft Plan (2023) to deliver Saffron Walden's established need for industrial land (3ha), but was subsequently granted planning permission for 55 homes by the Planning Inspectorate ([UTT/23/3112/PINS](#)).
- 5.4.18 Moving on to the other sites located in the northern sector, i.e. **between the two B-road corridors**, there is a clear case for considering the three sites in combination, including with a view to maximising the infrastructure delivery opportunity, not least in terms of road connectivity between the B-road corridors. There is an established opportunity for a new distributor road, e.g. suited to HGVs alongside safe cycling.
- 5.4.19 These sites would be less-well contained in topographical terms than the committed sites to the west. However, there is the potential to draw upon topography to contain growth, particularly given a proposal to deliver adjacent raised land to the east as a large country park. This was identified as a possibility within the Draft Plan (2023) and then detailed work has been undertaken subsequently through a SANG and Country Park Study (2024). Also further detailed masterplanning work has been completed.
- 5.4.20 The final two sites to consider are located to the **south of Thaxted Road (B184)**. Topography is a key consideration here, with the land rising to the south, towards a high point within the southern-most site (Site 005). In this light, it is the northern-most site (Site 006) that is clearly preferable, plus this site is better-connected in transport terms. Also, Site 005 is associated with a listed farmhouse and a footpath.
- 5.4.21 Focusing on Site 006, it should be noted that the western part of this site gained permission for 170 homes in 2023 ([UTT/22/3258/PINS](#)). This was subsequent to the cutoff date for preparing the Draft Local Plan.
- 5.4.22 With regards to growth scenarios, a starting point is the position taken at the **Draft Plan stage (2023)**. Specifically, the preferred approach was to support comprehensive growth to the east and southeast, comprising: A) all of the sites between the B-road corridors; and B) Site 006 to the south of Thaxted Road.
- 5.4.23 Also, a lower growth scenario was formally examined that omitted Site 006 (i.e. Site 006 was a 'variable').
- 5.4.24 With regards to Site 005, this was ruled out / not progressed to the RA growth scenarios, but it was highlighted as 'noted' in Figure 5.15 of the ISA Report (2023). This was particularly with a view to flagging the possibility of more comprehensive growth at Saffron Walden aimed at securing an eastern bypass. However, no consultation response was received from the landowner through the consultation in 2023.
- 5.4.25 **At the current time**, there is considered to be a strong argument for broadly taking forward the preferred approach from the Draft Plan stage as a 'constant' across the RA growth scenarios. The strategy for Saffron Walden generated relatively limited objection through the consultation in 2023, and the County Council is strongly supportive of strategic growth that is able to deliver a new primary school, recognising that this will also serve the recent / permitted urban extensions to the east of Saffron Walden.
- 5.4.26 Also, it is the case the higher growth scenario was broadly found to perform well through the appraisal in 2023 (N.B. it featured in four of the five growth scenarios appraised, reflecting a view that the decision to test a lower growth scenario was marginal). Having said this, one of the benefits of higher growth in 2023 was thought to be around delivering new secondary schools capacity within Site 006 and, in this respect, the situation has moved on, in that there is now less certainty that additional capacity is needed, and there is thought likely to be capacity for the existing secondary school to expand if needed (although this is a detailed matter subject to further feasibility work following the plan; the plan can ensure contingencies via support for new capacity at Stansted Mountfitchet and Takeley, as discussed further below).
- 5.4.27 The new proposed approach to growth is a notable evolution from that proposed in the Draft Plan, including given the 'loss' of Site 008/9 as an employment site. Also, and to reiterate, the plan is now being prepared with an understanding that the western part of Site 006 has permission for 170 homes.
- 5.4.28 However, the new proposed approach remains broadly similar to that from 2023. Taking the sites in turn:
- At Site 001 the current proposal is broadly as per 2023, including a primary school. It should be noted that the permitted site adjacent to the north was included as a proposed allocation in the Draft Plan.
  - The main question is around land uses within: A) the remaining non-permitted part of Site 006; and B) Site 007. Both of these sites are owned by the Audley End Estate, plus the Estate owns the two fields adjacent to the east of Site 007, which are now being considered for delivery of the first phase of a future country park, as discussed within the Country Parks and SANG Study (2024). N.B. this would be in addition to appropriate green space within the allocation.

- 5.4.29 Latest understanding is that the required industrial land will be provided for within Site 007, which will mean that the remaining unpermitted part of Site 006 is primarily used to deliver new residential, along with two areas of green space on raised land at the southern extent of the site. To reiterate, land for secondary school capacity is no longer required.
- 5.4.30 Overall, there is now little question that the remaining unpermitted part of Site 006 must feature within the plan, including as it is owned by the Audley End Estate, who are now also set to deliver employment land and the first phase of what could become a country park (plus part of a new distributor road, which was always known to be the case). However, there is a notable surface water flood risk constraint here.
- 5.4.31 The remaining outstanding question is around comprehensive growth with a long term perspective, with a view to realising benefits and avoiding sub-optimal development ‘creep’ (see map of topography [here](#)). Concerns regarding sub-optimal piecemeal development were discussed in the Interim SA Report (2023), and the situation now is even more stark, with two parts of the previous proposed allocation now permitted.
- 5.4.32 In this regard, it is noted that Site 005 is owned by a developer and that the Audley End Estate own further land to the east and south east of Site 006. However, no ‘more comprehensive’ growth scenario can currently be identified as developable; hence Saffron Walden is progressed to Section 5.5 as a constant.
- 5.4.33 As a final point, it is recognised that there are inherent transport (and related air quality) challenges affecting Saffron Walden. These matters are discussed further in Section 9 of this report, but one point to note here – in support of the conclusion to hold constant the emerging proposed approach to growth at Saffron across the RA growth scenarios – is the conclusion of the Sustainable Transport Study (2024) that there is “significant potential for a drastic mode shift” away from the private car. Coordinated and comprehensive growth could help to deliver infrastructure in support of this ambition.

**Table 5.1: Saffron Walden growth scenarios (new supply only) progressed to Section 5.5**

Progressed scenarios		Homes	Employment land
1)	Strategic growth to the east and southeast	879*	~3ha

N.B. a primary reason for this figure being reduced relative to 2023 is the permission (170 homes) within Site 006.

## Great Dunmow

- 5.4.34 Great Dunmow is located in the south of Uttlesford, on the A120 corridor and near equidistant between Braintree to the east and Bishops Stortford to the west. It is a historic settlement associated with the River Chelmer corridor and the intersection of north-south and east-west historic routes (Roman Roads). However, Great Dunmow has expanded well-beyond the linear historic core area, including in the direction of bypass roads. As can be seen from the [historic mapping](#), the town was historically located to the west of the River Chelmer, with the small village/hamlet of Church End to the east, straddling the river corridor.
- 5.4.35 High recent and committed growth is a key feature of Great Dunmow, and it is also important to note that the Local Plan withdrawn in 2020 proposed two garden communities in the vicinity of Great Dunmow (discussed further below). The Town Council [website](#) explains recent and committed growth locations, and another map is available on the Little Easton Parish Council [website](#). Both maps show extensive recent and committed sites (also, in the latter case, a previously proposed garden community), but both maps are out of date as they do not show Land East of Highwood Quarry, which is located to the west of Great Dunmow and which gained permission at appeal for 1,200 homes in 2023 ([UJT/21/1708/OP](#)).
- 5.4.36 Growth has delivered strategic infrastructure; however, as per Saffron Walden, there is a concern that piecemeal growth in the absence of an up-to-date local plan has led to infrastructure capacity issues and opportunities missed. There have recently been [challenges](#) delivering a new secondary school.
- 5.4.37 **Completions** since the start of the plan period and **commitments** are both very high. In total, completions and commitments totalled 2,777 homes as of April 2023, which amounts to 26% of the population (10,624 as of the 2021) and, as discussed, there have been significant permissions post April 2023.<sup>9</sup>
- 5.4.38 The **HELAA sites** at Great Dunmow are shown below. By way of orientation, it is important to note that the ‘white’ land adjacent to the west of the town is committed / under construction. Also, the ‘white land’ at the very southeast extent of the map is set to deliver a solar farm and a community woodland.

- 5.4.39 The first point for consideration is **new settlement options**, albeit the strategic case is weak in the context of the current local plan, as discussed in Section 5.3.
- 5.4.40 The primary option for consideration is to the **west of Great Dunmow**, where Site 004MIX is now a committed site for 1,200 homes (as discussed) but was previously proposed as the eastern extent of a much larger new settlement known as Easton Park - see Figure 5.5. The remaining part of the previously proposed Easton Park scheme (i.e. land to the west of the East of Highwood Quarry site) is still being promoted, and comprises the former Easton Park estate (cleared for a WWII airfield, as discussed [here](#)).
- 5.4.41 Three further figures are presented below in order to explain the situation:
- Figure 5.6 is the concept masterplan for Easton Park (up to 10,000 homes between Great Dunmow and Takeley) submitted to the Council by the site promoter in 2021 (includes East of Highwood Quarry).
  - Figure 5.7 is the land use strategy for East of Highwood Quarry.
  - Figure 5.8 is an 18<sup>th</sup> Century map showing the East of Highwood Quarry site adjacent to Easton Park.
- 5.4.42 The Easton Park site excluding Land East of Highwood Quarry is associated with a range of significant constraints, including relating to biodiversity (High Wood SSSI and related smaller woodlands, including ancient woodland and others designated as a County Wildlife Site) and the historic environment (investigated in detail as part of the examination of the withdrawn local plan). There are also clear transport connectivity challenges, including in respect of M11 Junction 8 and the viability and ultimately deliverability of a Bus Rapid Transport (BRT) scheme, or otherwise transformative public transport connectivity, recognising the lack of rail connectivity (albeit the nearby airport is a public transport hub).
- 5.4.43 Matters were explored in detail in the Inspectors' [letter](#) that reached conclusions on the withdrawn local plan (2020; see from paragraph 100), and it should be noted that whilst upgrades to M11 Junction 8 are [ongoing](#), Road Investment Strategy (RIS) 3 is still forthcoming (due in 2024, as discussed [here](#)).
- 5.4.44 Finally, it should be noted that the potential to deliver Easton Park as a major new country park has been identified through the Country Parks and SANG Study (2024) – see Figure 5.9. This could deliver major benefits in terms of avoiding recreational pressure on Hatfield Forest, and it is also important to note that the country park would encompass High Wood SSSI, which can be seen on the figures below, and risks otherwise being encompassed by development or infrastructure on all sides. The SSSI is in 'unfavourable' condition, although this is understood to be primarily as a result of deer grazing/browsing. The SSSI is currently inaccessible, and so there could feasibly be some merit in exploring accessibility options, including noting that was formally associated with an avenue leading to Easton Park to the north (there is ruined gatehouse at the southern extent of the wood, adjacent to the B1256 / A130 junction).
- 5.4.45 The other two new settlement options are being less actively promoted, but still warrant brief consideration:
- South of Great Dunmow – this was *not* a proposed new settlement in the withdrawn local plan (2020), but the latest situation is that a 134 ha site has been submitted as available (Site 007), plus Site 006 is available to the east. There is potentially a degree of landscape capacity in this area, given the potential for growth to be contained within the valley of Martel's Brook, the site would be well-placed to deliver employment land and the potential to deliver community facilities to the benefit of Barnston (a small village with limited historic sensitivity) is of note. However, the A120 is a clear barrier to effective connectivity with Great Dunmow, and a key area of land south of the A120 junction is not available.
  - East of Great Dunmow – the withdrawn local plan (2020) proposed to allocate the western part of a larger garden community known as West of Braintree, the bulk of which would have been located within Braintree District, and which was proposed to be allocated through a Joint Plan prepared by the North Essex Authorities (NEA). However, the Inspectors for the withdrawn Uttlesford Local Plan raised some concerns – particularly in respect of the viability and deliverability of a BRT scheme – and then the allocation was deleted by the Inspector for the NEA Joint Plan in December 2020 (as discussed above). Clearly it is for Braintree District to take the lead on any further consideration of a new settlement here and, in this respect, Braintree District adopted a Local Plan in 2022 and the review is at an early stage. The promoter did not submit a consultation response to the Uttlesford Draft Plan consultation in 2023.

Figure 5.5: HELAA sites at Great Dunmow

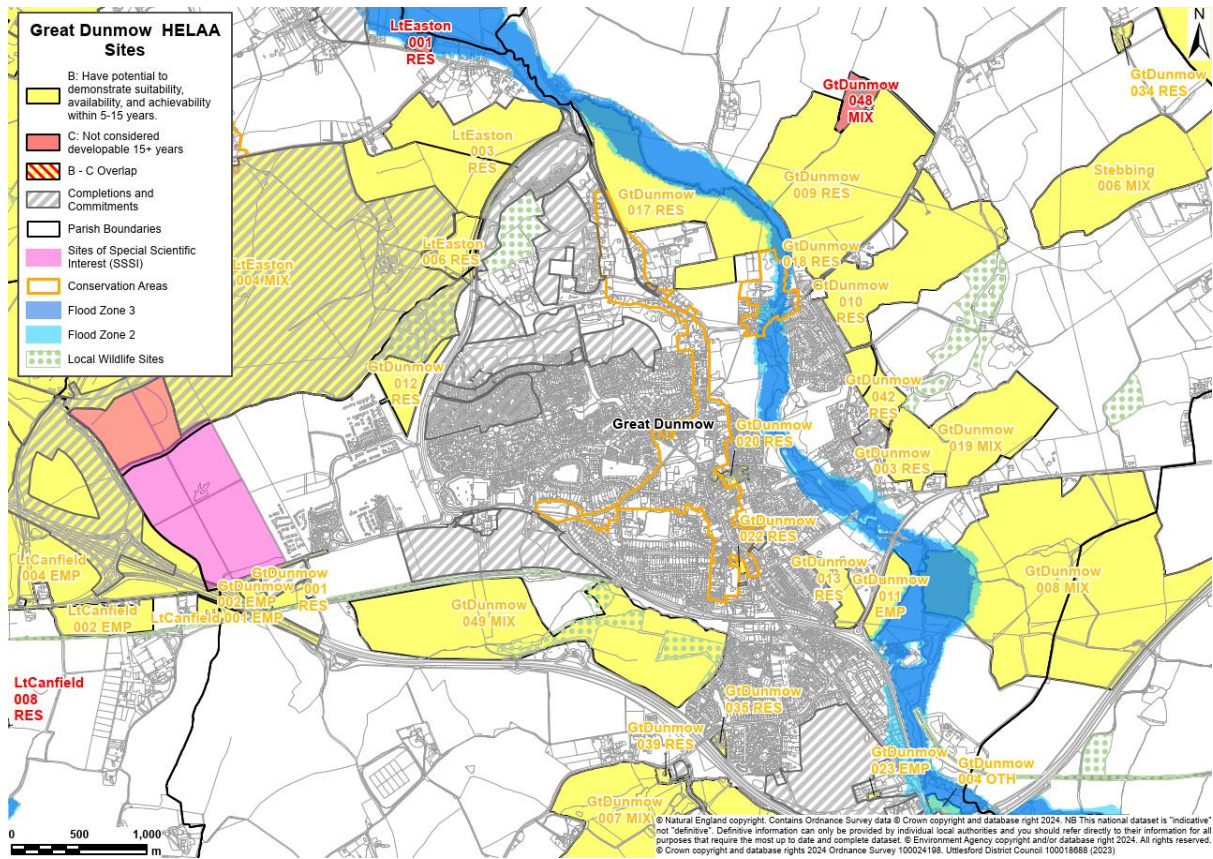


Figure 5.6: Easton Park (including Land East of Highwood Quarry) site promoter's concept plan (2021)





Figure 5.7: Land East of Highwood Quarry land use strategy (from application UTT/21/1708/OP)

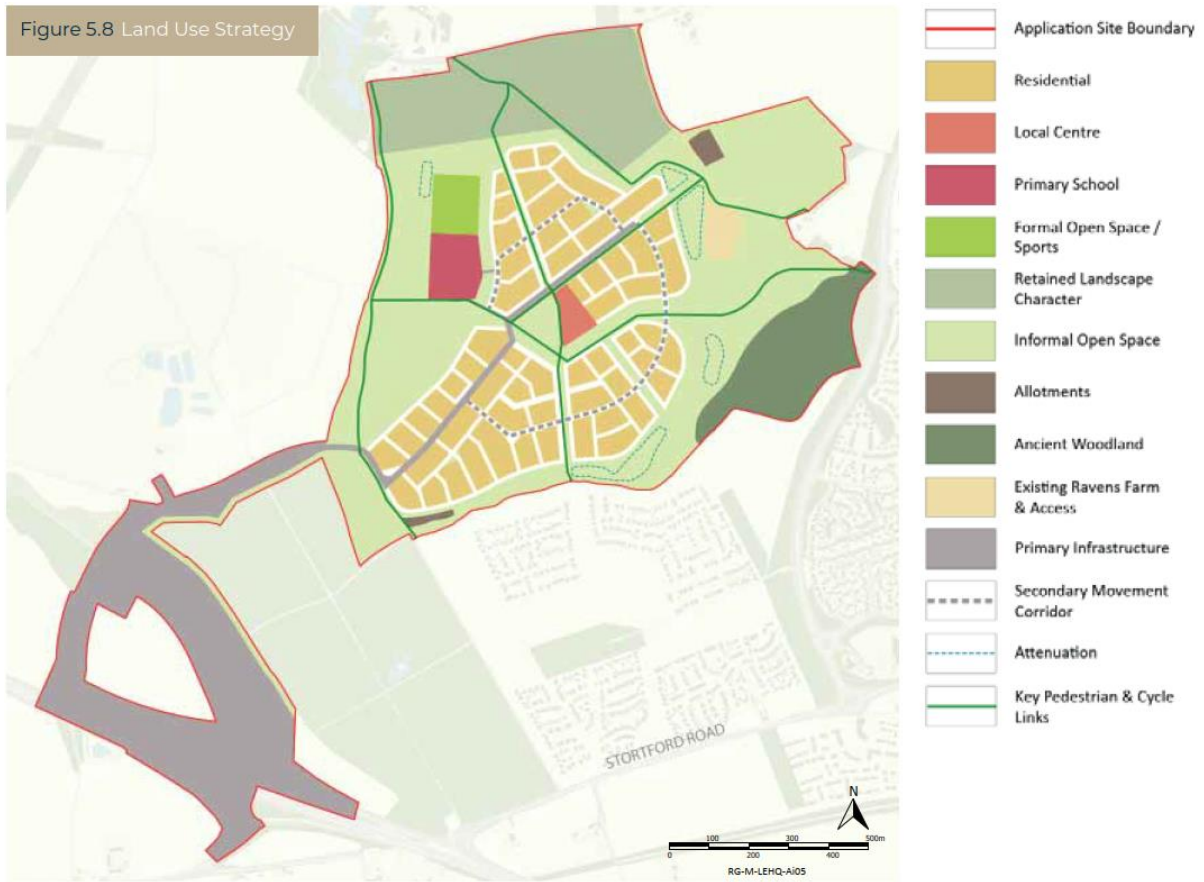
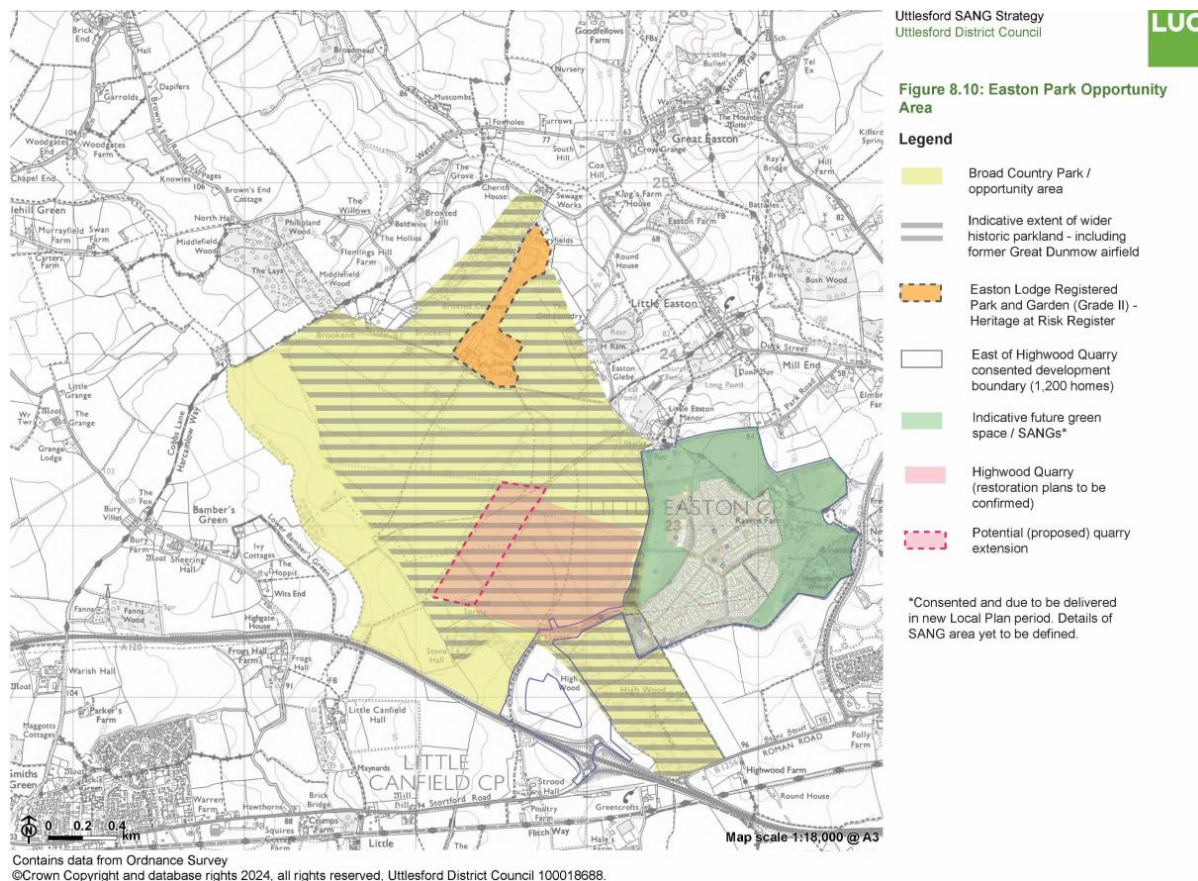


Figure 5.8: Land East of Highwood Quarry site location on 18<sup>th</sup> Century map (from application UTT/21/1708/OP)



Figure 5.9: Easton Park Country Park Opportunity Area



5.4.46 There are three broad strategic **expansion** options to consider.

5.4.47 Beginning with land to the **north** of Great Dunmow, there are two options here, both of which are considered to perform relatively poorly, namely: A) expansion beyond the B184, in the direction of Little Easton; and B) expansion east of the B1008.

5.4.48 With regards to (A), there is potentially a degree of landscape capacity given the potential to draw upon the Chelmer Valley for containment. However, the site would risk coalescing Great Dunmow with historic Little Easton / Mill End. The site would also relate poorly to the adjacent Land East of Highwood Park (discussed above), given extensive proposed greenspace proposed at the northeast extent of the site (see Figure 5.6). The site might alternatively be considered for a country park (discussed below).

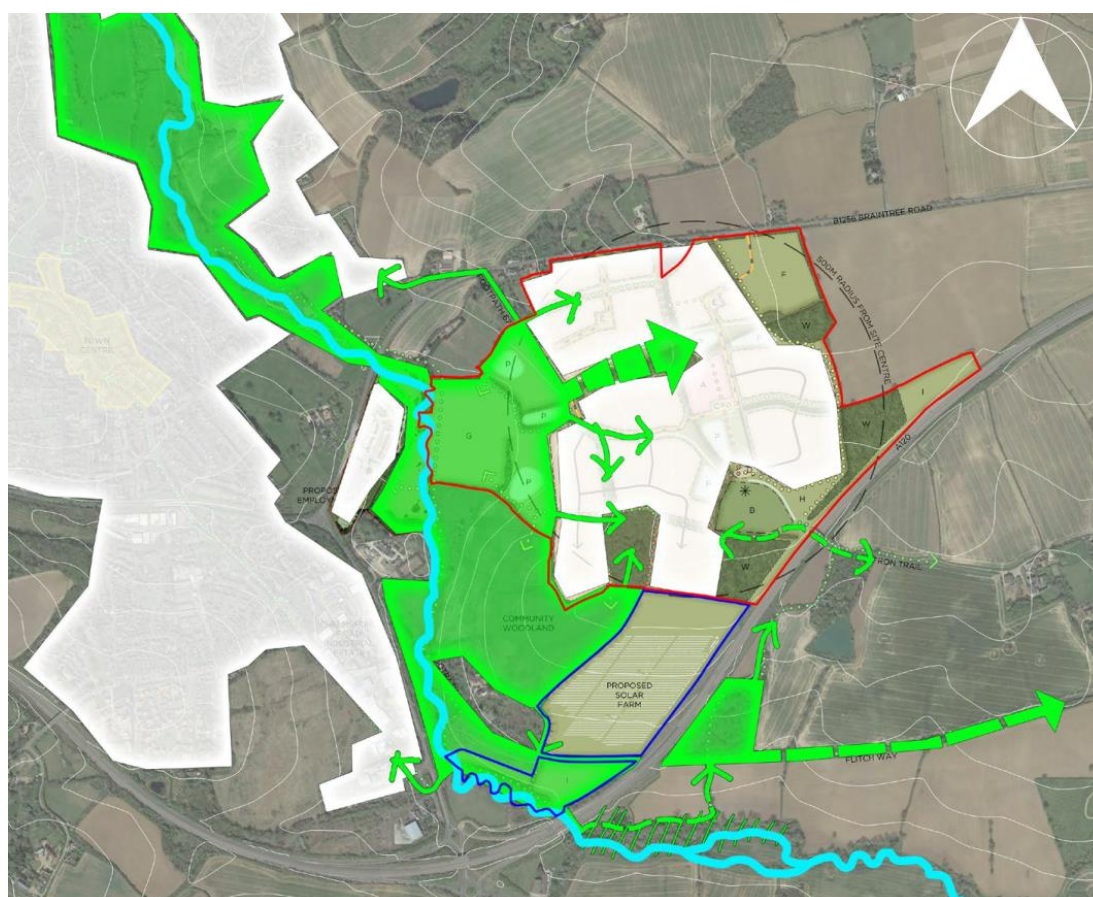
5.4.49 With regards to (B), the Interim SA Report (2023) explained:

*“... land here does relate well to Great Dunmow; however, there is significant historic environment constraint, given conservation areas to the west (Great Dunmow) and to the east (Church End) and also given an adjacent scheduled monument and potential archaeology within the site. There is also clear landscape constraint given views across the Chelmer Valley from the B1008. The option of a stand-alone strategic urban extension here can be ruled-out as unreasonable; however, this land parcel does warrant further consideration, ahead of plan finalisation, including potentially in combination with the option of strategic expansion in the vicinity of Church End (discussed below).”*

5.4.50 However, the status of this site has now evolved considerably, following a consultation response received in 2023 proposing to make the majority of the site available as accessible greenspace and also to deliver a care home (in addition to standard residential homes). This option is considered to perform strongly, particularly because in-combination with Site 009 – which was a preferred option at the Draft Plan stage and is discussed below – it would deliver comprehensive new green infrastructure, which is a matter that has been explored in detail through the Country Parks and SANG Study (2024). It is also fair to say that the site relates quite well to the settlement edge when viewed in isolation, particularly noting a housing site under construction for 125 homes to the north west and a committed site for 200 homes to the west (see Town Council [map](#)). However, it is recognised that there is a strong historic environment sensitivity associated not only with the two conservation areas, but also Parsonage Farm to the south.

- 5.4.51 Moving to the **east**, Site 009 would deliver a strategic urban extension to Church End and was a preferred option for 869 homes at the Draft Plan stage, although the option of non-allocation was also explored in detail through the appraisal of RA growth scenarios in the ISA Report. There are a range of issues and constraints, including inherent transport and historic environment challenges. However, work in 2023 showed an opportunity to deliver a comprehensive scheme that delivers benefits beyond new homes.
- 5.4.52 At the current time, there remains support for the site, in light of the consultation held in 2023, and because subsequent (and ongoing) detailed masterplanning has served to highlight the potential to adjust the scheme in such a way that issues are better addressed, and opportunities realised. In particular, the new proposal is for the eastern ~40% of the site to deliver strategic open space which, in combination with new strategic open space within the eastern part of Site 009 to the west (discussed above), would mean that the new community is flanked by new strategic open space on near-two sides.
- 5.4.53 Finally, to the **southeast**, the promoters of Site 008 have submitted vision documents over a number of years. The site was not allocated in the Draft Plan, nor did it feature in the RA growth scenarios at that time, but it was ‘noted’ in the ISA Report (2023) as a site potentially warranting further consideration. Understanding in 2023 was that the site would deliver 1,300 homes and a community hub (with a primary school), plus 2ha of the proposed built form was highlighted as “potential employment”.
- 5.4.54 Latest understanding on the basis of the consultation response received in 2023 is broadly similar, except that employment land is no longer proposed as an option. A key issue is that the site would be poorly linked to Great Dunmow, after having taken steps to avoid an extensive flood risk zone, and also noting that land to the south comprises a community woodland and land proposed for a solar farm (ref. [UTT/23/2136/FUL](#)). Also, parcels of land between the site and Great Dunmow are unavailable that might otherwise assist with connectivity, including historic Dunmow Park (although the south west part of the Park comprises HELAA Site 013). Figure 5.10 is taken from a superseded vision document (2021) but quite effectively highlights the issue of proposed built form being notably separated from Great Dunmow.
- 5.4.55 On balance, at this stage there is considered to be merit in exploring this site further through the appraisal of RA growth scenarios, as discussed further below.

**Figure 5.10:** Site promoter’s landscape concept plan for SE Great Dunmow (2021)

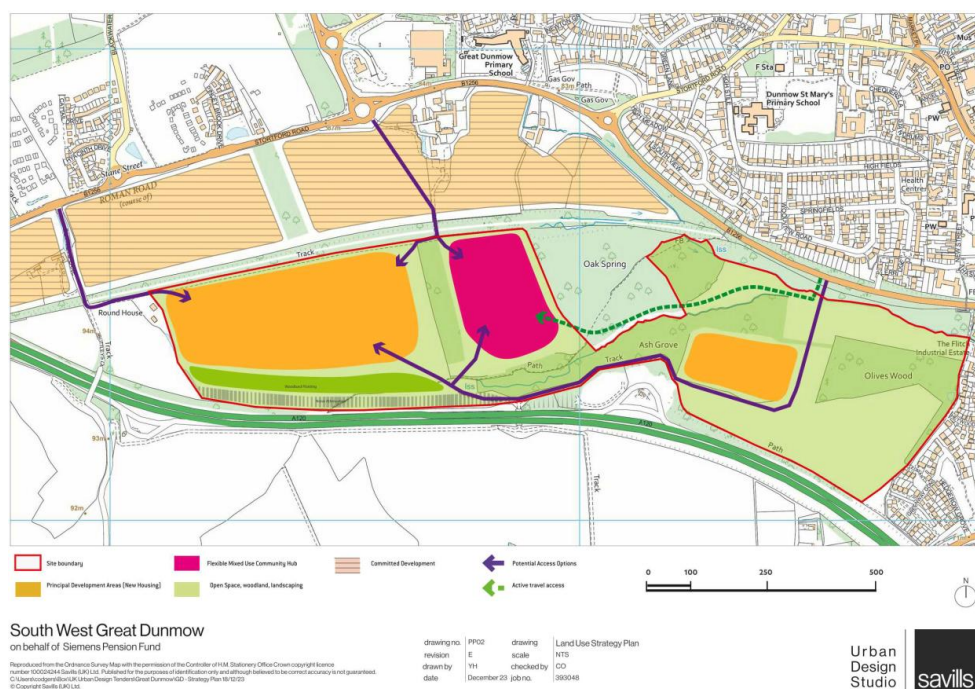


5.4.56 One final strategic urban extension option is located to the **southwest**, but this is considered to perform relatively poorly, in comparison to the northeast/east and southeast expansion options discussed above.

5.4.57 This is partly because the site was only submitted for the first time in 2023, and its scale and location is such that it would be a challenge to introduce to the plan without further consultation under Regulation 18. Also, there are clear challenges around the need to cross the Flitch Way, which is a country park and long distance cycle route (and a [study](#) was completed in 2023 exploring cycle connectivity options, which did not account for this proposed scheme). Also, there are considerable onsite constraints, particularly in the form of locally designated woodland (shown in figures presented above and below), but also in the form of an associated stream corridor. Furthermore, High Wood SSSI is in very close proximity.

5.4.58 Overall, the eastern part of the site is quite heavily constrained, and so the landowner (also the land owner of the majority of the committed land to the north) might reconsider proposals for this area, ideally whilst retaining the proposal to provide land for a new primary school (the current proposal is for between 500 and 700 homes). Finally, there is a need to consider implications for the permitted sites to the north (ideally the whole area would have been considered comprehensively) and it is generally the case that there is a very high level of current and forthcoming growth to the west of Great Dunmow (which also potentially calls into question when this site would be delivered).

**Figure 5.11: Site promoter's concept plan for SW Great Dunmow (2023)**



5.4.59 As a final step, there is a need to briefly consider **smaller site options**, albeit there is very little strategic case for this in the context of Great Dunmow, where there is an established need to focus growth with a view to delivering new infrastructure. Smaller options are focused to the east of the town, bar Site 013, which comprises the western extent of Dunmow Park, and is clearly constrained in heritage terms.

5.4.60 Taking the sites to the east of the town in turn, from north to south:

- Sites 010 and 018 – these form part of the strategic allocation option discussed above. There would be clear opportunities missed in terms of delivering new community, transport and green infrastructure.
- Site 042 – the southern part of the site benefits from a resolution to grant planning permission for 32 self / custom build homes ([UTT/22/2035/FUL](#)), which would extend a recently delivered scheme adjacent to the southwest. There are clear historic environment sensitivities on account of an adjacent Grade II listed windmill, and there is no reason to suggest potential to deliver an extended strategic scale scheme.
- Sites 003 and 019 – there is a pending planning application for 51 homes at the western extent of this area ([UTT/24/0213/FUL](#)), and there is also planning permission here for 31 self / custom build homes. An extended scheme would not relate well to the settlement edge, and this is rising land visible from the Braintree Road, plus there is a public footpath through the site linking to Stebbing.

5.4.61 Finally, it should be noted that Sites 042, 003 and 019 are in the same land ownership (also, the same landowner was involved with the recently delivered adjacent scheme). A single consultation response was received covering these sites in 2023 (ref. 3995), promoting the land for 400 homes, although few details were provided, and there were no commitments made regarding new infrastructure.

5.4.62 The situation across these sites, to the east of Great Dunmow, serves to highlight the importance of taking a strategic approach to growth whereby benefits are realised over-and-above new homes, including with a view to addressing what is widely perceived to be an infrastructure deficit affecting Great Dunmow as a result of non-plan-led housing growth over a number of years.

**Figure 5.12:** Figure from application UTT/24/0213/FUL (Site 003) also showing the recently delivered scheme to the west and a site to the north with a resolution to grant permission (southern part of 042)



5.4.63 In **conclusion**, whilst the ISA Report (2023) explored both the emerging preferred approach and a reasonable alternative approach involving no strategic allocation, at the current time this reasonable alternative is ruled out as unreasonable. It was not shown to have particular merit through the appraisal, nor through the consultation in 2023. At this stage in the process it would represent a major departure from the previous strategy, e.g. perhaps calling into question delivery of a secondary school at Takeley.

- 5.4.64 However, there is still considered to be a strong strategic argument for exploring RA growth scenarios at Great Dunmow, given the recent and ongoing experience of sub-optimal piecemeal growth and, in turn, the importance of delivering strategic growth in such a way maximises infrastructure and wider benefits. Also, there are historic environment and landscape constraints, and public transport connectivity is an issue, with no train station and relatively poor bus connectivity (Sustainable Transport Study, 2024).
- 5.4.65 On balance, in addition to the emerging proposed approach which involves strategic expansion to the northeast / east (Sites 017 and 009 respectively) it is reasonable to also explore a scenario involving an alternative focus of growth to the southeast (Site 008), as well as a scenario involving both a focus of growth to the southeast (Site 008) and the smaller site to the northeast (Site 017). It is recognised that there is also a feasible scenario involving Site 009 to the east only (as per the Draft Plan, 2023), but this scenario is not progressed to Section 5.5 on balance (given a need to minimise the number of scenarios).
- 5.4.66 No other omission sites stand-out as being ‘of note’ at the current time, i.e. in the context of the current Local Plan (given the strategic factors discussed in Section 5.2). However, it is recognised that further consideration will need to be given to option of Easton Park through the next Local Plan.
- 5.4.67 Also, it is recognised that there is feasibly the possibility of allocating all three of the sites progressed to Section 5.5, namely Sites 009 and 017 to the northeast / east and Site 008 to the southeast. Also, as part of this, consideration could also feasibly be given to the intervening collection otherwise set to come forward in a piecemeal fashion (Sites 042, 003 and 019). The potential for comprehensive planning for the eastwards expansion of Great Dunmow might be envisaged, achieving benefits over-and-above what is being achieved via committed expansion to the west, and recognising that all land to the east of Great Dunmow is quite sensitive in landscape terms (see the [Landscape Sensitivity Study](#), 2021). As part of this, the potential for comprehensive planning for green/blue infrastructure along the River Chelmer corridor might be envisaged, stretching from land to the northwest of Great Dunmow via Church End to SE Great Dunmow and potentially beyond (noting the Flich Way and Saffron Way).
- 5.4.68 However, this would call into question work that has been undertaken regarding infrastructure capacity, including road infrastructure. There is a need to proceed with caution regarding planning for the A120, including with a focus on public and active transport, and awaiting certainty on M11 J8 upgrades is part of this. Another consideration is waste-water treatment (see the Stage 2 Water Cycle Study, 2024).
- 5.4.69 In light of the above, there are two reasonable growth scenarios, which are set out below.
- 5.4.70 Finally, with regards to **employment land**, the current proposed approach is a modest evolution from the proposal at the Draft Plan stage. Specifically, whilst the proposal in 2023 was to allocate the two fields to adjacent to the west of the A120 junction at High Wood (west of Great Dunmow), namely Site Lt Canfield 004EMP, for a total of 15 ha industrial and logistics land against a need figure of 5-10 ha, the new proposal is to additionally allocate a small field to the east of the junction, with a view to 18 ha of industrial/logistics land and also a mobility hub (discussed further below). Also, the effect of allocating the additional field would be to link more effectively to existing employment land nearby to the southeast.
- 5.4.71 The site comprises the southern extent of the Easton Park new settlement option (Figure 5.5) and is constrained by a Grade II listed building associated with a former entrance to Easton Park, as well as a public footpath and a stream corridor. The ISA Report flagged the possibility of supporting only the part of the site closest to the A120 junction (also mindful of maintaining a strong landscape gap to Takeley), and this remains a possibility given the identified need for new industrial/logistics land at Great Dunmow. However, the proposed allocation met with limited objection through consultation in 2023, and there is clear merit in a comprehensive scheme. On balance, only one employment land scenario is progressed.

