



Uttlesford District Council: Draft Local Plan

Pre-Publication Report on behalf of Takeley Parish Council

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1.0 INTRODUCTION

- 1.1 Uttlesford District Council (**UDC**) is preparing a new Local Plan and intend to publish a 'Pre-Submission Draft' (Regulation 19) version in early 2017. An initial draft was to have been considered by the Planning Policy Working Group on 25 October 2016 and some detail was published as a press release, including a proposal for '230 new homes at Takeley/Hatfield Broad Oak'. However, that draft was not published or considered but a note appeared on the UDC website saying that publication was postponed, although no specific reasons were given. Full Council held an 'extraordinary meeting' on 16 November 2016 to debate a submitted motion, and respond to written questions, about the Local Plan process. The outcome is currently unknown.
- 1.2 Takeley Parish Council (**TPC**) is concerned that even more housing may be allocated at Takeley and at a meeting with the Leader of UDC and Development Manager on 20 October 2016 TPC was informed that it is the 'Bonnington Green' site which is likely to be allocated (Site refs: 02, 03, 04HBO15).
- 1.3 TPC, with the support of Hatfield Broad Parish Council, instructed Gardner Planning Ltd (GPL) on 10 November 2016 to submit this Report which considers the likely Local Plan proposals and then makes the case against allocating this site in the Local Plan. When the Pre-Submission Local Plan is finally published, after reconsideration, then that site (or any other similar sites in and around Takeley) should not be included as a proposed allocation for housing.
- 1.4 UDC withdrew an earlier Local Plan in January 2015 after an unfavourable Inspector's report. Work has been underway since then on a revised Plan and the Planning Policy Working Group have been receiving and considering draft chapters since July 2016. These documents are noteworthy:
- Report to the Planning Policy Working Group (**PPWG**) 'Local Plan Development Strategy' 12.7.16



- Presentation to PPWG 12.7.16
- Minutes of the Council Meeting 26.7.16 - consideration of the PPWG Report of 12.7.16

1.5 Our submission is fully supported by Hatfield Broad Oak and Gt Canfield Parish Councils.

2.0 HOUSING PROVISION

- 2.1 The PPWG Report and Presentation (12.7.16) states that the SHMA¹ identifies Uttlesford's housing requirement 2011 - 2033 to be 12,500 homes (delivery of some 580 homes p.a.). It states that after taking into account housing completions since 2011 and current commitments, the new Local Plan must allocate approximately 4,600 additional homes. This is derived by deducting completions to date (2,468), commitments with planning permission (4,598) and windfalls (850) - a total of 7,916 units² - then deducting 7,916 from 12,500 then rounded up to 4,600. The latest published figures for completions/commitments³ (November 2015) shows a total of 5,903 units 2015 - 2033.
- 2.2 The 5-year housing land supply (**5YHLS**) from the latest projected completion numbers in UDC's November 2015 report⁴, with an annual requirement of 568 + 5%⁵ (596), is as follows:

	5Y completions	at 568 p.a. +5% (596)
		years
		596
16/17	3489	5.9
17/18	3316	5.6
18/19	2689	4.5

- 2.3 This demonstrates that no new permissions need be granted until 2018/2019 in order to maintain a 5 year permitted supply of housing. The February 2016 timetable is to have an adopted Local Plan by December 2017, and even if that slips an adopted plan should be in place by early 2018. By the beginning of the 2018/19 period, therefore, the housing land supply will be 'topped-up' with many new allocations, not just the new settlements where, in any event, the developers' submissions are that they will commence in 2019/22.

¹ West Essex and East Hertfordshire Strategic Housing Market Assessment Report of Findings September 2015

² Presentation to PPWG July 2016

³ UDC Housing Trajectory and Statement of 5-Year Land Supply Republished November 2015

⁴ UDC Housing Trajectory and Statement of 5-Year Land Supply Republished November 2015

⁵ NPPF para 47 pt 2

- 2.4 The hastily withdrawn Draft Plan in October indicated⁶ the following main sites likely to be allocated in the Plan:

site	units
Easton Park, Gt Dunmow	1,400
Stebbing (Uttlesford/Braintree border)	1,400
Saffron Walden	700
Stortford Rd, Gt Dunmow	400
Helena Romanes, Gt Dunmow	150
Takeley	230
Newport	94
Total	4,374

