

Uttlesford District Council Local Plan Examination

Matter 4

Hearing Statement on behalf of Stebbing Parish Council

05/19

Hearing Statement



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Matter 4 – Hearing Statement

The Spatial Strategy (Policies SP2 and SP3)

Introduction

- 1 This Hearing Statement has been produced on behalf of Stebbing Parish Council (SPC) to supplement its earlier representations objecting to the Garden Community being proposed to the West of Braintree (SP8), which expands across from Braintree District into Uttlesford District, and both directly and indirectly significantly impact upon Stebbing.
- 2 SPC's Regulation 19 representations refer in detail to the reasons for its objection to the West of Braintree Garden Community proposals, the key reasons being:
 - Adverse landscape and heritage impacts;
 - Impacts upon the highway network, in particular upon the strategic A120 route which currently suffers from frequent major congestion at Braintree; and
 - Serious doubts regarding its overall deliverability.
- 3 The main issue identified by the Inspector to be examined is:

Whether the Development Strategy is justified, effective and consistent with national policy.

Questions:

Q.1) What is the basis for the overall spatial strategy and broad distribution of growth set out in policy SP2? What options were considered and why was this chosen?

- 4 The Plan states that in developing the strategy for the Local Plan Uttlesford has considered a range of alternative strategies, which were subsequently reduced to five scenarios¹:

¹ EXAM Document 101.1, Paragraph 3.8

1. All development in new settlements;
2. All development pepper potted in villages;
3. All development in two main towns (Saffron Walden and Great Dunmow);
4. A combination of development in main towns and villages;
5. Hybrid involving new settlement(s), main towns and villages.

- 5** It goes on to state that the first four were rejected for a variety of reasons. Focussing significant new development in the villages or the two main towns would result in a scale of development which would have a detrimental impact on the character and historic assets of the town or village, the surrounding countryside and highway network².
- 6** The Plan suggests that the scale of individual developments would not provide the infrastructure required. Therefore, it was concluded that these strategies would have significant impacts on these communities, many of which have seen significant growth in recent years. Uttlesford District Council (UDC) specifies that focussing all development in new settlements does have significant benefits, in that focussed development is better able to provide new and improved infrastructure and reduces development pressure on the historic settlements, a strategy that focussed all development in new settlements was considered to not address the challenges around housing need early enough and deprives existing settlements of sustainable growth.
- 7** The Plan acknowledges that new settlements have longer lead in times before development can commence, and the Council is required to address its housing needs in a more balanced approach.
- 8** Consequently, the Local Plan proposes a hybrid strategy with significant growth in new settlements, but some additional growth in existing communities as well. This strategy is said to recognise that towns and larger villages offer sustainable locations for development³.

² EXAM Document 101.1, Paragraph 3.9

³ EXAM Document 101.1, Paragraph 3.10

- 9 The broad locations for the garden communities seem to have been chosen in order to divert very large scale housing development away from the district's major towns and to disperse it to different parts of the district.
- 10 The Place Services Sustainability Appraisal referred to the fact that the Plan's allocations (including the Garden Communities) could be seen to be broadly focused within the M11 and A120 corridors, which were stated as making car use attractive. However, it was suggested that these corridors also make sustainable transport provision more viable and attractive to service providers, particularly in serving Garden Communities⁴.
- 11 SPC strongly disagrees, it has raised significant concerns in its representations regarding the A120 access to the West of Braintree Garden Community. Nor does it believe that the range of services and facilities available at Braintree will be of a sufficient scale and size to avoid a heavy reliance upon increased car journeys, which are likely to be particularly problematic in terms of congestion on and around the A120, and the resultant negative impact upon local air quality.
- 12 SPC considers that the spatial strategy is too heavily focussed upon Garden Community provision, which will be very difficult to deliver given the very high amount stipulated in the Plan by Policy SP3 (The Scale and Distribution of Housing Development). This identifies that 4,820 dwellings out of the total identified dwelling supply of 6,380 dwellings between 2017-33 will come from the three Garden Community sites (just over 75% of the identified future housing supply).

Q.2 Is the growth in villages consistent with their position in the settlement hierarchy set out in policy SP2?

- 13 We note that the Stebbing is identified as a Type 'A' Village within Table 2 of the Local Plan. These are villages which have a primary school and some local services, e.g. village hall, public house or shop. They are identified as acting as a local service centre and are suitable for a scale of development that reinforces their role as a local centre. In total in all the Type 'A' Villages (19 in total) there will be up to 134 new

⁴ EXAM Document 104.14, Paragraph 9.2.9

homes in new allocations for housing development in the Local Plan. This represents an average housing supply of only 7 dwellings per Type 'A' village.