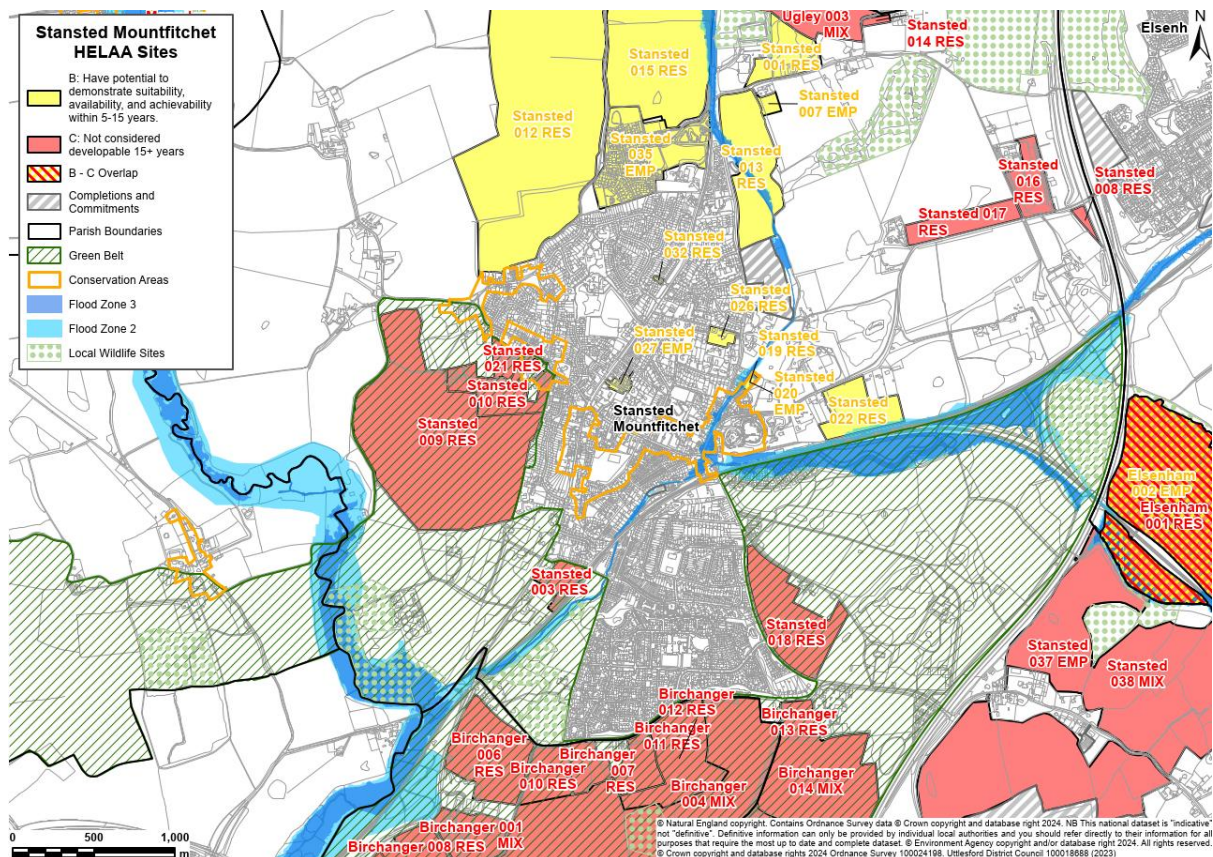
**Table 5.2:** Great Dunmow growth scenarios (new supply only) progressed to Section 5.5

Progressed scenarios		Homes	Employment
1)	Strategic growth to the northeast (Site 017) and east (Site 009)	917	18ha site to the west (Little Canfield Parish)
2)	Strategic growth to the southeast (Site 008)	1,250	
3)	Strategic growth to the northeast (Site 017) and southeast	1,453	

## Stansted Mountfitchet

- 5.4.72 Stansted Mountfitchet is a smaller settlement than Great Dunmow, but there is a secondary school and a leisure centre (located at the southeast extent of the settlement), and the settlement is ultimately placed in the top tier of the settlement hierarchy (Key Settlement) by the Settlement Hierarchy Study (2024).
- 5.4.73 The village also benefits from a train station as well as very good links to Bishops Stortford and Stansted Airport, where there is extensive employment. Another strategic consideration is close links to Elsenham, to the east, where there is very high committed growth from sites that have gained permission ahead of the Local Plan and, in turn, in a somewhat piecemeal fashion leading to infrastructure challenges. M11-bound traffic associated with growth at Elsenham is a further consideration.
- 5.4.74 With regards to strategic constraints to growth, the key point to note is that the southern half of the settlement edge is constrained by the Green Belt. There are feasible growth options here, including land sites/land with good accessibility credentials. However, demonstrating the ‘exceptional circumstances’ necessary to justify Green Belt release would clearly be very challenging, given other options for growth at Stansted Mountfitchet itself and elsewhere within the District outside of the Green Belt.
- 5.4.75 **Completions** since the start of the plan period and **commitments** (as of April 2023) are both very low in comparison to other higher tier settlements. However, there was notable growth prior to the start of the plan period – most recently to the north and, prior to that, to the south (c.2010).<sup>9</sup>
- 5.4.76 The **HELAA sites** at Stansted Mountfitchet are shown below. By way of orientation, the railway line runs west to east through the centre of the settlement, whilst the M11 is to the east, with Stansted Airport and Elsenham beyond. Also, Site 035EMP is under construction for a residential-led scheme.

Figure 5.13: HELAA sites at Stansted Mountfitchet



- 5.4.77 From the figure above it is clear that strategic expansion options are focused to the **north** of the settlement and, in particular, attention focuses on Site 015 RES, which was a proposed allocation at the Draft Plan consultation stage for 250 homes. There remains support for this scheme, in light of the consultation, and the current situation is that the applicant is consulting locally ahead of a planning application, with an initial proposal for 350 homes in 2023, and the latest proposal being for 270 homes (see [here](#) and [here](#)).
- 5.4.78 It is unfortunate that the scheme would represent phase two of an urban extension that might alternatively have been planned for comprehensively. However, a key point to note is that a large area of land is proposed to be made available as strategic greenspace at the northern extent of the site, which could play an important role in terms of defining the northern extent of the settlement and would link quite effectively to the wider countryside, noting public rights of way and the proximity of valued areas to the east.
- 5.4.79 The other key site for consideration is then Site 012, known as West of Pennington Lane. This site was not a proposed allocation at the Draft Plan stage (2023), but it was examined closely through the appraisal of RA growth scenarios at that stage. Section 5.4 of the ISA report explained:
- “A key consideration here [north of SM, west of the B1351] is the need to deliver a strategic scale scheme able to deliver a primary school, as there is understood to be a need for a new primary school at Stansted Mountfitchet (the existing school could be expanded, but this would not be an ideal solution).*
- This being the case, there is a strategic case in support of the max growth option in this area, which would deliver ~550 homes. A combined scheme would include an area of strategic greenspace at its northern extent in order to prevent northward ‘sprawl’ of what is already a linear settlement. Also, there would be the potential to enhance Pennington Lane as a historic route linking to an extensive bridleway network.*
- However, there is also a need to consider a focus of growth to the east of Pennington Lane, which is much better contained in landscape terms (see rising land to the west of Pennington Lane [here](#)). This might involve either A) no growth to the west of Pennington Lane; or B) only modest growth to the west of Pennington Lane, directly adjoining the settlement edge. With regards to (B), a small site has been proposed within the wider site, but this does not align well with the existing field boundaries.”*
- 5.4.80 In short, a key motivation for exploring the option of a more comprehensive scheme involving growth to the west of Pennington Lane (Site 012) in addition to growth to the east (Site 015) was a desire to secure a new primary school. However, in this regard the situation has now moved on, including on the basis of increased confidence regarding potential to deliver a new primary school at nearby Elsenham. Site 015 includes flexibility to potentially deliver a primary school, as per the County Council’s recommendation.
- 5.4.81 There is also quite a strong argument for drawing upon Pennington Lane to define the settlement edge and, in turn, an overall strong argument for ruling out Site 012 at this stage.
- 5.4.82 Finally, it is noted that an application for 168 homes on part of Site 012 was dismissed at appeal in 2023 ([UTT/20/2121/OP](#)), and that the landowner promoted only this part of the site through the consultation in 2023 (ref. 3452). The site is being promoted by Bloor Homes, as per land to the east of Pennington Lane (both the site under construction and Site 015) and also Site 013 discussed below. The consultation response suggests that higher growth at Stansted Mountfitchet could allow for “comprehensive” growth.
- 5.4.83 Moving to the **northeast**, Site 013 was a proposed allocation in the Draft Plan (2023) in combination with a site adjacent to the south. However, that site now has planning permission ([UTT/22/0457/OP](#)). It is recognised that Site 013 would be delivered as a separate non-strategic scheme (i.e. it would not link with the site permitted site to the south; this risk was flagged in 2023), such that it’s allocation would amount to an exception to the rule of allocating strategic sites through the Local Plan (see Section 5.3). However, it is considered to be a strongly performing site, particularly given good links to the centre of Stansted Mountfitchet and the train station, and limited concerns were raised through consultation in 2023. One point to note is the proposal to deliver a new active travel route along High Lane and Lower Street.
- 5.4.84 Having said this, it is recognised that this is a somewhat complex site split by a stream corridor, with a clear need for early commitment regarding how to treat land to the north of the stream corridor (given sensitivities beyond and noting Site 015).<sup>10</sup> As such, a slight concern is that no consultation response was received from the site promoter in 2023 in respect of this site (although the promoter did reference this site as part of a consultation response focused on Land West of Pennington Lane, as discussed).

<sup>10</sup> The Environment Agency notably commented in 2023: “There has been previous exploration into Natural Flood Management in the upper reaches of the Ugley Brook Catchment. There is opportunity for this to be included and explored on the site.”



- 5.4.85 Next there is a need to briefly consider two **non-strategic sites** shown in Figure 5.13. Beginning with Site 022 (southeast), this site was not actively promoted through the consultation in 2023 and the site contributes to views across the Stansted Brook valley (albeit including the railway line) on the approach to the Stansted Mountfitchet Conservation Area. Turning to Site 001 (northeast), this site does not relate well to the settlement edge, and no consultation response was received in 2023. The ISA Report (2023) presented a discussion of comprehensively planning for land from Pennington Lane to Site 013 via this site (including with a focus on green/blue infrastructure),<sup>11</sup> but there is no clear option at the current time.
- 5.4.86 Next there is also a need to briefly consider one specific **Green Belt** site option. Specifically, discussions were held in early 2024 to consider the option of a 150 home scheme on Site 018, at the southeast edge of the village. It was recognised that there was a unique opportunity to secure significant ‘planning gain’ (see discussion [here](#)), but this was not considered sufficient to warrant taking the site forward, given the high bar of ‘exceptional circumstances’ and the question of total growth quantum at Stansted Mountfitchet.
- 5.4.87 The matter is discussed on the Parish Council [website](#), which describes the scheme as “effectively an extension of the development at Elms Farm”. However, the recent Elms Farm development to the north is not adjacent (but is in the same landownership), which serves to highlight the importance of taking a strategic approach to any expansion of the village to the southeast.
- 5.4.88 Finally, there is a need to consider the option of a **new settlement** to the north of Stansted Mountfitchet, within Site Ugley 003, which is located directly to the north of Site 015 (as shown on Figure 5.13, above). The site, which is known as Bollington Hall Farm, was not a proposed allocation at the Draft Plan stage (2023) but was considered closely through the appraisal of RA growth scenarios (but only under one of the five scenarios appraised, namely the highest growth scenario, serving to indicate that the decision to explore this option through the RA growth scenarios was marginal). The ISA Report explained:
- “The site promoters suggest a garden community of 2,200 – 3,600 homes, to include a secondary school. However, transport connectivity would be an issue for a scheme of this scale and there is no clear need for a secondary school here (plus there is generally limited strategic case to be made for a large garden community...). The potential for a small garden community to be well-located within the landscape can be envisaged (e.g. south of the Halcramow Way), and new homes could be concentrated in relative proximity to Stansted Mountfitchet and Elsenham train stations. A smaller scheme would also serve to reduce regarding traffic through Ugley Green, where there is heritage constraint. As such, it is considered appropriate to assume that any garden community here would be of a smaller scale (e.g. 1,500 homes). Importantly, there is no reason assume that the scheme might expand further in the longer term (or plan with ‘one eye’ on this option of an expanded / larger scheme, with commensurate evidence requirements).”*
- 5.4.89 The site promoters then submitted a consultation response proposing a 1,500 home scheme (ref. 4006). However, there was no further detail proposed regarding implications of a reduced scheme for masterplanning and addressing issues / realising opportunities. It is also noted that there is an emphasis on heritage, with the headline conclusion that a reduced scheme for 1,500 homes would be sub-optimal.
- 5.4.90 In **conclusion**, at this stage there is considered to be just one reasonable growth scenario that warrants being progressed, which is broadly the preferred approach from the Regulation 18 Draft Plan stage. Whilst detailed work was undertaken to explore RA growth scenarios in 2023 (see the ISA Report), this was predicated on a view that there were significant challenges locally around primary school capacity.
- 5.4.91 Having said this, it is recognised that the combination of a good local offer and very good transport connectivity serves as an argument for higher growth. Also, the other key driver of work in 2023 to explore higher growth was a general desire to ensure comprehensive growth and, in turn, avoid the risk of sub-optimal piecemeal expansion in the long term with opportunities missed to secure investment in new/upgraded infrastructure (e.g. community, transport and green/blue) and this is still considered to be an important consideration at Stansted Mountfitchet that warrants an ongoing focus.

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<sup>11</sup> The ISA Report explained: *“This is potentially an option that warrants further consideration, with a view to securing a new primary school and ensuring a rounded built form (without breaching Pennington Lane). However, in addition to the barrier of land not currently being available, there are wider constraints to delivering this option, relative to: historic environment – there are two Grade II listed buildings along Alsa Lane in this area, one of which is located within Site 001, plus there are other buildings within clear historic character, and the lane itself has a strong historic character ([historic mapping](#) shows an area of parkland); biodiversity and landscape – there is a considerable amount of priority habitat in this area, including two County Wildlife Sites (one of which is accessible as a nature reserve), plus an ancient woodland is nearby; landscape – there are views across the stream valley, towards the woodland, from High Lane; and employment / commerce – part of the land not currently available currently comprises an auction room, a garden centre and a rifle range (the Rifle range is a former quarry and a new CWS).”*

5.4.92 As a very final point at Stansted Mountfitchet, there is a question-mark around expansion of the secondary school given Green Belt constraint. This is explored further in Section 9 of this report.

**Table 5.3:** Stansted Mountfitchet growth scenarios (new supply only) progressed to Section 5.5

Progressed scenarios		Homes	Employment
1)	Strategic growth to the north plus non-strategic site to the northeast	325	-

## Thaxted

5.4.93 Thaxted is a notably smaller settlement than those discussed above but is marginally the largest of the Local Rural Centres, as defined in the Settlement Hierarchy Study (2024). Thaxted has a notably high ‘settlement score’ relative to its population (see Figure 5.3), which potentially suggests a growth opportunity. However, Thaxted is unique amongst the Key Settlements and Local Rural Centres in that it does not lie along either the M11 or A120 corridors. It is a notably rural village and also constrained.

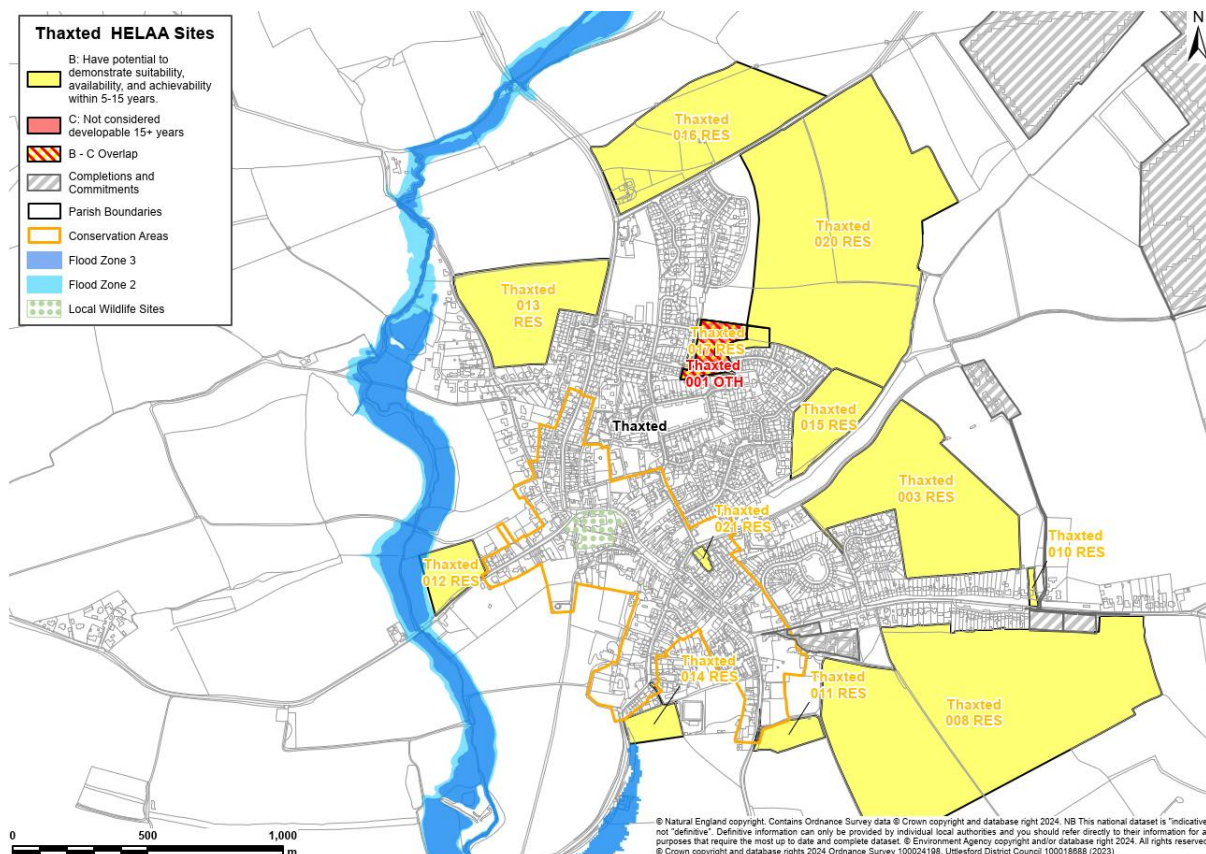
5.4.94 The medieval core includes seven Grade I listed buildings, and Grade II\* listed Thaxted Windmill is also an important landmark to the west. The village has expanded beyond the designated conservation area to the north and east, but overall retains a very strong historic character linked to the surrounding chalk influenced landscape, as experienced from the roads through the village (also the Harcamlow Way).

5.4.95 The rural nature of the village means that car dependency is unavoidably high, and it is important to note that there is no secondary school (with Thaxted near equidistant between secondary schools at Saffron Walden, Newport, Stansted Mountfitchet and Great Dunmow). However, an hourly bus service links Thaxted to Saffron Walden and Great Dunmow between Mon-Sat, and a further hourly bus service runs through Thaxted via Debden between Saffron Walden and Stansted Airport on Mon-Sat.

5.4.96 **Completions** since the start of the plan period and **commitments** are fairly low. However, there has been some housing growth over the past decade (a scheme to the north and another to the north east).<sup>9</sup>

5.4.97 The **HELAA sites** at Thaxted are shown below (N.B. the committed site to the northeast is a solar farm).

**Figure 5.14:** HELAA sites at Thaxted



- 5.4.98 Landscape sensitivity serves as a clear argument against the sites located to the **north** and to the **west**. One point to note is a recently refused application for 67 homes on Site 013 ([UJT/22/2900/OP](#)).
- 5.4.99 This leaves options for expansion: to the **east** (either side of Copthall Lane) and to the **south east**.
- 5.4.100 Of these two options, it is the option of expansion to the **east** that is judged to be preferable. There is the potential for a comprehensive scheme here, to include a primary school, including because land to the north east is in public sector ownership, and expansion here is preferable in built form and landscape terms. The site to the south east does not draw upon a field boundary at its southern extent and is prominent in the landscape from Bardfield Road (the route to/from Braintree) on the approach to Thaxted. Growth to the east is also potentially marginally preferable in terms of linking to the village centre. Finally, expansion to the south east could lead to pressure for further growth to the west, such that built form links to the B184, which would give rise to concerns in respect of impacts to the conservation area.
- 5.4.101 With regards to the nature of scheme that might be supported to the east, masterplanning work has been completed that suggests the potential for comprehensive growth across this sector, i.e. between the B-road in the north (B1051 Great Sampford Road) and the homes on Bardfield Road in the south. Copthall Lane could be utilised as an active travel corridor; however, a constraint is the strong surface water flood channel and green corridor along the northern edge of the lane. There is the potential to deliver a primary school adjacent to the current north east edge of Thaxted.
- 5.4.102 However, the scale of growth involved (489 homes in total) could create a challenge from a viability perspective. Specifically, whilst 1fe school on a 2fe site would be viable, the County Council’s preference is 2fe schools. Also, Site 001 OTH is proposed as a nature reserve, which is a barrier to connectivity in respect of the northern-most HELAA site, which is where the primary school is proposed. Having said this, there could be a footpath through the site. A final point to note is a pending planning application for 49 homes on Site 015 ([UJT/21/1836/OP](#)).
- 5.4.103 Finally, with regards to **non-strategic sites**, it is noted that the site promoter of Site 014 was the only site promoter at Thaxted to submit a consultation response in 2023, proposing the site for 10-12 homes. The site is sensitive on account of views from the B1051 on the approach to the Thaxted Conservation Area, and it is also noted that access is constrained. However, as a small site this could be one that is suited to consideration by a review of the Thaxted Neighbourhood Plan, with a view to making provision for locally arising needs / maintaining village vitality without giving rise to issues in respect of school capacity.
- 5.4.104 In **conclusion**, whilst the Draft Local Plan proposed a strategic allocation to the east the County Council raised a significant concern regarding the proposed 1fe primary school (with land available for a future expansion). Also, there is a degree of concern regarding aircraft noise, recognising that the Local Plan must avoid directing growth to locations that could lead to increased tensions between residents and Stansted’s operation including noted the committed expansion.
- 5.4.105 As such, and given sever primary school capacity constraints, the emerging proposed approach is to not allocate any sites for strategic growth at Thaxted, nor to assign the village a housing requirement that must then be met by allocation of non-strategic sites through a neighbourhood plan.
- 5.4.106 Nonetheless, it is considered reasonable to continue to test the option of a strategic allocation (as per the Draft Plan proposal) through the appraisal of reasonable alternative growth scenarios. This reflects a view, amongst other things, that there is a clear need to support growth at Thaxted with a view to meeting locally arising housing needs (including small family housing and affordable housing), maintaining village services and facilities (including bus services) and more generally maintaining village vitality. The only other feasible scenario is higher growth in order to increase confidence around viability of delivering a 2fe primary school; however, it is very difficult to envisage any such scenario given constraints to growth.

**Table 5.5: Thaxted growth scenarios (new supply only) progressed to Section 5.5**

Progressed scenario		Homes	Employment land
1)	Nil strategic growth (or NP housing requirement)	-	-
2)	Strategic expansion to the east	489	-

## Takeley

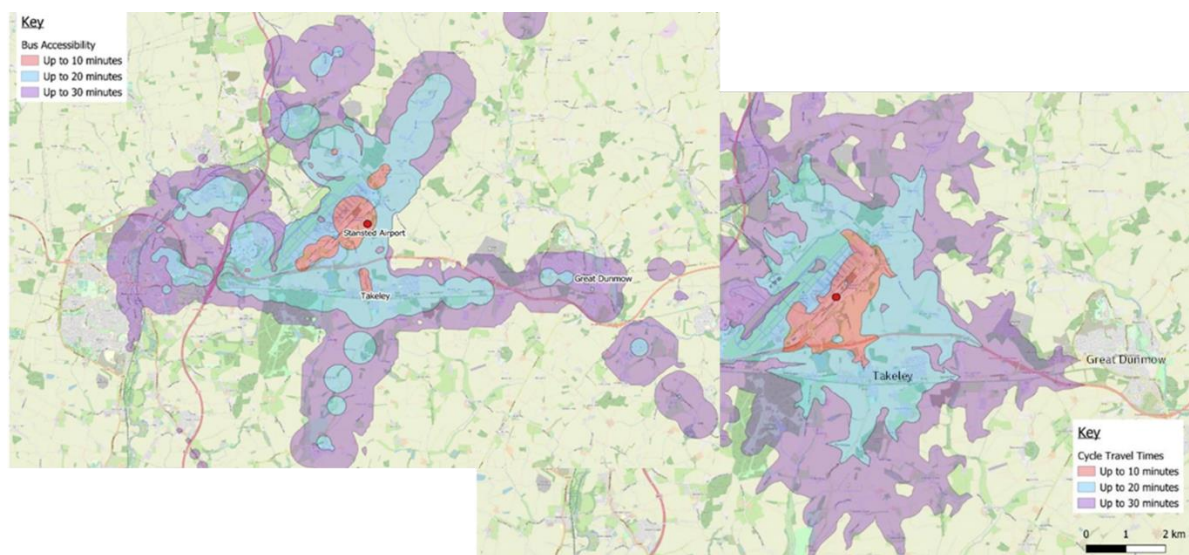
5.4.107 Figure 5.3 records Takeley as having a settlement score similar to Thaxted but a notably higher population as of 2021, plus it is important to note that the population has increased since 2021 and will increase further as a result of committed growth (which is delivering somewhat limited community infrastructure).

5.4.108 Takeley was a key focus of growth within the Draft Local Plan (2023) despite being a settlement located in the second tier of the settlement hierarchy and not benefiting from a train station. Significant levels of local concern were raised through the consultation. However, strategic arguments for supporting higher growth remain, including: A) proximity and links to Stansted Airport, which is a key employment hub and transport interchange (see Figure 5.15); B) an opportunity to deliver a local centre and a secondary school as a focal point for the village; and C) the A120 bypass to the north, which could define a new northern extent to the village. The settlement is also well-linked to both Bishops Stortford and Great Dunmow, and work has been underway to explore strategic transport upgrades along the A120 / B1256 corridor, including a new mobility hub alongside improved links to Stansted and improvements to the Flich Way.<sup>12</sup>

5.4.109 However, there are a range of challenging constraints to growth, notably in terms of:

- Historic environment – the central Smiths Green area is associated with a strong historic character, and was recently designated as a conservation area. It is also important to note that a historic lane (and cycle route) links through Smiths Green to Bamber’s Green to the north (north of the A120) via Grade I listed Warish Hall, which is also a scheduled monument. There is also sporadic historic character along the B1256 (a Roman Road) stretching from Takeley Street to Little Canfield (see [historic mapping](#)).
- Biodiversity – first and foremost, there is a need to note the proximity of Hatfield Forest, which has already been introduced above as highly sensitive to increased recreational pressure. Also, Priors Wood ancient woodland CWS is a significant constraint to growth, including recognising its value within a wider wooded landscape, with a position between Hatfield Forest to the west and High Wood SSSI to the east. There is also a notable concentration of woodland priority habitat within the central part of Takeley.
- The Stansted Airport Countryside Protection Zone (CPZ) – is an existing designation that has a clear purpose and is widely valued. The designation had a strong influence on the previous two withdrawn versions of the local plan; however, at the current time a detailed study has been undertaken showing the potential for strategic growth to come forward in an amended way – relative to the Draft Plan stage – in a way that maintains the integrity of the CPZ. See further discussion below.

**Figure 5.15: Existing bus and cycle connectivity to Stansted Airport public transport hub**



<sup>12</sup> It is recognised that the potential for comprehensive transport solutions / enhancements along the A120 / B1256 are limited at the current time, but early steps can be taken with long term aspirations in mind. Focusing on a new mobility hub at the A120 junction east of Takeley, this opportunity is discussed within the Sustainable Transport Study (2023), with reference to another [study](#) that defined tiers of mobility hub (there would also be a lower tier hub within any strategic site at Takeley). Mobility hubs are “designed to host public transport alongside shared transport modes and active travel facilities... with the possibility of seamless switches and improved links between different layers of transport such as the core public transport network and shared services. They raise the profile and visibility of the range of shared and other sustainable travel modes, which provides a new status and appeal, with the associated benefits of reduction in car use.”

5.4.110 **Completions** since the start of the plan period and **commitments** are significant (762 homes in total, as of April 2023) but considerably lower than at Great Dunmow. However, there has been significant growth over recent years, with satellite imagery from 20 years ago showing the settlement primarily located to the west of Smith’s Green (a historic cross-roads).<sup>9</sup>

5.4.111 Strategic expansion to the east delivered a second primary school for the village in c.2010, and recent/ ongoing office development has provided employment (plus a committed office scheme could deliver a GP surgery). However, the general view is that infrastructure delivery has been sub-optimal.

5.4.112 The **HELAA sites** at Takeley are shown below across two maps, one centred on Takeley Parish and the other centred on Little Canfield Parish. By way of orientation, a key point to note is that the committed sites to the west are set to deliver new strategic greenspace to define the western edge of the village (see Figure 5.18), also accounting for a sensitive historic bridleway and an isolated Grade I listed church.

5.4.113 The Draft Plan proposed **comprehensive growth** to the north of the village, to include a new secondary school that could also serve Great Dunmow. This was discussed within the ISA Report (2023) as the only option reasonably in contention (i.e. Takeley was a ‘constant’), because of: A) a clear strategic case for growth; B) a need to avoid further piecemeal growth; and C) no other realistic options for strategic growth.

5.4.114 In respect of there being ‘no other realistic options for strategic growth’, elaborating on this point:

- The possibility of strategic growth to the north of the A120 is mentioned as a possibility within Section 5.3, above. However, the landowners submitted a consultation response in 2023 (ref. 3283) promoting only the southern part of the land in question. The proposal is for residential and employment land, but there are very few further details provided. For a range of reasons, including the CPZ designation and the need to consolidate built form / deliver a local centre at Takeley, this option performs relatively poorly.
- The possibility of a large new settlement to the East of Takeley (‘Easton Park’) is also discussed above as a long term option but is not an option for this current local plan. Even if it were feasible to delay the Uttlesford Local Plan to explore this option with a view to possible allocation (which it is not) a new secondary school here could be much delayed relative to the option of a new school at Takeley, plus the opportunity to consolidate built form / deliver a local centre at Takeley would be missed.

Figure 5.16: HELAA sites at Takeley (Takeley Parish)

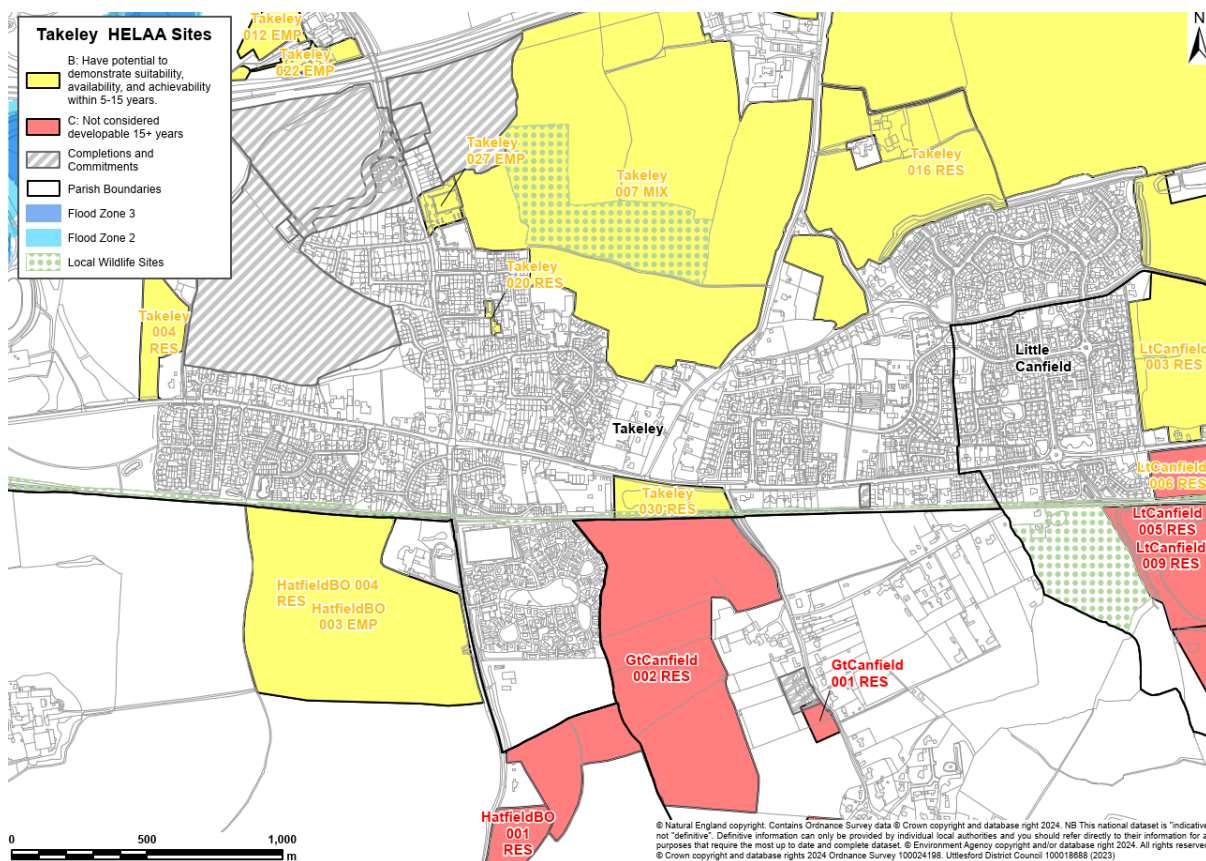
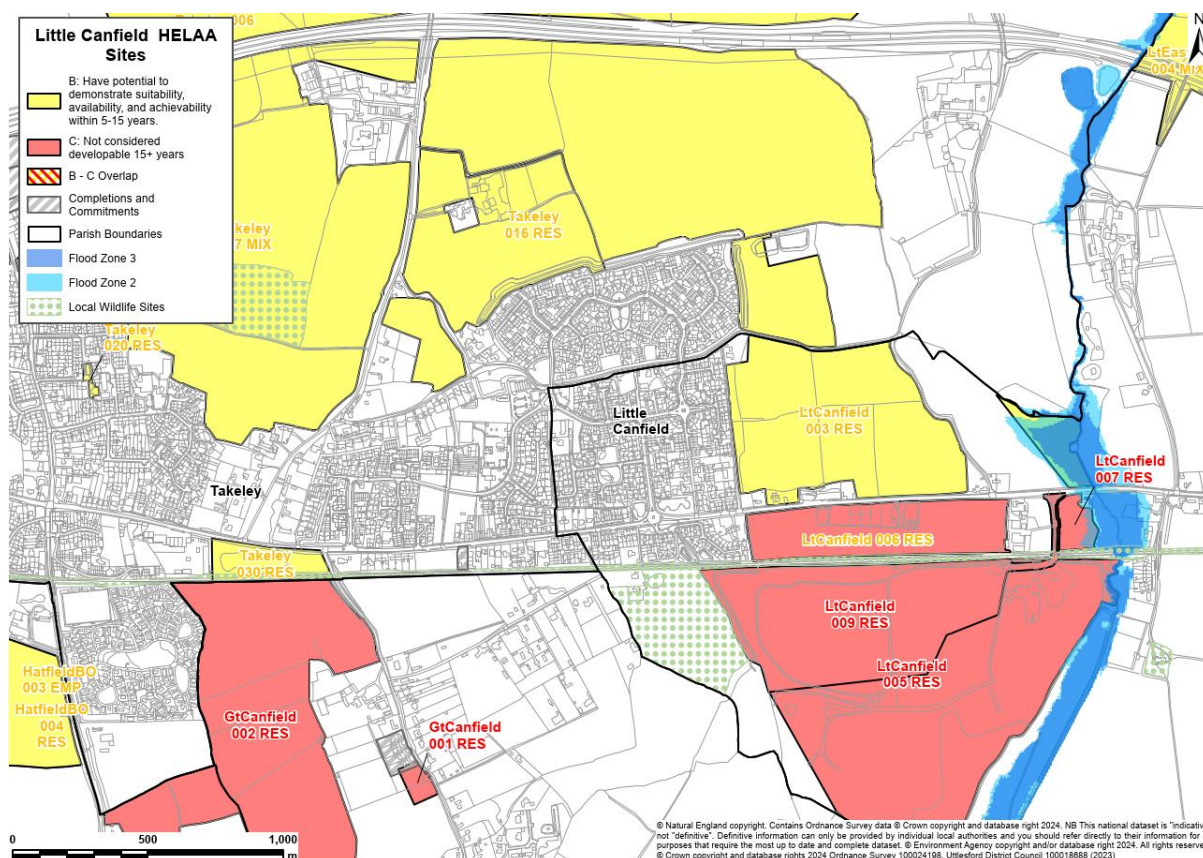


Figure 5.17: HELAA sites at Takeley (Little Canfield Parish)



5.4.115 Focusing on the option of strategic growth to the **north of the village**, the Draft Plan proposal generated a considerable level of objection from local residents through the consultation in 2023, and concerns have continued to be raised since the time of the consultation, with Takeley a focus of several meetings of the [Local Plan Panel](#). Concerns mainly relate to the CPZ designation, but also transport / traffic concerns, including recognising growth elsewhere along the A120 / B1256 corridor (and recognising that issues with the A120 can cause traffic to divert along the B1256).

5.4.116 In this light, a considerable amount of work has been undertaken explore options for strategic expansion to the north of Takeley. This has not only resulted in a proposal to extend the CPZ designation to include land to the southwest of Takeley, as discussed (also see the CPZ Study, 2024), but also a considerable adjustment to the configuration of proposed growth to the north of the village.

5.4.117 The new proposed approach is shown at a high level in Figure 5.18 and in detail in Figure 5.19. The new proposed approach represents a major improvement on the proposal from 2023, in particular:

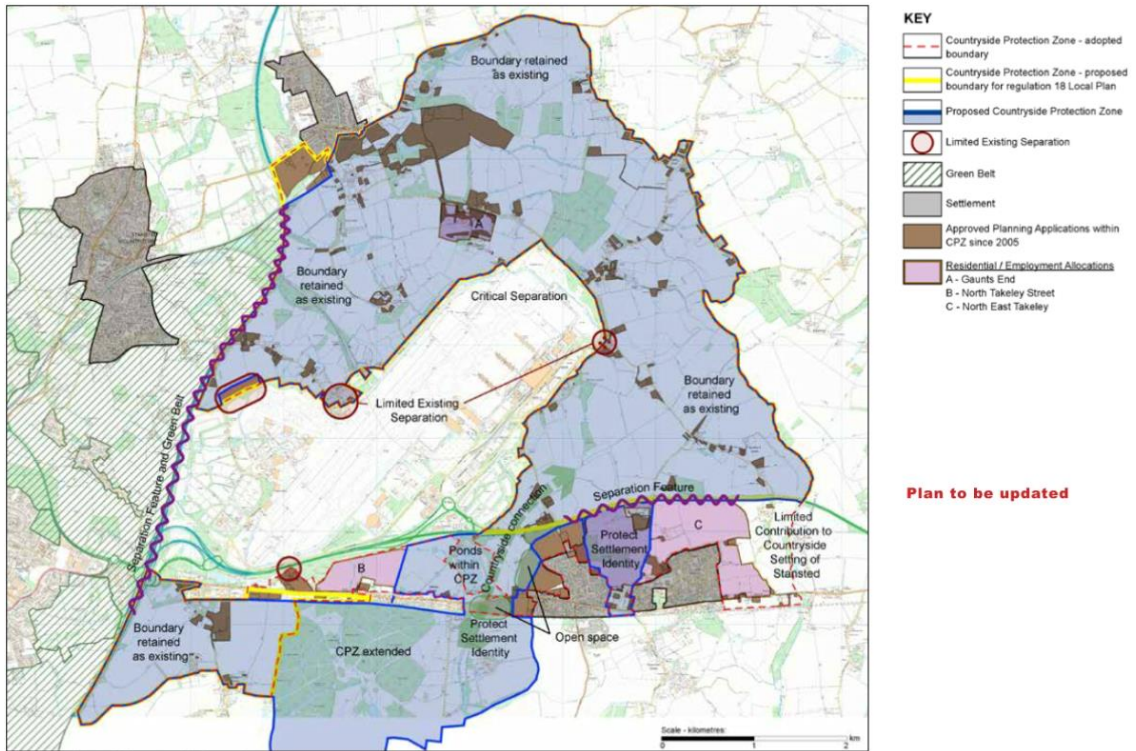
- The new strategic greenspace mitigates concerns around the CPZ (albeit a road will still pass through the Smiths Green area) and recreational pressure<sup>13</sup> on Hatfield Forest (also supporting the functioning of priors wood as a component of a wider wooded landscape).
- The new proposed schools area is preferable from a perspective of avoiding close proximity to the A120. Also, it will assist with defining the eastern extent of the village. In this latter regard, it is important to note that Takeley is notably associated with raised ground, with land [descending](#) towards stream sensitive corridors to both the west and east, hence there is a need to avoid 'sprawl'.
- Opportunities to enhance 'sustainable transport' connectivity to Stansted Airport and also with Braintree and Great Dunmow have been confirmed through recent work, as discussed further in Section 9.

N.B. framework plans as per Figure 5.19 are available for all of the current proposed growth locations.