- 2.5 Some assumptions have been made in this Table about Easton Park and Stebbing. The '2,800' figure has been equally apportioned to each 'new settlement', no further details are available.
- 2.6 Easton Park is potentially two sites (05LtEas15 and 06LtEas15). However, site 05 (West of Dunmow - capacity 1188 - 2653) was dismissed on appeal⁷ in August 2016 so is unlikely to be proposed for allocation in the Local Plan. From the SHLAA site 06 (Easton Park) has a capacity of 8,514 - 19,015 homes, but completions in the plan period up to 2033 are assessed at 4,750 - 5,600. The Easton Park promoter's submission⁸ envisages 7,000 completed homes within 20 years of commencement, or an average of 350 p.a. Commencement is likely to be in 2019/20 as envisaged in the submissions - allowing 2 years for adoption of the Local Plan and grant of detailed planning permission - which indicates completions over the 15 years to 2033 to be 5,250 homes.
- 2.7 Stebbing is also in two sites with combined capacity of at least 12,000, with later phases possible. Andrews Field (05Ste15) has a total capacity of 7,500 homes but only a small area is within Uttlesford for which the promoter's submission envisages 725 units⁹. Boxted Wood (06Ste15) also straddles Uttlesford and Braintree Districts but the majority of the site is in Uttlesford. The promoter's submission proposes 3,500 homes in

⁶ UDC press release 20.10.16

⁷ APP/C1570/A/14/2213025, UTT/13/1043/OP

⁸ Easton Park New Garden Development Prospectus May 2105 pp56 - 67

⁹ Development Vision June 2015 Capita p12

Uttlesford¹⁰. The remainder (1,000 units initially) of the site is in Braintree District. The 'call for sites' form completed by the developer, and the analysis of the SHLAA, envisages commencement in 2022 with a 10-year development period, thus delivering the 3,500 homes in Uttlesford within the Plan period.

- 2.8 Thus, if Easton Park were to become an allocation in the Local Plan, on the evidence submitted and on the assessment of the SHLAA, it should deliver some 5,250 homes within the Plan period; the evidence for the Stebbing site of Boxted Wood indicates it would deliver 3,500 homes and Andrews Field 725 homes, all within the Plan period. **From this total of 9,475, provided by the developers and the SHLAA, it is unexplained how these two locations could only be counted on to deliver 2,800 homes, or 30% of the available capacity.**

- 2.9 Whilst not named so far, a possible third (or alternative) location for new settlement is Great Chesterford (SHLAA ref 10GtChe15). Some 5,000 homes have been proposed, although the SHLAA estimates a range of some 4,000 to 9,000. The SHLAA concludes on 'suitability'

The site has good access to the strategic road network. There is a railway station in Great Chesterford but this site is not within walking distance of it. Great Chesterford has a number of facilities and services but a development of this scale should include a range of services.

- 2.10 The site would provide a better balance for growth in the District rather than the current focus on new settlements and other major development in the south of the District along the A120.
- 2.11 This site has the advantage of access to the M11 J9 (south) via the A11 - and north via J10. These junctions have more capacity than the A120/J8. There is also a station. It is also feasible that junction 9 could be reconfigured to allow access north and south.
- 2.12 Moreover, MOD land at Carver Barracks is intended for disposal within the Plan period and has the potential to provide significant housing development in the north of the

¹⁰ Land at Boxted Wood Call for Sites Submission Statement AECOM June 2015 para 3.1.1 p8
Uttlesford District Council