- 14 The Local Plan specifies that the first four were rejected for a variety of reasons. Focussing significant new development in the villages or the two main towns would result in a scale of development which would have a detrimental impact on the character and historic assets of the town or village, the surrounding countryside and highway network⁵.
- 15 However, the Spatial Strategy does not seem to have given similar weight to the same detrimental impact on the character and historic assets of villages such as Stebbing from the proposed Garden Communities, which will be far greater in size.
- 16 SPC is not a NIMBY authority. Over recent years it has supported a variety of new housing schemes that have respected the Stebbing's unique historic character. Work is also well underway with regard to the production of a Neighbourhood Plan for Stebbing.
- 17 SPC believes that a fair and balanced approach needs to be taken in relation to housing distribution throughout the villages. It believes that there is significant scope for Uttlesfords' villages to accommodate additional new housing supply, which would reduce the current over-dependence upon Garden Community provision.

Q.3 Has the settlement hierarchy taken account of facilities in neighbouring settlements, outside of the local authority's boundary? If not, should it?

- 18 We consider that the focus of the West of Braintree Garden Community proposal to be very much focussed upon Braintree. We do not believe that the new Garden Community will address the needs of Uttlesford residents, particularly given that in terms of size it would only make a minor contribution to the overall new Garden Community.
- 19 Whilst it is not inappropriate to have regard to facilities in neighbouring settlements, the Plan should not be placing undue weight and reliance upon facilities and services

⁵ EXAM Document 101.1, Paragraph 3.9

located in other districts, it should be seeking to meet the key needs of its residents and businesses within Uttlesford itself.

Q.4 Is the approach to development in the countryside, set out in policy SP2 and SP10, justified and effective and consistent with national planning policy? Should it be more flexible and less restrictive?

- 20 No. SPC believes that to adhere to national planning policy, the approach needs to be more flexible and less restrictive. It should allow development to take place in the countryside in appropriate circumstances. It would also reduce the need for such a great reliance upon Garden Community housing provision.

Q.5 What has been the Council's approach to defining village envelopes? Is this approach justified and effective?

- 21 SPC believes that Neighbourhood Plans should have a very significant role to play in determining how, when and where future village expansion takes place. It considers that in accordance with national planning policy such matters should be determined wherever possible at the most local level, so long as they are in general compliance with the content of the wider Spatial Plan.

Q.6 Is the approach set out in Policy SP3 of providing a large proportion of new homes within garden communities realistic?

- 22 No. We do not consider it to be either realistic or feasible for the District Council to seek to deliver three separate new garden communities alongside one another. Within our separate accompanying representations in relation to Policy SP 8 in the Draft Plan we have provided further details as to why we think this is to be the case.
- 23 The Examination Inspector for the North Essex Joint Strategic Plan (Roger Clews) wrote to the three local authorities on 8 June 2018 setting out his advice on the next steps in the Examination (EXAM Document 2000.1). The Inspector identified a number of serious flaws and identified the need for substantive Main Modifications to address.
- 24 Whilst the North Essex Joint Strategic Plan Examination Inspector surmised that it was not impossible that one or more of the Garden Communities could deliver at rates of around 300 dpa, he considered it would be more prudent to undertake

viability analysis on the basis of delivery at 250 dpa⁶ and 30% affordable housing provision⁷.

- 25** We note Appendix 3 – Housing Trajectory does not assume annual housing delivery rates above 150 dwellings. However, the Uttlesford Draft Local Plan does assume 40% affordable housing provision. This does raise serious doubts regarding how much infrastructure related to the West of Braintree Garden Community will realistically be capable of being delivered within the Plan period off the back of such delivery rates.
- 26** SPC has strong concerns regarding the inability of the surrounding road network to accommodate the levels of growth envisaged. It does not consider that the proposed highway works will be capable of adequately addressing this. It has also commented upon the likelihood of new residents driving considerable distances to much larger retail centres given the absence of any large-scale town centres nearby. This would generate significant amounts of unsustainable travel.
- 27** It believes that Policy SP 3 should be amended by the deletion of any reference to West of Braintree from the policy, and replacement housing provision identified for the 970 dwellings previously proposed for delivery within the Plan period.

Q.7 Is the windfall allowance in Policy SP3 realistic and is it based on the advice in paragraph 48 of the NPPF?

- 28** Yes. The windfall allowance of 1,120 dwellings to be provided on small unidentified windfall sites between 2017 and 2033 equates to a small windfall allowance of only 70 dwellings per annum. This figure is not considered to be at all unreasonable.

Q.8 Should the Plan include more small and medium size sites in order to provide greater choice and flexibility?

- 29** Yes. The Plan is overly focussed upon provision from three new Garden Communities, which will be very difficult to deliver due to their complex nature, particularly in relation to the necessity for extensive new infrastructure provision. To fill the vacuum until such time as provision from one or more new Garden Community

⁶ EXAM Document 2000.1, Paragraph 53

⁷ EXAM Document 2000.1, Paragraph 55

comes forward, a continuous supply of small and medium sized sites will be essential over the short to medium term at least if the District's housing needs are going to be adequately addressed.

Q.9 Would it be more appropriate for some of the spatial strategy (SP) policies in the second part of the plan that contains development management policies, in particular policies SP9, SP10 and SP12?

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