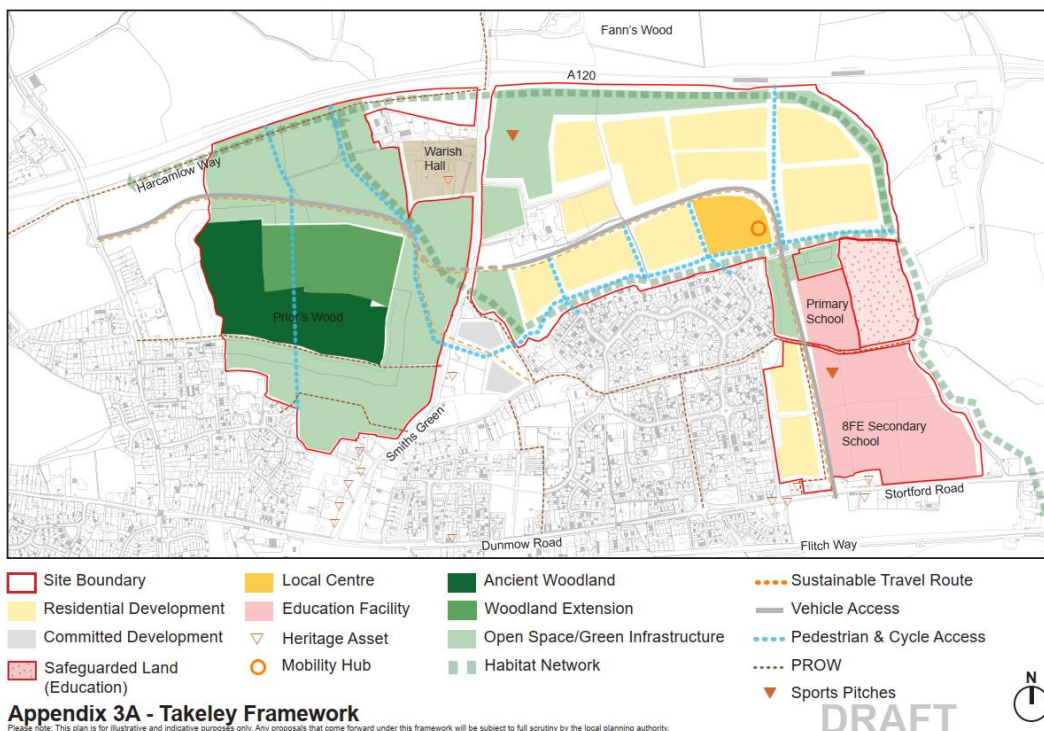
<sup>13</sup> Detailed work has been undertaken to ensure new strategic greenspace accords with the standards expected by Natural England in the case of Strategic Alternative Natural Greenspace (SANG), which is employed extensively across the country as a means of mitigating the impacts of recreational pressure associated with housing growth on internationally designated sites.

5.4.118 The final option for discussion here is HatfieldBO 004, located to the **southwest** of Takeley, specifically to the south of the Flitch Way and west of the B183. The site promoters submitted a consultation response in 2023 (ref. 3152), explaining that whilst the site had previously been proposed for 275 homes and a primary school, the current proposal is for a 100 home scheme on part of the site. It is recognised that the Landscape Sensitivity Study (2021) shows land to the south of Takeley to be less sensitivity than land to the north; however, there are heritage sensitivities associated with this site (which are a focus of the consultation response). Also, and regardless, there is a clear case for strategic rather than further piecemeal growth at Takeley, and for containing the village to the north of the Flitch Way, noting that the adjacent development comprises park homes and noting the new CPZ proposal.

**Figure 5.18: Conclusion of the CPZ Study (2024) also showing growth locations**



**Figure 5.19: The new proposed CPZ boundary also showing growth locations**



- 5.4.119 Finally, there is a need to discuss **employment land**, which is an important consideration at Takeley given proximity to the Stansted and the M11. The Draft Plan (2023) proposed a site for 15ha of industrial and logistics land at Takeley Street (see Figure 5.18), and the ISA Report (2023) gave this site detailed attention. There are clear sensitivities, and some notable concerns were then raised through consultation, including relating to: access onto / traffic generation on the B1256; close proximity to Takeley Street, where there are 23 listed buildings (although overall limited historic character due to modern infill); and proximity to Hatfield Forest SSSI / National Nature Reserve (and potential links via an important stream corridor).
- 5.4.120 The proposed the new proposed approach is to support 18 ha of industrial and logistics land within the site (the total area of which is 27 ha). However, work has been undertaken to revise proposals aimed at mitigating concerns, including by masterplanning with a view to strategically targeted new green/blue infrastructure. Natural England has not objected regarding potential impacts to Hatfield Forest (noting that the scheme would not generate significant recreational pressure, which is the key 'impact pathway').
- 5.4.121 The other key sensitivity is the CPZ designation. However, there is confidence that the site can be removed from the CPZ without undue effects, assuming that the fields adjacent to the east (which could feasibly link to the A120) are included in the CPZ in the long term. This is clearly important in terms of maintaining a landscape gap to Takeley, which is expanding to the west, as discussed.
- 5.4.122 Overall, this is a sensitive site for new industrial land, but also one that performs very strongly in terms of a desire to support new industrial land in close proximity to Stansted and the M11. Also, the reality is that there are not considered to be any reasonable alternative approaches that might be taken to meeting the requirement to deliver 15 ha of new industrial land in the vicinity of Stansted.<sup>14</sup> There could be flexibility to consider a reduced scheme, noting that the current proposal (18 ha) exceeds the requirement for this area (15ha), and also noting that the proposed industrial and logistics allocation at Great Dunmow is large and somewhat 'faces' Takeley and Stansted; however, there is also a need to make best use of the site.
- 5.4.123 In **conclusion**, as per the conclusion reached in 2023, it is reasonable to progress only one growth scenario to Section 5.5, namely support for strategic growth to the north of Takeley (plus new industrial land at Takeley Street). It is recognised that the Draft Plan proposals generated significant local concerns, but detailed work has been undertaken to address these concerns, and the strategic case for growth at Takeley remains very clear. The proposed approach to growth clearly warrants ongoing scrutiny (equally, the proposed industrial land allocation), but it is not possible to envisage a reasonable growth scenario involving nil or low growth at Takeley, mindful of objectives at the Takeley scale, at the A120 corridor scale and at the District scale (e.g. a new secondary school at Takeley could ease pressure at Saffron Walden).
- 5.4.124 It is recognised that Natural England requested consideration of alternative scenarios for Takeley though the consultation response received in 2023, but we respectfully suggest there are no *reasonable* alternative growth scenarios in light of the discussion above (also see the appraisal in Section 9).

**Table 5.4: Takeley growth scenarios (new supply only) progressed to Section 5.5**

Progressed scenario		Homes	Employment land
1)	Strategic expansion to the north	1,546	18ha site to the west (Takeley Street)

## Newport

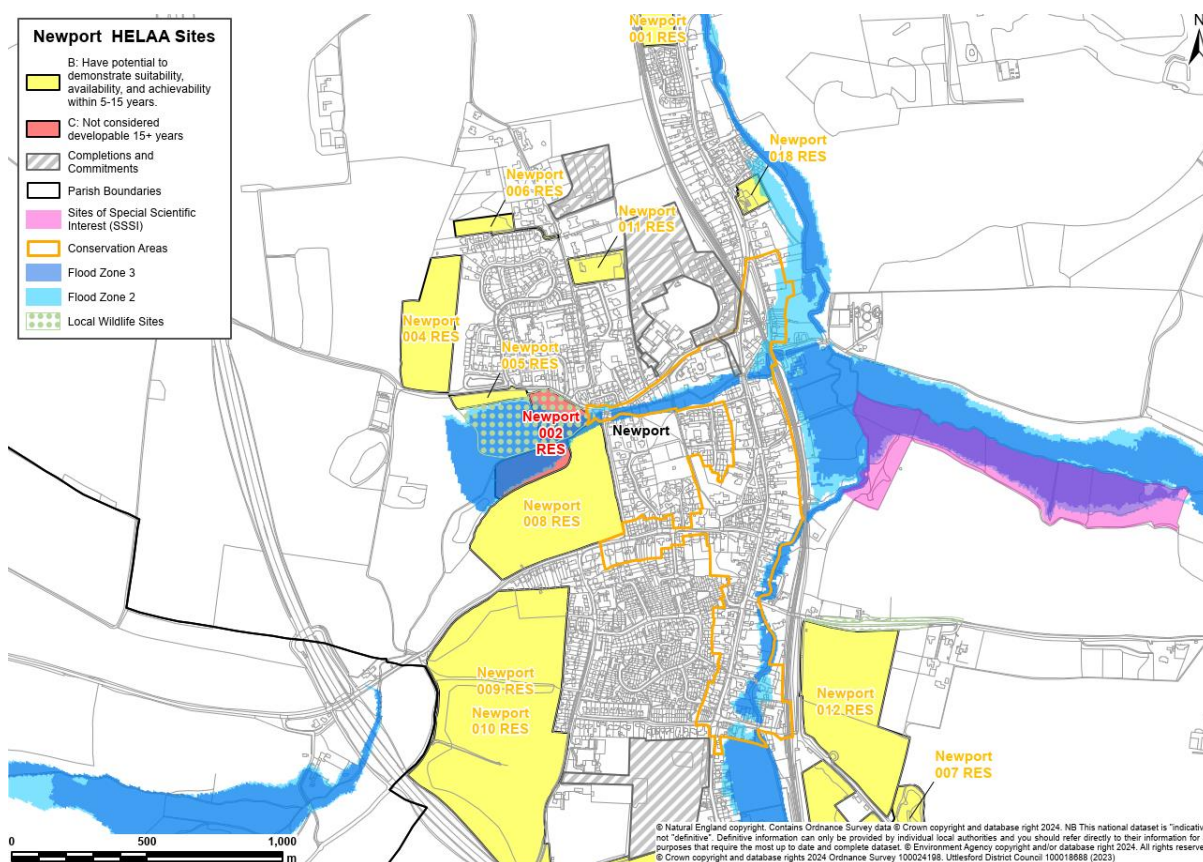
- 5.4.125 Newport is located in the north of Uttlesford, to the south of Saffron Walden. Newport has a lower 'service score' than Takeley and Thaxted (see Figure 5.3) but benefits from a train station (25 minutes to Cambridge) and a secondary school. The village is distant from an M11 junction and not on an A-road.
- 5.4.126 The village has a strong medieval core associated with a confluence of valleys (the upper reaches of the River Cam) and associated transport route, and the village has expanded beyond the conservation area solely to the west. The M11 is located to the west and could serve to contain expansion of the settlement.

<sup>14</sup> See further discussion within the Employment Land Site Selection Topic Paper (2024). There is a cluster of small site options to the north of Takeley (Parsonage Road), but this area is sensitive from a CPZ perspective, plus the intention is to enhance this road as a cycle route. Also, there is a site adjacent to M11 J8, but a scheme was recently refused by PINS ([UTT/23/0950/PINS](https://www Uttlesford.gov.uk/Document/1234567/UTT/23/0950/PINS)).



- 5.4.127 **Completions** since the start of the plan period and **commitments** are relatively low (155 homes in total, as of April 2023), and it appears there was limited housing growth over the preceding c.20 years.<sup>9</sup>
- 5.4.128 There is some secondary school capacity, but primary school capacity is an issue. This led to a proposal at the Draft Plan stage (2023) to propose strategic expansion to the west and to the southeast, including with a focus on securing new primary school capacity. However, the County Council then raised concerns regarding the potential for the primary school to expand to accommodate this level of growth. Also, traffic modelling highlighted issues with the proposed approach of strategic expansion to the west and, whilst there could be a technical solution, this would have viability implications. In turn, a viable solution could necessitate additional growth, which would generate significant tensions with various constraints.
- 5.4.129 This all leads to an argument for a lower growth strategy for the village. Also, the latest understanding is that the Parish Council is very keen to take forward the task of allocating sites through a Neighbourhood Plan, and it is likely a plan could be ‘made’ prior to Local Plan adoption (see <https://www.nqrplan.org/>).
- 5.4.130 Specifically, whilst the proposal at the Draft Plan was for allocations totalling 412 homes, the new proposal is a 300 home housing requirement. This level of growth should still support expansion of the primary school. However, if growth is dispersed across smaller sites, then this could be made more challenging.
- 5.4.131 In **conclusion**, there is only one reasonable growth scenario for Newport, which is to assign a housing requirement of 300 homes to be taken forward through the neighbourhood plan. The ISA Report (2023) presented detailed discussion of the various site / growth options at Newport, but that discussion need not be repeated here. It need only be said that there is quite an important strategic choice regarding expansion to the west (the previous Draft Plan approach) versus expansion to the east (breaking with the existing built form; the railway as a barrier to movement; rising land associated with long distance footpaths; the train station in proximity) versus further linear expansion to the north (a risk of ‘sprawl’).

**Figure 5.20: HELAA sites at Newport**



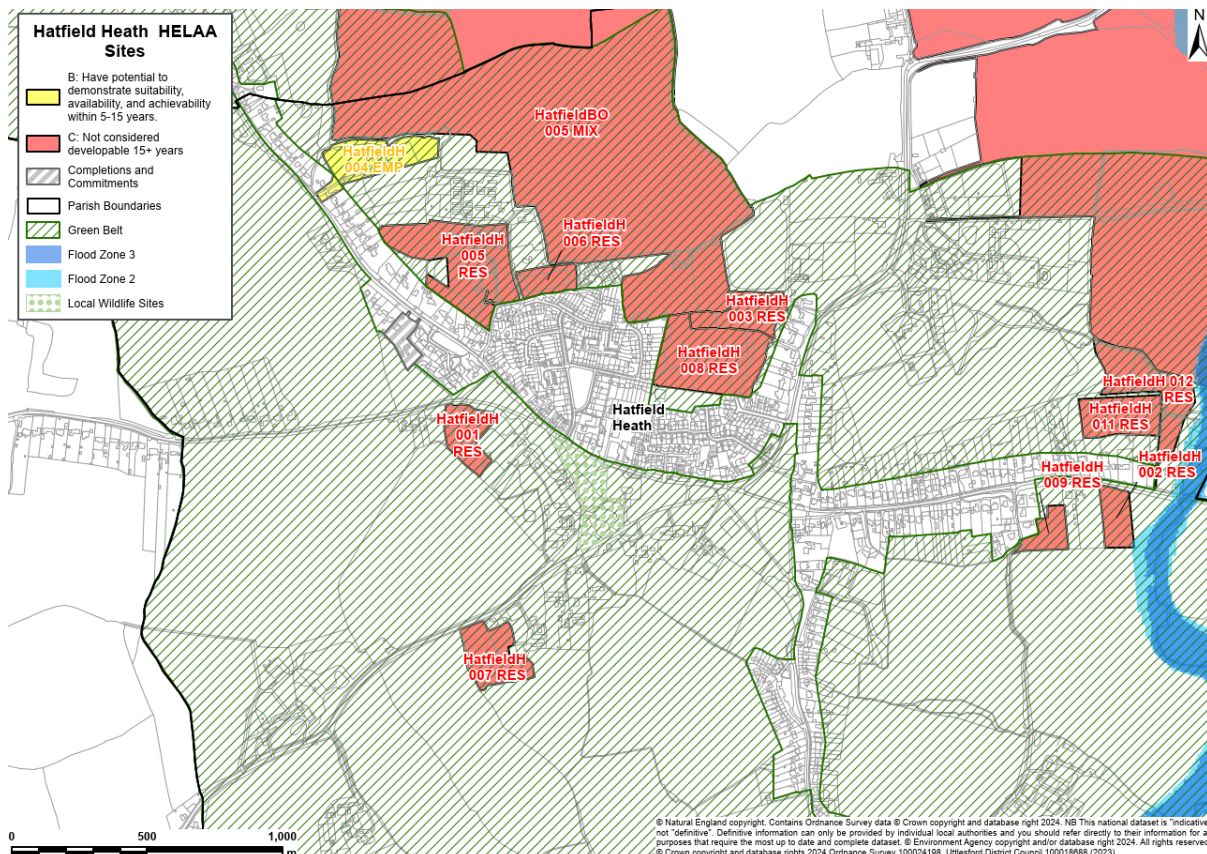
**Table 5.5: Newport growth scenarios (new supply only) progressed to Section 5.5**

Progressed scenario		Homes	Employment land
1)	Neighbourhood plan housing requirement	300	-

## Hatfield Heath

- 5.4.132 Hatfield Heath is constrained by the London Metropolitan Green Belt, and there are not known to be any particular development related opportunities, beyond meeting locally arising housing needs and maintaining village viability / vitality. Completions and commitments are low (42 homes in total, as of April 2023), and historic satellite imagery shows very low housing growth over the c.20 years preceding the start of the plan period. However, the village is well-linked by road to both Bishops Stortford and Harlow.
- 5.4.133 The village has overall relatively low historic environment sensitivity, with no designated conservation area and few listed buildings, but there is a clear historic character linked to the central heath (see [historic mapping](#)). There is a dispersed built form that might benefit from consolidation, but there is no clear development opportunity that would deliver benefits to override the Green Belt constraint.
- 5.4.134 Two modest sized sites are being actively promoted (**Site 005/006** and **Site 008**), and both do benefit from a degree of containment in landscape terms, but both are constrained in biodiversity terms (specifically, both sites are shown by the national dataset to comprise priority habitat, albeit the accuracy of this data is limited, and neither site is designated as a Local Wildlife Site). Site 008 appears to be the better contained site in Green Belt terms but is potentially more sensitive in biodiversity terms (on the basis that the national dataset indicates heathland priority habitat), plus footpaths cross the site. For information submitted in support of these two sites see consultation responses 3994 and 3775 from 2023.
- 5.4.135 Finally, it should be noted that there is a **new settlement option** to the north of the village. However, land here is not very well connected in transport terms, and there would be a clear concern regarding impacts to Hatfield Forest. A new settlement here would link to Harlow and Bishops Stortford, so could feasibly be reconsidered in the future should there be a need for growth to support these settlements. A vision document (dating from 2021) was submitted as part of the consultation in 2023 (ref. 3162).
- 5.4.136 In **conclusion**, there is only one reasonable scenario involving no strategic allocation, as per 2023. There is no potential to demonstrate the ‘exceptional circumstances’ necessary to justify release of land from the Green Belt for development at Hatfield Heath, given growth options outside of the Green Belt; limited strategic case for growth at Hatfield Heath; and limitations and constraints affecting the available sites.

**Figure 5.21: HELAA sites at Hatfield Heath**



**Table 5.6: Hatfield Heath growth scenarios (new supply only) progressed to Section 5.5**

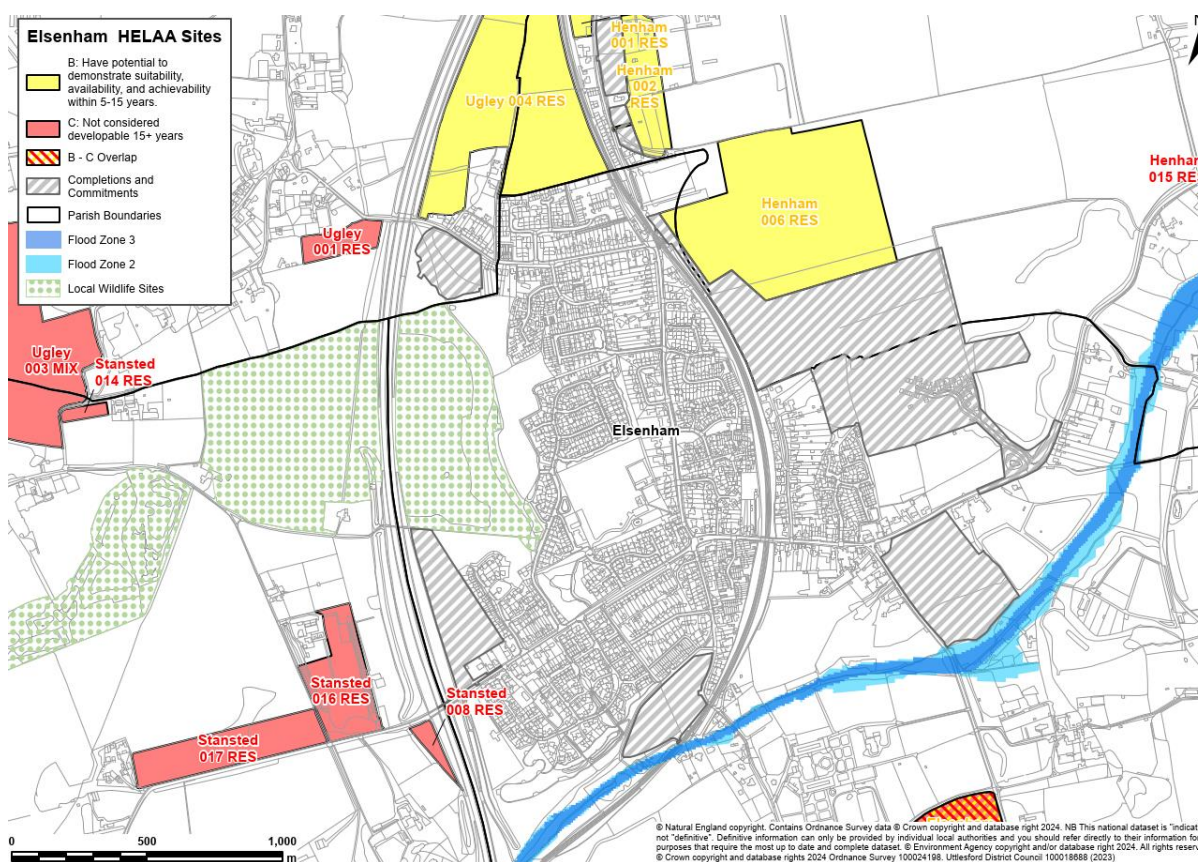
Progressed scenario		Homes	Employment land
1)	Nill growth (bar windfall)	-	-

## Elsenham

5.4.137 Elsenham benefits from a train station and good links to Stansted Mountfitchet and Stansted. There is also notably low historic environment constraint, and fairly limited constraint in wider respects. However, the level of completions and commitments is very high, with the village set to see transformative change.

5.4.138 The **HELAA sites** at Elsenham are shown below. By way of orientation, it should be noted that the bulk of Site 006 is permitted, as is 'white' land to the west and to the southeast.

**Figure 5.22: HELAA sites at Elsenham**



5.4.139 Understanding at the Draft Plan stage (2023) was that there were no available uncommitted strategic growth options. However, it was then recognised that an area of uncommitted land exists comprising the northeastern part of **Site Henham 006**. This site is notably unconstrained, benefits from very close proximity to the train station and its allocation will significantly improve the potential to deliver a new primary school within the permitted part of Site Henham 006. One consideration is the sensitive wooded landscape to the east of Elsenham, including Elsenham Woods SSSI, but there is no reason to suggest that an additional 110 home scheme here (to the east of the village) gives rise to significant concerns.

5.4.140 In light of the above discussion, there is little if any strategic case for exploring further strategic growth options at Elsenham. However, there is a need to note **Site Ugley 004**, where there is a current planning application for 240 homes ([UTT/24/0543/OP](#)). This site is constrained on account of the adjacent railway line and M11, there is surface water flood risk (the development proposal includes land raising and quite extensive SuDS) and it is also noted that the field boundaries are present are shown on historic mapping. However, the key consideration is perhaps the lack of a strategic argument for further growth at Elsenham.

- 5.4.141 Finally, there is a need to consider **employment land**, and specifically the future of the Water Circle Estate at Gaunt's End. The situation is complicated here, but the first thing to say is that this is quite a long established small industrial / logistics estate. The second point to note is that permission was granted in 2012 on land to the east for a ~2-3 ha new office scheme (Trisails; [UTT/1473/11/FUL](#)) and some work has begun on the scheme. The permitted scheme formed part of wider [vision](#) for the estate. However, this vision is now unviable, recognising recent changes to the market for out-of-town office floorspace, and given the committed Stansted Northside scheme. Whilst there is demand for office space, this is for smaller units, and perhaps company satellite offices, rather than HQ space.
- 5.4.142 Full details of the proposed approach are set out in the Employment Land Site Selection Topic Paper. However, in brief, the proposal now is to allocate 5 ha of land in the east of the Estate (including land previously permitted for the Trisails scheme) for office space, in the hope that this will stimulate a revised office scheme to come forward. However, it is recognised that there is considerable uncertainty, with market demand at the estate seemingly focused more on logistics (e.g. see [here](#)).
- 5.4.143 This is an appropriate location at which to meet the need for office space in the vicinity of Stansted, and logistics growth is not supported for reasons including a rural road network. As such, the Local Plan aims to shape the future of this site, and equally is setting out to meet need/demand for logistics elsewhere.
- 5.4.144 In **conclusion**, there is only one reasonable scenario for Elsenham. This conclusion was also reached in 2023, although since that time the proposed approach has evolved significantly.

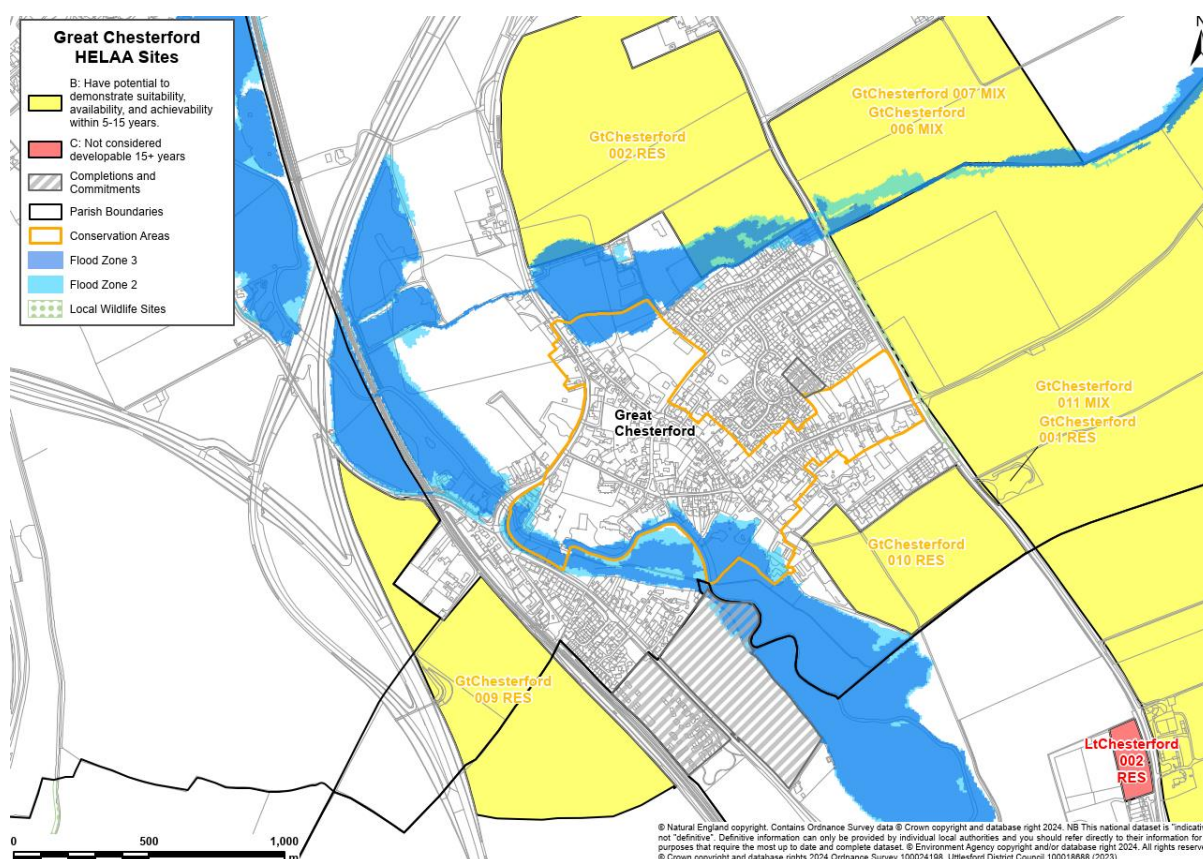
**Table 5.7: Elsenham growth scenarios (new supply only) progressed to Section 5.5**

Progressed scenario		Homes	Employment land
1)	Uncommitted part of Site 006	110	5ha at Gaunt's End

## Great Chesterford

- 5.4.145 Great Chesterford is the smallest of the settlements under consideration here (as a potentially location for strategic growth). The village is located at the northern extent of the District, adjacent to the River Cam and M11 Junction 9. There is a train station and the journey to Cambridge is ~15 minutes. There are also strategic employment sites in close proximity, and the potential for further strategic employment growth to the southeast of Cambridge, within both South Cambridgeshire and Uttlesford, can be anticipated.
- 5.4.146 Focusing on strategic employment sites, of particular note is Chesterford Research Park, which is located in Uttlesford, and provides laboratory and office space for biotechnology, pharmaceutical and technology R&D companies. Current occupiers include AstraZeneca, Isogenica, Microbotica and Biomodal. Chesterford Research Park is Uttlesford's most prominent R&D facility, has planning permission to expand further, and the owner has expressed an intention to expand further still over the plan period. The Park masterplan sets out the potential for around 100,000 sqm for research and development uses of which approximately 30,000 sqm of space is already built and occupied, and 31,500 has planning permission.
- 5.4.147 In this light there is a strategic argument for growth at Great Chesterford. However:
- Historic environment constraint is high, both in terms of the village conservation area and also given an adjacent scheduled monument comprising a Roman town and fort plus cemeteries. There are five scheduled monuments in total surrounding the village, with the primary site located to the north west (see map [here](#)), plus there is extensive wider land known to be of archaeological value.
  - Landscape sensitivity is high (west of the B184, with is a clear focus of attention).
  - The water environment is sensitive, including as the River Cam is in [poor](#) ecological condition.
  - There is a significant primary school constraint to growth, with the existing primary school small and unable to expand. The County Council has identified the need for a 2.1ha site for a new 2fe primary school and would be unwilling to support a smaller school.
- 5.4.148 **Completions** and **commitments** total 229 homes, as of April 2023, which is amounts to a significant level of growth, given an existing population of 1,776 (2021). Historic satellite imagery indicates that there was some modest housing growth in the years preceding the start of the plan period.<sup>9</sup>

Figure 5.23: HELAA sites at Great Chesterton



5.4.149 Whilst there is a clear case for considering strategic growth options, in practice there are very limited if any options. Attention naturally focuses on land to the west of the B184, given the existing settlement form (relating to the river / rail corridor) and the need to avoid breaking into an open and expansive chalk influenced landscape to the east. However, in this area:

- **North** of the village – feasibly has potential to deliver a strategic scheme to include a new primary school. However, Historic England has raised significant concerns. A planning application for 350 homes and a heritage park (no primary school) was recently refused ([UTT/22/2997/OP](#)). The site promoters briefly responded to the consultation in 2023 (ref 973), criticising the decision not to progress this site to the RA growth scenarios, but did not respond to the concerns raised, e.g. primary school capacity.
- **West** of the village – land is available to the west of the railway line; however, it has not been possible to conclude the potential for good/safe road access, including because access would need to be through land that falls within South Cambridgeshire District. Also, it is important to note that the [Icknield Way](#) passes through the site, although there might be an enhancement opportunity. The site promoters submitted a response in 2023 (ref 667) stating that work to explore access is soon to be undertaken.
- **East** of the village – land here relates well to the village edge; however, there is landscape sensitivity here, with the site in the foreground of extensive views across the Cam Valley, as experienced from the Walden Road (B184). Regardless, the latest situation is that the land is not available for development.

5.4.150 The final matter for consideration is then the option of a **new settlement**, which was previously proposed through the withdrawn local plan (2020). Historic environment, landscape and transport constraints were considered in detail by the [Inspectors' letter \(2020\)](#), for example the Inspectors concluded: *“Presently, the proposed Garden Community at North Uttlesford is not justified by the historic heritage evidence available and we share Historic England’s views that there is a possibility that it is not a suitable location for the development proposed due to its impact on the significance of heritage assets.”*

5.4.151 In this light, and given the strategic context discussed in Section 5.2, the option of a new settlement was ruled out as unreasonable in 2023, but the site promoters then submitted a detailed representation (ref 1127), including a detailed ‘technical note’ criticising the decision taken. The latest proposal is for a 1,500 home garden community, but with a long term aspiration to deliver 4,500 homes as per the scheme previously allocated in the withdrawn local plan – see Figures 5.24 and 5.25.

- 5.4.152 It is recognised that the inability to currently identify any strategic growth locations at Great Chesterford (where, as discussed, there is a strategic case for growth) does serve as a reason in favour of exploring the option of a new settlement. Also, it is recognised that the site would relate very well to key employment locations, most notably the Wellcome Genome Campus – where there is consent for up to 150,000m<sup>2</sup> of employment floorspace and up to 1,500 homes – but also Chesterford Research Park (which is proposed for expansion, as discussed below), Granta Park, and Babraham Research Campus.
- 5.4.153 However, the site is not without its issues, for example terms of: transport connectivity (given the lack of a train station and a need to carefully consider capacity at M11 Junction 9 and the A11 Stump Cross junction; see the Stump Cross Study, 2024) and in landscape terms (there is a need to question the merit of growth on [raised / rising](#) chalk influenced land given the extent of growth opportunity on low lying / flat land south of Cambridge, which is also a transport consideration, from a cycling perspective).
- 5.4.154 More fundamentally though, there is no strategic case for supporting a new settlement through the current Local Plan, for the reasons given in Sections 5.2 and 5.3. Whilst the decision was taken to explore a new settlement option through the RA growth scenarios in 2023 (at Ugley), this was for specific reasons around school capacity, and the option was not found to perform well through appraisal or through consultation.
- 5.4.155 Also, there was support for testing this option because of the potential to deliver a small garden community option without any expectation of future expansion, which is not the case for a garden community north of Great Chesterford. Here any decision to support a 1,500 home garden community would have to be made in the knowledge of a likely tripling in size of the garden community in the long term, with implications for evidence-gathering (as discussed in Section 2 of this report). For example, it is noted that the consultation response explains that a 4,500 home community would enable delivery of a secondary school, but there is no discussion of secondary school considerations in respect of a smaller scheme, e.g. 1,500 or 3,000 homes. Also, there would be a need for much detailed work around transport infrastructure. More broadly, there would be a need to engage closely with Greater Cambridge, which would likely be challenging given the current situation regarding progressing the Greater Cambridge Local Plan. It is clearly the case that any significant growth here needs to be considered in the context of planning for both Uttlesford and Greater Cambridge and, in this light, the next Uttlesford Local Plan will be well placed to explore options.
- 5.4.156 The following from the Inspectors' letter of 2020 serves to highlight the scale of the task involved:
- “In general terms we are concerned about the lack of evidence before us to enable us to conclude these [garden communities] are sound. Whilst we realise it is the Council's intention to lay down much of the detail of the proposed Garden Communities in further Development Plan Documents (DPDs), following the adoption of the plan, it is this examination which must determine whether the Garden Community proposals are properly justified and realistically developable. This is of major importance in this case given the large scale and long-term nature of the Garden Community developments, combined with the fact that they would be the primary source of housing in the district for the next 30 to 40 years.”*
- 5.4.157 Finally, with regards to **employment**, the proposal is broadly unchanged from the Draft Plan stage, namely to support an 18 ha expansion to Great Chesterford Research Park (over-and-above land already with permission). This is a thriving research park well-related to the Greater Cambridge area and well-positioned to attract significant international investment.
- 5.4.158 However, this is a rural location such that transport connectivity is an inherent issue (albeit there is a frequent shuttle bus service from Great Chesterford Station). The allocation will enable realisation of the landowner's [masterplan](#) vision, but there are a number of detailed masterplanning issues for ongoing consideration, and the effect of allocation will be an oversupply of R+D employment land district-wide.
- 5.4.159 In **conclusion**, there is no potential for a strategic allocation for housing, nor is there a clear basis for assigning a housing requirement to the Parish Council, given the primary school capacity issue along with a lack of non-strategic site options. With regards to employment land, there is strong support for the proposed expansion with a view to contributing to a nationally significant R+D cluster, notwithstanding that the site is located in a rural area, and the effect of allocation will be to generate an oversupply that could lead to problematic commuting patterns. It is recognised that growth at Chesterford Research Park serves as a reason for giving ongoing consideration to strategic growth options in this part of the District, as does links to South Cambs and Cambridge. The next Local Plan will be well placed to explore options.

Figure 5.24: Two garden community site boundary options plus wider context including NP designations

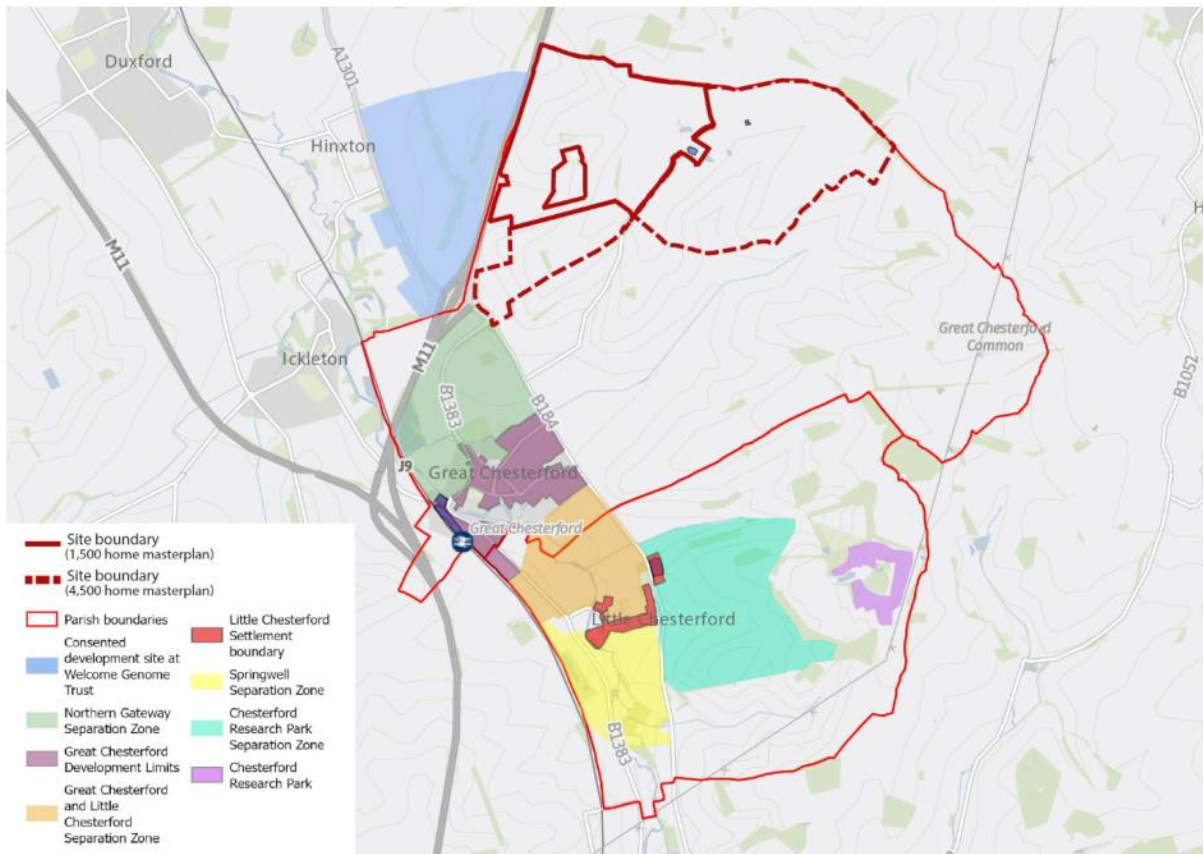


Figure 5.25: Concept masterplan for a 1,500 home garden community (4,500 homes would use entire site)



Table 5.8: Great Chesterford growth scenarios (new supply only) progressed to Section 5.5

Progressed scenario	Homes	Employment land
1) Nill growth (bar windfall)	-	Comprehensive expansion of Chesterford Research Park

## Larger villages

- 5.4.160 As already introduced in Section 5.3, the aim is to assign housing requirements to larger villages, with non-strategic allocations then made through neighbourhood plans.
- 5.4.161 The proposal at the Draft Plan stage was to deliver 1,000 homes via non-strategic allocations at larger villages. However, the new proposed approach is to support **600 homes**, reflecting:
- The number of larger villages has decreased, in light of the latest Settlement Hierarchy Study (2024).
  - A range of concerns were raised by parish councils through the consultation in 2023.
  - The number of homes set to be delivered by sites with planning permission in the plan period is now understood to be significantly higher than was the case in 2023 (most notably because of the Land East of Highwood Quarry site, which gained permission at appeal for 1,200 homes in 2023). The implication is that the overall number of homes that need to be delivered via allocations within the plan period decreases. In turn, there is a clear argument for reducing the number of homes required to be delivered via non-strategic allocations at larger villages.
- 5.4.162 There are **eight larger villages**, but two of these are located in the Green Belt, and there are no exceptional circumstances to warrant nonetheless assigning these villages a housing requirement.
- 5.4.163 The table below presents the proposed approach to distributing the 600 homes figure across the six settlements. The methodology is unchanged from the Draft Plan stage and is explained in full within a separate topic paper available at the current time. In summary, the methodology firstly involves accounting for three factors, namely: 1) population; 2) the 'services score' established through the Settlement Hierarchy Study (2024); and 3) a desire to distribute homes across the villages fairly evenly. Secondly, there is a check on the capacity of HELAA sites, and if there is insufficient capacity then the HELAA capacity is applied to 'cap' the housing requirement and the shortfall redistributed across other villages.
- 5.4.164 The outcome is that: A) Felsted is assigned a relatively higher housing requirement, on account of having comfortably the highest population and service score; B) Debden is assigned a relatively low housing requirements, on account of having comfortably the lowest population and a low (but not the lowest) service score along with 'capped' potential to allocate sites on account of limited HELAA capacity; and C) the other three villages are assigned broadly similar housing requirements because, as it transpires, there is not much to differentiate them, in terms of population and service score.