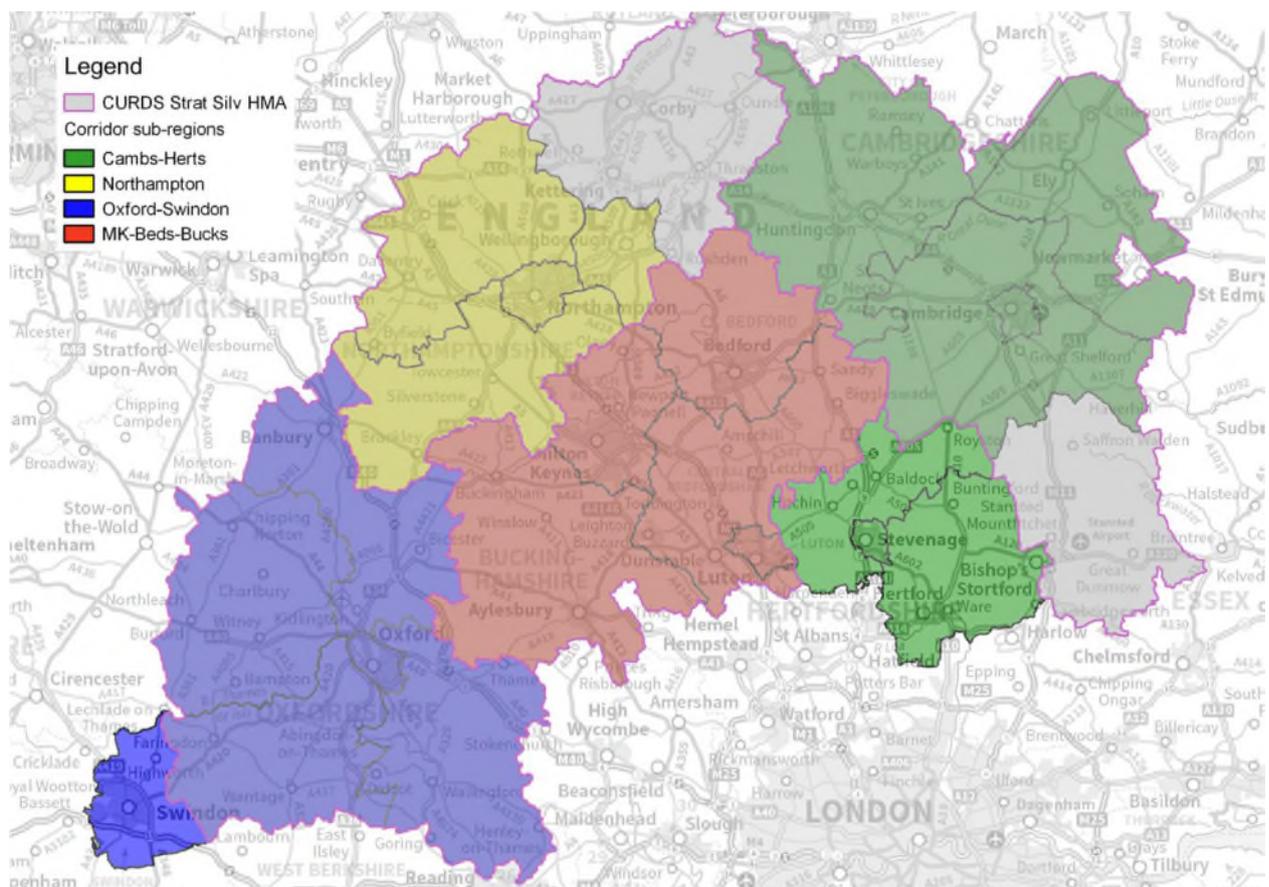


District (more than a 'windfall site'), but has not yet seemingly been factored into the Plan.

3.0 SPATIAL STRATEGY

3.1 Most importantly, more development in the north of the District such as Great Chesterford is that it would be within or serve the **Cambridge-Milton Keynes-Oxford Corridor** for which there is strong Government support through the National Infrastructure Commission, and in the Chancellor's Autumn Statement (23 November 2016).

3.2 The National Infrastructure Commission (NIC) has now published the **Interim Report on the Cambridge-Milton Keynes-Oxford Corridor** (October 2016) with a strong and positive message about future housing/development/infrastructure strategic planning for this important corridor which covers an extensive area including North Essex as shown in Figure 9 (p33) of the Interim Report:



3.3 There is no need to refer extensively to this Report here, except to identify some main points, followed by this Report's comments. Relevant highlights include (emphasis added):

- **scale of new housing required**

*The Commission's central finding is that a lack of sufficient and suitable housing presents a fundamental risk to the success of the area. Without a joined-up plan for housing, jobs and infrastructure across the corridor, it will be left behind by its international competitors. By providing the foundations for such a strategy, new east-west transport links present a once-in-a-generation opportunity to secure the area's future success. **The success of the area has fuelled exceptionally strong demand for housing across the corridor and in its key cities, which has not been matched by supply**¹¹. ...*

- **a strategic plan - a 'joined-up strategy'**

*Investment in infrastructure, including enhanced east-west transport links, can help to address these challenges, but it **must be properly aligned with a strategy for new homes and communities, not developed in isolation**. This means local authorities working in partnership, and with national government, to **plan places, homes and transport together**. Current governance mechanisms are not sufficient to deliver the step-change in strategic leadership and collaboration needed.¹²*

*Recommendation 1: Local authorities, Local Enterprise Partnerships, government departments and national delivery agencies, **should work together to develop an integrated strategic plan for infrastructure, housing and jobs across the corridor**.*

- *The plan should provide a framework for cross-corridor economic and transport strategies and for strategic spatial plans which, when combined, enable a step-change in housing provision and connectivity.*
- *The plan should also ensure that options for funding infrastructure are fully integrated into the strategy.*
- *The Commission will support this process as part of the second phase of the Cambridge-Milton Keynes-Oxford study.¹³*

*3.8 The Commission therefore wants to examine how different types of development can be planned to deliver significant new housing across the corridor drawing on domestic and international examples and best practice, and to examine the role of infrastructure in enabling such development. This **could include looking at densification urban extensions, and new garden towns, cities and villages**. The*

¹¹ ditto p8

¹² CMKOX NIC Interim Report p5

¹³ CMKOX NIC Interim Report p10

Commission is keen to understand the capacity of different forms of development to deliver quality housing and a built environment which maintains and enhances quality of life for communities.