**Table 5.9:** The proposed approach to growth across the larger villages

Larger village (non-Green Belt)	Total housing requirement for the plan period	Completions and commitments	Residual requirement
Felsted	320	216	104
Clavering	199	77	122
Henham	181	60	121
Stebbing	171	62	109
Hatfield Broad Oak	141	26	115
Debden	78	49	29
<b>Total</b>			<b>600</b>

- 5.4.165 With regards to changes since the Draft Plan stage (2023), the first point to reiterate is that five villages are no longer assigned a requirement on account of being moved to the smaller villages tier of the settlement hierarchy, in light of the new Settlement Hierarchy Study (2024). It is recognised that some (but not all) are located in quite rural areas, perhaps most notably High Easter in the far south of the District, and that two are located in the north of the District, in the vicinity of Newport and Thaxted, where there is now set to be lower growth relative to the Draft Plan stage. However, in none of the cases is there a clear argument for growth in order to deliver benefits (e.g. maintaining local services/facilities) over-and-above simply providing for locally arising housing needs, which is something that could be addressed through any future neighbourhood plan allocations or potential applications for rural exception sites.

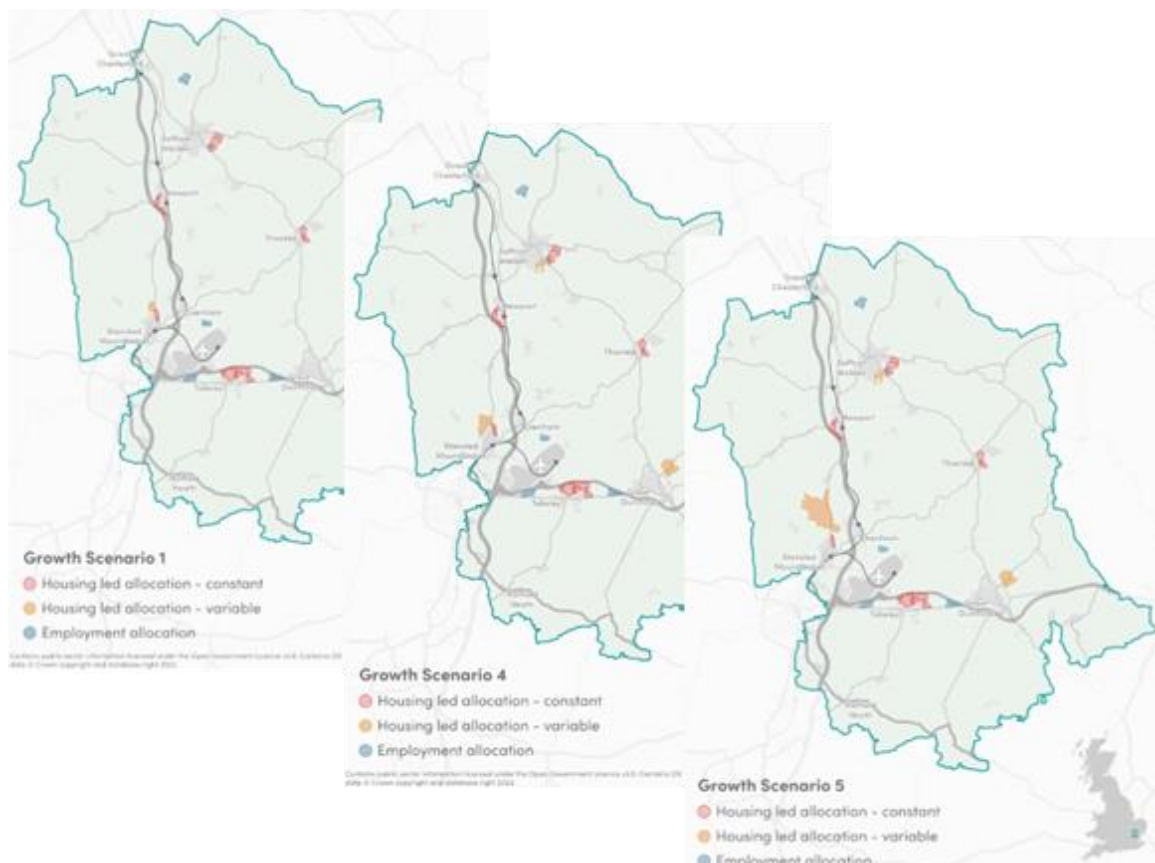


- 5.4.166 The second point to note is that for seven of the eight of the larger villages assigned a housing requirement at the current time the requirement is very similar to that assigned at the Draft Plan stage. Debden is the exception, where the requirement is now notably lower, but it is difficult to envisage assigning a higher requirement, given limited HELAA capacity. It is recognised that there will be the potential to identify additional available sites through the Neighbourhood Plan, but it would not be safe to assume that this will result in significant additional capacity. Debden is located between Newport, Saffron Walden and Thaxted, and it can be envisaged that the village primary school received pupils from these larger settlements, such that there is limited reason to assume any concerns regarding maintaining the school roll.
- 5.4.167 In **conclusion**, there are not considered to be any reasonable alternative approaches in respect of supply from non-strategic allocations at the larger villages. The proposed approach is considered to strike an appropriate balance between supporting growth at villages in line with the NPPF (including to meet locally arising needs, support village vitality and the rural economy, and also to support SME builders) whilst also weighting growth to higher order settlements in line with accessibility, transport and decarbonisation objectives. It is recognised that there is an ongoing national switch-over to electric vehicles, but EVs are not without their issues, including in terms of greenhouse gas emissions, air pollution and traffic congestion / road safety. Also, there is some uncertainty regarding the timing / pace of the national switch-over.
- 5.4.168 Overall, there is little case to be made for assigning housing requirements to additional villages, and whilst there is the possibility of modestly adjusting the housing requirements assigned to the six larger villages listed in the table above - e.g. by 100 homes either way - it would be difficult to comment meaningfully on the implications of this through appraisal and consultation. If anything, there would be greater potential to decrease the requirements across the six villages modestly (on a pro rata basis), given the strategic context, namely a residual need for the Local Plan to identify supply from allocations for at most 6,000 homes and given the breadth of strategic site supply options at higher order settlements, as discussed.

**Table 5.10: Large villages growth scenarios (new supply only) progressed to Section 5.5**

Progressed scenario		Homes	Employment land
1)	Housing requirements assigned to six villages	600	-

**Figure 5.26: Select RA growth scenarios from 2023; all now unreasonable in light of the discussion above**



## 5.5 Reasonable growth scenarios

- 5.5.1 The final step was to **combine sub-area scenarios** introduced above into district-wide reasonable growth scenarios, also accounting for: completions since the start of the plan period = 980 homes; permissions between the start of the plan period ('commitments') = 7,673 homes; and a windfall allowance = 1,540 homes. The total supply from these sources (completions, commitments and windfall) is 10,193 homes.
- 5.5.2 Combining sub-area scenarios to form RA growth scenarios is a straightforward process in light of Section 5.4, which identifies a strategic choice between growth scenarios at just two sub-areas. Specifically, at Great Dunmow there are three growth scenarios, and at Thaxted there are two, which leads to **six district-wide RA growth scenarios** – see Table 5.11.
- 5.5.3 These would involving providing for a total quantum of homes ranging between LHN + 10% and LHN + 18%, which is considered to be a reasonable range of growth quanta to test. To reiterate the discussion presented in Section 5.2, LHN is 675 dpa or 13,500 homes over the plan period.
- 5.5.4 Under the lowest growth scenario the housing requirement would certainly be set at LHN, with a 10% supply buffer, whilst under the highest growth scenario there would be flexibility to consider a requirement set modestly above LHN (or, alternatively, a housing requirement at LHN with a supply buffer of 18%).
- 5.5.5 Also, under all of these scenarios there would be a good trajectory of supply over time, in that there would be good potential to provide for a housing requirement set at LHN on an annual basis over the entire plan period, i.e. there would be no need for a 'stepped trajectory'. Under all scenarios the identified supply falls below LHN over the final five years, but supply will be boosted through at least one Local Plan Review.
- 5.5.6 This approach of ruling out scenarios that would risk generating unmet need is an evolution from the equivalent position in 2023 (see Section 5.5 of the ISA Report). It reflects latest understanding regarding reasonable sub-area scenarios (as discussed above) combined with an understanding that the level of completions and commitments is now significantly higher, relative to the position in 2023.
- 5.5.7 There is no pressure to explore higher growth scenarios, i.e. scenarios with a total supply in excess of LHN +18%, and it is very difficult to identify other sites that might come into contention. Table 5.12 lists some additional omission sites (i.e. options that do not feature in the RA growth scenarios) that perhaps come into contention; however, in each case there is considered to be a strong argument for 'non-support' given the discussion of strategic, settlement-specific and site-specific considerations presented above.
- 5.5.8 With regards to further omission sites, it is fair to flag the option of a 1,500 home new settlement north of Great Chesterford. However, there is no potential to allocate this site within the current local plan, including noting that the aspiration is to expand the scheme to 4,500 homes. There will be the opportunity to revisit new settlement options, likely to include this site, through a Local Plan Review.
- 5.5.9 Similarly, the plan could feasibly be delayed allowing for further work to be undertaken in respect of growth options at certain settlements, including Saffron Walden, but there is no clear reason to suggest that this would be a fruitful exercise, and there is an urgent need to progress the Local Plan (as discussed).
- 5.5.10 Finally, with regards to 'other options' that could feasibly boost supply but which are ruled out on balance, it is also difficult to see any potential to boost the housing requirement assigned to Newport, or potential to assign a housing requirement to either Thaxted or Great Chesterford. There could be the possibility of a modest boost to the requirements assigned to the six larger villages listed in Table 5.9 (above) but appraising any such scenario would not allow for meaningful comparisons with the proposed approach.
- 5.5.11 In conclusion, on the basis of the discussion presented across Section 5 read as a whole, the following RA growth scenarios presented below are considered to represent the current reasonable alternatives:
- Scenario 1 – Constants plus strategic growth to the NE of Great Dunmow
  - Scenario 2 – Scenario 1 plus strategic growth to the east of Thaxted
  - Scenario 3 – Constants plus strategic growth to the SE of Great Dunmow
  - Scenario 4 – Scenario 3 plus strategic growth to the east of Thaxted
  - Scenario 5 – Constants plus strategic growth to the SE of Great Dunmow plus low growth to the NE
  - Scenario 6 – Scenario 5 plus strategic growth to the east of Thaxted

**Table 5.11: The 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>

**Table 5.12: 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

# 6 Growth scenarios appraisal

## 6.1 Introduction

6.1.1 Having defined reasonable alternatives in the form of six growth scenarios, the next step is to present an appraisal under the ‘SA framework’ (see Section 3).

### Appraisal methodology

6.1.2 The appraisal is presented under 13 headings – one for each of the topics that together comprise the SA framework (see Section 3), before a final section presents an overview ‘matrix’. Under each heading, the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green**.<sup>15</sup>


6.1.3 It is important to be clear that there is a need to make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery etc. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness and accessibility.

6.1.4 A final key methodological point to note is in respect of growth quantum. It is not always appropriate to simply conclude a preference for lower growth (Scenario 1) from an environmental perspective, despite the fact that housing growth inevitably leads to environmental impacts. This reflects a view that: A) if housing need is not provided for in Uttlesford it would only have to be provided for elsewhere in a constrained sub-region; and B) if there is an insufficient ‘supply buffer’ over-and-above the housing requirement then the supply would risk falling below the housing requirement in practice, leading to a risk of the District being subject to the presumption in favour of sustainable development.

## 6.2 Appraisal findings

6.2.1 The appraisal is presented under 13 headings – one for each of the topics that together comprise the SA framework – before a final section presents conclusions, including a summary appraisal matrix.

### Accessibility (to community infrastructure)

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
	4	2	5	3	6

6.2.2 Schools capacity has been a key ‘driver’ of spatial strategy and site selection, as discussed in Section 5.4. This is inherently challenging on account of a ‘chicken and egg’ situation whereby the County Council seeks certainty on growth locations before undertaking detailed work in respect of schools capacity whilst, from an Uttlesford Local Plan perspective, there is a need for understanding of schools capacity issues / opportunities to inform thinking in respect of spatial strategy and site selection. However, consulting on a full Draft Local Plan under Regulation 18 (2023) provided a key opportunity to explore issues and options.

6.2.3 Secondary school capacity at Saffron Walden is one key consideration, which is discussed in further detail in Section 9 (because Saffron Walden is a constant / not a variable across the RA growth scenarios that are a focus of the appraisal here), but in summary: there may transpire to be no major concerns, but support for a new secondary school at Takeley acts as a contingency to minimise any residual concerns.

6.2.4 Focusing on the variable growth locations:

<sup>15</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

- Great Dunmow – under all scenarios growth at Great Dunmow would support delivery of a new secondary school at Takeley (notwithstanding the level of existing committed growth at Great Dunmow, including Land East of Highwood Quarry, and the forthcoming new secondary school west of Great Dunmow, which will replace an existing school). The differentiating factor is primary school capacity, with it being the case that Scenario 3 sees an additional 500+ homes relative to Scenario 1, but still only one primary school (as per Scenario 1). It is not clear there would be significant concerns; however, there is a need to recall the general context of wishing to ensure a strong focus on delivering new community infrastructure capacity alongside new homes at Great Dunmow, given the experience of recent years, which is one of new homes being delivered in a somewhat uncoordinated way that has been sub-optimal in terms of infrastructure capacity.
- Thaxted – as discussed, the County Council does not support new primary schools below 2fe for reasons of viability, even where the land is provided to enable schools to expand to 2fe. This being the case, there is a need to flag a concern with the scenarios that would see strategic growth at Thaxted (as per the Draft Plan proposal from 2023). However, there is a degree of uncertainty, recognising that there would be an opportunity to direct further growth to Thaxted through a Local Plan Review within five years. If it could be assumed that the Review will be able to allocate further growth at Thaxted to support a 2fe school, whilst also avoiding constraints etc (which are extensive), then concerns could be allayed. Another consideration is potentially growth at villages surrounding Thaxted, where residents might choose to send children to primary school in Thaxted, but this is likely not a significant consideration.

Also, with regards to implications of growth at Thaxted for secondary school capacity, there are not thought to be any clear implications, noting that the village is equidistant between several schools (existing and planned/proposed).

- 6.2.5 Aside from matters relating to schools capacity, there are also wider considerations in respect of accessibility to community infrastructure (existing and new). At Great Dunmow, an argument in support of growth is good potential to walk to a town centre, but the option of growth to the South East (Scenarios 3 to 5) is thought to perform less well in this regard (although, as a larger site, there could be greater potential to deliver new community infrastructure). At Thaxted, there is thought to be a clear argument for growth aimed at maintaining the viability and vitality of the village centre and also maintaining bus services.
- 6.2.6 In **conclusion**, leaving aside the question of primary school capacity at Thaxted, all of the growth scenarios are strongly supported from a perspective of delivering new homes in such a way that there is good access to community infrastructure for new and existing residents, essentially by aligning with the settlement hierarchy and realising opportunities to focus growth in order to deliver new and upgraded infrastructure. This is in the context of an infrastructure deficit that has arisen due to the prolonged period without an up-to-date local plan and where there has been speculative and piecemeal development.
- 6.2.7 As such, significant positive effects are concluded for Scenarios 1 and 3, and ‘moderate or uncertain’ positive effects for Scenario 5. Matters are discussed further in Section 9 (where there is a focus on all settlements, as opposed to just those that are a variable across the growth scenarios).
- 6.2.8 The Thaxted primary school issue is significant, but there is an element of uncertainty, and it is only an issue for one settlement (i.e. one of the nine highest order settlements), hence the conclusion is ‘neutral’ effects on balance (albeit recognising and argument for predicting negative effects).

### Biodiversity

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
★ 1	★ 1	2	2	2	2

- 6.2.9 The Interim SA Report (2023) was able to predict that the Draft Local Plan would result in ‘moderate or uncertain’ positive effects on the biodiversity baseline, which is an important starting-point for the appraisal at the current time, recognising limited adjustments to strategy / sites. Furthermore, since the 2023 a considerable amount of further work has been undertaken focused on delivering green and blue infrastructure benefits, including through adjustments to concept masterplans at strategic sites and also through a focus on planning for country parks and SANG (see the Country Parks and SANG Study, 2024).

6.2.10 Matters in respect of the plan as a whole are discussed further in Section 9, but focusing on the growth locations that are a variable across the RA growth scenarios:

- Great Dunmow – there is a preference for a focus of growth to the northeast, but this is potentially somewhat marginal. Focusing on growth to the northeast, the proposed developable area is notably unconstrained, and there is an established opportunity to deliver new strategic greenspace in such a way that there are significant enhancements to the River Chelmer corridor, and potentially also the ancient woodland cluster to the south (Markshill Wood). With regards to the site to the southeast:
  - Constraint – onsite is higher, specifically a network of mature / historic field boundaries that do appear likely to contribute to connectivity between small woodland patches / copses within the site and beyond (although the proposal is to integrate these as part of onsite green and blue infrastructure)
  - Enhancement opportunity – has not been explored in detail, but could perhaps be of similar strategic significance, noting that this is at or close to the point where the Chelmer meets other stream corridors, and also noting the community woodland adjacent to the south.
  - Quantum – there is also a need to note that the site to the southeast is a considerably larger site, and there are SSSI woodlands in relative proximity (with highly valued small, scattered woodlands being a characteristic feature of the south of Uttlesford). However, there are no clear concerns in this regard.
- Thaxted – biodiversity is not considered to be a major issue here. Copthall Lane is strongly associated with a surface water flood channel and a green corridor that links to woodlands to the north east of the village. However, the two closest woodlands are neither ancient woodlands nor designated as a CWS. There is also the context of West Wood SSSI to the northeast, which is accessible and managed as a nature reserve by Essex Wildlife Trust. However, the wood would be ~1.5km distant, and it is difficult to foresee recreational pressure being a major concern. The SSSI is in favourable condition.

6.2.11 A final consideration is total growth quantum district-wide. In particular, it is fair to highlight that under higher growth scenarios there would be reduced risk of unplanned growth and/or there could be some flexibility to provide for modest unmet need from elsewhere within a constrained subregion (e.g. biodiversity constraint potentially increases in the direction of the Essex coast). However, it is not clear that this is a significant consideration. Also, it is important to note that higher growth would give rise to a need to revisit the Habitats Regulations Assessment (HRA) work that has been undertaken in support of the Local Plan (including noting that Great Dunmow and Thaxted are both located towards the east of the District, i.e. in the direction of the Essex coast). The HRA Report concludes as follows:

*“The Habitats sites, considered within the Appropriate Assessment for impact pathways that could not be screened out at the Test of Likely Significant Effects stage were: Blackwater Estuary (Mid Essex Coast Phase 4) SPA & Ramsar, and Essex Estuaries SAC. Impact pathways considered were atmospheric pollution, recreational pressure, water quality, and water quantity, level and flow. Of which recreational pressure was brought forward for appropriate assessment. For recreational pressure it was determined that adherence to the Essex Coast RAMS SPD would be sufficient to prevent adverse effects on the Habitats sites. Overall AECOM concluded that there are no adverse effects on Habitats sites as a result of the Uttlesford Local Plan.”*

6.2.12 In **conclusion**, there is a marginal and uncertain preference for a focus of growth to the northeast of Great Dunmow. With regards to significant effects, there is a case for now predicting ‘significant’ positive effects on account of the amount of work that has been undertaken since the Draft Plan stage in respect of planning for biodiversity and green/blue infrastructure. However, there a high bar to reach before ‘significant’ positive effects can be predicted with confidence (particularly ahead of the forthcoming Essex Local Nature Recovery Strategy, [LNRS](#), which will identify strategic priorities for intervention). Also, it is recognised that there are still certain sensitivities and potentially uncertainties, including in respect of growth in proximity to Hatfield Forest. As such, ‘moderate or uncertain’ positive effects are predicted.

### Climate change adaptation

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
=	=	=	=	=	=

6.2.13 A key consideration is the need to avoid development – in particular new homes – encroaching on fluvial flood risk zones, given worsened flood risk under climate change scenarios. Surface water flood risk is another consideration, but this can often be dealt with through masterplanning and sustainable drainage systems (SuDS). Another consideration is development impacting on water flows and, in turn, downstream flood risk; however, it is difficult to pinpoint issues ahead of detailed work, and it is typically the case that SuDS can be implemented to ensure no net worsening of run-off rates, and often a betterment.

6.2.14 It is overall the case that flood risk is not a major issue for the Local Plan, given the growth locations under consideration (see further discussion in Section 9). However, there are some flood risk considerations in respect of the growth locations that are a variable across the RA growth scenarios:

- Great Dunmow – the proposed location for strategic growth to the southeast (Scenarios 3 to 6) is strongly associated with the River Chelmer corridor / flood risk zone. There would, of course, be good potential to avoid fluvial flood risk zones, but there could be pressure to encroach on the flood risk corridors (mindful of a need to make allowances for increased flood risk under climate change scenarios), with a view to a scheme that links most effectively to the town centre. Also, there is a series of notable/significant surface water flood risk zones passing through the site. These do follow field boundaries, such that they could likely be integrated effectively as part of green blue / infrastructure, but these could still act as a constraint to effective masterplanning.

With regards to the two sites that would together deliver strategic growth to the northeast under Scenarios 1 and 2, the smaller site to the west appears to be subject to low flood risk constraint, whilst the site to the east is associated with a series of three or four surface water flood risk channels (see the available mapped data [here](#)). There is also a need to note that the new built form would be upstream of Church End and Great Dunmow, although there appears to be very few properties within the current flood risk zone downstream and, in any case, there is no reason to suggest any concerns in respect of increased downstream flood risk (given potential for effective SuDS). Indeed, it could feasibly be the case that options for strategic flood storage could be explored, in order to deliver a flood risk betterment.

- Thaxted – a consideration is the aforementioned surface water flood risk channel adjacent to Copthall Lane, east of Thaxted, noting that village centre is downstream. However, there is little reason to suggest any significant concern, given potential for effective onsite SuDS.

6.2.15 Other than flood risk it is a challenge to identify climate change adaptation considerations – of relevance to this appraisal of growth scenarios – that are not more appropriately dealt with under other headings.

6.2.16 In **conclusion**, it is difficult to differentiate between the two main competing growth locations at Great Dunmow, whilst at Thaxted there is a degree of surface flood risk constraint, but it is not possible to conclude that this is in any way significant. At Great Dunmow it is recognised that the Level 2 Strategic Flood Risk Assessment (SFRA) has concluded that: *“Development is likely to be able to proceed if... Development is steered away from... the small flow paths/areas of surface water ponding are incorporated and considered within the development design.”* However, there remains an element of uncertainty regarding the extent to which this will be the case, i.e. the extent to which surface water flood risk will be a constraint to effective masterplanning. Also, it is important to recall that equivalent assessment work has not been undertaken for the site to the southeast of Great Dunmow (also, the Environment Agency has not been consulted on this site, in that it did not feature in the Draft Plan in 2023, nor in the RA growth scenarios that were a focus of appraisal in the Interim SA Report). As such, and taking a precautionary approach, it is appropriate to flag a ‘moderate or uncertain’ negative effect across all of the scenarios. See further discussion in Section 9.

### Climate change mitigation

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
2	2	2	1	2	2

- 6.2.17 The primary consideration here is per capita built environment emissions, given the potential to cover matters relating to transport emissions under other topic headings.
- 6.2.18 Strategic growth locations can give rise to an opportunity over-and-above smaller developments, given economies of scale and also the possibility of delivering a mix of uses onsite, which can feasibly support one or more heat networks. Strategic growth locations can also give rise to an opportunity to deliver ‘smart energy systems’ that link heat networks / heat pumps, solar PV, power consumers and battery storage. Also, it is simply the case that large sites will generate a high degree of attention and scrutiny, and housebuilders will often be keen to demonstrate good practice or even exemplar development.
- 6.2.19 However, the relationship between scale and decarbonisation opportunity is not clear-cut, e.g. because strategic sites often have to deliver costly infrastructure upgrades. Also, heat networks are technically challenging to deliver, and practice is not well advanced nationally, with a clear opportunity currently only seen to exist where there is very high density development and/or a good mix of uses (to allow heat to be shared across the course of the day) and/or a source of waste or ambient heat that can be drawn upon.
- 6.2.20 A further consideration, in respect of built environment decarbonisation, is a case for directing growth to locations that benefit from strong **viability**, with a view to ensuring funding for decarbonisation measures and potentially delivering net zero development (recognising competing funding priorities).

**Box 6.1: Defining net zero development**

Another important consideration is around ensuring that ‘net zero development’ is carefully defined. There are perhaps three key points to make. Firstly, any approach to net zero development must align with the energy hierarchy, which means a primary focus on efficiency (‘fabric first’) followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort. Secondly, there are two broad approaches to calculating net zero and evaluating proposals, namely 1) the methodology applied under the Building Regulations; and 2) an energy-based approach. The two approaches are compared and contrasted in a recent report [here](#).<sup>16</sup> Thirdly, it is important to be clear that the focus of discussion above is in respect of ‘operational’ energy/carbon, i.e. the energy used / carbon emitted as a result of the development’s occupation / use. Additionally, there is a crucial need to consider the ‘whole life cycle’ of a development, to include to the emissions associated with construction, maintenance, retrofitting and demolition (often referred to simply ‘embodied’ carbon or emissions).


- 6.2.21 In light of these points, there is potentially a decarbonisation argument for the higher growth scenarios, given: A) development viability is broadly quite high across Uttlesford, and this is notably the case at Thaxted; B) the sites at Great Dunmow do not generate concerns around fragmented land ownership, which can be a barrier to deliverability and, in turn, affect development viability; C) at Thaxted there are three landowners, but the main landowner is the county council, which is a ‘positive’ from a perspective of wishing to deliver net zero development to exacting standards (see definition above) alongside affordable housing, infrastructure delivery etc; and C) the SE Great Dunmow site (Scenarios 3 to 6) would deliver a considerable concentration of growth to include a good mix of uses onsite (feasibly to include employment), which would give rise to economies of scale (with benefits for scheme viability and, in turn, the potential to deliver an ambitious net zero development) and it could also feasibly be the case that opportunities to draw ambient heat from the River Chelmer to feed heat into a heat network could be explored (albeit this is unlikely to be a viable option; similarly, there is no suggestion of drawing electricity from the adjacent committed solar farm, recognising that the solar farm will feed the national grid).

<sup>16</sup> Under the Building Regulations methodology the question for any given planning application is the extent to which the development can improve on a Target Emissions Rate (TER), measured in percentage terms up to a possible 100% improvement. The energy based methodology involves scrutiny in absolute terms, measured in terms of kWh /m2/yr. It has wide-spread support amongst specialists, including due to the simple fact that actual ‘as built’ performance can be monitored using a smart meter. However, on 13th December 2023 a Written Ministerial Statement was released which appears to prohibit its use in local plans.



- 6.2.22 In **conclusion**, it is fair to flag support for concentrated growth at Thaxted and concentrated growth at SE Great Dunmow from a built environment decarbonisation perspective, because both growth locations appear to be very well suited to delivering net zero development to exacting standards (to include with operational net zero delivered onsite, i.e. without recourse to offsetting).
- 6.2.23 With regards to significant effects, whilst all scenarios would undoubtedly see an improvement on the baseline (a situation whereby growth continues to come forward but in a less well-planned way, and without stringent development management policy in place such that Building Regs apply by default), there is a need to reach conclusions mindful of established objectives and targets, including the local 2030 net zero target, which amounts to a high bar to reach before predicting positive effects of any significance.
- 6.2.24 It is recognised that the District is strongly committed to stringent development management policy aimed at achieving net zero development (to an exacting standard, to include net zero achieved onsite). However, it is not possible to be entirely certain that this will prove to be viable in all cases, hence there is a need to take steps through spatial strategy and site selection aimed at maximising the opportunity.
- 6.2.25 In this light, it is considered appropriate to flag ‘moderate or uncertain’ negative effects across the growth scenarios, as per the conclusion reached in the Interim SA Report (2023). Certain of the sites are associated with a theoretical opportunity (to deliver net zero development to an exacting standard), but there are few if any firm commitments, or details regarding site-specific opportunities to be realised.
- 6.2.26 In this regard, it is important to note that none of the scenarios involve a focus on large-scale strategic growth locations akin to the previously withdrawn local plan (2020), or what is proposed at Harlow and Gilston Garden Town (~10,000 homes, e.g. where detailed masterplanning work has been completed and where a [Design Review Panel](#) is in place to scrutinise developer proposals), or what might be anticipated in the future in the Greater Cambridge area. Finally, there is a need to note that much work on masterplanning and infrastructure planning has been undertaken since 2023, including with a focus on addressing local community concerns, and it is conceivable that this will have some implications for development viability and, in turn, the ability to deliver net zero developments to an exacting standard.

### Communities, equality, inclusion and health

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
4		5	2	6	3

- 6.2.27 The aim here is to discuss factors other than in respect of ‘Accessibility’. There are wide-ranging such considerations, including recalling the focus on equality and health considerations, which makes it inherently difficult to reach clear and concise conclusions.
- 6.2.28 At the Regulation 18 stage, the ISA Report (2023) focused on: place-making, high quality design and beauty; neighbouring uses (e.g. proximity to the M11 or A120); green and blue infrastructure; access to the countryside; active travel; traffic congestion; green belt; Countryside Protection Zone (CPZ); village vitality; relative deprivation; rural deprivation and isolation; and Gypsies And Travellers.
- 6.2.29 The conclusion at the Regulation 18 stage was that perhaps the primary issue was around the matter of further growth at Great Dunmow, given the extent of recent and committed growth at the town. Specifically, the appraisal favoured a scenario that would see nil growth at Great Dunmow via new allocations. A contextual factor, discussed as part of the appraisal in 2023, was an understanding that the previous withdrawn local plan (2020) involved a clear strategy of focusing growth at three large new settlements in order to avoid further growth at existing settlements as far as possible.
- 6.2.30 However, at the current time concerns in respect of further growth at Great Dunmow are reduced. Relatively limited concerns were raised through consultation, and a considerable amount of work has been undertaken to explore how to bring forward strategic expansion to the northeast of the town in such a way that community benefits are maximised. This is most notably via new strategic green and blue infrastructure, but it is also important to note the new proposal to bring forward a new care home.

- 6.2.31 Nonetheless, there remains an element of concern regarding the scale of growth at Great Dunmow and the extent to which this is 'good growth' focused on delivering benefits to the town beyond new homes. In this light there is a case for favouring Scenarios 1 and 2, which would deliver fewer homes but potentially similar infrastructure benefits. However, on the other hand, there is considerable uncertainty regarding precisely what benefits could be delivered by a strategic expansion to the southeast.
- 6.2.32 A more significant factor for consideration through this current appraisal is considered to be the matter of supporting growth at Thaxted. This has already been a focus of discussion above, with a view to flagging a specific concern regarding primary school capacity. However, putting this specific issue to one side (see discussion above regarding a possible route to boosting confidence around viability of a new school) there is a clear 'communities' argument for supporting housing growth at Thaxted.
- 6.2.33 Whilst there has been some housing growth over recent years and decades, this in combination with committed housing growth is fairly low, and house prices are high (~£535,000, which is ~£100,000 more than the average for the District), hence it is possible to foresee a situation whereby newly forming households struggle to buy or rent locally. Also, there are the related matters of delivering affordable housing and also maintaining village services and facilities and the vitality of the village centre.
- 6.2.34 It is recognised that the matter of housing growth to meet local needs and deliver wider community benefits is a focus of the adopted Neighbourhood Plan, which for example explains:
- “Community services (healthcare; education; roads; recreation; etc) are generally operating at capacity and whilst plans are being made for expansion, the scope for this is limited by physical and budgetary constraints. New schools, new roads and new community buildings can only be developed with funding generated by very major house building programmes which would in turn destroy the intrinsic character of the local environment and its historical context. Thaxted is too important to be overwhelmed and destroyed by new development around its perimeter. The principal issue therefore is what form of development can Thaxted accommodate?”*
- It is apparent that the impact of further large scale housing development on the land surrounding the centre would have disastrous consequences for the village and the setting of both the Conservation Area and key heritage assets. The village has been under pressure from developers proposing inappropriate schemes which would bring no benefits and only damage what already exists. This Plan has to prevent that type of development.”*
- 6.2.35 The Neighbourhood Plan then goes on to explain: *“A Housing Needs Survey was also commissioned and this was undertaken by the Rural Communities Council of Essex (RCCE) who assessed housing needs based on questionnaire responses. The principal conclusion was that in fact, there was limited demand from the local community for additional housing.”* This then feeds into an objective to guide thinking around new development, namely that it must be *“of a scale and nature such that they do not impact on the town’s character, surrounding countryside and tourism potential.”*
- 6.2.36 However, the plan was finalised in 2018, and the situation may have evolved since that time. For example, the Uttlesford Local Housing Need Assessment (LHNA, 2024) presents a range of evidence, including around the population of Uttlesford aged over 65 having increased by 32.1% between 2012 and 2022. Also, over a similar period, the number of homes owned outright and the number of rented homes increased at a much higher rate than the number of homes owned with a mortgage.
- 6.2.37 In this light it is considered to flag a 'communities' benefit to supporting strategic growth at Thaxted, assuming that the primary school issue could be addressed, and notwithstanding historic environment and landscape constraints to growth at the village, as discussed further below.
- 6.2.38 In **conclusion**, there is support for growth Thaxted and at Great Dunmow there is marginal support for a focus of growth to the northeast.
- 6.2.39 With regards to significant effects, there is a need to factor-in wide-ranging considerations associated with all of the other proposed growth locations / the wider spatial strategy (recalling that some settlements are notably not assigned growth), which is a task for Section 9. For example, and in particular, there is a need to factor-in latest proposals for Takeley, where significant concerns regarding the proposed growth strategy were raised through the consultation in 2023. Overall, as discussed in Section 9, there is now considered to be strong support for the spatial strategy, with a notably improved picture since the Draft Plan stage (2023). Under Scenario 2, which would see growth see strategic growth at Thaxted alongside a new primary school, it is considered appropriate to flag a particularly strongly performing strategy.

### Economy and employment

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
2	2	★1	★1	★1	★1

- 6.2.40 Employment land supply is broadly held constant across the scenarios and, as discussed in Section 9, under all scenarios the proposal is to provide for identified employment land needs with a significant 'buffer' to account for uncertainties and any unforeseen delivery issues.
- 6.2.41 One factor for consideration here is the possibility of delivering new employment land as part of a strategic urban extension to the southeast of Great Dunmow. However, as discussed in Section 5.4, whilst this has been flagged as a possibility by the site promoter in the past, it is no longer discussed as an option. The land in question is reasonably well suited to employment land in terms of road connectivity. However, landscape would be a constraint, and the effect could be to increase the argument for considering the overall scheme as a new settlement linked to Great Dunmow, more so than an urban extension.
- 6.2.42 With regards to Thaxted, it is recognised that housing growth could support the rural economy, particularly noting that Thaxted is a very rural settlement (there is a need to travel at least ~5km in any direction before reaching another village, with the nearest larger village). However, there is no clear evidence to suggest that this is a significant factor to the extent that it would be appropriate to differentiate the alternative scenarios, also noting cross-over with the appraisal findings presented above under 'Communities'.
- 6.2.43 In **conclusion**, there is very strong support for the proposed strategy for accommodating employment land needs under all scenarios (as discussed in Section 9). With regards to differentiating between the growth scenarios, whilst highly uncertain, it is considered appropriate to flag the possibility of delivering new employment land at the site to the southeast of Great Dunmow. As a contextual factor it can also be suggested that growth in employment land at Great Dunmow has perhaps not kept pace with housing growth over recent years and decades. However, there is some committed employment land, and the current proposal is to allocate a significant new site for industrial and logistics uses to the west of the town, as previously proposed in the Draft Local Plan (2023) and as discussed further in Section 9.

### Historic environment

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
3	4	★1	3	2	3

- 6.2.44 This is a key growth-related issue locally. The withdrawn local plan's focus on three large garden communities gave rise to significant historic environment concerns, however, there are also clear sensitivities associated with a strategy that focuses growth at the existing higher order settlements.
- 6.2.45 The equivalent appraisal work in 2023, as reported in the Interim SA Report published at that time, flagged a notable degree of concern associated with a focus of growth to the northeast of Great Dunmow and also with the option of strategic growth to the east of Thaxted. Concerns were also raised through the consultation, and then subsequently detailed Heritage Impact Assessment (HIA) work was undertaken.
- 6.2.46 Beginning with **Thaxted**, the village is clearly very sensitive in historic environment terms, with the medieval core containing seven Grade I listed buildings, and Grade II\* listed Thaxted Windmill is also an important landmark to the west. The village has expanded beyond the designated conservation area to the north and east, but overall retains a very strong historic character linked to the surrounding chalk influenced landscape, as experienced from the roads through the village (also the Harcamlow Way).

6.2.47 The sites in question are subject to limited *immediate* constraint. However, there is a need to consider impacts to the landscape setting of the conservation area, and also likely high car-dependency which in turn, will generate traffic impacts, particularly through the Thaxted Conservation Area (southward journeys) but also through Saffron Walden (northward journeys).

6.2.48 Historic England did not object to the proposed allocation through the consultation in 2023. However, there was a request to “be clearer in defining land within the allocations which would be inappropriate for development owing to the church’s views.” Subsequently, HIA work was undertaken for the largest component of the site proposed for allocation in the Draft Local Plan (Site 020), concluding:

*“This area is considered to have the potential to contain archaeological remains which would be adversely affected by any development within the site and could also affect the settings of the Thaxted Conservation Area and the Grade I listed Church of St John the Baptist.*

*It is anticipated that the site could accommodate limited development so long as appropriate design measures were implemented and an appropriate programme of archaeological investigation and recording was carried out.”*

6.2.49 Other specific concerns raised by the HIA included:

- Development could disrupt views of the spire of the Grade I Church of St John the Baptist, reducing the visibility of the church within the wider landscape.
- Large-scale development could result in an influx of traffic using Newbiggin Street/Watling Street/Town Street through the centre of the conservation area, detracting from the historic nature of the area.
- Development along the higher ground of the northern edge of the site would be prominent within the setting of the listed buildings to the north and would detract from their setting.
- Development could remove the tranquil rural setting of Copthall Lane through its visual impact and through increased levels of noise and light in the area.

6.2.50 With regards to **Great Dunmow**, the following statement was made in the Interim SA Report (2023):

*“... there is a clear concern regarding impacts to the Church End Conservation Area, which is associated with a characteristic position in the landscape. As well as risks of impacts to the setting of the Conservation Area, which includes a Grade I listed church and also a Grade II\* listed house (located directly on the B1057), there is also a need to consider the impact of increased traffic. A further consideration is the notable density of historic farms / farmsteads within the rural landscape to the north and east of Church End. This includes Crouches Farm, where the farmhouse is Grade II listed, although the potential for historic buildings to be retained as a focal point of a new community can be envisaged.*

*Overall, there is clearly a need for further work to confirm ways of avoiding and mitigating impacts, although it is important to note that early work to date includes a strong focus on green and blue infrastructure enhancements, including with a view to enhancing access to the historic river corridor and also ensuring that expansion of Church End is well contained in the landscape.”*

6.2.51 Subsequently, Historic England raised a “significant concern” through the consultation (with this being the only proposed allocation for which a significant concern was raised). In turn, the Council has undertaken detailed work to adjust the strategy for growth to the northeast of Great Dunmow, as discussed in Section 5.3, which has included a major focus on delivering new strategic green and blue infrastructure, but also the addition of an additional development parcel to the west of the River Chelmer (Site 017), which is itself subject to historic environment constraint.

6.2.52 The revised approach to growth to the northeast of Great Dunmow was then subjected to HIA, with two separate HIAs undertaken for the two component HELAA sites, namely Site 009 to the east of the River Chelmer (the site previously proposed in the Draft Local Plan) and Site 017 to the west (the new site).

6.2.53 Focusing on Site 009, the HIA conclusion is as follows:

*“Development within the site has the potential to directly affect known and previously unidentified archaeological remains within the site and could also affect the setting of the nearby scheduled monuments and listed buildings, the Church End Conservation Area and the northern part of the Great Dunmow Conservation Area and the ancient woodland of Markshill Wood.*

*Some parts of the site may be able to accommodate development, but large-scale development would have an adverse effect upon the setting of the Parsonage Farm scheduled monument and the Church End and Great Dunmow Conservation Areas. Adverse effects upon the setting of the nearby scheduled monuments and listed buildings could be reduced through implementation of design measures.*

*Due to the open and less wooded nature of the northern block of the site, as well as the topography of the site and its visibility in views from Parsonage Down and the Church of St Mary the Virgin, it is unlikely that the adverse effects upon the setting of the two conservation areas could be completely mitigated.*

*The southern block, however, due to its closer proximity to modern development and the lower level of its western end, may be more able to accommodate development if appropriate design measures were implemented to protect the ancient woodland to the east and the listed buildings to the west...*

6.2.54 Specific concerns raised then include:

- Development within the site could erode the dispersed rural character of the listed buildings along the B1057 (The Broadway)
- Development within the site could affect the isolated rural character of the listed building at Marks Farm and could disturb archaeological remains associated with the moated site at Marks Farm.
- New development could become visually prominent in the view looking east that incorporates the Church End Conservation Area. This could detract from the setting of the church and its prominence in views.
- New development could become visually prominent in view looking east from Parsonage Down in the northern part of the Conservation Area. This could reduce the open character and countryside setting of this part of the conservation area.

6.2.55 With regards to Site 017, the HIA concludes:

*“Development within the site has the potential to directly affect known and previously unidentified archaeological remains within the site, including those of the scheduled monument of the Square and circular barrows 260m south-east of Parsonage Farm, and could also affect the setting of the nearby scheduled monument of Parsonage Farm moated site and listed buildings, the Church End Conservation Area and the northern part of the Great Dunmow Conservation Area.*

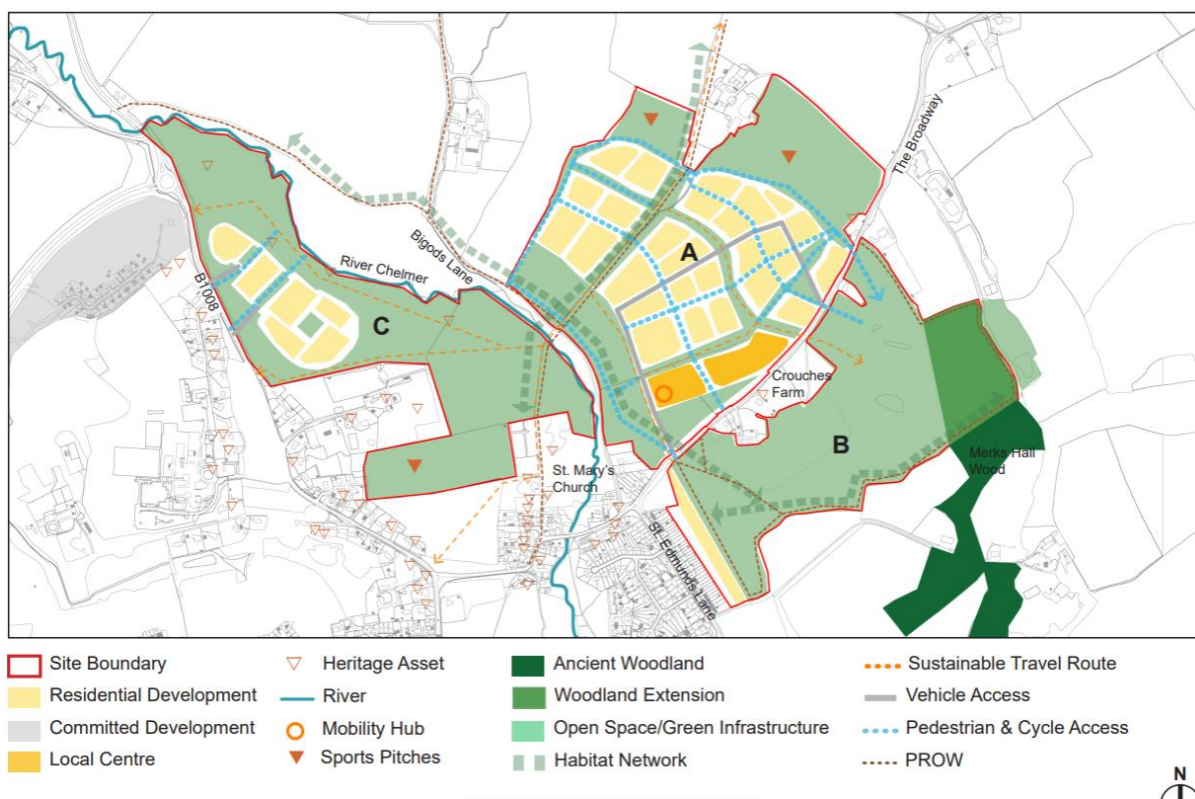
*Some parts of the site may be able to accommodate development, but large-scale development would have an adverse effect upon the setting of the Parsonage Farm scheduled monument, Grade II listed buildings adjacent to the site, and the Church End and Great Dunmow Conservation Areas. Adverse effects upon the setting of the scheduled monuments and listed buildings could be reduced through implementation of design measures. Due to the open nature of the site, as well as its topography and visibility in views from Parsonage Down and towards the Church of St Mary the Virgin, it is unlikely that the adverse effects upon the setting of the two conservation areas could be completely mitigated. Utilising small-scale development within the site would allow the rural setting of the area to be maintained and limit the additional noise and traffic created.”*

6.2.56 Overall, it is clear that there are residual concerns around historic environment impacts, albeit these are reduced on account of the work that has been undertaken on masterplanning and planning for strategic green and blue infrastructure, plus there will be the potential avoid and mitigate impacts at the planning application stage. In particular, it is important to note that the proposal is now to concentrate built form to the east of the river corridor (Site 009) within the more constrained “northern block”. With regards to Site 017 to the west of the river corridor, it seems likely that the proposed location for built form does amount to “small-scale development within the site [that] would allow the rural setting of the area to be maintained and limit the additional noise and traffic created”. However, there is a degree of uncertainty on this point.

6.2.57 Finally, there is a need to consider the option of alternatively directing strategic growth to the southeast of Great Dunmow, albeit recognising that Historic England has not been consulted on this site (as it was not a proposed allocation in 2023, nor did it feature in the RA growth scenarios at that time) and it has not been subjected to HIA. In short, the site is subject to limited constraint, at the very least relative to the option of growth to the northeast, and potentially in also in absolute terms. There are few concerns regarding impacts to designated assets, there would be significantly reduced concerns regarding traffic through a conservation area, and [historic mapping](#) shows this area to be notably rural. However, there is quite a dense network of historic field boundaries, and one other consideration is Dunmow Park to the west, which would become somewhat enveloped, as opposed to marking the southeast extent of the town.

6.2.58 In **conclusion**, the approach to growth at Great Dunmow and Thaxted are the two key historic environment considerations for the Local Plan, particularly in light of latest work to avoid historic environment constraints/concerns at Takeley (as discussed in Section 9). The historic environment constraint at Great Dunmow is potentially significant, but it will be for Historic England to comment further on the extent to which the latest proposals – in terms of masterplanning, site-specific policy and district-wide development management policy – serve to appropriately mitigate concerns. On balance, it is also considered appropriate to flag the risk of a ‘moderate or uncertain’ negative effect for those growth scenarios involving strategic growth at Thaxted, but there is some uncertainty in this regard.

**Figure 6.1:** The concept masterplan for NE Great Dunmow (also showing listed buildings)



**Homes**

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
6	5	4	3	2	1

6.2.59 All scenarios perform well because, as discussed in Section 5, all would involve a level of supply that allows for the housing requirement to be set at LHN along with a generous supply buffer (i.e. a situation whereby the supply exceeds the total housing requirement over the course of the plan period).<sup>17</sup> Also, under all scenarios the supply would be somewhat front-loaded, which is supported, recognising that there will be the potential to boost supply in the latter years of the plan period (as things stand, the supply drops below the annualised housing requirement in the final five years) through a Local Plan Review.

6.2.60 Under the higher growth scenarios (particularly Scenario 6) supply would exceed the housing requirement to such an extent (particularly in the first ten years of the plan period) that there would be flexibility to boost the housing requirement in response to locally arising affordable housing needs and/or in response to unmet need from elsewhere, which is obviously strongly supported from a pure ‘housing’ perspective.

<sup>17</sup> A generous supply buffer is important from a perspective of ensuring that supply does not dip below the annualised housing requirement at any point in the plan period (which could lead to a risk of being subject to the presumption in favour of sustainable development, albeit the effect of this would likely be to redress the situation by allow for additional homes to be delivered).

- 6.2.61 In wider respects there is limited potential to confidently differentiate between the growth scenarios, recognising that the matter of locally arising housing needs at Thaxted has already been discussed above. It is also worth noting that the Thaxted sites are likely to benefit from strong deliverability credentials and strong development viability, such that there would be confidence regarding delivery timescales and also the potential to deliver a policy compliant quota of affordable housing (alongside meeting wider policy requirements / delivering on wider objectives, e.g. net zero development).
- 6.2.62 At Great Dunmow development viability is not as strong, and there is also a need to consider the extent of committed growth to the west of Great Dunmow (i.e. there could feasibly be issues around market saturation leading to delayed delivery and or impacting development viability). In this regard, it is also important to note that the southeast would involve a larger quantum of growth and there is understood to be a single landowner, which could assist with ensuring strong development viability would mean good potential to negotiate planning gain. It could also possibly be the case that there is less need to deliver costly road upgrades (but this is highly uncertain; see further discussion below). However, there are no particular concerns regarding strategic growth to the northeast of the town, in light of the viability work that has been undertaken in support of the Local Plan and recognising that there has been close liaison with the landowners involved, both through the consultation in 2023 and through subsequent discussions.
- 6.2.63 A final consideration is Gypsy and Traveller accommodation needs. The ISA Report (2020) explained:
- “... this may prove to be a key matter for consideration at the next stage of plan-making, pending the outcome of an updated needs assessment... A number of the strategic sites that feature across the growth scenarios could potentially be suited to providing a site, but this is a factor that ideally needs to feed in early at the masterplanning stage, e.g. with a view to ensuring good road access, and a degree of separation or seclusion from the ‘bricks and mortar’ community. Also, it is important to recognise that there are strategic arguments for stand-alone sites for Gypsies and Travellers (including from a delivery perspective), and there can also be reasons for supporting expansion of existing sites.*
- Every effort must be made to meet needs, as poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers tending to experience very poor outcomes in terms of health, education and a range of other indicators (see [www.gypsy-traveller.org/our-vision-for-change](http://www.gypsy-traveller.org/our-vision-for-change)).”*
- 6.2.64 At the time of writing assessment work has been partially completed to understand the needs that are being generated from the 20 existing sites in the District (most of which are very small). Specifically, the assessment identifies a need for 18 pitches over the next five years, which is a key time horizon. Supply has been identified to meet this need, as discussed further in Section 9. However, the Government’s Planning Policy on Traveller Sites (PPTS, 2023) also requires provision for longer term needs.
- 6.2.65 With regards to longer term needs, it is noted that none of the emerging proposed strategic allocations include provision for Gypsy and Traveller pitches. The only other point to note here is that the southeast Great Dunmow strategic site option could potentially be quite well-suited to delivering a Gypsy and Traveller site, noting the amount of land that is available / under the control of the site promoter, and also noting good access to the strategic road network.
- 6.2.66 In **conclusion**, there is a clear need to rank the scenarios in order of total growth quantum. All of the scenarios perform well, particularly Scenario 6, but there it would not be appropriate to predict ‘significant’ positive effects ahead of certainty in respect of providing for Gypsy and Traveller accommodation needs.

### Land, soils and other resources

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
★ 1	2	★ 1	2	★ 1	2

- 6.2.67 Uttlesford is associated with notably high quality agricultural land, in the national context. Specifically, the nationally available dataset (available at [magic.gov.uk](http://magic.gov.uk)) shows the great majority of the District to comprise **grade 2 quality agricultural land**, where grade 1 quality land is that which is of the best quality nationally.

6.2.68 There are also areas of grade 3 quality land associated with the main river valleys, including a significant area in the vicinity of Great Dunmow. However, this does not give rise to the potential to differentiate between the growth scenarios with confidence. This is because the national dataset is very low resolution and also low accuracy, in the sense that it does not differentiate between land that is of grade 3a quality (which the [NPPF](#) defines as 'best and most versatile') and that which is of grade 3b quality.

N.B. there is also a second agricultural land quality dataset available at [magic.gov.uk](http://magic.gov.uk), which reflects the outcomes of field surveying and hence is highly accurate. However, the dataset is very patchy (submitted as part of planning applications), with no data available for either Great Dunmow or Thaxted.

6.2.69 In **conclusion**, whilst it would not be appropriate to flag a concern with higher growth, recognising that Uttlesford's neighbouring local authorities are similarly constrained by high quality agricultural land, it is considered appropriate to flag a preference for a lower growth strategy at Thaxted, given that the village is strongly associated with grade 2 agricultural land. There is also an argument for maximising growth at Great Dunmow (Scenarios 5 and 6), and it is noted that the site to the southeast is strongly associated with the River Chelmer corridor, along which runs a band of lower quality (grade 3) agricultural land; however, on balance the scenarios are not differentiated in this regard.

6.2.70 With regards to significant effects, the conclusion reached on balance is 'moderate or uncertain' negative effects. There is an argument for predicting 'significant' negative effects; however, it is important to reiterate that grade 2 quality agricultural land is quite wide-spread across the wider sub-region, with the western part of East Hertfordshire (around Stevenage) the nearest broad area associated with extensive lower quality (grade 3) land. There is also extensive grade 3 quality land in South Essex, including the majority of Brentwood District and the southern part of Chelmsford District.

### Landscape

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
=	=	=	=	=	=

6.2.71 Whilst there are no nationally designated landscapes, landscape character and capacity/sensitivity is a key issue locally, and one that has been explored through recent character and sensitivity studies.

6.2.72 Focusing on the three variable growth locations (NE Great Dunmow, SE Great Dunmow, east of Thaxted), the Landscape Sensitivity Study (2023) assigns 'moderate-high' sensitivity to all three areas, such that it is difficult to differentiate between them with any confidence. Further considerations are:

- NE Great Dunmow – with regards to the main proposed development area to the east of the River Chelmer, this is a somewhat open and expansive landscape with limited features within the landscape to contain growth, and the new proposal to concentrate development to the north of the B1057 does nothing to allay concerns regarding containment. In particular, the concern is future development creep to the northwest along the Chelmer Valley, noting the nearby historic farmstead.

With regards to the smaller proposed development parcel to the west of the river, this land is relatively well-related to the settlement edge (see Figure 6.1, above). However, it does seem likely that there will be impacts to long distance views across the river valley, as experienced from the B1008. However, on the other hand, the effect of development (certainly across both sites in combination; also potentially under Scenarios 5 and 6, which would see just development to the west of the river) would be to significantly increase accessibility to the river corridor which, in turn, would support appreciation of the river corridor and its close historic association to with Great Dunmow and Church End.

- SE Great Dunmow – this is relatively steep land strongly associated with the river corridor. On the one hand, the topography combined with other features in the landscape generates confidence regarding long-term containment, i.e. the potential to deliver comprehensive growth with low risk of sprawl. However, on the other hand, the land is visible from the B1256 Braintree Road, and could well be quite widely appreciated as contributing to the landscape setting of Great Dunmow. Also, and importantly, the Saffron Way long distance trail passes through the centre of the site.



- Thaxted – is overall quite sensitive in landscape terms, but there is a degree of landscape capacity to the east. Cophall Lane, which is located centrally within the proposed broad growth location, is associated with a shallow valley (also a strong surface water flood corridor and green corridor), which assists with landscape containment. There is also wider potential to draw upon topography and strong features within the landscape for containment, although this is less the case to the north east.

6.2.73 In **conclusion**, at Great Dunmow there is an argument for favouring growth to the northeast, but this is uncertain, including taking a long-term perspective, and so it is considered appropriate to conclude that the two options perform broadly on a par. With regards to Thaxted, it is recognised that there is a landscape constraint to growth here, but the constraint has also been to some extent reflected in the strong conclusions reached above under the historic environment heading. As such, and on balance, it is considered appropriate to rank the performance of the alternatives broadly on a par.

6.2.74 With regards to significant effects, there is a need to additionally factor-in landscape constraints affecting the growth locations that are a constant across the scenarios, which are a focus of appraisal in Section 9. On the one hand significant work has been undertaken to reduce concerns since the Draft Plan consultation stage (2023), including major adjustments to the proposed configuration of growth north of Takeley, work to contain growth locations with new strategic greenspace at Saffron Walden and Stansted Mountfitchet and the decision (as discussed in Section 5.4) to significantly adjust the strategy in respect of Newport. However, on the other hand, certain inherent sensitivities remain, including at Saffron Walden (including accounting for a possible future link road extending to the south of the town). There is also the broad context of well-established local concerns regarding urban extensions, which resulted in the ‘garden communities’ strategy was at the core of the previous withdrawn Local Plan. On balance, it is considered appropriate to flag ‘moderate or uncertain’ negative effects, as per the conclusion reached in 2023.

### Transport

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
★ 1	2	★ 1	2	2	3

6.2.75 Beginning with **Thaxted**, whilst there is some transport merit to the option of growth to the east of the village in terms of delivering and supporting village services and facilities (such that they can be accessed by residents via walking and cycling), and also maintaining bus services, an overriding consideration is that Thaxted is a rural village associated with high car dependency (e.g. with secondary schools 6 – 10 km distant). Also, there are concerns with junction capacity in the village centre, with the Transport Topic Paper published in 2023 explaining: *“The [B184 / B1051 / Orange Street] junction suffers significant delays as a result of the Local Plan growth and will require an integrated highway scheme in order to mitigate the impact. ... the junction exceeds its operational capacity and delays increase significantly...”*

6.2.76 With regards to **Great Dunmow**, arguments for and against growth from a transport perspective are more nuanced. On the one hand, the town centre has a good offer, and the town as a whole has a good service score (see Figure 5.2; albeit Great Dunmow’s score is not much higher than that for Stansted Mountfitchet, where there is also a train station). Also, Great Dunmow is understood to be generally quite a ‘walkable’ town. However, on the other hand, the village has quite poor public transport accessibility and, whilst cycling to employment locations to the west is a possibility, it is likely not a particularly attractive option for many (at least ahead of new infrastructure). Comparing and contrasting the two broad growth options:

- Walking and cycling – the option of growth to the southeast could involve new homes concentrated slightly closer to the town centre. However, there is less certainty regarding the potential for safe and attractive walking and cycling routes than is the case for the option of growth to the northeast.
- Road transport including busses – it does appear likely that the option of growth to the southeast is preferable, given easier access to the strategic road network. Detailed work has been undertaken to explore bus connectivity options in support of growth to the northeast (see the A120 Study, 2024), but these all involve indirect routes with implications for journey times. It seems likely that a new community to the southeast would have good access to existing bus stops along the B1256 with numerous services and, in turn, good potential to access destinations both to the west (Tesco, Takeley, Stansted, Bishops Stortford) and to the east (Braintree) by bus, and there might be potential to support enhanced services.

The figures below aim to supplement this discussion of the alternative growth locations at Dunmow, with Figure 6.2 serving to highlight good walking and cycling connectivity between Church End and the town centre (and beyond) and Figure 6.3 highlighting existing bus services along the main road corridor.

Finally, it should be noted that the A120 Corridor Study (2024) presents alternative options for bus routes to serve northeast Great Dunmow, including dependent on whether or not it is possible to upgrade the bridge at Church End. The current Transport Topic Paper (2024) concludes: *“A new local bus service could be created that links both housing allocations and could connect to the town centre and the Tesco superstore. The infrastructure requirements... service routing and frequency would need to be explored further...”* Overall, it seems clear that there are some uncertainties around the bus connectivity options.

6.2.77 In light of the above discussion, there is reason to suggest a transport preference for growth concentrated at SE Great Dunmow. However, there is also a need to factor-in that this would be a considerably larger scheme. On the one hand, this could mean additional funds being made available to fund ‘sustainable transport’ interventions, such as enhancements to the Flitch Way (also, the Uttlesford LCWIP highlights an aspiration for a new cycle route along the B1256). However, on the other hand, there could be implications for the traffic modelling work that has been undertaken in support of the Local Plan, both at the scale of Great Dunmow and also potentially looking more widely along the A120 corridor.

6.2.78 With regards to traffic impacts at the Great Dunmow scale, it should be noted that previous transport modelling undertaken in 2023 assuming a higher quantum of growth flagged concerns, as reported in the Transport Topic Paper (2023) and the ISA Report (2023). For example, the Topic Paper (2023) explained:

*“The modelling outputs highlight that even before development comes forward through the Local Plan that the M11 J8 and Dunmow South and East Intersections in particular, will be subject to increasing levels of delay [including from Chelmsford traffic]. The Local Plan will add to the level of demand on the corridor but only marginally when compared to other increases as a result of committed developments and expansion of operations at Stansted Airport and would be expected to be even less when the lower quantum of growth is tested. The interventions proposed to mitigate the increases in travel demand across Uttlesford are all schemes that would be delivered on the local road network and not the SRN. [However]... These will still have an impact on the A120... in terms of reducing demand [on the A120]. Whilst there is clearly a need for a long term solution to address delays which occur at M11 J8, the key driver for this is not the Local Plan. In this respect no proposed scheme has been identified. It is anticipated that when a solution has been determined, Local Plan development sites would contribute a commensurate amount towards the costs of the scheme....”*

6.2.79 However, the current Transport Topic Paper (2024) concludes the following on the basis of up-to-date modelling that accounts for latest proposals in respect of quantum and location of growth at the town:

*“The additional demand generated due to the Local Plan allocations is relatively modest. However, as this demand is being introduced onto a network which is already operating at its limits, the delays at junctions will be compounded... The proposed interventions to mitigate the impact of the Local Plan sites are successful in alleviating many of the most acute ‘pinch points’ at Great Dunmow. Junction entry widening and signalisation schemes will help to provide more capacity and regulate the flow of traffic. However, the approach to mitigating the impact of the Local Plan is not focused on the provision of increasing highway capacity. The wider transport strategy to support the Plan, of which this is part, prioritises the provision of greater travel choice and realistic alternatives to the car. In this respect, the interventions can result in longer delays on the network in places, particularly where new traffic signals incorporate green phases for pedestrians. Notwithstanding this approach, the measures to be taken forward will enable the junctions on the highway network to function relatively efficiently in the future.”*

6.2.80 In **conclusion**, whilst there is a fairly clear transport case to be made against strategic growth at Thaxted, this case is of limited significance. As for Great Dunmow, the choice between the two alternative growth locations is finely balanced in transport terms. There is a case for preferring growth to the southeast in theory. However, in practice there is also a need to give weight to the fact that a considerable amount of work has been undertaken in support of the option of focusing growth to the northeast, and the outcome of this work is a conclusion that the option of growth here is suitable in transport terms, in that it aligns with wide-ranging established strategic transport objectives. As such, at Great Dunmow it is considered appropriate to flag a concern only with high growth (Scenarios 5 and 6). Whilst the additional growth would be modest, there is a need to proceed with caution in respect of growth along the A120 corridor ahead of the next Uttlesford Local Plan, when it is considered likely that there will be good potential to consider strategic transport solutions, e.g. a Rapid Transit System (as previously suggested) or similar.

6.2.81 With regards to significant effects, it is now considered appropriate to reach more positive conclusions than was the case in 2023. This is in light of the amount of detailed work that has been undertaken in respect of masterplanning (with a transport focus) and through technical studies. The Transport Topic Paper (2024) summarises technical studies as follows: Local Plan Sustainable Transport (ITP, 2024); Local Cycling and Walking Infrastructure Plan (PJA, 2024); A120 Corridor Study (Essex Highways, 2024); Shared Transport in New Developments (CoMoUK, 2024); Model Outputs: Saffron Walden (Tetra Tech, 2024); Model Outputs: A120 Corridor (Tetra Tech, 2024); Stump Cross Assessment (Tetra Tech, 2024).

Figure 6.2: The LCWIP network at Great Dunmow

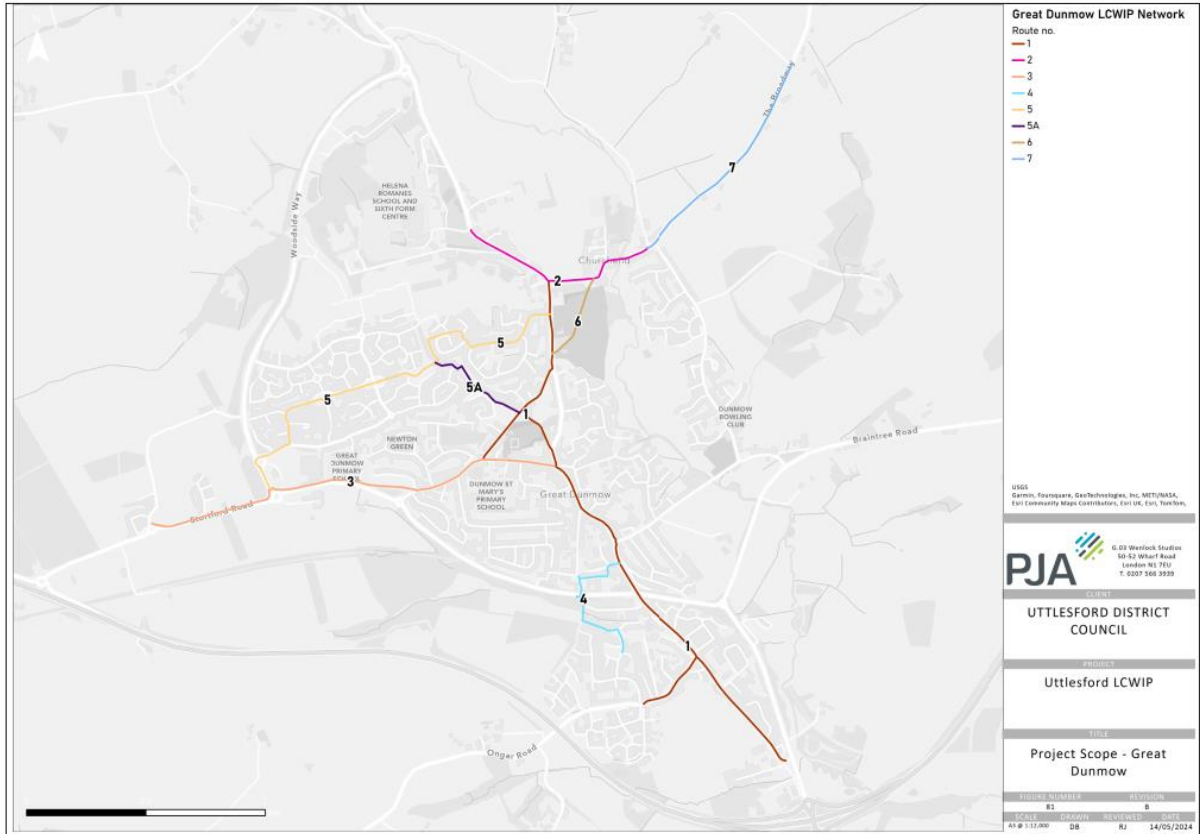
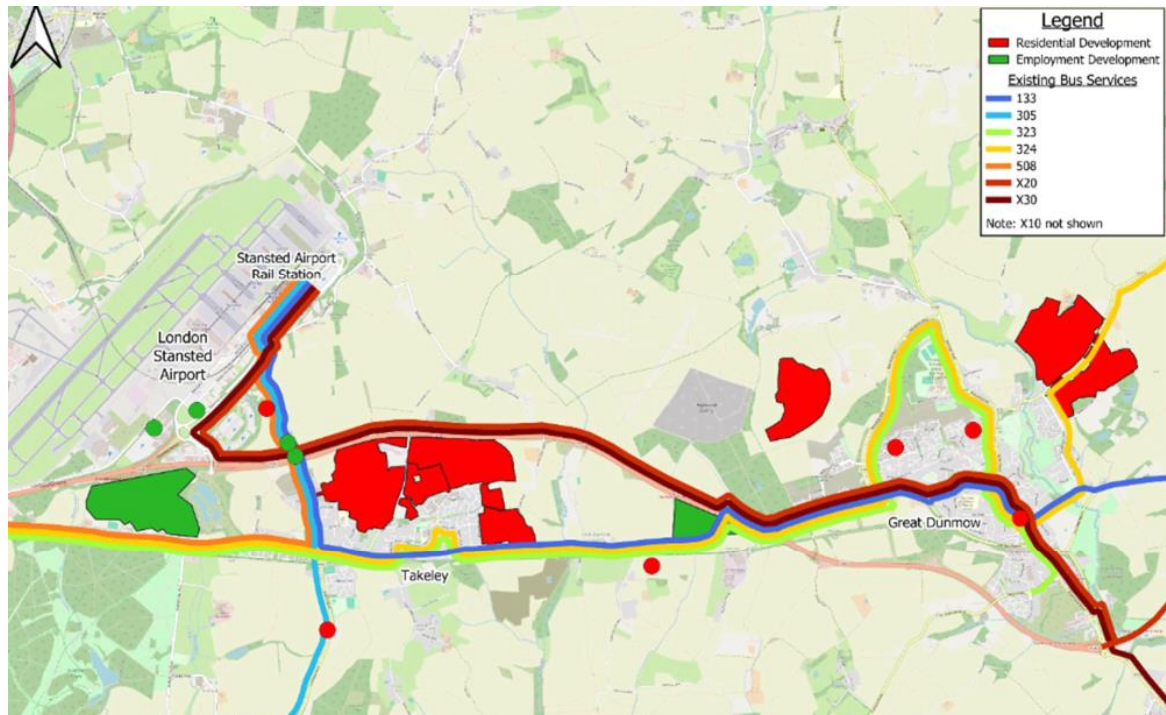


Figure 6.3: Existing bus routes along the A120 (also showing key allocations and commitments as of 2023)



## Water

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
★ 1	2	3	4	5	6

6.2.82 The Uttlesford Water Cycle Study Stage 2 (WCS, 2024) explores a range of considerations, but it appears that a key issue is capacity at wastewater treatment works (WwTWs).

6.2.83 Under the Wastewater Treatment heading, the study concludes (emphasis added):

*“A capacity assessment was undertaken by JBA comparing the future flow from each WwTW... with the permit limit. Eight of the WwTWs in the study area are expected to be close to or exceeding their permit during the Local Plan period. An increase in the permit limit, and / or upgrades to treatment capacity may be required at these WwTWs in order to accommodate planned growth.*

*It is important that when planning upgrades at WwTW that the full quantum of growth, including from neighbouring LPAs is taken into account. Population estimates within Anglian Water’s Drainage and Wastewater Management Plan suggest that they may have underestimated growth within the catchments of **Great Dunmow** and **Saffron Walden WwTWs**.*

*There are a number of poorly performing storm tank overflows at WwTWs in Uttlesford. Growth within these catchments could result in an increase in the operations of these overflows...”*

6.2.84 Also, there is a need to read the above alongside the conclusion under the Water Quality. This is because: *“An increase in the discharge of effluent from [WwTW] because of development and growth in the area in which they serve can lead to a negative impact on the quality of the receiving watercourse.”*

6.2.85 Under this heading the Stage 2 WCS (2024) reaches the following conclusion:

*“The modelling indicates the growth during the Local Plan period could result in a significant deterioration (10% or over or deterioration in class) in water quality at five WwTWs (Takeley, Great Easton, **Great Dunmow**, Debden and Great Chesterford). In all cases, this deterioration could be prevented by improvements in treatment.*

*The modelling also looks at whether growth during the Local Plan period could prevent good ecological status being achieved in the future. The results showed that growth alone will not prevent good ecological status being prevented in the future should improvements in upstream water quality be made, except for Takeley, where environmental capacity could be a constraint to growth.*

*An additional modelling scenario was run where the additional demand from growth expected to be served by Takeley WwTW was applied to Bishops Stortford WwTW rather than Takeley WwTW... Transfer of additional flow from commitments and allocations around Takeley and Great Dunmow to Bishops Stortford may be possible providing agreement from Thames Water that there is sufficient capacity at the WwTW to receive additional flow. Where a WwTW is shared with a neighbouring authority, coordination of growth plans in collaboration with Thames Water and Anglian Water is essential to ensure that infrastructure is in place prior to development to prevent a breach of the environmental permit.”*

6.2.86 Also, there is a need to consider the analysis presented under the “Environmental Impact” heading within the Stage 2 WCS (2024). A key conclusion here is as follows:

*“Water quality modelling has predicted a significant deterioration in the river adjacent to four SSSIs within Uttlesford [as a result of wastewater discharges]. At two of these sites, deterioration could be prevented by improvements in treatment upstream. At Little Hallingbury Marsh SSSI and Thorley Flood Pound SSSI, deterioration could not be prevented, and the predicted deterioration in BOD remains at 11%... Further investigation may be required on these sites... This is a cumulative impact of growth in both Uttlesford and East Hertfordshire with 90% of the growth coming from East Hertfordshire...”*

6.2.87 In this light, it is clear that there is a challenge at Great Dunmow (a variable across the RA growth scenarios) and at Takeley (a constant). However, the water companies have not raised serious concerns through consultation (namely Anglian Water in the case of Great Dunmow, and both Anglian Water and Thames Water in the case of Takeley, as the village is located on the border between the two water company areas, as discussed above). The Stage 2 WCS (2024) goes on to explain:

*“Where new infrastructure or upgrades to existing infrastructure may be required, engagement between UDC and the water company is required... Grampian conditions may be sought by the water company should development be in advance of the necessary infrastructure.”*

6.2.88 With regards to Thaxted, it is not a focus of the study as it is not an emerging proposed location for growth, but there are not known to be any particular concerns in respect of wastewater treatment / water quality. No concerns were raised by the Stage 1 WCS (2023), at which time growth at Thaxted was assumed.

6.2.89 Finally, the Stage 2 WCS (2024) presents an important discussion water resources, including with a focus on the implications of low groundwater levels for chalk streams (which are fed by groundwater). The outcome is a series of recommendations for achieving very high levels of water efficiency, which will have cost implications for developers (as discussed in the Study). Specifically, the recommendations are: Adopt CaBA strategy recommendation of 90l/p/d throughout Uttlesford; Require all new non-residential buildings achieve BREEAM “Outstanding” for water; Explore the feasibility of achieving water neutrality in the Stage 2 Water Cycle Study. By way of context, the Study also explains: *“Within Greater Cambridge, the Environment Agency are objecting to planning applications due to concerns over future water resource availability. A target of 80l/p/d is being explored by the planning authority.”*

6.2.90 In **conclusion**, there are some water-related constraints to growth locally. These are likely not as significant as those affecting Greater Cambridge, but other neighbouring local authority areas may be less constrained. As such, it is appropriate to rank the RA growth scenarios in order of total growth quantum, albeit concerns are likely associated with growth at Great Dunmow much more so than at Thaxted.

6.2.91 Finally, with regards to significant effects, there is a need to recognise that there are concerns with certain growth locations that are a constant across the RA growth scenarios. This is most notably the case for Takeley, plus there is a need to consider growth at those settlements associated with chalk stream catchments (e.g. recalling that whilst the quantum of growth supported at Newport is reduced at the current time, relative to the Draft Plan stage, the quantum of growth at Elsenham is increased).

6.2.92 The conclusion for most scenarios is ‘moderate or uncertain’ effects, recognising that limited concerns were raised through the Draft Plan consultation in 2023. However, it is appropriate to flag a risk of significant negative effects for the highest growth scenario.

## 6.3 Growth scenarios appraisal summary

6.3.1 The summary appraisal matrix below shows a very mixed picture, serving to highlight that the choice between the RA 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.

6.3.2 However, it does not *necessarily* follow that either Scenario 1 or Scenario 3 is the best performing or ‘most sustainable’ scenario overall. This is because the appraisal is undertaken without any assumptions made regarding the degree of importance, or ‘weight’ in the decision-making process, that should be attributed to each of the sustainability topics (and, as part of this, it cannot and should not be assumed that the sustainability topics have equal weight). Under several topic headings there are scenarios that outperform Scenarios 1 and 3, and the Council, as decision-makers, might choose to give particular weight to one or more of these topics. Also, it is important to recognise that considerable simplifying assumptions are made within the appraisal in order to reach overall conclusions under any given topic heading, including in terms of the weight attributed to specific issues/impacts. Adjusted assumptions could quite easily lead to adjusted overall conclusions and, in turn, an adjustment to the overall picture shown in the matrix below.

6.3.3 Having made the above overarching comments, the following bullet points summarise appraisal findings under each of the sustainability topic headings in turn:

- **Accessibility (to community infrastructure)** – a clear focus of the strategy is directing growth broadly in line with the settlement hierarchy and in response to community infrastructure capacity issues and opportunities, most notably by supporting delivery of several new schools, including to address existing issues. However, the County Council does not support a new school at Thaxted, because the concern is that the school would be unable to expand to two form entry and so could struggle to remain viable. Finally, at Great Dunmow there is a fairly clear preference for focusing growth to the northeast.
- **Biodiversity** – there is a marginal / uncertain preference for focusing growth at NE Great Dunmow. There is a clear biodiversity opportunity here, given the potential to target new strategic green and blue infrastructure in such a way that supports existing biodiversity priority areas. There could be a similar opportunity at SE Great Dunmow (River Chelmer corridor), but this is less certain, and there is a degree of onsite constraint. An ambitious approach to Biodiversity Net Gain is assumed under all scenarios.
- **Climate change adaptation** – the primary consideration here is flood risk and, in this regard, all three of the sites that are a variable across the RA growth scenarios (NE Great Dunmow, SE Great Dunmow, East Thaxted) are subject to a notable degree of surface water flood risk.
- **Climate change mitigation** – focusing on built environment decarbonisation, it is fair to flag a degree of support for NE Great Dunmow as a larger site in single land ownership, such that there is minimal reason to assume that development viability would be a constraint to delivering net zero carbon development to an exacting standard (to include net zero achieved onsite). However, this is marginal and uncertain. With regards to significant effects, the conclusion reflects the stretching nature of decarbonisation targets. It is not possible to conclude built environment decarbonisation has been a primary ‘driver’ of strategy and site selection (but transport decarbonisation has, as discussed below).
- **Communities, equality, health** – there are a very wide range of factors, but the rank of preference reflects: A) support for growth at Thaxted, with a view to maintaining village services, facilities and retail, maintaining bus services and generally maintaining village vitality, e.g. noting high house prices and notwithstanding the Neighbourhood Plan’s support for restricting housing growth; and B) a preference for NE Great Dunmow, as this would involve lower growth without necessarily compromising on infrastructure delivery (or wider objectives, e.g. housing mix). With regards to (B), this is in the context of very high recent and committed growth at Great Dunmow, much of which being speculative in nature.
- **Economy and employment** – established needs for new employment land would be provided for under all six scenarios (i.e. the approach to employment land is held constant). There is feasibly the possibility of delivering some modest new employment land at SE Great Dunmow, but this is not currently proposed by the site promoter. If possible, it could prove well-targeted from an employment land perspective but could create challenges in terms of effective masterplanning (linking new homes to the town centre).
- **Historic environment** – this is a key constraint district-wide, and also affecting two of the three growth locations that are a variable across the scenarios. The appraisal reflects a view that SE Great Dunmow is relatively unconstrained, but there is some uncertainty ahead of consulting with Historic England.
- **Homes** – all scenarios perform well because they make good provision for local housing need (LHN) over the plan-period as a whole (once account is taken of the potential to boost supply in the latter years of the plan period through a Local Plan Review). Nonetheless, there is still support – from a pure housing perspective – for the highest growth scenario, which could allow for the housing requirement to be set at a figure modestly above LHN, e.g. aimed at boosting affordable housing supply. With regards to significant effects, the issue is provision for longer term Gypsy and Traveller accommodation needs.
- **Land and soils** – high quality agricultural land is a significant constraint to growth across the sub-region; however, there is a concentration of slightly lower quality (grade 3) quality land at Great Dunmow.
- **Landscape** – all three of the variable growth locations are subject to notable degree of constraint. There is an argument to suggest that SE Great Dunmow is most constrained, e.g. noting the Saffron Way.
- **Transport** – the first point to note is that there is a transport argument against supporting strategic growth at Thaxted, as a rural village, although this is not entirely clear cut. Great Dunmow is not an ideal location for growth from a transport perspective, but an extensive amount of work has been undertaken to understand issues and opportunities associated with strategic growth to the NE, broadly concluding that this is a suitable location for growth from a transport perspective. SE Great Dunmow is clearly better linked to the strategic road network (supportive of bus connectivity) but would be notably separated from the urban edge by the river corridor, Dunmow Park, employment land and the B1256.
- **Water** – there are some outstanding concerns regarding wastewater treatment along the A120 corridor, including at Great Dunmow, hence there is a clear case for cautioning against higher growth.

**Table 6.1:** The reasonable growth scenarios – summary appraisal findings

	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

## 7 The preferred approach

7.1.1 The following text was provided to AECOM by UDC officers:

“The preferred scenario is **Scenario 1**, which the appraisal shows to perform reasonably well relative to the alternatives, clearly supporting a conclusion that it is “an appropriate strategy” (NPPF para 35). At Great Dunmow, it is recognised that the choice between growth to the northeast and growth to the south east 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. 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). 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.”