Recommendation 3: Local authorities, Local Enterprise Partnerships, government departments and national delivery agencies, should work together to develop proposals for the joint governance arrangements required to deliver coordinated planning.

- This work should build on and strengthen existing cross-corridor collaborations and should consider the potential for formal joint governance mechanisms (e.g. joint committees, combined authorities, sub-national transport bodies, or the creation of unitary authorities). These should include consideration of future devolved powers, freedoms and financial flexibilities.
- The work should also consider the full range of delivery mechanisms capable of accelerating housing growth, including looking at the potential for new development corporations to accelerate and drive delivery.
- The Commission will support this process as part of the second phase of the Cambridge-Milton Keynes-Oxford study.¹⁴

3.13 Cross-corridor governance does not necessarily require a single, overarching decision-making body for the corridor as a whole. Leadership on different issues will require governance at different spatial scales. For example, while collaboration on strategic transport infrastructure is likely to require collaboration at the whole corridor level, leadership on strategic spatial planning, **may require local authorities to collaborate around a travel to work area, or across clusters of housing market areas.** Enabling the efficient delivery of a new strategic plan may require different institutional structures again with, for example, development corporations focused on major sites or on key transport hubs and interchanges.¹⁵

Tackling the housing deficit will require different interventions in different places. In many cases this will require new approaches to meet future housing need in the area. **This means planning on a larger scale than has previously occurred and might include the development of urban extensions, densification of existing settlements or the construction of wholly new settlements. It may require all of these.**¹⁶

3.2 But to realise these benefits, and maximise the impact of committed and planned transport schemes on housing supply, infrastructure must be conceived, designed and developed as part of a strategic, cross corridor plan for new homes, jobs and communities. The core aim of this strategic plan must be to better meet current and future housing needs: improving land supply and accelerating the development of well-connected and sensitively designed new communities.

¹⁴ ditto p11

¹⁵ CMKOX NIC Interim Report p40

¹⁶ ditto p36

3.3 Developing such a plan will require a step-change in collaboration and commitment at all levels of government. It will require a fundamental shift in the scale at which local authorities collaborate on planning and infrastructure. A new model of strategic leadership will be required, bringing local authorities and national government together to:

- *Develop a strategic plan for transformative, large scale development that integrates new homes, jobs and infrastructure. ...¹⁷*

3.4 The Chancellor's Autumn Statement (23.11.16) endorses the Corridor Interim Report, and a press release from the NIC (Deputy Chair of the National Infrastructure Commission, Sir John Armitt) included the following response (emphasis added):

The government's acceptance of the National Infrastructure Commission's recommendations for the Cambridge, Milton Keynes, Oxford corridor is most welcome.

The government welcomes the NIC's interim report into the Cambridge-Milton Keynes-Oxford growth corridor, accepts the recommendation for an Oxford-Cambridge expressway, and will provide £27 million in development funding. The government will also bring forward £100 million to accelerate construction of the East-West Rail line western section and allocate £10 million in development funding for the central rail section. The government welcomes the NIC's work looking at a range of delivery models for housing and transport in the corridor, including development corporations, and will carefully consider its final recommendations. Following a successful public call for ideas, the government has also asked the NIC to undertake a new study on how emerging technologies can improve infrastructure productivity.

Comment

3.5 These extracts set out the essential message of the Interim Report. If the Corridor is to be a success, then much more housing is required and this delivery of growth could be achieved through urban extensions and new settlement. It requires a 'step-change' in 'cross border' collaboration. This provision must be integrated with major infrastructure in a new type of spatial plan involving the NIC and other Government Agencies, the Local Enterprise Partnerships (LEPs) and Local Government. The CMKOX Interim Report makes compelling reading as a clear direction of Government policy. It indicates how this 'growth corridor' should be planned with NIC/Government involvement - how

¹⁷ CMKOX NIC Interim Report p37

infrastructure and housing should be linked sub-regionally - and gives significant emphasis that the need for urgent and substantial additional housing is the twin key, along with infrastructure, to realising the potential of this English 'silicon valley'.

- 3.6 **The recognition that Cambridge-MK-Oxford Corridor needs to be supported by substantial new housing is an important, and new, Government message. It changes the policy guidance framework for the UDC Local Plan which must be taken on board as the Authority reconsiders the draft version, before publication in 2017. Failure to do so risks finding the Plan 'unsound' when it comes to be examined. It points to the need for greater housing provision in the north of the District which is best located to serve the Corridor.**

4.0 THE TAKELEY PROPOSAL

- 4.1 The suggestion that an allocation of 230 homes would be made in the Local Plan at/adjacent to Takeley now needs to be examined in the light of the foregoing context. In a meeting between Takeley PC, the Leader of the Council and the Development Management Officer on 20.10.16, it was stated that this proposed allocation referred to the 'Bonnington Green proposal'¹⁸. Whilst this site is within Hatfield Broad Oak Parish, it is located in the countryside on the south-west edge of Takeley.
- 4.2 It is not clear which actual site is being proposed, but the SHLAA considered 3 sites as follows (site plans are **Appendix 2**):