## **Part 2: What are the appraisal findings at this stage?**



## 8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal of the Proposed Submission Local Plan as a whole, as currently published under Regulation 19 of the Local Planning Regulations.

8.1.2 In practice, the aim is to appraise the following two broad components of the plan together:

1. The proposed **growth strategy** as understood from the Key Diagram (Figure 8.1)

This is Scenario 1 as previously appraised in Section 6. However, whilst the appraisal in Section 6 focused on aspects of the strategy that are a variable across the scenarios appraised (total growth quantum, Great Dunmow, Thaxted), the aim of the appraisal below is to consider the plan as a whole (i.e. to additionally appraise aspects of the strategy held constant across the Section 6 scenarios).

2. The proposed suite of **development management (DM) policies**

These are the district-wide, area-specific and site-specific policies that aim to support the growth strategy and generally manage growth and change in the District. The plan distinguishes between 'core' and 'development management' policies, but DM policy is an appropriate overarching term.

### Appraisal methodology

8.1.3 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each sustainability topic the aim is to discuss the merits of the Local Plan, as a whole, before reaching an overall conclusion on significant effects.

8.1.4 Specifically, the regulatory requirement is to "identify, describe and evaluate" significant effects taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. 'long term'.

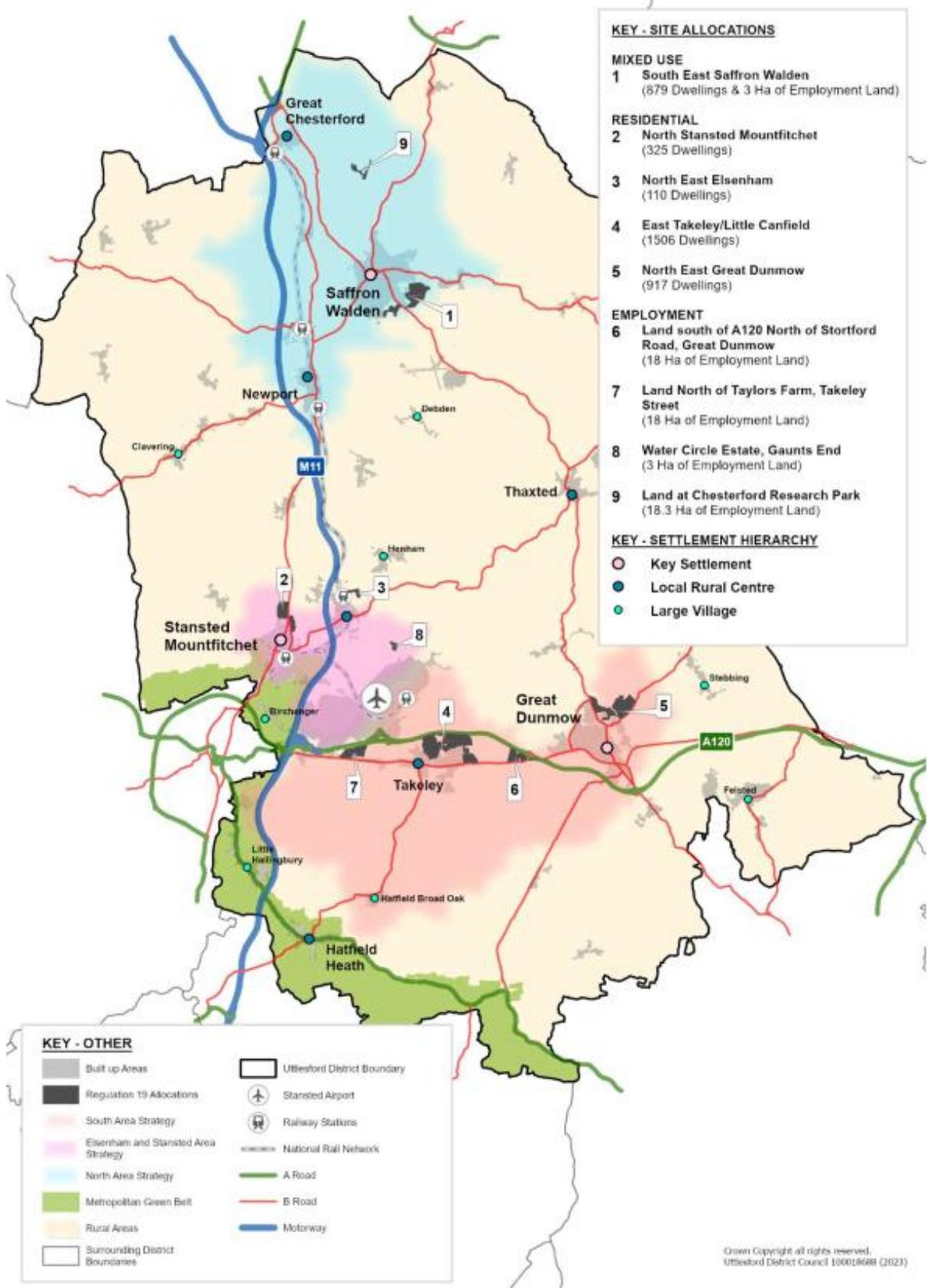
8.1.5 Also, significant effects are defined as follows:

- An effect is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the Local Plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the Local Plan. Also, neighbouring local authorities might have to consider providing for Uttlesford's unmet need.
- The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. the District has a 2030 net zero target date, such that there is a need to achieve a rapid decarbonisation trajectory).

8.1.6 Every effort is made to predict effects accurately. However, this is inherently challenging given the high-level nature of the Local Plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the Local Plan will be implemented and the effect on particular 'receptors'.

8.1.7 Finally, it should be noted that the objective of arriving at conclusions on significant effects means that the focus of the appraisal is primarily on the growth strategy. There is relatively limited potential for DM policies to generate significant effects, either alone or in combination. This conclusion is reached including on the basis that there is considerable leeway at the planning application stage in respect of applying DM policies.

Figure 8.1: The Draft Local Plan Key Diagram



# 9 Appraisal of the Local Plan

## 9.1 Introduction

9.1.1 Set out below is an appraisal of the Draft Local Plan as a whole. The appraisal takes the form of 13 narrative discussions – one for each of the topic headings that together comprise the SA framework.

## 9.2 Accessibility (to community infrastructure)

### Growth strategy

9.2.1 The conclusion reached in Section 6 is that there is strong support for the proposed growth strategy. This is essentially because the package of allocations has been selected with a strong focus on: A) distributing growth in line with the settlement hierarchy; and B) delivering community infrastructure (in the context of an infrastructure deficit that has arisen due to the prolonged period without an up-to-date local plan).

9.2.2 With regards to **Great Dunmow**, the appraisal in Section 6 supports the proposed focus of growth to the northeast of the town, as it will deliver a local centre including a primary school, along with very well-targeted new strategic green and blue infrastructure. With regards **Thaxted**, the appraisal is supportive of the decision not to support growth beyond windfall, given the primary school constraint at the village.

9.2.3 Taking the other higher order settlements in turn:

- **Saffron Walden** – the proposed eastern urban extension will deliver a new primary school, which is strongly supported as it will also serve the recent and committed housing sites adjacent to the west.

With regards to secondary school capacity there are some uncertainties and, in turn, there is a degree of risk. However, the school itself has undertaken detailed work and concluded that there is capacity to expand and, as discussed in Section 5.4, the Local Plan sets out to minimise risk by delivering new secondary school capacity at Takeley (including safeguarded land for a future expansion) and also by safeguarding land for an extension to the secondary school at Stansted Mountfitchet (although this land is within the Green Belt, which could act as a constraint to constructing school buildings). An ideal solution might involve a new secondary school at Saffron Walden, in light of the concerns raised by the County Council, but there is no potential to deliver this through the current Local Plan (see Section 5.4). It should also be noted that the previous proposal at the Draft Plan stage (2023) was to deliver a new sixth form centre within the urban extension, but this is not a preferred solution (albeit schools do operate across multiple sites elsewhere) and removing this requirement should assist with masterplanning and scheme viability, recognising that there is also a new requirement to deliver employment land relative to the Draft Plan stage (given the ‘loss’ of the previous employment allocation; see Section 5.4).

- **Stansted Mountfitchet** – as discussed in Section 5.4, there is no longer a clear need to deliver a primary school, but the proposal is to retain flexibility to deliver a school if necessary (in line with a recommendation made by the County Council). Any new school would likely be within an adjacent site currently under construction by the same developer (see <https://bloorhomes-stansted.co.uk/>). The new proposed allocation would deliver quite limited new community infrastructure itself but would deliver new strategic green and blue infrastructure. Also, it is important to note that Stansted Mountfitchet is suited to growth from an ‘accessibility’ perspective on account of its service score (see Figure 5.3, above) and train station. As discussed in Section 5.4, there is feasibly an alternative growth location that has considerable merit from an accessibility perspective, but it is ruled out on the grounds of Green Belt.
- **Takeley** – the situation is broadly unchanged from that reported at the Draft Plan stage, which is that there is strong support for strategic growth at Takeley to deliver a new secondary school as part of a new local centre (to also include a primary school) that will act as a focal point for the village. Significant adjustments have been made the concept masterplan since the Draft Plan stage, which are a focus of discussion below, but there are limited implications for ‘accessibility’ objectives. The new proposal is to significantly weight growth to towards the east of Takeley (i.e. towards the Priors Green part of Takeley), which is less than ideal in terms of allowing all Takeley residents good access to the local centre, and also in terms of focusing growth where there is strongest connectivity to Stansted Airport (a major employment and transport hub). However, there are no significant concerns in this regards, recognising that Stansted is very close (~15 minutes by bus and ~20 minutes cycling).

- **Newport** – as discussed in Section 5.4, there is a clear case for the new proposed approach – which is to assign the village a 300 home housing requirement to be taken forward by a Neighbourhood Plan, rather than to allocate sites for a 400 home urban extension – from a perspective of ensuring capacity at the village primary school (albeit, on the other hand, Newport benefits from a secondary school with some capacity and also a train station). A potential concern is that growth could be somewhat dispersed across smaller sites such that opportunities to negotiate delivery of new or upgraded community infrastructure (potentially to the benefit of the existing community, i.e. ‘planning gain’) could be missed. However, in practice, it is not known what approach to growth will be taken by the Neighbourhood Plan, and whatever is proposed will be subject to consultation, examination and referendum.
- **Hatfield Heath** – the proposal is not to support any growth at the village bar windfall, which was also the proposal at the Draft Plan stage. This approach reflects the Green Belt constraint affecting the village, but it is also the case that there are no clear community infrastructure issues, nor options for delivering strategic growth at the village with a focus on delivering infrastructure / planning gain.
- **Elsenham** – the new proposed approach is to allocate a site for 110 homes, which is strongly supported from an accessibility perspective, as it will significantly assist with delivering a new primary school within the existing permitted site to the south. Also, the proposed allocation is near-adjacent to the train station.
- **Great Chesterford** – the proposal is not to support any growth at the village bar windfall, which was also the proposal at the Draft Plan stage. There is an established need to deliver a new primary school at the village, but all of the available options are subject to significant constraints or barriers to delivery.
- **Larger villages** – the method for deciding housing requirements for larger villages accounts for the village settlement score and, in this way, weights growth to those larger villages where is the ability to meet some day-to-date needs within the village. The approach has been adjusted in light of consultation responses from Parish Councils and the County Council, and there are not known to be any significant concerns in respect of village primary schools reaching capacity or (and perhaps more pertinently) not being able to maintain the school roll. There is also a need to consider that parents can choose to send children to a school that is not the most local. For example, and notably, Debden is assigned a low growth strategy (due to a lack of sites) which could theoretically generate a concern regarding viability of the village primary school, but in practice the village is quite close to three higher order settlements (Saffron Walden, Newport and Thaxted) with primary school capacity issues (at least in the short term).

## Development management policy

- 9.2.4 Recognising the challenges associated with securing infrastructure alongside growth, a key policy is Core Policy 5 (**Providing Supporting Infrastructure and Services**), which explains:

*“All new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. Infrastructure requirements will be delivered directly by the developer and/ or through an appropriate financial contribution prior to, or in conjunction with, new development. Where appropriate, developers will be expected to collaborate...”*

- 9.2.5 The latter point on collaboration is important, as there are numerous instances of where this will be necessary in order to secure key infrastructure. It is also important to note that the policy goes on to present detailed guidance on the approach that will be taken to addressing development viability issues.

- 9.2.6 The policy also ends by discussing a proposed **Community Infrastructure Levy (CIL)**:

*“The Council’s Delivering Infrastructure Strategy will include both a CIL Charging Schedule and a Supplementary Planning Document for Section 106 agreements that will provide more detail about its approach to securing developer contributions.*

*Upon adoption of the CIL Charging Schedule, CIL will be used to pool developer contributions towards a wide range of new and improved infrastructure necessary to delivery new development.*

*Where not covered by the CIL Charging Schedule, infrastructure and services, including provision for their maintenance, should be delivered directly by the developer...*

*Infrastructure and services will be sought through the negotiation of planning obligations, conditions, levy, undertaking and/ or other agreement as secured through the planning permission, to mitigate the direct impacts of development and secure its implementation.”*

- 9.2.7 Given the extent of infrastructure required in support of growth – including transport infrastructure, community infrastructure, green infrastructure and utilities – taken into account alongside wider policy asks of developers including in respect of net zero, biodiversity net gain, water efficiency and Hatfield Forest recreational pressure mitigation, it will be very important that a CIL Charging Schedule is adopted.

## Conclusion

- 9.2.8 There is strong support for the proposed growth strategy, given a clear focus on directing growth broadly in line with the settlement hierarchy and in response to community infrastructure issues and opportunities, most notably by supporting delivery of new schools, including to address existing issues. However, there remain some outstanding issues, namely: A) an element of residual risk in respect of secondary school capacity at Saffron Walden; B) unresolved primary school issues at Thaxted and Great Chesterford (which can be revisited through a Local Plan Review). Also, there is a degree of uncertainty regarding primary school capacity at Newport ahead of a Draft Neighbourhood Plan, but latest understanding is that the school can expand to accommodate the 300 home housing requirement, and the Neighbourhood Plan represents an opportunity to explore options with a view to maximising benefits to the village.
- 9.2.9 With regards to DM policy, a key question is whether their combined effect will impact development viability to the extent that there is a need to compromise on community infrastructure objectives. There is no reason to suggest that this will be the case, in light of the Viability Study (2024) and consultation / discussions with site promoters, but the Viability Study explains that viability is tighter at Great Dunmow and Takeley than is the case for other proposed growth locations. Overall, it is now possible to predict a more positive conclusion than was the case at the Draft Plan stage (2023), given how the plan has been iterated via consultation, engagement with key partners and detailed technical work.
- 9.2.10 Overall, it is now appropriate to predict a **significant positive effect** on the baseline (which is a situation whereby housing growth continues without a plan, with suboptimal community infrastructure outcomes).

## 9.3 Biodiversity

### Growth strategy

- 9.3.1 The conclusion reached in Section 6 is that there is a good degree of support for the proposed growth strategy. This is essentially because: A) sites are mostly subject to limited constraint; B) there is a very strong focus on delivering targeted new strategic green and blue infrastructure; and C) the firm proposal is to take an ambitious approach to biodiversity net gain (BNG). In particular, the appraisal in Section 6 explains there is support for the proposed approach to growth at **Great Dunmow**. With regards to **Thaxted**, there is no particular biodiversity argument in favour of the decision not to allocate.
- 9.3.2 Looking across the settlements where the proposed approach to growth is a constant across the growth scenarios appraised in Section 6, it is **Takeley** that warrants being a particular focus of attention, from a biodiversity perspective. The Interim SA Report (2023) explained:
- “... the site itself is constrained by Priors Wood (ancient woodland CWS), as well as other onsite priority woodland habitat. Also, there is a need to avoid increased recreational pressure on nearby Hatfield Forest SSSI as far as possible. The Forest is not internationally designated, and is managed as a National Nature Reserve, but Natural England have significant concerns regarding the impact of recreational pressure. Concerns are reduced on account of the extent of green infrastructure proposed to be delivered onsite, which ties in with the need to avoid/mitigate historic environment impacts. As part of the GI strategy there will also be a need to consider recreational pressure on Priors Wood.”*
- 9.3.3 However, any concerns are now considerably allayed, on account of the significant changes that have been made to the concept masterplan (Figure 5.18), plus work that has been undertaken through the Countryside and SANG Study (2024). Specifically, the new proposal is to focus growth entirely within the eastern part of the site, with the western part delivered as strategic green infrastructure. This is strongly supported in biodiversity terms, as this is where the biodiversity constraint and opportunity is focused, plus the effect should be to divert a good proportion of recreational pressure away from Hatfield Forest. This is particularly the case as the proposal is to deliver the new greenspace to SANG (Suitable Alternative Natural Greenspace) standards. SANG is an established mechanism for mitigating the impacts of housing growth-related recreational pressure on internationally designated sites, but Natural England supports the terminology also being used in the context of mitigating impacts on nationally designated Hatfield Forest.

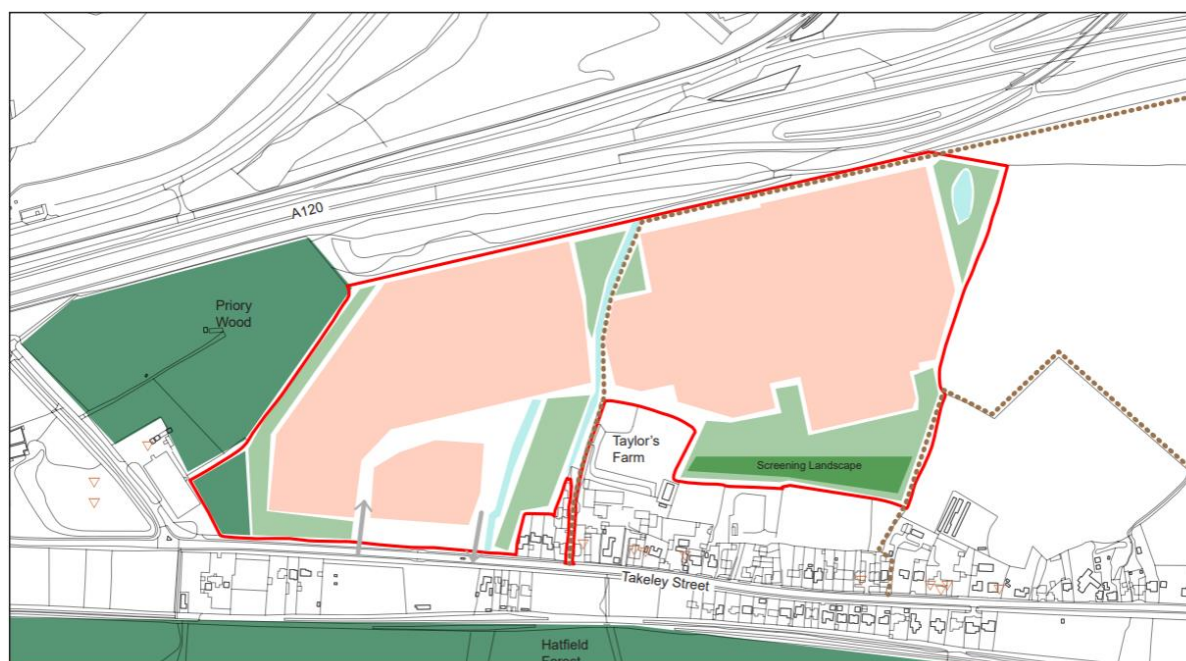
- 9.3.4 Finally, with regards to Takeley, there are three further points to note.
- 9.3.5 Firstly, the proposed employment allocation to the west (Takeley Street) is constrained given very close proximity to Hatfield Forest, adjacent ancient woodland and a stream corridor passing through the site that links strongly to Hatfield Forest. The ISA Report (2023) explained:

*“There is a need for further work, but it is currently not clear that this gives rise to a particular concern, assuming that the scheme would generate very limited recreational pressure, given that the land in question seemingly includes limited onsite habitat (bar mature hedgerows) and recognising that air quality impacts are very localised, i.e. problematic concentrations of air pollution occur only in close proximity to roads. However, it is recognised that the land in question falls in-between Hatfield Forest and other ancient woodlands in the wider landscape, including Priory Wood CWS, which is adjacent to the west of the site.*

*Also, [historic mapping](#) shows further woodland in the area, including through the site in question, with the former woodland associated with a surface water flood channel that could indicate a degree of hydrological connectivity. A final point to note is the proposal for 15 ha of employment land within a 27 ha site, such that there should be scope to address concerns via masterplanning and habitat creation.”*

- 9.3.6 However, Natural England has not raised an objection (as discussed in Section 5.4) and work has been undertaken to adjust the masterplan, including a proposal to deliver a small area of new woodland within the site boundary – see Figure 9.1. Having said this, the new proposal is to support 18 ha of employment land, rather than 15 ha as previously proposed in 2023. Overall, it is fair to say that the proposed extent and configuration of built form within the site boundary could warrant ongoing scrutiny from a perspective of wishing to buffer the ancient woodland to the west along with the stream corridor through in centre.

**Figure 9.1: Concept master plan for proposed employment allocation north of Takeley Street**



- 9.3.7 Secondly (maintaining a focus on Takeley), there is a need to note that Takeley is has a unique position within the landscape, in that it is located on raised ground, with shallow valleys / stream corridors to the west and to the east that are associated with a degree of biodiversity and historic environment constraint. In this regard, there is support for the new proposal to locate the primary and secondary schools at the eastern extent of the proposed strategic allocation (North Takeley), as this should serve to contain the extent of the village and so reduce concerns regarding future development creep / sprawl downhill.
- 9.3.8 Finally, with regards to Takeley, the Countryside and SANG Study (2024) discusses the possibility of a major new country park between Takeley and Great Dunmow. This could have major benefits in terms of minimising recreational pressure on Hatfield Forest, and also avoiding concerns regarding development enveloping High Wood SSSI in the long term (discussed in Section 5.4). However, it is also important to note that this land is being promoted for a new settlement (Easton Park), as discussed in Section 5.

- 9.3.9 Looking across the remaining settlements, there is limited biodiversity constraint to further growth east of **Saffron Walden**, with no priority habitat in the vicinity, and given good potential to integrate field boundaries (notably along Tiptofts Lane) as part of green infrastructure. However, there is a need for ongoing consideration of the sensitive water environment, recognising that the Cam is a Chalk Stream and in poor ecological condition. This matter is explored in a Water Cycle Study (2024), which is discussed further below. Natural England commented in 2023: *“The high ammonia sensitivity in the Chelmer and phosphate sensitivity in the Cam, Pincey Brook and Stort need to be reviewed further in the stage 2 WCS.”*
- 9.3.10 Final settlement and site-specific considerations are as follows:
- **Stansted Mountfitchet** – the equivalent appraisal in 2023 focused on a previous allocation to the east that now has planning permission. The main proposed allocation to the north is subject to limited biodiversity constraint, but the small site to the east is closely associated with a stream corridor. There might be potential to enhance the corridor with a focus on biodiversity and wider ecosystem services.
  - **Newport** – the new proposal is to assign the village a 300 home housing requirement, rather than to allocate sites, as per the previous proposal in the Draft Local Plan. This is broadly supported from a biodiversity perspective. The ISA Report (2023) commented as follows regarding the proposed allocations at that time: *“... the northern-most of the two proposed allocations is adjacent to Wicken Water, which is a chalk stream. There could well be the potential to avoid issues and potentially deliver an enhancement to the stream corridor (there is already a footpath), but this could have implications for site capacity. The site to the south is associated with several mature and historic field boundaries.”* However, one point to note is that a focus of growth to the west of the village would have meant directing growth away from Debden Water SSSI to the east of the village.
  - **Debden** – is a notable example of a larger village assigned a housing requirement. Specifically, Debden is assigned a notably low housing requirement, on account of limited site availability. This is potentially supported from a biodiversity perspective, given nearby (and downstream) Debden Water. However, this is a marginal consideration, as there is likely good potential to avoid concerns through site selection.
  - **Little Canfield employment site** – located between Takeley and Great Dunmow, this site is in close proximity to High Wood SSSI, and there is a stream corridor through the centre of the site that potentially links to the SSSI to some extent. However, it is difficult to suggest any major concerns.

## Development management policy

- 9.3.11 Focusing on the south of Uttlesford, which is a key area of sensitivity, the policy on green and blue infrastructure in the **South Uttlesford Area** sets out that: *“Contributions will be sought towards the relevant strategic projects (including their enhancement and on-going management costs) identified in the Uttlesford Green and Blue Infrastructure Strategy, including:*
- the creation of a country parkland at Church End, Great Dunmow of not less than 30 ha will stretch in continuous public open space from the north, near to Marks Farm, around the eastern edge by Merks Hill Wood, and along the River Chelmer... and westwards across Parsonage Downs to the B184 road into Great Dunmow. It should be designed to Natural England SANG criteria..., and*
- the creation of public open space of not less than 17ha in area in the western part of the Takeley development site... to be designed in accordance with SANG criteria. It will incorporate the proposed sustainable travel route for bus, cycle and walking. Recognising also its potential for biodiversity net gain, it will be designed to protect and enhance the heritage settings of Warish.”*
- 9.3.12 Also relevant to the South of Uttlesford, the policy on the natural environment requires: *“Where appropriate... contributions from proposed residential developments will be secured towards recreational mitigation measures and Priority Habitat enhancement/ connectivity at Hatfield Forest SSSI...”*
- 9.3.13 In the north of Uttlesford a key issue is chalk streams, hence the policy on **watercourse protection and enhancement** sets out a need to ensure a 15m buffer to water courses. It is noted, however, that the policy no longer includes a particular focus on chalk streams, and the proposal from the Draft Local Plan stage to require certain applicants to submit a Chalk Stream Impact study is removed. The amended approach is with a view to aligning with the consultation response received from Natural England.
- 9.3.14 Similarly, policy wording in respect of development impacts to groundwater levels in chalk stream areas (aquifers) has been adjusted, with the new policy wording: *“Development must not lead to a reduction in groundwater levels or reduced flows in any water courses including the chalk streams.”*

9.3.15 Finally, applying district-wide will be the Core Policy on Biodiversity, which sets out a requirement for developments to secure a 20% biodiversity net gain (**BNG**), i.e. a requirement in excess of the legislative minimum 10% net gain. Whilst this is unchanged from the Draft Plan stage, there has been a considerable amount of work undertaken to evidence this policy approach, and set the foundations for its successful implementation, particularly in terms of achieving well-targeted offsite habitat creation / enhancement in such a way that: A) it is well-targeted from a biodiversity perspective (ahead of an Essex Local Nature Recovery Strategy); and B) it is deliverable, in that there is not an undue burden placed on the development industrial or the Council. In short, there is a need to carefully consider how the 'gains' will be achieved in order to allow developments to demonstrate a 'net gain' despite onsite losses.

9.3.16 The BNG Study (2024) concludes:

*“The district... has enormous potential for nature recovery, through habitat regeneration and creation, with rapidly emerging and supportive Farmer Cluster networks and similar agricultural diversification instruments providing capacity to deliver significant biodiversity gains through BNG... The 20% biodiversity net gain target is considered deliverable and achievable within Uttlesford District, and does not affect the viability of new developments... The unique combination of characteristics found within Uttlesford District, including low biodiversity levels, significant habitat losses and species extinctions and the practicable means for the delivery of significant biodiversity gain, represent a seminal opportunity to put Lawton’s principles into practice through the requirement of 20% Biodiversity Net Gain.”*

9.3.17 This is very positive, however, there is a need for ongoing consideration of “the practical means” for delivering gains. Whilst heavy reliance on agricultural diversification instruments may be appropriate in the Uttlesford context, there is also a need to consider the role of ‘habitat banks’ i.e. specific large-scale areas managed for habitat creation/enhancement in order to generate a steady stream of credits (with a high degree of confidence) that can then be purchased by developers need to demonstrate offsite gains.

## Conclusion

9.3.18 There is a strong focus on avoiding biodiversity constraints and realising opportunities, particularly through new strategic green and blue infrastructure (see the Countryside and SANGs study, 2024), although there is a need for further scrutiny of the proposed employment allocation at Takeley Street, and broadly a need for ongoing scrutiny of the potential in-combination impacts of growth along the A120 corridor, particularly given Hatfield Forest and High Wood SSSIs. Also, there is strong support for the detailed work that has been undertaken to evidence that a 20% BNG requirement is both viable and deliverable (without undue administrative burden). There is a case for now predicting ‘significant’ positive effects, recognising that the baseline situation is one whereby development continues to come forward but in a relatively unplanned way. However, there is a high bar to reach before ‘significant’ positive effects can be predicted with confidence (particularly ahead of the forthcoming Essex Local Nature Recovery Strategy, [LNRS](#)). In conclusion, a **moderate or uncertain positive effect** is predicted.

## 9.4 Climate change adaptation

### Growth strategy

9.4.1 The appraisal of growth scenario 1 presented in Section 6 aims to flag a degree of concern regarding flood risk (the key climate change adaptation consideration) ahead of further consultation with the Environment Agency. The appraisal in Section 6 focuses on NE Great Dunmow, as that site is a variable across the RA growth scenarios, but also accounts for a degree of flood risk affecting other sites.

9.4.2 Focusing on **Great Dunmow**, the primary concern here is surface water flood risk, as there will clearly be good potential for built form to avoid the fluvial flood risk zone associated with the River Chelmer. Having said this, there is also a need to confirm that it will be possible to avoid fluvial flood risk affecting the sewer network (a recommendation that is set out in the Stage 2 Water Cycle Study, 2024).

9.4.3 Focusing on surface water, it is recognised that the Level 2 Strategic Flood Risk Assessment (SFRA) has concluded that: *“Development is likely to be able to proceed if... Development is steered away from... the small flow paths/areas of surface water ponding are incorporated and considered within the development design.”* However, there remains an element of uncertainty regarding the extent to which surface water flood risk will be a constraint to effective masterplanning.



- 9.4.4 The other key sites for consideration are the two near adjacent allocations to the north / northeast of **Stansted Mountfitchet**, both of which are closely associated with the Ugley Brook fluvial flood risk zone, and this is similarly the case for a committed site adjacent to the south (previously a proposed allocation in 2023; discussed in Section 5.4). Furthermore, there is a need to note that the centre of Stansted Mountfitchet is downstream, with a number of properties located in the flood zone. However, there will be good potential to avoid built form in the flood risk zone, and to deliver Sustainable Drainage Systems (SuDS) in order to ensure no increased downstream flood risk; for example, SuDS proposals are shown at: <https://bloorhomes-stansted.co.uk/>. The Environment Agency notably commented in 2023: *“There has been previous exploration into Natural Flood Management in the upper reaches of the Ugley Brook Catchment. There is opportunity for this to be included and explored on the site.”*
- 9.4.5 The final settlement to consider, from a flood risk perspective, is **Saffron Walden**, where there are two significant surface water flood channels associated with the proposed allocation, with one located to the north of Thaxted Road and the other to the south. To the north, this flood risk channel can clearly be integrated as part of a green/blue infrastructure strategy with relative ease. However, the flood risk channel to the south runs parallel to Thaxted Road, and so is likely to act as a constraint to bringing forward housing in this area. The recently permitted site adjacent to the west includes a focus on green/blue infrastructure to immediately to the south of Thaxted Road, as can be seen within the [Design and Access Statement](#).
- 9.4.6 Finally, it is noted that both of the proposed **employment allocations** along the A120 corridor are bisected by stream corridors. However, in each case there is good potential to avoid and buffer the stream corridor (important not only from a flood risk perspective), plus employment land is less vulnerable to flooding.
- 9.4.7 The above discussion focuses on flood risk, but it is recognised that there are also wider climate change adaptation (and resilience) considerations that are of relevance to local plan-making, including minimising **overheating risk**. However, it is difficult to comment on the merits of the growth strategy with any certainty in terms of overheating risk or any other wider climate change adaptation considerations (over-and-above points made more appropriately under other topic headings. For example, it is recognised that climate change adaptation is a reason for planning with a strong focus on biodiversity, community resilience and protecting high quality agricultural land. The key point to note here is that the plan does include quite a strong focus on supporting **larger-scale strategic sites**, where it can be anticipated that there will be a degree of focus on climate change resilience/adaptation as part of master planning and design work at the planning application stage. As part of this, strategic sites will certainly tend to support effective planning for green and blue infrastructure, which is an important climate change resilience/adaptation consideration, including given links to biodiversity, flood risk and overheating risk. Furthermore, in practice it is the case that the Local Plan has a strong focus on ensuring that green and blue infrastructure planning opportunities are fully realised, as evidenced through the Country Parks and SANG Study (2024).

## Development management policy

- 9.4.8 With regards to policies on **flood risk** and **SuDS**, these have been updated including in response to comments received from the Environment Agency. However, the policies include limited local specificity.
- 9.4.9 There are a number of policies that are supportive of climate change adaptation objectives, including those discussed above under ‘Biodiversity’ and below under ‘Water’. A key policy for discussion here is the Core Policy on **Overheating**, which is mostly unchanged from the Draft Plan stage and requires:

*“All development proposals, including outline applications, must demonstrate how the cooling hierarchy has been integrated into design decisions, via the Climate Change & Sustainability Statement. Major development proposals (full or detailed reserved matters) are encouraged to use the following CIBSE (Chartered Institute of Building Services Engineers) standards: TM52 for non-residential development; TM59 for residential development.”*

## Conclusion

- 9.4.10 In conclusion, a **neutral effect** is predicted, as per 2023. Whilst the appraisal of RA growth scenarios concludes a slight concern with the growth strategy in terms of surface water flood risk, this conclusion is quite marginal, and concerns are allayed once detailed account is taken of proposed concept masterplans and DM policy. Having said this, proposed concept masterplans at Saffron Walden, Great Dunmow and Stansted Mountfitchet warrant ongoing scrutiny from a flood risk perspective (with a focus both on avoiding any increased flood risk and realising any opportunities for strategic flood water attenuation).

## 9.5 Climate change mitigation

### Growth strategy

- 9.5.1 The appraisal of growth scenario 1 presented in Section 6 focuses on built environment decarbonisation and aims to raise the possibility of an increased focus on sites benefiting from strong development viability – and, in turn, good potential to deliver net zero development to an exacting standard, to including without having to rely on offsetting – given the challenging nature of national and local decarbonisation targets.
- 9.5.2 There is little potential to comment on the merits of the proposed growth strategy over-and-above the discussion presented in Section 6. With regards to Takeley, there is support for a strategic scale scheme that will achieve economies of scale (with benefits for development viability), however, there are numerous competing objectives / priorities here – e.g. around maximising green infrastructure provision and delivering community and transport infrastructure – that could feasibly conflict with net zero ambitions.

### Development management policy

- 9.5.3 The proposed policy approach is broadly unchanged from 2023, at which time the appraisal presented in Section 9 of the ISA Report was very strongly supportive – see Box 9.1.

#### **Box 9.1: Commentary on proposed net zero carbon development policy from 2023**

The proposed development management policy framework is very strong and reflects the outcomes of a considerable amount of detailed work. This is a very live topic at the current time, and ambitious decarbonisation focused policies have scrutinised closely as part of a number of local plan examinations over the course of recent months. The proposed policy framework is considered to represent cutting edge best practice; however, there is a need to ensure a focus on conciseness and accessibility, to the benefit both of planning applicants and also interested members of the public seeking to understand the role of the Local Plan in terms of contributing to the District's ambitious 2030 net zero target.

In particular, the policy on **net zero operational carbon development** reflects a cutting-edge best practice approach to securing net zero development. The proposal is to require application the 'energy-based' approach to scrutinising performance and ultimately demonstrating net zero. This approach involves scrutiny of development proposals in absolute terms, specifically in terms of 'energy use intensity' (kWh /m<sup>2</sup>/yr). The energy-based approach has wide-spread support amongst specialists, including due to the simple fact that actual 'as built' performance can be monitored using a smart meter.

With regards to the specifics of the proposed approach, there is a clear focus on aligning with the energy hierarchy, which means a primary focus on efficiency ('fabric first') followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort. In turn, the clear aim is to secure *onsite* net zero operational carbon.

Beyond operational built environment emissions, there is also a need to consider non-operational emissions, with the term 'embodied' emissions typically used as an intuitive shorthand. This is a focus of the policy on **embodied carbon**, which again is considered to represent cutting-edge best practice.

The policy requires a tiered approach whereby:

*"All development proposals must demonstrate, through the Climate Change & Sustainability Statement, what measures have been taken to reduce embodied carbon content as far as possible. Where it is proposed to demolish a building, this should be justified e.g., in relation to..."*

*Major new-build proposals should identify the steps taken to reduce the building or overall development's impact on embodied carbon e.g., regarding its design and building materials...*

*Proposals for large scale new-build developments (e.g. 100 dwellings...) must submit a Whole Life Carbon Assessment that demonstrates the following targets have been met..."*

Taken together, the two policies reflect a highly ambitious approach, and it is also noted that the policies have been developed in light of work undertaken recently by Essex County. However, there will be a need for ongoing scrutiny of viability implications – when taken into account alongside other infrastructure and policy requirements – and there is also a need to consider the practical challenges associated with applicants demonstrating compliance with the policy. The energy based approach is gaining traction nationally, and benefits from being relatively easy to understand and implement, but it currently remains the case that an alternative methodology is a requirement under the Building Regulations.

- 9.5.4 Since consultation on the Draft Local Plan in 2023 there has been considerable ongoing debate nationally regarding the potential to require standards that are more stringent than those required under the Building Regulations and, in particular, the potential to set policy that requires the energy-based approach to calculating and reporting energy use / emissions. On one side of this argument are those with concerns about undue impacts to development viability and/or creation of a variable and confusing policy environment nationally. However, ultimately there remains very strong support for the proposed policy approach, from climate change mitigation / decarbonisation perspective. With regards to potential concerns around a confusing policy environment for applicants and those wishing to scrutinise applications, there is a strong argument to suggest that the energy based approach is intuitive in a way that the Building Regulations Methodology (see summary in the December 2023 [WMS](#)) is not.
- 9.5.5 Finally, there is a need to consider the policy on **renewable energy infrastructure**, which sets out criteria to be used when determining applications for renewable energy (electricity) generation, with particular policy support for “*community-led schemes with evidence of community support along with local energy sharing schemes, and battery storage.*” The policy has been adjusted to ensure clarity on greenfield solar farms, with the policy now focused on ensuring clarity on how the site will be restored once electricity generation operations have ceased. The ISA Report (2023) flagged this as a key issue given that solar farms are a key form of energy infrastructure locally and in the context of high quality agricultural land.

## Conclusion

- 9.5.6 The conclusion is as per the ISA Report (2023): “... a **neutral effect** is predicted on the baseline, accounting for established objectives, in particular... achieving net zero by 2030. As discussed, there is very strong support for the proposed development management policy framework; however, this will require further scrutiny... and there is also a need to recognise that the national policy context – in respect of requiring net zero development (onsite as far as possible) – is potentially subject to change. In turn, it is important to ensure that there is not undue reliance placed on development management policy, and that ‘no regrets’ actions are taken through spatial strategy and site selection, ensuring that growth is focused in such a way as to maximise the potential for built environment decarbonisation.”

## 9.6 Communities, equality, inclusion and health

### Growth strategy

- 9.6.1 The appraisal in Section 6 is supportive overall of the proposed growth strategy, albeit recognising that there are many different factors potentially ‘pulling in different directions’. A concern is raised with the proposed nil / low growth strategy for **Thaxted**, but this is potentially unavoidable, and there will be the potential to revisit the matter through a Local Plan Review. With regards to **Great Dunmow**, the appraisal in Section 6 notes that there is a ‘communities’ argument for limiting growth, due to the extent of recent and committed piecemeal housing growth. However, on balance, the appraisal supports the proposed strategy of delivering an urban extension to the northeast of the town to include a primary school, local centre, care home and very extensive and well-located strategic green and blue infrastructure.

- 9.6.2 Rather than considering remaining settlements in turn, the following bullets consider issues in turn:

- **Place-making, high quality design and beauty** – growth at scale can, in theory, lead to an opportunity, particularly if delivered in line with garden community principles. Opportunities can often be missed in practice; however, there is a high degree of confidence in the Uttlesford context, particularly because concept masterplans were published for consultation at the Regulation 18 stage and then subsequently have been refined / iterated including in response to consultation responses received. This is considered to represent very good practice, i.e. this level of work on concept masterplanning is not common practice.

Also, it is important to note that a range of technical studies have fed into concept masterplans, including studies looking at sustainable transport opportunities (walking, cycling and bus connectivity) and strategic green and blue infrastructure opportunities (see the Country Parks and SANG Study, 2024).