SHLAA ref	Site	Area (ha)	No. of dwellings	SHLAA summary
2HBO15	Land at Bonningtons Farm, Station Road Hatfield Broad Oak Parish	1.8	54	The site is available and development is achievable subject to the cost of removal of existing buildings and any remediation works needed for contamination. Development of part of the site is considered suitable and this is reflected in the Deliverability Assessment below which is based on a site area of 0.6 ha (This is the site area of planning applications submitted for the redevelopment of the existing buildings.). The suitability of developing the whole site will depend upon the suitability of the adjoining site 03HBO15.
3HBO15	Land west of Station Road, Hatfield Broad Oak Parish	17.0 (12.45 developable)	280 - 467	The site is available and development is achievable. The site is considered suitable if development south of the Flitch Way is accepted in order to provide the scale of development needed.
4HBO15	Land west of Station Road, Hatfield Broad Oak Parish	10.0 (9.0 developable)	203 - 338	The site is available and development is achievable. The site is considered suitable

¹⁸ Appendix 2 - the Bonnington Green sites

				if development south of the Fritch Way is accepted in order to provide the scale of development needed.
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- 4.3 The essence of these summaries is that if there is a proven need to allocate further significant development at Takeley, then the principle of breaching the long-standing southern limit of the Fritch Way would be justified. In response: firstly, there is no proven need for sites in this locality and secondly it is at least recognised that the Fritch Way is an important boundary.
- 4.4 Site 4 can only be accessed through site 3. Site 3 wraps around site 2 so if 3 were allocated then so too would site 2. So site 2 is too small to accommodate '230' homes; sites 2 and 3 combined could accommodate **at least 334 homes**. Site 4, if allocated, would add at least 203 homes - a total of at least 537 homes. But the three sites in total could accommodate **up to 859 homes**.
- 4.5 Section 3 above has already demonstrated why there may already be too much land in the south of the District proposed for allocation in the Plan. The emphasis should be to allocate land to the north of the District - not only to achieve a more balanced pattern of growth of the District to be associated with the main town of Saffron Walden, but also to serve the identified housing shortfall for the Government recognised Cambridge-MK-Oxford Corridor.
- 4.6 To add another '230' homes (or considerably more) at Takeley, as well as the two proposed new settlements and allocations at Gt Dunmow in the south of the District, is not justified by any available evidence. It seems to be an arbitrary allocation and the claimed sustainability credentials (as stated by the Development Manager at the 20.10.16 meeting 'the offer of community facilities adjacent to Takeley') may be an illusion - benefits which can be/are commonly offered by many sites with little commitment to do so.

4.7 District commitments¹⁹ (November 2015) shows a total of 5,903 units 2015-2033. Takeley accounts for 236 of those²⁰, or 4%. District completions between 2011-2015 were 1,894 of which Takeley sites accounted for 418 or 22%. Without any further allocations, therefore, Takeley is already contributing 654 homes to the Local Plan or 5% of the total 12,500.

4.8 Various options for spatial strategy for the Plan were discussed in July 2016 by the PPWG, Cabinet and Council (26.6.16). Council resolved to adopt Scenario 5 which was set out in detail in an Officer presentation to the PPWG on 12 July:

	no.	%
New Settlements	2800	60
Main Towns	1500	32
Key Villages	200	5
Type A Villages	100	3
Total	4600	100

4.9 The 'key villages'²¹ are Elsenham, Great Chesterford, Hatfield Heath, Newport, Stansted Mountfitchet (including Foresthall Park), Takeley, Thaxted; so Takeley is one of eight. The total key villages allocation agreed by the PPWG (subsequently endorsed by Cabinet and Council) was for a collective total of 200 homes²². The withdrawn draft Plan (October 2016) appeared to seek to allocate 230 homes to Takeley. This is clearly contrary to what was agreed by Members in July 2016, with no explanation to justify a significant departure from what they agreed. Whilst Hatfield Heath is constrained by the Green Belt, a starting point for the other seven key villages would be some 30 dwellings each, and certainly not that the allocation at Takeley which would be more than the total for all key villages.

4.10 There are specific objections to any further development at Takeley and to the 'Bonnington Green' site (whatever its extent). Takeley was recorded to comprise 962

¹⁹ UDC Housing Trajectory and Statement of 5-Year Land Supply Republished November 2015

²⁰ UDC Housing Trajectory and Statement of 5-Year Land Supply Republished November 2015

²¹ Issues and Options Stage Consultation 29.9.15

²² Planning Policy Working Group - Development Strategy 12.7.16

homes in 2001, so that the growth of the combined Local Plans (1,171) represents an increase of 121% in 15 years. The core of the village at the cross roads remains essentially unchanged. Modest employment sites have been developed, and the Roseacres primary school has now re-opened (Sept 2015) with capacity only to accommodate already planned growth. Facilities within the village have not developed at the pace of house building, access to Stansted Airport railway station is inadequate and does not encourage commuter use, and bus services have recently been further reduced.

- 4.11 UDC refused planning permission for 180 dwellings in March 2015 on a similarly located site south of the Flich Way with poor access to the village²³. An appeal was lodged and after a significant case was assembled by UDC and TPC the appeal was withdrawn. Allocation of the Bonnington Green site would be completely at odds with this recent position taken in UDC's decision. The reasons for refusal included the following which are equally applicable to the Bonnington Green site:

The proposal is on the boundary of the Countryside Protection Zone and would destroy the open relationship of the zone and its connectivity to the countryside. As such the proposal represents significant harm to the CPZ and therefore does not accord with Policy S8 of the ULP 2005.

The lack of safe and appropriate access for pedestrians and cyclists to the wider network and local facilities mean that this location is wholly dependent on the private car and therefore the proposal does not represent a sustainable location as defined in the core principles of the NPPF and is not in accordance with Policy GEN1 of the ULP 2005.

- 4.12 The NPPF clearly recognises the need to be mindful of the cumulative impact of development on a community. It advocates an integrated approach to considering the location of housing, economic uses and community facilities and services²⁴. Further new development would be reliant on the infrastructure and services of Takeley which are

²³ UTT/14/3705/OP Land West of Canfield Road Great Canfield Essex

²⁴ National Planning Policy Framework para 70 pt1

already under severe pressure and cannot meet the needs of the already approved/planned development.

- 4.13 **Education provision** for any further development in Takeley is already over-subscribed. Essex County Council (since Nov 2013) has recognised the critical shortage of primary school places in the vicinity. Takeley Primary School on Priors Green is oversubscribed (420 places). Roseacres Primary School opened in Sept. 2015 as a single form entry school. It is already clear that these primary schools will not adequately provide for the demand for places even from the newly built and approved dwellings. Surrounding schools are overburdened by the concentration of housing development in the south of the district (Dunmow, Stansted, Elsenham).
- 4.14 The availability of secondary school places is also critical. ECC anticipate the existing provision will be over capacity in the year 2017-18. ECC has taken the unusual step of objecting to recent applications on the grounds of a lack of school places.
- 4.15 **Health provision** is absent in Takeley - Takeley does not have a GP. Even where a GP surgery is suggested by the developer this is not deliverable because NHS England will not support it. Current policy is for large hubs therefore to suggest a GP surgery within any proposals is disingenuous. TPC has experience of this very situation on Priors Green, and has been engaged in discussions subsequently with the Health Authority. In reality the proposal may offer land (or the shell of a building) but local NHS has no intention of providing a service.
- 4.16 **Retail provision** is very low-key with a few local shops grouped around the Four Ashes junction. The nearest towns with retailing are 5-6 miles away.
- 4.17 **Employment provision** is low. The Stansted Business Centre is the main employment site in Takeley offering *“a purpose-built centre, providing an ideal environment for small businesses to flourish. The office accommodation is complimented by a suite of eight meeting rooms and a separate conference facility for up to 200 delegates”*²⁵. There is

²⁵ Stansted Business Centre website

little available data but job numbers are likely to be small. Stansted Airport is within 2km but draws its workforce from a wide area. Information provided by UDC states that the last employees survey (2015) undertaken by MAG, the Stansted Airport employee number from Uttlesford is 2,007 which is 18.3% of the total on-airport workforce. There's no exact breakdown by parish, but a plan showing home location by zone gives a village figure of about 240 (2% of workforce).

- 4.18 **Countryside protection:** Takeley is surrounded by attractive countryside and much is protected by the Countryside Protection Zone²⁶ which strongly resists new development. The Flich Way is a public bridleway leading to the SSSI of Hatfield Forest some 1.5km to the west. It forms a natural southern boundary to the built-up area of Takeley.