For example, in respect of Great Dunmow, the vision is as follows: “*The proposed allocations... seek to deliver around 917 dwellings in a new neighbourhood to the east of Church End and at nearby Parsonage Downs... structured around extensive parkland and linking the site through quality open space provision... provide public access and amenity to new and existing residents, along with a local centre of community uses and small retail and/or small business units.*”

- **Green and blue infrastructure** – the ISA Report (2023) explained that *“this has been a key driver of the emerging strategy / work to define growth scenarios, informed by Green Infrastructure Study (2023)”* and then subsequently further detailed work has been undertaken, as has been discussed.

In particular, in light of the Country Parks and SANG Study (2024) there is now very strong support for the proposed new strategic green and blue infrastructure at Great Dunmow and Takeley, including from a perspective of supporting communities objectives. There is also strong support for the proposed new strategic greenspace at Stansted Mountfitchet which, whilst relatively peripheral to the settlement, will link well to the wider countryside – with Manuden and the Stort Valley to the west and valued woodlands to the east – and will serve to define the northern extent of the settlement very effectively.

Also, there has been new work to consider options for a new country park at Saffron Walden, and the proposed growth strategy should be supportive of realising this objective, but there remains an element of uncertainty. A new country park to the east could prove well located and could certainly play a role in terms of defining the eastern extent of the town, but other locations for a country park could perhaps also be considered, recalling the importance of long term strategic planning at Saffron Walden.

- **Access to the countryside** – the District is generally well served by a network of public rights of way linking settlements to high quality countryside, including river corridors, ancient woodlands and historic rural villages. However, there is some variability, in terms of access to the countryside, such that growth-related opportunities might be explored. For example, there are woodlands / woodland complexes where improved accessibility might be sought, and opportunities for improving access along river/stream corridors. The key opportunities appear to be along the A120 corridor (Bishops Stortford → Hatfield Forest → Takeley → Little Canfield / High Wood / former Easton Park → Great Dunmow → Felsted).

A related consideration is recreational cycling in the countryside, and one consideration in this regard is support for new employment land, with associated traffic, at Gaunt's End and at Chesterford Research Park. Both are rural sites associated with minor roads/lanes that are likely popular with cyclists.

- **Active travel** – this is a focus of discussion under other headings, but also warrants mention here, as access to active travel infrastructure (linking to key destinations) is important for good health, and new / upgraded infrastructure is a key means of achieving 'planning gain' to the benefit of existing community. The District has a very good existing network, most notably along the and in the vicinity of Stansted (already considered a transport hub, and with the potential for this role to be significantly enhanced), and this network has been a key factor influencing site selection. Along the A120 there is a considerable opportunity to support and encourage active travel, hence there is support for a focus of growth here.

Also, Saffron Walden is described within the current transport evidence base as having “significant potential for a drastic mode shift” away from the private car, reflecting the fact that the town currently exhibits high car dependency. This is important from a health perspective given the health benefits of active travel, but also because there are some concerns regarding **air quality** in the town. Specifically, whilst a town centre AQMA was revoked in 2024 (having been declared in 2012), there is nonetheless an inherent concern regarding pollution from high levels of traffic through the historic town centre. In this light, and in the context of no clear means of delivering a town centre bypass, there is a considerable focus at the current time on delivering the Saffron Walden Air Quality Project, which *“seeks to pilot sustainable modes of transport and encourage active travel within the town.”* Matters are discussed further below, but broadly speaking the strategic growth should assist with the project objectives, in terms of delivering targeted new infrastructure and potentially funding for initiatives such as car sharing. Whilst an ideal situation might be comprehensive growth with a very long term perspective, aimed at delivering comprehensive transport solutions for the town (e.g. looking ahead to designing roads for driverless cars), the current proposed strategy for Saffron Walden is a suitably proactive step forward.

- **Countryside Protection Zone (CPZ)** – the designation is highly valued by residents, and significant concerns were raised regarding impacts to the CPZ through the consultation in 2023, most notably concerns regarding strategic growth to the north of Takeley and employment land at Takeley Street. Subsequently, detailed work was undertaken, concluding that there is potential to accommodate the proposed allocations in a way that maintains the CPZ designation and, in turn, the long-established status of Stansted Airport as an airport in the countryside. The new strategy is presented in Figure 5.17, and central to this is protection afforded to maintaining the openness of land directly to the north of the village, to the west of Smiths Green Lane, which is particularly important from a CPZ perspective, as well as extending the CPZ to the south to afford new protection to land to the southwest of Takeley.

Overall, there is support for taking a comprehensive approach to growth in this area now, rather than risking further piecemeal growth over coming years, and also noting that land is being actively promoted for strategic growth to the north of the A120, i.e. between Takeley and the airport. However, it is recognised that the matter of long term planning for employment land between M11 J8 and the Stansted Airport junction of the A120 warrants ongoing scrutiny from a CPZ perspective.

- **Green Belt** – warrants mention here as another designation typically highly valued by residents. There is no proposal for Green Belt release; however, within Section 5.4 there is discussion of possible Green Belt release at Stansted Mountfitchet and at Hatfield Heath. There is a ‘communities’ argument for release at Stansted Mountfitchet, but this is somewhat limited, such that ultimately the conclusion reached is that there are not ‘exceptional circumstances’ to justify Green Belt release. At Hatfield Heath there is no clear strategic communities case for Green Belt release, having taken account of the available sites, but this is nonetheless a matter that warrants ongoing consideration.
- **Village vitality** – as discussed in Section 5.4, levels of recent completions and committed growth vary significantly across the villages. Low recent/committed growth can suggest support for strategic growth, in that: a lack of new housing can contribute to an ageing population and suppressed household formation; the national trend towards online retail is putting strain on local and neighbourhood centres; rural primary schools can struggle to maintain school rolls, including due to a recent period of low birth rates; and rural bus services can tend to be at risk. Equally, if significant growth has come forward, or is coming forward, in a relatively unplanned way (e.g. as a result of sites gaining planning permission at appeal) then there can be an argument for supporting plan-led growth in order to deliver new infrastructure, e.g. (and notably) schools capacity. In respect of the former point, Thaxted and Hatfield Heath are the local rural centres of note (also Great Chesterford, but here there is some recent and committed growth, as discussed in Section 5.4, plus there is committed growth nearby in South Cams), plus there is a need to note two larger villages not assigned a housing requirement due to Green Belt (also Debden, which is assigned a low housing requirement on account of limited land availability). In respect of the latter point, Elsenham is the primary example, hence there is strong support of the new proposed approach of supporting a 110 home allocation that will help to deliver a new primary school.
- **Neighbourhood planning** – supporting neighbourhood planning led by town and parish councils is clearly important from a communities perspective, and this is a matter that has been the focus of detailed work prior and subsequent to the Draft Plan consultation (2023). As well as the matter of assigning housing requirements to larger villages, the key point to note is the new proposed approach of assigning a housing requirement to Newport (a local rural centre), with allocations then to be made through a Neighbourhood Plan, as opposed to the previous approach of allocating sites for strategic growth.
- **Neighbouring uses** – an issue in constrained areas can be pressure to direct new homes to locations adjacent to main roads and railways where there is degree of air and noise pollution. Noise pollution is typically reflected in house prices, but there can be impacts not accounted for by the market. However, in this regard, the concerns are now reduced relative to the Draft Plan stage, when the ISA Report flagged some concerns with: Newport (proposed allocations at the time were adjacent to the M11, but the latest proposal is to delegate the task of allocating to the Neighbourhood Plan); Thaxted (an issue here is the defined Standard [noise contours](#), but the new proposal is not to assign nil growth); and Takeley (the new concept masterplan moves the school to a location further from the A120).
- **Traffic congestion** – directing growth in order to minimise traffic congestion is often a key issue for existing communities. Matters are discussed further below, under the ‘Transport’ heading, but it is fair to say that there are inherent challenges along the A120/B1256 corridor (Great Dunmow and Thaxted), plus Saffron Walden is constrained on account of traffic not being able to bypass the historic town centre, and there are also understood to be challenges at Stansted Mountfitchet, including on account of housing growth at Elsenham. Focusing on the A120/B1256 corridor, one point to note – from a communities and health perspective – is the number of homes / communities located directly on the B1256, both at Takeley and Takeley Street, and it is recognised that environmental quality along the road corridor is already an issue, including because of HGV traffic.

Another consideration is ‘rat-running’ along rural lanes and through rural communities, but concerns are perhaps not as great in the Uttlesford context as elsewhere (specifically locations with a higher density of access points to the strategic road network). One consideration is presumably Cambridge-bound traffic from Great Dunmow choosing to route via Thaxted and Saffron Walden rather than via the M11.

Road safety is a related issue. However, at the current time it is not possible to pinpoint any particular concerns. HGV traffic from new employment land along the B1256 is potentially one consideration.

- **Relative deprivation** – there are no particular pockets of relative deprivation within Uttlesford that might potentially be addressed via spatial strategy / site selection. However, there are large towns (also Cambridge) surrounding Uttlesford that are associated with significant relative deprivation. This serves as an argument for remaining alive to the possibility of providing for any unmet housing needs that might arise, and also ensuring a cross-border focus (including cross-county) when planning for infrastructure.
- **Rural deprivation** – is likely to be an issue to some extent in the more deeply rural parts of the District, distant from the main transport corridors. Focusing on the larger villages, the suitability of supporting 600 homes across eight villages (over-and-above completions and commitments) is discussed within Section 5.4, including from a perspective of seeking to: maintain villages services/facilities; provide for locally arising housing needs; and more generally maintain village vitality. Overall, there is no clear basis for questioning 600 homes 'larger village allowance', nor the approach that has been taken for distributing this figure between villages. Also, it is important to note that the neighbourhood plans that will take forward the larger village allowance can choose to over-provide in order to deliver on local objectives. Equally, it is the case that smaller villages can bring forward neighbourhood plans that make allocations to deliver on local objectives if they so wish (albeit Green Belt constrains two smaller villages).
- **Housing and accommodation** – a wide range of considerations are discussed under the 'Housing' heading, including providing for specialist needs, including Gypsy and Traveller accommodation needs.

## Development management policy

9.6.3 Numerous policies have broadly positive implications. The following are of particular note:

- Policy on **noise** – sets out a range of detailed requirements, which are important in the context of Stansted Airport and also noise pollution from the M11 and A120.
- Policy on **movement and management of freight** – sets out that submitted Freight Management Strategies should “ensure the prioritisation of the use of the Strategic Road Network and minimise the use of the rural network and that encourage the movement of freight by sustainable modes whilst minimising negative impact of freight trips on local communities.”
- Policy on **good design outcomes and process** – development will be supported where proposals can clearly demonstrate compliance with appropriate national policy and guidance in respect of Design, especially the most up-to-date version of the Uttlesford Design Code(s), and the Essex Design Guide. Proposals must clearly demonstrate how ten defined characteristics are addressed.

The policy also sets out specific requirements for:

- Major Development – “submit Masterplans and Design Codes... undertake appropriate Community Engagement that informs the proposals from an early stage in accordance with [guidance].”
- Schemes of 100 dwellings or more – “make use of a Design Review as early in the process as possible. The Uttlesford Quality Review Panel is the preferred approach, but the Essex Design Review Panel, or a Building for a Healthy Life assessment... are also acceptable options.”
- Policy on **planning for health** – requires a Health Impact Assessment for major development.

## A note on equality and health considerations

9.6.4 With regards to **equality**, and specifically the implications of the Local Plan for those with protected characteristics under the Equality Act 2010 (where the protected characteristics are age, disability, gender re-assignment, marriage / civil partnership, pregnancy, maternity, ethnicity, religion/belief, sex and sexual orientation), key objectives include: avoiding and supporting those at risk from unlawful discrimination, harassment and victimisation and other prohibited conduct; advancing equality of opportunity between people who share a protected characteristic and those who do not; and fostering good relations between people who share a protected characteristic and those who do not.

9.6.5 Key benefits of the Local Plan in these respects include: Providing for housing/accommodating needs, ensuring access to community infrastructure, green infrastructure and employment opportunities, providing options for convenient transport / movement and delivering high quality place-making.

- 9.6.6 However, the same could be said of many local plans nationally, i.e. it is difficult to highlight particular issues/opportunities or impacts that are specific to the Uttlesford Local Plan. It can often be the case that attention can reasonably focus on addressing pockets of relative deprivation, with a view to supporting equality-related objectives, but it is difficult to pinpoint pockets of relative deprivation in the Uttlesford context. What is clear though is that communities are facing a range of challenges, as discussed above, and within these communities facing challenges there will be those with protected characteristics. For example, communities facing challenges include: communities at higher order settlements that have seen unplanned growth leading to infrastructure deficits; rural communities with high house prices; and Gypsy and Traveller communities unable to meet their accommodation needs in suitable locations.
- 9.6.7 Taking steps to address key ‘communities’ issues such as these through the Local Plan should mean that the plan is supportive of equality objectives in the widest sense, and no significant equality-related concerns are known to have been raised through as part of the plan-making process.
- 9.6.8 Finally, with regards to **health**, the discussion in Section 3 has established that key objectives are: healthy neighbourhood design; healthy housing; healthier food environments; natural and sustainable environments; and healthy transport. For the most part, these are factors that are a strong focus of the appraisal here, under the ‘Communities’ heading, and/or under other topic headings. However, it is recognised that this is less the case for the objective of ensuring ‘healthier food environments’. In this regard there is considered to be relatively limited scope for the Local Plan to deliver benefits. However, it is noted that proposed Core Policy 66: Planning for Health and Wellbeing requires that Health Impact Assessments include a focus on: “[making] it easier for people to make healthier food choices by promoting access to fresh, healthy and locally sourced food, for example by providing opportunities for food growing, for example by the inclusion of allotments.”

## Conclusion

- 9.6.9 Whilst the equivalent appraisal in 2023 predicted a neutral effect, it is now considered appropriate to predict a **moderate or uncertain positive effect**, given how the plan has been adjusted to respond to communities issues raised through the consultation, including via the completion of detailed technical work such as the CPZ Study (2024). In 2023 there was a degree of uncertainty regarding how local communities would respond to a plan focused on urban extensions (in the context of the previous withdrawn Local Plan, which focused on new settlements), and a particular concern was raised regarding Great Dunmow; however, these concerns are now reduced. As part of this, the importance of needing to ‘get a plan in place’ in order to put an end to problematic piecemeal growth and avoid the risk of Government intervention (which would reduce the influence of communities on plan-making) has clarified. However, there is a new concern raised at the current time in respect of low growth at Thaxted.

## 9.7 Economy and employment

### Growth strategy

- 9.7.1 The appraisal in Section 6 is strongly supportive of the proposed growth strategy. Specifically, this is the case because the plan allocates new sites that respond in full to the employment land needs established through the Employment Needs Update (2023), which are summarised in Box 5.1. Furthermore, the plan sets out to protect existing employment land in accordance with the Employment Land Review (2024).
- 9.7.2 The table below presents a summary of the district-wide need/supply position.

**Table 6.1: Employment land need and supply**

Supply	Office and R&D (ha)	Industrial (ha)
Completions and permissions (exc. Northside)	TBC	
New strategic allocations		
<b>Total</b>		
<b>Above/below need</b>		

### 9.7.3 Specific considerations include:

- Great Chesterford Research Park – supporting delivery of the vision in full will result in a significant R+D over-supply, which in theory gives rise to concerns around in-commuting. However, in practice the Research Park relates very closely to Greater Cambridge, which is a national focus for R+D growth.
- Saffron Walden – there is an element of uncertainty regarding delivery of industrial/logistics land to meet the locally arising need identified through the Employment Needs Update (2023). Specifically, this is the case because the location previously identified as suitable for employment has now been permitted for housing by the Planning Inspectorate. However, there is no clear basis to question deliverability.
- Gaunt's End (Water Circle Estate) – the situation here is complex, as discussed in Section 5.4. This is the sole proposed allocation for offices, but there is a clear element of uncertainty regarding deliverability. This does not necessarily give rise to major concerns given inherent uncertainties in respect of the market demand / need for new office space, in the context of few if any reasonable alternative locations for office development reasonably in contention for allocation, as discussed in the Employment Land Site Selection Topic Paper (2024) and given policy support for windfall applications.
- A120 corridor – both of the proposed allocations for industrial and logistics space are considered well-located in terms of aligning with employment land objectives. In particular, the site at Takeley Street benefits from close proximity to the M11, and the site that is allocated in order to meet the need arising from Great Dunmow also has the benefit of being located on the Stansted / M11 side of the town. Both appear to have very strong delivery credentials, although both are associated with onsite and nearby constraints, and there is a need to consider local and in-combination traffic impacts. The Viability Assessment (2024) discusses how development viability can be challenging for employment sites, but concerns are allayed where the sites have strong credentials in terms of predicted future revenues associated with their operational use. Nonetheless, there is a need for ongoing scrutiny of the costs associated with bringing these sites forward in a way that mitigates environmental and traffic concerns.

A priority is ensuring a strategic long-term approach to employment land in proximity to Stansted, avoiding the risk of sub-optimal piecemeal growth and aligning with transport and wider objectives. The Employment Land Review (2024) explains: *“Lack of floorspace at the airport has resulted in aviation businesses spilling out into surrounding areas, especially along the A120 towards Braintree.”*

- 9.7.4 The other key consideration here is a need to deliver homes in support of employment growth, which means: **A)** setting the housing requirement at a level that reflects LHN, any economic / infrastructure opportunity and any unmet needs; **B)** ensuring that the identified supply is sufficient to give confidence that the housing requirement will be provided for in practice over the plan period; **C)** delivering a good mix of homes, including homes suited to those working in key growth sectors; and **D)** focusing homes in close proximity to key employment hubs / growth locations, including in locations well-linked to Greater Cambridge. In these regards the plan broadly performs well. In respect of point (D) there is a need to note a focus of growth along the A120 corridor, which is distant from Greater Cambridge. However, it is difficult to envisage reasonable higher growth options at Great Chesterford, Saffron Walden, Newport, Thaxted, Stansted Mountfitchet or Elsenham, as discussed in Section 5.4.

## Development management policy

- 9.7.5 The plan includes a range of policies aimed at protecting existing employment land and guiding applications for new employment land. Other key policies include:

- Policy on **noise** – seeks to avoid development in areas where noise could be an issue. This is an important consideration from a perspective of avoiding future issues with the Stansted's operation.
- Policy on **rural diversification** – strikes a balance between competing objectives. The policy supports “economic activities that bring about rural diversification” providing that criteria are met including: *“the development... contributes to the viability of the holding... [and] it is not detrimental to the character and appearance of existing buildings and their setting within the landscape.”*
- Policy on **retail and main town centre uses hierarchy** – sets new town centre boundaries, which will be used to guide planning applications for main town centre uses, and also defines Primary Shopping Areas, where requirements will apply including:



*“Where planning permission is required, proposals resulting in the loss of Main Town Centre Uses at ground floor level within a Primary Shopping Area must demonstrate that the unit has been proactively and appropriately marketed for at least 12 months and it has been demonstrated that there is no longer a realistic prospect of the unit being used for E Class Uses in the foreseeable future.”*

- 9.7.6 There is also a need to consider any development management policies that could potentially conflict with ‘economy and employment’ objectives. One point to note is the requirement within the policy on **net zero operational carbon development** to achieve ‘on site net zero’ to include an energy use intensity of 35 kWh/m<sup>2</sup>/yr. There can be an argument for allowing for a higher energy use intensity and, in turn, increased reliance on rooftop solar PV in order to achieve onsite net zero (over the course of a year).

## Conclusion

- 9.7.7 Whilst the Draft Local Plan predicted a moderate or uncertain positive effect, it is now possible to predict a **significant positive effect**. The ISA Report (2023) flagged some concerns, but these are now allayed in light of consultation responses and ongoing engagement with key partners. There is particular support for: A) supporting new R+D space at Great Chesterford Research Park; and B) supporting new industrial and logistics space along the A120 corridor. However, respect of (A) there is a need for an ongoing focus on supporting nearby housing growth; and in respect of (B) there is a need to ensure a long term strategy in-line with environmental and transport objectives.

## 9.8 Historic environment

### Growth strategy

- 9.8.1 The appraisal in Section 6 flags a concern with the proposed growth strategy, and focuses discussion on **Great Dunmow**, which is a variable growth location across the alternative scenarios. The historic environment constraint at Great Dunmow is clearly somewhat significant, but it will be for Historic England to comment further on the extent to which the latest proposals – in terms of masterplanning, site-specific policy and district-wide development management policy – serve to appropriately mitigate concerns.
- 9.8.2 Also, the appraisal in Section 6 focuses on **Thaxted** where, in short, there is support for the proposed strategy of supporting nil growth over the plan period other than from windfall developments.
- 9.8.3 With regards to the settlements where the approach to growth is held constant in Section 6:

- **Saffron Walden** – there are inter-related landscape and historic environment concerns associated with expansion to the east and south east. The first point to note is that the town has already expanded to the east well-beyond the limits of its conservation area, and recent / committed expansion takes the settlement edge as far as two historic farms (although not with any listed buildings) and a historic lane (now a bridleway); however, historic environment concerns are overall fairly limited in this area. There are potentially greater concerns with expansion to the southeast, where there is a risk of growth (including transport infrastructure) encroaching on a historic farm (‘Herberts’) where there is a Grade II listed barn, and it is noted that the farm is associated with a notably raised position in the landscape and there is an adjacent footpath. It is also important to recognise that expansion to the south east could lead to pressure for further expansion to the south in the future, where land is significantly more sensitive in both landscape and historic environment terms, including given relative proximity to the Audley End Estate, which is a Grade I listed Registered Park and Garden. The current proposal is to safeguard land for a link road south of Saffron Walden through the Local Plan, in recognition of the benefits that this would achieve including for the constrained historic town centre.

Two final considerations at Saffron Walden are: A) traffic through the town centre conservation area, including as a result of growth elsewhere in the District (to the south / south east); and B) the need to avoid the risk of coalescence with Swards End, where there are several listed buildings (including thatched cottages) and a water tower, although there is overall limited historic character.

- **Stansted Mountfitchet** – there are fairly limited historic environment concerns associated with the proposed growth strategy. There is support for utilising Pennington Lane to define the northwestern edge of the settlement (recalling that the option of expanding beyond the lane has been explored). Potentially the greatest concern is in respect of traffic through the Stansted Mountfitchet Conservation Area, which includes Mountfitchet Castle, which is a visitor attraction and a Scheduled Monument.

Also, there is a need to consider traffic through Ugley Green, where there is a significant concentration of listed buildings, although this was more of a consideration in 2023, at which time consideration was given to the option of a garden village (with this option now ruled out, as discussed in Section 5.4).

- **Takeley** – there are a range of historic environment constraints to growth at Takeley, which have been set out in Section 5.4, above, and these also relate to landscape constraints, with Takeley associated with a raised position with historic valleys / stream corridors to both the west and east. Whilst recognising these constraints, a conclusion in the ISA Report (2023) was that *“there is a clear case for supporting comprehensive, masterplanned strategic urban expansion, rather than risk further piecemeal expansion.”* Subsequently detailed work has been undertaken to adjust the masterplan and the new proposed approach performs much in historic environment terms, although it is important to recall that there will still be a need for new road and cycle infrastructure through the sensitive Smiths Green / Warish area (see the proposed concept masterplan in Section 5.4).
- **Newport** – has a strong medieval core, strongly associated with a confluence of valleys and associated transport routes, and the village has expanded beyond the conservation area only to the west. As discussed in Section 5.4, the new proposed approach is to support lower growth and to delegate the task of making allocations the Neighbourhood Plan, which is supported from a historic environment perspective. Previous appraisal work in 2023 raised a notable concern with one of the proposed allocations “somewhat framing a distant view of the Parish Church on the approach to the village...”
- **Hatfield Heath** – is proposed to see growth only from windfall, largely on account of Green Belt. The village has overall relatively low historic environment sensitivity, with no designated conservation area and few listed buildings, but there is a clear historic character linked to the central heath.
- **Elsenham** – has notably low historic environment constraint, and fairly limited constraint in wider respects. The new proposal is to support 110 homes as a logical extension to an existing permitted site, making use of an existing field boundary for containment. There are few historic environment concerns, but it is noted that the aforementioned field boundary is associated with a footpath shown on [historic mapping](#) as linking to a windmill to the east, and the historic village of Henham beyond.
- **Great Chesterford** – again there is significant historic environment constraint, as discussed in Section 5.4. The proposed strategy of supporting only growth from windfall is unchanged from the Draft Plan.
- **Large villages** – the proposed approach is broadly unchanged from the Draft Local Plan stage. Specifically, the proposed approach is to support housing growth of between 320 homes and 78 homes (in total over the plan period, i.e. from completions, commitments and allocations) at larger villages where possible (specifically where Green Belt is not a barrier to village expansion).

Clearly numerous of these villages are constrained in historic environment terms, and some have expanded little from their historic cores / conservation areas, such that expansion could well lead to concerns in respect of impacts to the setting of the conservation and/or specific listed buildings. The methodology employed to arrive at housing requirements for larger villages does not factor-in environmental constraints (historic environment or otherwise), but there should be good potential to avoid and mitigate issues through site selection and good design etc.

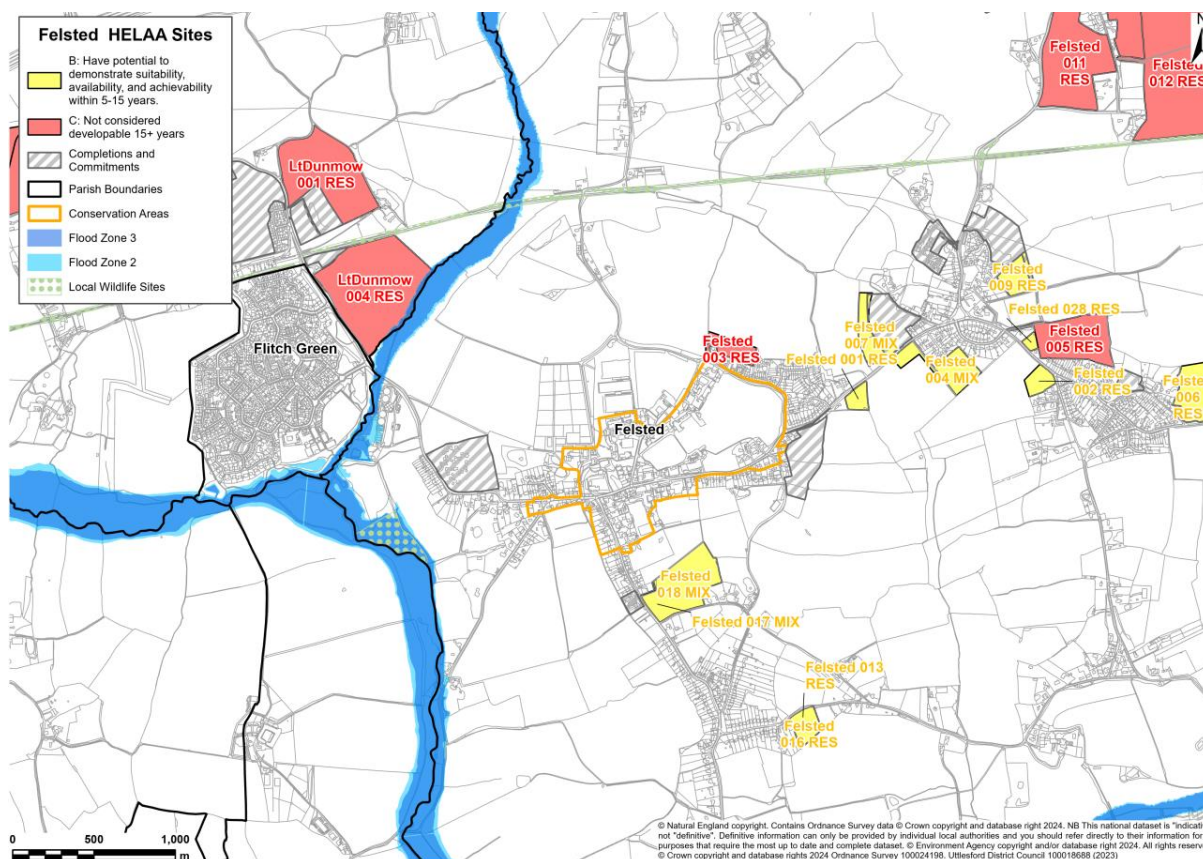
Focusing on Felsted, which is village set to see highest growth (320 homes in total, with 104 from Neighbourhood Plan allocations) completions/commitments and HELAA sites for further consideration through the Neighbourhood Plan are shown on the figure below. Historic environment constraint is primarily focused in the western-most settlement area, but there is little reason to assume the likelihood of the Neighbourhood Plan allocating land for further housing in this area. The village primary school is located in the central settlement, and historic environment constraint here is low (with [historic mapping](#) showing that the primary school here was built prior to WWI and then homes built subsequently).

#### 9.8.4 Finally, with regards to employment sites:

- Both of the proposed allocations along the A120 corridor are subject to a degree of historic environment constraint, as has been discussed, and at both sites there is now support for additional employment land relative to the Draft Plan stage. However, it is only the site to the west (Takeley Street) where support for additional development within the site potentially creates a tension with historic environment objectives. Specifically, this reflects a cluster of four Grade II listed buildings near adjacent to the south. However, the proposed concept masterplan aims to respond to this constraint with a landscape buffer. The other consideration here is the possibility of development resulting in future pressure for development of land adjacent to the east, which could potentially be more sensitive in historic environment terms, given a more significant cluster of near adjacent listed buildings and public footpaths.

- At Gaunt’s End the proposal is to support office development, but there is a possibility of ongoing/future pressure to deliver industrial and logistics development, as discussed in Section 5.4. There are notable historic environment constraints in this area, both in the immediate vicinity (six or seven nearby Grade II listed buildings) and looking further afield and accounting for how traffic might look to route to the M11 and A120. The road network in this area is primarily one of rural lanes.
- At Chesterford Research Park there is an element of historic environment (and associated biodiversity) constraint, recognising that this land was historically the wooded and landscaped grounds of Chesterford Park. However, concerns are limited, including the knowledge that the landowner’s vision for the area seeks to capitalise on historic and landscape assets.

Figure 9.2: Felsted as a notable larger village, showing sites in contention to deliver the housing requirement



## Development management policy

9.8.5 The suite of development management policies primarily reflects the standard wording included within local plans nationally (in the context of possible forthcoming [national development management policies](#)). There have been some adjustments made in response to comments received from Historic England; for example, HE suggested that policy should “be expanded to refer to the historic environment’s role in understanding the landscape. Many tracks, green lanes, field boundaries and settlement patterns are remnants of past use and provide evidence of how the landscape has evolved over time. The objective of protecting and enhancing the landscape and recognition of its links to cultural heritage can help improve how the historic environment is experienced and enjoyed.” The consideration of settlement and site options presented throughout this report does serve to highlight this as an important issue locally.

9.8.6 There is also a need to consider any development management policies that could potentially conflict with historic environment objectives. Numerous policies could potentially be discussed, but one policy of note is the policy on tourism and the visitor economy, which is supportive of “small-scale development to support the visitor economy, including farm diversification and equine development” provided that certain criteria are met. One of the requirements is that schemes “are in keeping with the scale and character of the locality and will not adversely affect heritage assets or their setting.”

## Conclusion

- 9.8.7 The appraisal in 2023 flagged a ‘moderate or uncertain negative effect’, recognising constraints to growth at key settlements and proposed allocations and given the context that: *“It is important to recognise that the proposed strategy is very different to that which underpinned the previously withdrawn local plan, namely a strategy centred on delivering three large new garden communities (which generated significant objection from a historic environment perspective).”* However, the appraisal in 2023 also recognised that: *“The historic environment has fed-in to the spatial strategy / site selection process as a key issue (e.g. influencing the proposed approach of nil proposed new supply at Great Chesterford).”*
- 9.8.8 The plan now performs notably better in many respects, both on account of adjustments made to strategy (notably at Thaxted and Newport) and masterplanning (notably at Takeley). However, there are still some tensions with historic environment objectives, most notably at Great Dunmow / Church End / Parsonage Down. On balance it remains appropriate to continue to flag a **moderate or uncertain negative effect**, although this is marginal, i.e. there is an argument for concluding an overall neutral effect, including given that alternative options are limited and the baseline situation involves continued growth without a plan.

## 9.9 Homes

### Growth strategy

- 9.9.1 The appraisal in Section 6 finds the proposed growth strategy to perform well. However, there is unsurprisingly support for higher growth from a pure ‘homes’ perspective. Also, not providing for locally arising housing needs at **Thaxted** is potentially an issue (albeit these needs are unquantified) and there is an issue around providing for Gypsy and Traveller accommodation needs, particularly longer-term.
- 9.9.2 There is no need to repeat discussion from Section 6 here, either in respect of **A**) the proposed approach to growth quantum, i.e. setting the housing requirement relative to need, and then identifying a supply of sites/land sufficient to provide for the housing requirement on an annual basis, recognising that under-delivery can lead to punitive measures; or **B**) distribution, e.g. directing growth to locations with strong viability and deliverability credentials. However, it is appropriate to elaborate on the proposed approach to providing for **Gypsy and Traveller accommodation needs**.
- 9.9.3 Current understanding is that, whilst at some of the existing sites in the District that are generating a need there is the potential to accommodate additional pitches, which is a good solution (notwithstanding any constraints affecting the sites), it is not possible to provide for all of the need generated in this way. As such, the proposal is to provide for residual need via a 14 pitch extension to the one public owned / managed traveller site in the District, which is located at Felsted. There is merit to this approach in that there is a need to support public owned / managed traveller sites (‘social provision’, as discussed in a recent RTPI [blog](#)). Also, the site is considered to be quite well-located and subject to limited constraint. However, the site itself is not currently generating any need for new pitches itself, and the effect of allocation will be to triple the size of the site (although it has previously had permission for a 10 pitch extension). As such, this is not an ideal solution, but is considered the best performing option out of the alternative options open to the Council, given that there has been a lack of new site options promoted as available for Gypsy and Traveller, and given constraints to expanding certain of the sites that are generating a need (including, but not limited to, concerns around impacting openness of the Green Belt).

### Development management policy

- 9.9.4 The first point to make here is the implications of wide ranging requirements in terms of infrastructure and wider policy asks for **development viability**. The ISA Report (2023) explained:
- “It will be important to ensure that decisions taken through spatial strategy / site selection reflect key ambitions with cost implications, including around infrastructure delivery (notably new schools capacity and transport infrastructure) and wider policy asks including affordable housing and net zero. There is a need to avoid delivery risks that amount to storing up issues for the future, and one specific matter for further consideration is in respect of sites that will require collaboration between landowners, including instances of one landowner having to forego housing to provide land for strategic infrastructure...”*
- 9.9.5 The Viability Study (2024) reaches an overall positive conclusion, but there is a recognition that

development viability is tighter at Takeley and Great Dunmow, which is where the plan is setting out to direct a relatively high proportion of growth (for wide-ranging reasons). Specifically, the Study concludes:

*“This is based on an [affordable housing] headline at 35%. The latest findings show that in some test scenarios (and mainly those reflective of the direction of the emerging allocation proposals at NE Great Dunmow and N Takeley) the indications are around the cusp of viability with 35% AH with all other estimated costs allowed for. Overall, however, in our view this would not be an appropriate point at which to lower or selectively lower AH delivery expectations from such schemes. There is still a great deal of further preparatory work to do, and information to build and keep under review – typical circumstances involved in development at significant scale.”*

9.9.6 The following bullets consider policies with broadly positive implications for housing objectives:

- **Affordable dwellings** – new residential development (including conversions and changes of use) with the capacity to provide 10 or more self-contained units should provide 35% of the total dwellings as affordable dwellings. This would go a long way to meeting affordable housing needs, as set out within the Local Housing Needs Assessment (LHNA, 2024); however, it is not uncommon for some local authorities to prioritise affordable housing to the extent that the policy ask is 40% affordable housing.<sup>18</sup>

The policy also sets out that: *“Affordable dwellings should incorporate a mix of tenures and sizes prioritising rented dwellings at social rent levels.”* Specifically, the policy sets out a requirement that the affordable homes should split as follows: 70% affordable/ social rented; 30% other forms (including First Homes). The point on First Homes is important and a supported evolution from the Draft Plan stage.

- **Standards for new residential development** – the requirement is for all residential schemes to be wheelchair accessible, i.e. M4(2) compliant. Also, 10% of market homes and 20% of affordable homes should be M4(3) compliant. M4(2) dwellings are those that are ‘accessible and adaptable’ so a wheelchair user can visit whereas a Part M4(3) dwelling is one in which a wheelchair user could live.

The LHNA provides data in support of this approach, for example identifying that over the 2023-2033 period there will be a 32% increase in the population aged 65+ and a 41% increase in the number of people aged 65+ with dementia and a 39% increase in those aged 65+ with mobility problems.

- **Specialist housing** - strategic housing sites will be expected to provide at least 5% extra care dwellings (C3 Use Class) as part of the overall mix. Should it be agreed with the Council that extra care housing would not be desirable in a particular location, an equivalent amount of alternative specialist housing 15 (C3 Use Class) for older people will be required.

Also, the policy sets out that the Council will support residential care homes (C2 Use Class) and developments which provide for a mix of Uses Classes C3 and C2 where the appropriate infrastructure is provided and they offer easy access to community facilities and frequent public transport. Sheltered and extra care housing are alternatives to care/nursing home bed spaces and can help to reduce costs associated with care by supporting people to remain as independent for as long as possible.

The LHNA suggests that in the period 2023-2033 there is a need for: 355 sheltered/retirement market homes; 330 additional housing units with care (extra-care) (90% to be market sector); 300 additional nursing care bedspaces, and 370-640 dwellings for wheelchair users (meeting M4(3) standards).

- **Custom and self-build housing** – proposals for 100 or more dwellings will provide serviced plots to deliver at least 5% of the total number of dwellings on the site as self-build or custom build homes. Custom and self-build homes are another route to achieving home ownership.
- **The travelling community** – the policy sets out criteria to guide planning applications for new or expanded sites. This takes on considerable importance given: A) the specific issues associated with new and expanded/intensified Gypsy and Traveller sites, from a perspective of avoiding impacts / realising benefits to both Traveller and settler communities, and ensuring harmonious relationships between the communities; and B) needs are not being provided for through allocations to the extent that would ideally be the case, hence there is a need for robust policy to ensure that allocations are permitted without delay and there is a need for policy support for windfall development.

<sup>18</sup> The Local Housing Needs Assessment identified that 261 households p.a. in Uttlesford are currently in affordable housing need, which equates to 38 % of the annual LHN figure for the district of 684 dwellings. However, the link between affordable and overall needs is complex and many of those identified as having an affordable housing need are already in housing and thus do not generate a net additional need for a home. An adjusted need is 192 dwellings, or 28 % of our LHN.

## Conclusion

9.9.7 The conclusion from the ISA Report (2023) still broadly holds true, namely that:

*“... a **moderate or uncertain positive effect** is predicted on the baseline, accounting for established objectives. The plan represents a considerable step-change, in terms of addressing housing and wider accommodation needs locally, in the context of a national housing crisis, but there is a need for further work, including around deliverability and providing for Gypsy and Traveller accommodation needs.”*

9.9.8 In terms of growth quantum (i.e. setting the housing requirement relative to need, and then identifying a supply of sites/land sufficient to provide for the housing requirement on an annual basis, recognising that under-delivery can lead to punitive measures) the plan performs as well or better than in 2023, recognising that there has been a significant ‘boost’ to supply from sites unexpectedly gaining planning permission (that will deliver in the crucial early part of the plan period). In terms of growth distribution, the new proposed approach at Thaxted (no housing growth bar windfall) is not ideal, but the matter can be revisited through a Local Plan Review; and development viability along the A120 corridor that could feasibly lead to challenges in respect of delivering affordable housing in line with policy (in terms of the total number of affordable homes and their tenure mix). Finally, in respect of providing for Gypsy and Traveller accommodation needs, work has been completed but the available evidence base is incomplete, with the main outstanding issue uncertainty regarding needs beyond year five of the plan period.

## 9.10 Land, soils and other resources

### Growth strategy

9.10.1 The appraisal in Section 6 finds the proposed growth strategy to perform well relative to the ‘reasonable alternative’ of supporting higher growth at Thaxted, but flags a concern with the proposed growth strategy in absolute terms. This is because Uttlesford is associated widespread grade 2 quality agricultural land, albeit this is also mostly the case for neighbouring local authorities over the sub-region.

9.10.2 Other than productive / best and most versatile agricultural land, it is difficult to identify other significant issues of relevance. One further consideration here is avoiding the undue sterilisation of minerals resources (and, equally, a situation whereby it transpires that there is an unexpected need to extract minerals ahead of development at allocated sites, leading to delays to / issues with site delivery); however, the County Council (the responsible authority) did not raise any concerns with the spatial strategy or site selection through the consultation in 2023 (but did request that Minerals Assessments are undertaken for a number of proposed allocations at the planning application stage). By way of context, the County Council is currently (July 2024) consulting on a [new Minerals Local Plan](#), which identifies that the north of the District is associated with chalk minerals resources and the south sand and gravel. However, sand and gravel resources are very extensive within Essex and more widely, and it is not known to be the case that there is likely to be a need for extraction of chalk ahead of development at either Saffron Walden or Great Chesterford Research Park.