'Bonnington Green' impacts and constraints

- 4.19 **Highways and Transportation:** A separate report²⁷ by highway consultants Railton TPC on transportation impacts and pedestrian connectivity is attached, demonstrating that the Four Ashes cross-roads has no capacity to take extra traffic - the sites' only access is from the B183. Pedestrian access would be via a sub-standard footway which is constrained by the railway bridge abutments. The access of the B1256 to the M11 Junction 8 is already overloaded. So access to 'the site' is wholly unsatisfactory. Moreover, it is possible that employment sites TAK 13 and 14 will be allocated in the Plan, with all lorry traffic to/from this site will have to travel via B1256, which would also put considerable additional pressure on the capacity of infrastructure in Takeley,

Countryside

- 4.20 Proposed development on land west of Station Road would have an impact on the broader landscape and should be considered in the context of Adopted Local Plan (ALP) Policy C1 - Protection of Landscape Character. The site is within the Broxted Farmland Plateau category of landscape Character Assessment. It has a moderate to high

²⁶ CPZ policy is derived from the expansion of Stansted and in the Adopted Local Plan, but also recently confirmed by UDC as a policy which it continues to support - PPWG June 2016

²⁷ Appendix 1

sensitivity to change. These sites are outside development limits and are greenfield sites south of the Flitch Way which acts as a strong defensible boundary to the southern edge of Takeley, south of which, other than Takeley Mobile Home Park, the area is characterised by isolated dwellings and farms. Development of this land would introduce an area of built form detrimental to this character and would significantly impact on the views from Hatfield Forest.

- 4.21 This land is adjacent to the Flitch Way which is a wildlife corridor and a linear country park, and leads to the adjacent Hatfield Forest (the District's largest SSSI). There is a great need for wildlife corridors in maintaining viable populations that would otherwise suffer as a result of fragmentation and isolation. This wildlife corridor is one of the 'veins and arteries' of Hatfield Forest. In accordance with existing ALP Policies NE1 & SP11- Protecting & Enhancing the Natural Environment - development of this site would lead to significant harm. Planning policy recognises Hatfield Forest which 'is an important recreational resource to Uttlesford residents and is a strategic area of green infrastructure which is important to protect'. At the current time that SSSI status is under threat. The Forest has become overburdened with visitor numbers. The land is being eroded with insufficient time to recover which has led this year to the events calendar being scaled back in an attempt to reduce the footfall and allow the land time to heal.²⁸

Education

- 4.22 The site is more than 800m from the existing primary school provision. It is also more than 4.8km from a secondary school. A proposal for a primary school on 03HBO15 is unrealistic. Access from the centre of Takeley via Station Road, B183 cannot provide a safe pedestrian route to school due to the narrow bridge that crosses the Flitch Way (old railway line).

²⁸ Extracted from the Countryside Manager's Note 20.7.16 - Appendix 3

'Offer' of Facilities

- 4.23 The Officer's comment at the meeting with TPC on 20 October 2016 is revealing: *"Bonnington Green proposal is deemed sustainable given the offer of community facilities adjacent to Takeley"*. The viability of **all** of these items is doubtful given the proposal for development of 230 homes (or even the 'up to' 859 homes of all three sites) and the 'offer' is an illusion:

	Comments
Education	see above
MUGA	Takeley already has a MUGA on the Sports Field opposite the proposal site.
Community Hub	Takeley Parish Council is creating a Community Hub in the centre of the village at the Old School House/Youth Centre, Brewers End.
Primary School	Neither Takeley nor Hatfield Broad Oak would support an additional primary school in this location. It is too isolated from HBO community & there is not a safe pedestrian access to this location from Takeley village centre (narrow bridge over Flich Way).
Football Ground car park	The Football Club has an arrangement with Takeley Parish Council to use Takeley Sports Field car park and already has permission to use the site for overflow car parking.
Trim trail	The village has an existing trim trail at Takeley Recreation Ground, behind the Silver Jubilee Hall at Brewers End.
Dog walking circuit	The proposal appears to lack the necessary investment to provide an adequate facility e.g. dog waste bins. It is unlikely that this would be a popular facility given the close proximity to the Flich Way.
Kick about area	Takeley Sports Field already has a range of full size and mini community pitches available FOC. There is also the MUGA on the Sports Field which provides an all-weather surface.
Shop	There are 2 parades of shops in Takeley the nearest of which is that at the Four Ashes junction on B1256 that provides a Post Office stores, newsagent and pharmacy.
Health facility	As above this is not deliverable because NHS England will not support it (see general comment above).