### Development management policy

9.10.3 Natural England commented through the consultation in 2023: *“Best and Most Versatile Agricultural Land - Natural England expects to be consulted on larger allocations proposed within the Local Plan which would result in a potential loss of 20ha or more of Best and Most Versatile Agricultural Land. Development proposals would be expected to have undertaken an ALC survey as part of consultation.”* However, it is important to recognise that protecting agricultural land is more of an issue for spatial strategy / site selection than it is for the development management process, because it is difficult or impossible to mitigate the loss/sterilisation of agricultural land within development sites.

9.10.4 Having said this, one proposed DM policy of note is that dealing with **change of use of agricultural land to domestic gardens**, which sets out that: *“Change of use of agricultural land to a domestic garden will be permitted if the proposal, particularly its scale and means of enclosure, does not result in a materially negative change in the character and appearance of the surrounding countryside and does not lead to the irreversible loss of the best and most versatile agricultural land.”*

- 9.10.5 Also of note is the policy on **renewable energy infrastructure**, which sets out that account should be taken of best and most versatile agricultural land when making decisions, e.g. on solar farms. However, avoiding BMV agricultural land in Uttlesford is not easy, given the extent of BMV land and also limitations within the available data (see discussion in Section 6).
- 9.10.6 Also of note here is the policy on **managing waste**, which has a dual focus: 1) support proposals for sustainable waste management facilities as identified in the Essex Minerals Local Plan (2014) and Essex and Southend-on-Sea Waste Local Plan (2017), or their replacements (subject to criteria); and 2) ensure that new development includes adequate recycling facilities to allow occupiers to separate and store waste for recycling and recovery, preferably within the premises of the dwelling, or provide adequate, secure, external or communal storage facilities. Convenient and safe access to manage waste must be ensured, including for older persons or persons with disabilities.
- 9.10.7 In respect of waste there is also a need to note the policy on **embodied carbon**, as discussed above. Planning to minimise embodied carbon links in very closely with two other widely discussed concepts, namely planning for the 'whole lifecycle' of developments and planning for a 'circular economy'.

## Conclusion

- 9.10.8 The conclusion from the ISA Report (2023) still holds true, namely that:

*"... it is appropriate to flag a **moderate or uncertain negative effect** given the extent of high quality agricultural land that would be lost. However, it is difficult to envisage an alternative strategy that would be preferable, and there is no clear guidance in respect of judging the significance of loss of agricultural land through local plans. The available [guidance](#) focuses on planning applications."*

## 9.11 Landscape

### Growth strategy

- 9.11.1 The appraisal in Section 6 finds the proposed growth strategy to perform broadly on a par with the alternatives but concludes that there is a concern regarding impacts of the growth strategy. Whilst there are no nationally designated landscapes, landscape character and capacity/sensitivity is a key issue locally, and one that has been explored through recent character and sensitivity studies. In turn, there is an argument for favouring low growth. However, it is difficult to pinpoint which particular proposed allocations might be removed in order to allay landscape concerns. Attention may focus on the B1256 corridor, accounting for both proposed housing and employment allocations, but the discussion of alternatives in Sections 5 and 6 suggests that the key choice may be at **Great Dunmow**, and that landscape impacts are likely broadly similar whichever option is supported.
- 9.11.2 Also, it is recognised that an argument is to minimise concerns regarding landscape impacts by directing growth to new settlements rather than urban extensions. However, as discussed in Section 5, this is not considered to be a reasonable options for the current Local Plan (but can and will be revisited through the next Local Plan). Amongst other things, the concern is that were the plan delayed to further explore new settlement options then there could be a risk of Government intervention in plan-making and/or an ongoing inability to defend against 'speculative development' with resulting landscape impacts.
- 9.11.3 Taking each component of the proposed strategy in turn (with settlements in size order):
- **Saffron Walden** – a range of key issues have already been introduced above, under the 'Historic environment' heading. Beginning with option of expansion to the east (between the B-road corridors), it is important to recognise that the proposed allocations here would be less-well contained in topographical terms than the permitted sites to the west. However, the potential to draw upon topography to contain growth can be envisaged (potentially broadly drawing upon the 100m contour), and the latest proposals for new strategic greenspace (a potential country park) are strongly supported in this regard. Ultimately, landscape sensitivity work concludes 'low-moderate' sensitivity, which equates to relatively low sensitivity in the context of the growth options currently under consideration.

The other site in question is located to the south of Thaxted Road is potentially more sensitive in landscape terms, with the land notably rising to the south, towards an adjacent high point. There is a clear need to plan comprehensively for growth as far as possible, avoiding development creep over time along with commensurate opportunities missed for infrastructure and environmental planning.

Also, there is a need to ensure early consideration is given to any possible road options that would link the two B-road corridors to the east with the M11 corridor to the west, bypassing the historic town centre. The transport/traffic and wider arguments in support of exploring such options are recognised, but there are clear landscape constraints. The current proposal is to safeguard land for a potential future link.

- **Great Dunmow** – there is a degree of landscape capacity, however, this is a relatively flat landscape and there are limited features within the landscape to contain growth. As such, there is a need for masterplanning with a view to a suitably comprehensive scheme / avoiding development sprawl. It is also important to recognise the merits of a new area of ‘riverside parkland’.
- **Stansted Mountfitchet** – beginning with the small proposed allocation to the east of the B1351, this site relates well to the settlement edge and gives rise to limited landscape concerns. The site is split by a stream corridor, and the proposal is to use the stream corridor to bound the northern extent of the built form, presumably in perpetuity. Moving on to the larger proposed allocation to the north, this site gives rise to limited landscape concerns, and the proposal to deliver a new strategic area of greenspace at the site’s northern extent is strongly supported, as it will serve to define the settlement edge. Also, there is support for drawing upon Pennington Lane to define the northwest edge of the settlement (Section 5.4), including noting rising land beyond the lane. However, the matter warrants ongoing consideration.
- **Thaxted** – the proposed low growth strategy is supported from a landscape perspective, but only ‘on balance’, as sensitivities are understood to relate to the historic environment more so than landscape.
- **Takeley** – constraints to growth north of Takeley have been discussed extensively under other headings. There is landscape sensitivity, including in light of the Landscape Sensitivity Study (2023), but equally there is a landscape argument for planning comprehensively for expansion of the village as far as the A120, with a view to avoiding further piecemeal expansion over time.

A further consideration is long-term planning for growth along the A120 / B1256 corridor, with a view to avoiding risk of settlement coalescence / maintaining settlement gaps. As part of this, there is a need to recognise that Takeley is associated with raised land between stream corridors to the west (Harcamlow Way; Grade I listed church) and to the east (Little Canfield). In this regard, the new proposed approach to masterplanning and CPZ designation is supported, as has been discussed.

It is also recognised that employment growth west and east of Takeley gives rise to an ‘in-combination’ risk. However, ultimately a long term situation whereby there is a balance struck between supporting growth and maintain settlement gaps / the landscape setting of settlements can be envisaged.

- **Newport** – is strongly associated with a confluence of valleys and associated transport routes (the upper reaches of the River Cam catchment), and the M11 is located to the west, which provides an opportunity to deliver growth that is well contained in landscape terms. This is an area, along with land to the east and south east of Saffron Walden, that is identified as having only ‘low-moderate’ landscape sensitivity. These factors fed-in to the proposal in 2023 to allocate sites to deliver strategic growth to the west of the village; however, significant concerns were raised by the local community through the consultation, including from a landscape perspective. The new proposed approach is to support lower growth and to delegate the task of allocating to the Neighbourhood Plan, and it will be important that work on strategy / site selection is undertaken with a long term perspective, with a focus on comprehensive growth..
- **Hatfield Heath** – nil strategic growth reflects the Green Belt constraint. The village has a dispersed built form, which can suggest some capacity for growth from a landscape perspective.
- **Elsenham** – has notably low landscape constraint, and fairly limited constraint in wider respects. However, the level of completions and commitments is very high, and all of the strategic growth options are now committed, hence ‘no strategic allocation’ is a constant across the scenarios.
- **Great Chesterford** – nil strategic growth is supported from a landscape perspective, because landscape sensitivity work concludes ‘high’ sensitivity (to the west of the B184, and whilst sensitivity is classed as lower to the east, there is equally a clear landscape case for containing the settlement to the west of the road). However, there are also strategic arguments for growth in this area, as has been discussed.
- **Employment sites** – both of the proposed allocations along the A120 corridor are subject to a degree of landscape constraint, as has been discussed. The other two stand-alone employment allocations are located in rural areas, but it is not clear that there are significant landscape concerns. Finally, at Saffron Walden there has been some discussion of the best way to deliver new employment land as part of the urban extension, with a clear need for it to relate closely to Knight Park, as far as possible, plus a consideration is surface water flood risk (recognising employment land has relatively low vulnerability).



## Development management policy

- 9.11.4 The policy on **landscape character** is considered robust but reflects limited tailoring to the local context (recalling the Government’s proposal to introduce National Development Management Policies, as discussed above). The policy sets out that proposals will not be permitted if they would:

*“i. cause an unacceptable visual intrusion into the open countryside ii. be inconsistent with local character iii. cause coalescence between settlements iv. harm views to distant landmarks and landscapes particularly sensitive to change v. harm the setting of natural and built landmark features, or vi. reduce the historic significance of the landscapes.”*

- 9.11.5 Other key policies from a landscape perspective include those on:

- **Good design outcomes and process** – sets out a list of criteria that reflects a degree of local tailoring, but importantly sets out that: *“Development will be supported where proposals can clearly demonstrate compliance with appropriate national policy and guidance in respect of Design, especially the most up-to-date version of the Uttlesford Design Code(s), and the Essex Design Guide.”*

Also, the policy sets out that specific requirements for major developments and schemes involving 100 homes or more (*“make use of a Design Review as early in the process as possible”*).

- **Renewable energy infrastructure** – which has already been discussed above. The policy is clear that a key criterion is “visual impacts on local landscapes”.
- **Specific areas** – noting both green / blue infrastructure and safeguarding land for transport infrastructure. As discussed, a key issue is a potential new strategic link road south of Saffron Walden.

## Conclusion

- 9.11.6 The ISA Report (2023) concluded that:

*“... after having accounted for the proposed suite of development management policies and also the site specific policies that have been developed (which will be further refined and supplemented prior to plan finalisation), it is appropriate to predict a broadly neutral effect on the baseline. However, the fact remains there are clear sensitivities. It will be important that plan-finalisation is informed by consultation responses received and further work, e.g. in respect of development densities, scheme layouts and integration of green infrastructure. There will be a need to consider the combination effects of developments and also ensure a suitably long-term perspective, including along the A120/B1256.”*

- 9.11.7 The plan has been improved significantly since the Draft Plan stage, perhaps most notably at Takeley (also accounting for the latest proposals in respect of CPZ designation). However, there remain sensitivities and challenges that will require ongoing consideration (as part of plan finalisation over the course of the Examination in Public, and then through decision making at the development management stage). As such, it remains appropriate to predict a **neutral effect**.

## 9.12 Transport

### Growth strategy

- 9.12.1 The appraisal in Section 6 is notably supportive of the proposed growth strategy relative to the reasonable alternatives, although there remain some issues/challenges and uncertainties. The appraisal in Section 6 focuses particularly on Great Dunmow and Thaxted, and these are both key areas for consideration from a transport perspective, specifically: at **Great Dunmow** there is good potential to walk and cycle to designations within the town, but links to key destinations beyond the town is not as strong as for other settlements; whilst at **Thaxted** there is support for low growth from a transport perspective, given that Thaxted is a rural village with high car dependency / a need to travel long distances by car, albeit there are also transport argument for growth, from a perspective of supporting village services and facilities.
- 9.12.2 Looking more widely across the key settlements (other than Thaxted), the Table below is taken from the Sustainable Transport Study (2024) and presents a helpful summary of key issues and opportunities.

**Figure 9.3: Summary of sustainable transport issues and opportunities (Sustainable Transport Study, 2024)**

Place	Public transport (bus and train)	Cycling and walking	Constraints	Opportunities
Saffron Walden	<ul style="list-style-type: none"> <li>Good coverage of bus stops, and accessibility to them</li> <li>Nearest train station is at Audley End, circa 3.5km SW of Saffron Walden</li> </ul>	<ul style="list-style-type: none"> <li>Limited NCN access</li> <li>Consistent 30mph speed limits.</li> <li>Bike hire schemes and subsidised bike rental schemes.</li> <li>Most key services are within the town are within walking distance.</li> </ul>	<ul style="list-style-type: none"> <li>No significant barriers such as rivers, motorways, or rail lines to impede internal movements.</li> <li>Historic centre with one-way streets which aren't wide enough for contraflow cycle lanes.</li> </ul>	<ul style="list-style-type: none"> <li>High car dependency, and therefore significant potential for a mode shift.</li> </ul>
Great Dunmow	<ul style="list-style-type: none"> <li>Bus routes are classed as Low Accessibility.</li> <li>Nearest train station is at Stansted Airport, circa 7.2km West of town centre</li> </ul>	<ul style="list-style-type: none"> <li>Great access to NCN.</li> <li>Possible to cycle to Stansted Airport via a mostly segregated route.</li> <li>Access to The Fitch Way.</li> </ul>	<ul style="list-style-type: none"> <li>River Chelmer and the A120 represent instances of severance.</li> </ul>	<ul style="list-style-type: none"> <li>A compact town where walking and cycling to services may be more attractive than driving.</li> <li>Transport to Stansted Airport, as the largest employer in Uttlesford.</li> </ul>
Stansted Mountfitchet	<ul style="list-style-type: none"> <li>Central rail station with regular journeys to key destinations.</li> <li>Adequate bus network.</li> </ul>	<ul style="list-style-type: none"> <li>Stansted Mountfitchet links to NCN16 but lacks safe routes to the airport.</li> <li>A 92-mile route, NCN 11 runs north from Stansted Mountfitchet.</li> </ul>	<ul style="list-style-type: none"> <li>Severance from M11 and A120. There are just 3 crossing points.</li> </ul>	<ul style="list-style-type: none"> <li>B1383 Stansted Mountfitchet to Bishop Stortford active travel could be improved.</li> <li>Rail station ensures the town is well-connected.</li> </ul>
Elsenham	<ul style="list-style-type: none"> <li>Sparse, and infrequent bus network.</li> <li>Has a rail station which provides frequent links to key destinations.</li> </ul>	<ul style="list-style-type: none"> <li>New Road has a footway on just one side of the carriageway.</li> <li>No safe cycling connections between Elsenham and Stansted Mountfitchet and not served by NCN.</li> </ul>	<ul style="list-style-type: none"> <li>Severance of M11 and rail line.</li> <li>New Road is unlikely to be wide enough for contraflow cycle lanes.</li> </ul>	<ul style="list-style-type: none"> <li>Major scope to increase the mode share of active travel modes.</li> <li>Opportunity to upgrade bus stop facilities and improve walking and cycling provision at key junctions.</li> </ul>
Great Chesterford	<ul style="list-style-type: none"> <li>Served by a sparse, and infrequent bus network.</li> <li>Great Chesterford has a rail station which provides frequent links to: Cambridge and London Liverpool Street.</li> </ul>	<ul style="list-style-type: none"> <li>The proximity to Cambridgeshire, where many work, makes cycling more attractive with the right infrastructure.</li> <li>The access road to the station is poorly maintained.</li> <li>Lack of footways and dominance of parked cars on street.</li> </ul>	<ul style="list-style-type: none"> <li>Severance of the River Cam and M11.</li> <li>Isolated location.</li> </ul>	<ul style="list-style-type: none"> <li>Just 1.2% of the population cycle to work. Saffron Walden, the closest town, is 6 miles away, a feasible cycling distance with appropriate infrastructure.</li> <li>Opportunities for traffic calming measures on the B183.</li> </ul>
Takeley	<ul style="list-style-type: none"> <li>Good coverage of bus stops, and accessibility to them.</li> <li>No train station – nearest is at Stansted Airport. Direct bus services are available.</li> </ul>	<ul style="list-style-type: none"> <li>Great access to NCN through the town.</li> <li>Signed shared footpath/cycleway</li> </ul>	<ul style="list-style-type: none"> <li>The current road network in Takeley town centre is inefficient, leading to frequent traffic.</li> <li>Minor A120 severance.</li> </ul>	<ul style="list-style-type: none"> <li>Potential to provide access to the multi modal transport hub at Stansted Airport.</li> <li>Stansted Airport is the largest employment site in the district so there is an opportunity to access employment by sustainable means.</li> </ul>

9.12.3 On the basis of the table it can be suggested that settlements with perhaps a lower case for growth, from a transport perspective, are:

- **Saffron Walden** – however, there is clear case for directing a good proportion of growth to the District's largest town, and there is an established strategy for boosting walking and cycling, which should be supported by strategic growth to the east / southeast to support the strategy.
- **Elsenham** – is assigned limited further growth (i.e. over-and-above completions and commitments) and the one new allocation is near adjacent to the train station and will help to deliver a primary school.
- **Great Chesterford** – is assigned nil growth. It is important to give weight to the village's very good train connectivity to Cambridge, as well as potential to reach key employment areas by cycling or bus.

9.12.4 The two settlements shown to perform strongly in the table below are then: A) **Stansted Mountfitchet**, where the possibility of higher growth is discussed in Section 5.4, but ruled out as unreasonable on balance; and B) **Takeley**, where there is considered to be a very strong transport-focused case for strategic growth, including because of good existing potential to reach key destinations by cycling or bus (most notably Stansted Airport, which is a key employment and transport hub) and potential to deliver benefits through a new secondary school and very well-targeted investment in 'sustainable transport'.

9.12.5 With regards to Takeley, it should also be noted that the transport merits of strategic growth were also highlighted through the appraisal work completed in 2023:

*“With regards to Takeley, whilst the proposal... amounts to a relatively high growth strategy, and the village does not benefit from a train station, there is a clear transport argument for strategic growth given the inherent locational merits of Takeley combined with identified opportunities for delivering new and upgraded transport infrastructure in line with a clear long term strategy that includes:*

- *A multi modal corridor for public transport and active travel between Takeley and Stansted Airport public transport interchange including improvements along Parsonage Road to improve connectivity for cyclists and offer priority for bus services, plus connections through the airport to the transport interchange.*
- *Creation of a Sustainable and Public Transport Mobility Hub adjacent to the proposed strategic employment allocation at Canfield End providing convenient access to the B1256/A120 junction.*
- *Flich Way upgrade - safety, access, interpretation, multi-functional surface and eco- management.*
- *Explore B1256 Dunmow/Stortford Road as a secondary vehicular route and as a sustainable travelling route following on from the A120 sustainable transport study.*

*However, there are also risks and uncertainties, particularly relating to the B1256, A120 and M11J8.”*

9.12.6 These appraisal statements broadly hold true at the current time. However, one point to note is the proposal to now weight growth further to the east, slightly more distant from Stansted.

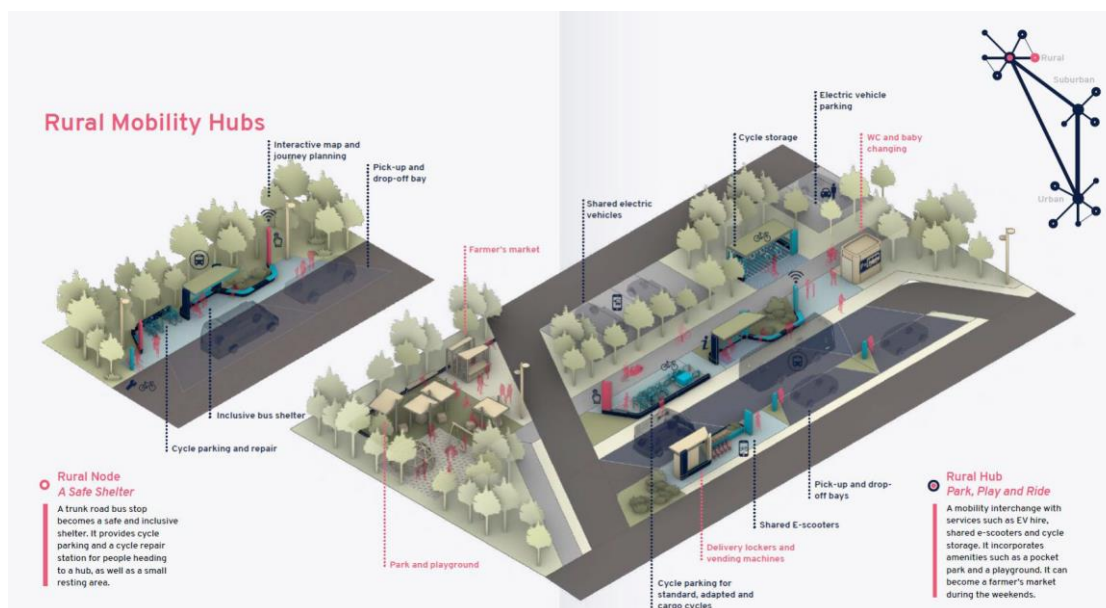
9.12.7 The other key point to note, from a sustainable transport perspective, is the proposed approach of supporting a series of new ‘mobility hubs’. The ability to take this approach is strongly related to the proposed growth strategy, with lower order hubs proposed for each of the strategic allocations and a higher order hub proposed to be delivered between Takeley and Great Dunmow, enabled by a proposed 18ha employment allocation. Within the transport evidence base supporting the plan there is a focus on defining mobility hubs, and it is recommended that specifics of the vision are also made clear in the plan.

9.12.8 With regards to the proposed mobility hub between Takeley and Great Dunmow, it is described as follows within the evidence base supporting the plan:

*“The site has good opportunity for a mobility hub with the Flich Way cycle path being located along the southside of the site. There are also two bus stops within close proximity to the site which travel to Great Dunmow, Braintree, Stebbing, Stansted Airport and Bishops Stortford.*

*... Due to the location and size of the site, this mobility hub has the potential to become a Standard Hub. To be classified as a Standard Hub, this mobility hub would have to include Community Transport, 2 forms of shared mobility (car clubs, bike share), cycle parking and a sheltered waiting area. Components to consider also include EV charging for buses and private vehicles... and local services/amenities.”*

**Figure 9.4: Potential design of a ‘rural mobility hub’ (Sustainable Transport Study, 2024**



- 9.12.9 The final matter for consideration is then traffic congestion along key road links and at junctions. This is an important consideration in and of itself, but also from a perspective of wishing to encourage walking and cycling as well as fast and reliable bus services. The Transport Topic Paper (2024) summarises the situation at each settlement in turn, and in each case concludes:

*“The overall picture is one in which the additional impacts of the site allocations, over and above those set to be experienced because of committed growth, are relatively modest... The package of interventions which have been identified to mitigate the impacts, focuses on the need to improve travel choice and the provision of realistic and attractive alternatives to the car. The resultant reallocation of road space and reprioritisation of road users therefore results in marginal increases to the travel times and delays depicted in the Local Plan Case Modelling... The additional impacts are deemed to be justifiable in the context of the improved travel choice on offer and in seeking to facilitate sustainable growth.”*

- 9.12.10 This approach is broadly supported, from a transport perspective, and in line with recent shifts in national policy. Also, it can be anticipated that it will be in line with the new Essex Local Transport Plan (LTP), which is currently in development. It is also summarised elsewhere as follows:

*“The approach to mitigating the impact of the Local Plan is not focused on the provision of increasing highway capacity. The wider transport strategy to support the Plan prioritises the provision of greater travel choice and realistic alternatives to the car. In this respect, the interventions can result in longer journey times and a reduction in the speed of traffic but presents a more sustainable ‘vision led’ approach than the historic predict and provide method of accommodating future demand on the network.”*

- 9.12.11 However, there is also a need to be clear on where the traffic pinch points could be, notwithstanding an assumed modal shift away from the private car. In this regard, it appears that concerns are focused at:

- Great Dunmow – “There will be some increases in traffic volume and delays around the town and particularly at the junctions of the B1256 with the B184 Woodside Way and at the Braintree Road/St Edmunds Lane intersection.”
- Takeley – “There will be some increases in traffic volume and delays around the town and these are most evident around the known existing pinch point of the Four Ashes junction (B1256/Parsonage Rd / Station Road).”
- Stansted Mountfitchet – “There will be some increases in traffic volume and delays to the east and south and these are most evident on the B1051 with traffic looking to travel into the village from Elsenham and delays at the Gypsy Lane/B1383 junction.”

- 9.12.12 With regards to Saffron Walden, it appears that concerns are relatively limited, but there is a degree of uncertainty regarding the extent to which a new link road through the site will deliver strategic benefits. The previous Transport Topic Paper (2024) had stated:

*“The scheme itself could have many benefits in terms of the removal of traffic from many existing routes in the south of the town. However... many vehicles will still be required to travel through the town centre via High Street. In particular, if they are travelling north towards the M11 and Cambridge. In this respect, the link road would fall short in addressing all of the town’s highway capacity issues...”*

*... The link road could unlock wider benefits in terms of the reallocation of road space to more sustainable forms of travel within the town, and subsequent improvements to air quality...”*

## Development management policy

- 9.12.13 Numerous policies have broadly positive implications for transport objectives. For example, the policy on **active travel (walking and cycling)**, which sets out that developers will be expected to:

*“enable and contribute towards improvements and delivery of local and strategic active travel routes and links as identified in the Area Strategies and associated [Infrastructure Delivery Plan, IDP] and [Local Cycling and Walking Implementation Plan, LCWIP].”*

- 9.12.14 The policy on **providing for sustainable transport and connectivity** is also highly relevant. Amongst other things, the policy sets out that:

*“The Council will support measures identified in the Essex Local Transport Plan and the area travel plans and work with Essex County Council to ensure that transport improvements...”*

*... Sustainable modes of transport should be prioritised in new developments to promote accessibility and integration with the wider community and existing networks. Priority should be given to cycle and pedestrian movements and providing access to public transport including the provision of new or enhanced existing bus services.”*

- 9.12.15 It is also possible to highlight policies for the **rural area** as potentially leading to a degree of tension with transport-related objectives. However, the key point to note is that the spatial strategy seeks to balance, on the one hand, a need to support a degree of new development in the rural area in support of rural communities and the rural economy; and, on the other hand, a need to limit the dispersal of growth to rural areas from a transport perspective (albeit recognising the national switchover to electric vehicles).

## Conclusion

- 9.12.16 The proposed growth strategy performs very well in a number of respects, in light of a range of technical studies and consultation on a full draft version of the Local Plan in 2023 (a very important step in terms of providing partner organisations with early certainty and an opportunity to input effectively to plan-making). Fundamental aspects include: provision for housing need in full, which is important from a transport perspective; directing growth in line with the settlement hierarchy and restricting growth in rural areas (including Thaxted); directing growth to settlements with a train station (albeit the plan might ideally have a stronger focus in this regard, including noting the new lower growth strategy for Newport); and directing growth to the A120 corridor where, despite inherent constraints (given background traffic growth outside the control of the Local Plan), there is also a strategic opportunity (albeit more so at Takeley than at Great Dunmow). Also, it is important to recall that the current Local Plan is a major departure from the previous withdrawn local plan, which sought to rely on costly and uncertain major new transport infrastructure. Overall, and after taken account of concept masterplans and DM policies, it is now possible to predict **moderate or uncertain positive effects**, although there does remain a need for ongoing scrutiny of the viability, deliverability and efficacy of the sustainable transport proposals that are so central to the proposed approach to mitigating growth in road transport, perhaps most notably at Great Dunmow.

## 9.13 Water

### Growth strategy

- 9.13.1 The appraisal in Section flags a potential concern with the proposed growth strategy, particularly in terms of capacity at wastewater treatment works (WwTWs), and in light of the evidence provided by the Stage 2 Water Cycle Study (2024). However, the proposed strategy is preferable to the alternatives appraised (on the basis that all of the alternatives involve higher growth). As discussed in Section 6, the potential issues are particularly associated with **Great Dunmow** and **Takeley**. However, in practice there is every chance that through further consultation with the water companies and the Environment Agency it will be possible to arrive at a conclusion that there are acceptable and viable solutions.

### Development management policy

The policy on **water supply and protection of water resources** presents policy under several headings, but of particular note is the following requirement on water efficiency: *“All new residential development that achieves at least a water efficiency standard of 90 litres per person per day will be supported. Proposals for non-residential development should achieve at least 3 credits under the BREEAM “Wat01” measure. Where possible, proposals involving the refurbishment or change of use of existing building should undertake retrofitting to increase water efficiency.”*

- 9.13.2 This is an evolution from the proposal at the Draft Plan stage (2023), when the requirement was that *“no more than 90l/p/d must be achieved in the sensitive chalk stream catchments”* and there is a need to strike a note of caution regarding potential implications for development viability at Takeley and Great Dunmow. By way of context, water use in the Uttlesford area is relatively high at around 161.27 litres per person per day (l/p/d) for existing customers, compared to a national average of 147 l/p/d and 121.92 and 126.19 in the East and Southeast Affinity Regions with higher levels of metering. The Building Regulations offer a standard beyond the mandatory 125l/p/day or 110l/p/d where there is local stress.

## Conclusion

- 9.13.3 Whilst the proposed ambitious approach to water efficiency is supported, in the context of a water-stressed sub-region, there are some outstanding wastewater treatment challenges along the A120 corridor. There will likely be a solution, but it is appropriate to flag a **moderate or uncertain negative effect** at this stage.

## 9.14 Conclusions

- 9.14.1 The whole plan appraisal presented above builds upon the appraisal of Growth Scenario 1 in Section 6. After having accounted for the growth strategy alongside proposed concept masterplans and development management policy (including site-specific policy), and after having accounted for established sustainability objectives (see Section 3), the appraisal predicts effects on the baseline as follows:

- **Significant positive** in respect of **accessibility** (to community infrastructure) – primarily on account of the proposal to deliver or facilitate delivery of a secondary school and several primary schools, although there remains a degree of uncertainty at several settlements, notably Saffron Walden.
- **Significant positive** in respect of **employment land** – although there remains a degree of uncertainty at Saffron Walden and in respect of new office development at Gaunt's End (Elsenham).
- **Moderate or uncertain positive** in respect of **biodiversity** – given a focus on avoiding sensitivities and realising strategic opportunities, aligned with a DMP policy requirement for all development to achieve 20% BNG. However, SSSI woodlands along the A120 remain a constraint.
- **Moderate or uncertain positive** in respect of **communities, equality and health** – given adjustments that have been made to the plan following consultation in 2023, perhaps most notably at Takeley and Newport, but also at Thaxted (although there is a 'communities' argument for growth) and Great Dunmow (in particular, there is now a very strong proposed approach to green and blue infrastructure).

The appraisal also includes a stand-alone discussion of **equality** and **health** considerations, including a focus on those with protected characteristics under the Equality Act. Ultimately, the plan is deemed to perform well and no significant tensions with equality or health objectives can be identified.

- **Moderate or uncertain positive** in respect of **homes** – the plan performs strongly in many regards, but is not able to provide for longer term Gypsy and Traveller accommodation needs. Also, development viability is tight along the A120 corridor, with possible implications for affordable housing.
- **Moderate or uncertain positive** in respect of **transport** – the plan takes a highly proactive approach to supporting modal shift away from the private car, including via a focus of growth at Takeley, but opportunities could feasibly be taken to ensure a higher focus of growth in proximity to train stations.
- **Neutral** in respect of **climate change adaptation** (flood risk focus) – because there are some outstanding constraints/challenges in respect of surface water flood risk. These can likely be addressed through masterplanning without undue issue, i.e. with limited need to compromise on wider objectives.
- **Neutral** in respect of **climate change mitigation** (built environment decarbonisation focus) – best practice DM policy approach is proposed, but there is also a need to ensure that all steps are taken through strategy / site selection, and there is a 'high bar' to concluding positive effects given targets.
- **Neutral** in respect of **landscape** – notable adjustments have been made, including at Takeley (CPZ). Whilst there are residual impacts, these are of localised more so than strategic significance, and it is important to recall that the baseline situation in one whereby growth would continue without a plan.
- **Moderate or uncertain negative** in respect of the **historic environment** – detailed work has been undertaken in line with the consultation response received from Historic England, but some inherent concerns/challenges remain, most notable at Great Dunmow.
- **Moderate or uncertain negative** in respect of the **land, soils and resources** – because significant loss of best and most versatile agricultural land (including grade 2 quality) is likely unavoidable.
- **Moderate or uncertain negative** in respect of the **water** – whilst the proposed ambitious approach to water efficiency is supported, in the context of a water-stressed sub-region, there are some outstanding wastewater treatment challenges along the A120 corridor.

- 9.14.2 There will be the potential to make improvements to the plan through the forthcoming examination in public. Improvements to the plan might seek to further bolster positive effects identified through this appraisal, and there will certainly be the potential to further explore tensions with sustainability objectives.
- 9.14.3 A small number of specific recommendations are discussed. However, it is inherently difficult to make specific recommendations because actioning them will inevitably have implications that are difficult to foresee and account for here. For example, it would be very easy to recommend further detailed policy in respect of affordable housing, but this would have cost/viability implications such that there could be a need to accept trade-offs in respect of one or more wider objectives (e.g. net zero). Equally, it would be very easy to recommend further site-specific policy, but there is always a risk of being overly prescriptive, such that there is reduced flexibility at the development management stage, potentially impacting delivery.
- 9.14.4 Finally, it should be noted that the current version of the Local Plan was prepared taking account of the appraisal presented within Section 9 of the Interim SA Report (2023). There is no requirement for SA to be iterative in this way, but it helps to demonstrate a robust and sound plan-making process.

### Cumulative effects

- 9.14.5 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and 'larger than local' effects. The following bullet points cover some key considerations:
- **Housing needs** – progressing the Uttlesford Local Plan and providing for local housing needs (LHN) in full is strongly supported from a 'larger-than-local' perspective. It is not impossible that one or more neighbouring local authorities in the sub-region will struggle to provide for their own LHN in full. Another consideration is providing for Gypsy and Traveller accommodation needs in collaboration with neighbouring authorities, recognising that it is not uncommon for Local Plans to fail to provide for needs in full (see <https://www.rtpi.org.uk/blog/2024/june/simon-ruston-kicking-the-can-down-the-road/>). However, on the other hand, accommodation needs can be very local, and even site-specific.
  - **The economy** – the proposed strategy of providing for employment land needs in full is also strongly supported from a 'larger-than-local' perspective. The need to deliver employment land along the M11 corridor and in the vicinity of Stansted in particular is clearly of at least regional importance. Also, there is a need to support national objectives around economic growth at Cambridge, which leads to a focus on Great Chesterford (the plan does not propose any new supply) and Chesterford Research Park (the plan proposes to allocate land to enable the park to expand to the full extent of its masterplan vision).
  - **Transport corridors** – there is need for ongoing consideration of capacity issues at M11 J8, and there is also a need to work with neighbouring local authorities – including East Herts (Bishops Stortford), Braintree and Chelmsford – in respect of capacity along the A120. Another key consideration is capacity on the train line to Cambridge, e.g. taking into account committed strategic growth to the north of Harlow.
  - **Stansted Airport** – is a key national asset. The local plan is supportive of employment growth in the vicinity of the airport and has a strong focus on avoiding conflicts with the airport's operation.
  - **Internationally and nationally important biodiversity sites** – the key consideration is recreational pressure on Hatfield Forest, which is nationally designated as a SSSI and National Nature Reserve. Recreational pressure also comes from East Hertfordshire District. The new proposed approach involves a focus on Suitable Alternative Natural Greenspace (SANG) which is strongly supported.
  - **Landscape scale nature recovery** – primary larger-than-local considerations relate to river corridors, including the River Cam in the north of the District and the Chelmer in the south. However, other strategic considerations are set out in the Green and Blue Infrastructure Strategy (2023), and further spatial guidance will be set out in the forthcoming Essex Local Nature Recovery Strategy ([LNRS](#)).
  - **Agricultural land** – self-sufficiency of food production is increasingly a key national consideration. The Local Plan will result in a significant loss of high quality agricultural land; however, in the absence of a Local Plan there is no reason to assume that development pressure locally would be any less.
  - **Water** – this is a key larger-than-local issue, including recognising that the Greater Cambridge Local Plan is paused whilst work is undertaken in respect of water resources and the water environment. Also, it is understood that there is a need for collaboration across two water companies in respect of ensuring waste water treatment capacity in support of growth along the A120 corridor.

## **Part 3: What are the next steps?**



## 10 Plan finalisation

- 10.1.1 Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period. The Council will also submit the SA Report.
- 10.1.2 At examination one or more Government-appointed Inspector(s) will consider representations before identifying modifications necessary for soundness. Modifications will then be prepared (alongside SA if necessary) and subjected to consultation (alongside an SA Report Addendum if necessary).
- 10.1.3 Once found to be 'sound' the Local Plan will be adopted. At the time of adoption a 'Statement' must be published that sets out (amongst other things) "the measures decided concerning monitoring".

## 11 Monitoring

- 11.1.1 Within the SA Report the requirement is to present "measures envisaged concerning monitoring".
- 11.1.2 A draft monitoring framework is presented within the current Draft Local Plan, covering a wider range of issues including many of the issues that are a focus of the appraisal presented in Section 9 of this report. Amongst other things, it is noted that a range of detailed performance measures are proposed in respect of net zero carbon development, which is strongly supported, given the District's 2030 net zero target.
- 11.1.3 The following are possible suggestions for bolstering the monitoring framework (although it is recognised that, in practice, there is a need to balance ambition with time and resource implications):
- Agricultural land – it is not clear that this warrants being a focus of monitoring locally, but nationally there is certainly a need for increased clarity around loss of agricultural land and implications for plan-making.
  - Biodiversity – there will be a need to establish a regime for ensuring that decision making in respect of biodiversity net gain as part of planning applications is undertaken under a strategic spatial framework – informed by the forthcoming Local Nature Recovery Strategy – and then monitor effectiveness.
  - Communities – there could be merit to targeted monitoring of growth/change at Takeley.
  - Community infrastructure – Wokingham Borough is commended as an authority that sets out very clear information on progress in respect of delivering infrastructure at strategic growth locations (see [here](#)).
  - Climate change mitigation – monitoring should a focus on clarity. This can be a confusing policy area, but it is very important that the interested public can engage and effectively scrutinise applications.
  - Climate change adaptation – a focus on avoiding surface water flood zones could be considered but would likely prove challenging. Regardless, there is a need for clarity on the different forms of flood risk.
  - Economy and employment – the nature of need/demand for office floorspace and industrial/logistics floorspace changes very quickly. Regular monitoring of delivery would assist with future assessments.
  - Historic environment – it can be difficult to know what monitoring indicators are most appropriate to apply. What is quite typical is to monitor the number of assets on the Heritage at Risk register, but this will not give a good picture of the local plans impacts or contextual changes to the historic environment.
  - Homes – this topic is already a focus of the monitoring, but additional indicators could be explored, for example with figures broken down further by settlement and by housing type and tenure. A focus on Gypsy and Traveller accommodation could also serve to inform future needs assessments.
  - Transport – there is a clear need for targeted detailed monitoring. As well as road traffic and air quality, there is a need for improved data on bus patronage and use of cycle routes. Also, understanding of strategic transport infrastructure issues and opportunities changes significantly over time (e.g. Essex LTP4 is forthcoming), hence there is a need to consider local plan implications on an ongoing basis.
  - Water – there is a need for monitoring of the situation regarding the potential to accommodate the proposed growth strategy along the A120 corridor, from a perspective of ensuring that capacity is not breached at the receiving treatment works nor the environmental capacity of receiving watercourses. Also, there is a clear case for monitoring water efficiency standards achieved by developments.

# Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

**Table A:** Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
<b>Introduction</b>	What's the plan seeking to achieve?		<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>	
<b>Part 2</b>	What are the SA findings at this current stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>	
<b>Part 3</b>	What happens next?	<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>	

**Table B: Interpreting Schedule 2 and linking the interpretation to the report structure**

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> <b>[Part 1 of the Report]</b>
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> <b>[Part 2 of the Report]</b>
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> <b>[Part 3 of the Report]</b>

**Table C: ‘Checklist’ of how and where (within this report) regulatory requirements are reflected.**

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 (‘What’s the plan seeking to achieve’) presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an ‘SA framework’, which is presented within Section 3 in an adjusted form.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... ..areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an ‘SA framework’, which is presented within Section 3.  With regards to explaining “ <i>how... considerations have been taken into account</i> ”, Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with ‘reasons for selecting the alternatives dealt with’, with an explanation of reasons for focusing on growth scenarios / certain growth scenarios.  Sections 7 explains ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal.  Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This SA Report is published alongside the Proposed Submission Local Plan in order to inform representations and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising the plan for publication (see Section 10).  Also, it should be noted that an Interim SA Report was published alongside the Draft Local Plan in 2023. It presented the information required of the SA Report.