5.0 CONCLUSIONS

- 5.1 The draft Local Plan was withdrawn before it was due to be considered by the PPWG on 25.10.16, but a press release gave some details of the likely housing strategy and numbers. These included an allocation of 230 homes at Takeley, which was disclosed to be at 'Bonnington Green' at a meeting between Takeley Parish Council and UDC on 20.10.16. The purpose of this Report, commissioned by TPC, is to set out the concerns about the prospect of more housing in Takeley, and the wider southern area of Uttlesford, and especially to demonstrate why the possible site at 'Bonnington Green' is unsuitable for housing development.
- 5.2 According to an earlier report to the PPWG on 12.7.16, the Local Plan must accommodate a further 4,600 homes for the period 2011 - 2033 (after deduction of completions so far and current commitments). Housing Land Supply will remain above 5 years until after the Local Plan is adopted, when new sites will come forward to keep it at that level.
- 5.3 The proposed strategy is to accommodate 2,800 homes at two new settlements - Easton Park (near Gt Dunmow) and Stebbing (straddling the Uttlesford/Braintree border), 550 homes at Gt Dunmow and 230 at Takeley - a total of 3,580 homes (78%) in the south of the District. The north of the District is proposed to accommodate just 700 at Saffron Walden and 94 at Newport - a total of 794 (17% of 4,600).
- 5.4 This seems wholly unbalanced when the north of the District contains the main settlement (Saffron Walden) and serves the Cambridge-Milton Keynes-Oxford Growth Corridor - the subject of a National Infrastructure Commission Interim Report (October 2016) which has been recently endorsed by Government²⁹. The importance of the Growth Corridor and its implications for development in Uttlesford is not yet recognised by UDC, but the pause in the Local Plan process allows this to now be seriously

²⁹ Chancellor's Autumn Statement 23.11.16

considered - it should result in a major change to the spatial pattern of development between south and north of the District in the Local Plan.

- 5.5 There is another potential new settlement at Great Chesterford with a capacity of some 5,000 homes which would have significant advantages over locations in the south of the District both in terms of being able to serve the Growth Corridor and because of connectivity - having a railway station and ready access to the M11.
- 5.6 In any event, the contribution of the two identified new settlements to housing numbers has been significantly mis-calculated. Promoters of these new settlements have submitted evidence that they can deliver 9,475 homes in the Plan period, so it is a mystery why a figure of only 2,800 has been factored in. It is also not the case that they will make insufficient contribution to the 5-year housing supply in the early stages. Given the actual scale of their contribution, there seems no justification for allocating 230 dwellings at Takeley.
- 5.7 The suggested allocation at 'Bonnington Green' is actually within the Parish of Hatfield Broad Oak, but in reality would be a further expansion of Takeley. Three sites have been put forward and assessed at Bonnington Green with a combined capacity of up to 859 homes and all have received a similar assessment - so it is unclear where the figure of 230 homes has come from and the potential impact of almost 4 times that number of homes seems to have been ignored.
- 5.8 Takeley has already provided substantial new housing for the District - some 654 completed or committed homes in the Plan period. It has also grown considerably as a result of allocations in the Adopted Local Plan. But it remains a settlement with few services - including education, health, employment and retailing. Adding even more housing is a step too far and would cause serious harm.
- 5.9 The strategy agreed by the PPWG, Cabinet and Council in July 2016 was that 'key villages' (Takeley is one of 8) would collectively provide 200 homes, which means an average of some 30 homes each. These July decisions seem to have been forgotten if

Takeley alone is expected to accommodate 230 homes - without any obvious explanation or justification.

- 5.10 Takeley has few local services available to serve the existing settlement let alone additional development, and there is little likelihood of extra services being provided. There is no secondary school; the primary schools are already over-capacity; there are no health services (and TPC has previous experience that the NHS will not fund a doctor's surgery); no railway station; there are few shops and little employment other than Stansted Airport. Airport jobs are often low paid and housing in Takeley is often unaffordable for airport workers.
- 5.11 The countryside around Takeley is protected by the recently re-endorsed Countryside Protection Zone. The Flich Way is a 'linear country park' which services the nearby Hatfield Forest (an important SSSI) which is already under threat from the scale of visitors and extra development at Takeley would exacerbate that problem.
- 5.12 The 'Bonnington Green' site(s) has its own constraints which point to a lack of sustainability. Access is poor (see the attached Report by Railton - Appendix 1) with the Four Ashes cross-road operating at over-capacity and the M11 Junction 8 with the B1256 also operating at over capacity. Pedestrian access is wholly unacceptable via a dangerously narrow footway over the former railway bridge. The greenfield countryside of the site(s) is 'sensitive to change'.
- 5.13 The 'offer' of on-site facilities (the reason put forward by the Officer at the 20 October meeting to justify a claim of 'sustainability') is illusory. A primary school on the site would have very poor and dangerous pedestrian access; a surgery would not be supported by the NHS; the various open space 'offers' are already available in Takeley.
- 5.14 In short, this is a wholly unsatisfactory and unsustainable site in a settlement that is unable to accommodate any more development beyond the 654 committed or completed homes that are already contributing to the Plan.

5.15 It is therefore important that UDC, reflecting upon this Report and the NIC Interim Report on the Cambridge-Milton Keynes-Oxford Corridor (October 2016) - both of which should be added to the Local Plan evidence base - will take the opportunity offered by the pause in the Plan process to reconsider the spatial strategy to make greater provision in the north of the District and less in the south, and choose not to allocate the 'Bonnington Green' site(s) or anything further in Takeley. The Plan does not need it and it would cause significant harm.