

UTTLESFORD DISTRICT COUNCIL

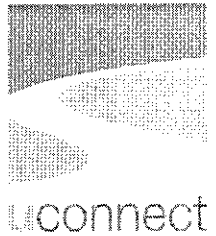
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Housing and Growth Programmes
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30 June 2008

Your ref:

Our ref: RH

Please ask for Roger Harborough on 01799 510457
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Dear Ms Flint

ECO-TOWNS – LIVING A GREENER FUTURE CONSULTATION

The Council is opposed to North East Elsenham, Hanley Grange or any substitute location in the sub regions in which they sit being identified in a national planning policy statement as locations that have the potential to be an eco town;

Local planning authorities should determine through their Local Development Frameworks whether there are local circumstances that would favour an eco-town as an appropriate way of delivering housing to meet identified needs and achieve quality in the built and natural environment, a sustainable form of development with jobs, services, facilities, public transport links, the opportunity to make trips by walking and cycling and reduce carbon emissions.

The North East Elsenham location is the same as that identified in the Council's Local Development Framework Core Strategy November 2007 Preferred Options consultation for a smaller new settlement of 3,000 homes, shops, community facilities, open space and workplaces, focused on Elsenham railway station and served by a frequent and high quality bus service. Those preferred options also included policies that 40% of such housing should be affordable, should provide a range of infrastructure including greenspace, development should meet the needs of all users, reduce consumption of energy and water, minimise the production of pollution and waste, and incorporate facilities for recycling water and waste. Renewable energy and low carbon technologies would generally be supported for single buildings and neighbourhoods. However, there are three key differences between the core strategy options on which the Council has consulted and the new small zero carbon eco-towns described by Yvette Cooper when she launched the government's concept in March 2007. North East Elsenham does not involve any brownfield land or surplus public sector land, and the Council does not support a development on the scale sought by the Government.

The Council's community involvement on the LDF Core Strategy has identified substantial opposition to its Preferred Options including a 3,000 home new settlement at Elsenham. It may be anticipated that opposition to the eco town proposal for "a minimum of 5,000 homes and possibly more in the longer term" will be expressed on broadly similar grounds. An extract from the summary of the representations received on the Council's Preferred Option is appended. The Council's LDF Core strategy development work is on-going and needs to address these issues.

Where there is the potential and need for a strategic scale development this should be identified through the Regional Spatial Strategy review process. The Panel Report of the

public examination of the East of England Plan published in June 2006 shared the widely expressed view in representations that it was unnecessarily specific for the RSS to allocate 2,650 to Great Dunmow or a new village and that it saw such issues as being determined through the local development framework. This advice was accepted by the government. Subject to the uncertainty about additionality, the contribution of the North East Elsenham eco-town proposal to deliver extra homes over the East of England Plan minimum requirement for Uttlesford is of the same order of magnitude.

The requirement that eco-towns would deliver additional homes to those provided in existing plans but would count towards revised housing targets determined through partial regional spatial strategy reviews creates a significant problem for authorities like Uttlesford that have not yet reached adoption of an LDF core strategy. South Cambridgeshire has adopted its strategy and Hanley Grange is not included. That proposal would clearly be wholly additional to (and inconsistent with) that strategy. In Uttlesford's case, DCLG has suggested in discussions that the North East Elsenham proposal would deliver 2,000 homes in addition to the 3,000 proposed for the same location in the core strategy preferred options. However, this is no more than one interpretation of the potential implications of the proposed national eco-town PPS. It is more than likely that if the final version were to confirm the position as it currently stands at the pre-draft consultation stage, at the public examination of its core strategy, the Council will be faced with claims from those promoting alternative strategies that all 5,000 plus proposed at Elsenham should be regarded as an additional contribution and that provision in the core strategy should still be made for 4,200 homes to meet its East of England Plan minimum requirement elsewhere. The local development framework route for eco towns would avoid the ambiguity about additionality.

The ultimate size of any eco-town should be established through the development plan process. The Elsenham proposals are described being for a minimum of 5,000 homes and possibly more in the longer term. Whilst it is stated that the Hanley Grange site would accommodate 8,000 homes, it is understood that there are potential phasing issues. The promoters have not resolved how many homes would be expected to be delivered in particular periods. Lack of clarity for both proposals over lead times, development programmes and ultimate size would have significant implications for service provision planning (primary and secondary schools for example), housing strategies, transport strategies, and viability. The TCPA's Eco towns: scoping report published in July 2007 pointed to the need for long lead times. It is difficult to see eco-towns making a positive contribution to the Government's national aim of delivering 240,000 homes a year by 2016. That aim itself appears not to be feasible and subject to revision in the light of the current state of the housing market.

The Transport Assessment work so far submitted by the Fairfield Partnership promoting the North East Elsenham eco-town is deficient. The Initial Road Link Capacity Assessment needs to be supplemented by a full transport assessment including public transport capacity and modal split analysis, involving Network Rail, train operating companies and bus operators to ensure that transport plans are viable.

In the Council's view, the process of preparing a national Planning Policy Statement on eco-towns and encouraging the submission of planning applications is being rushed. It prevents the development plan system from testing the inter-relationships between new and existing settlements, the implications for transport planning and fit with integrated spatial strategies and community strategies. It risks inadequate assessment of all the implications and prejudices the ability to secure the community involvement that is meant to be at the heart of the new planning system.

Yours sincerely

Roger Harborough
Head of Planning and Housing Strategy

Extract from the summary of the representations received on the Council's Preferred Option

Growth Option 4

Development of a new settlement to the north east of Elsenham with limited development in the towns and villages.

Representations in favour of option 4 made the following points.

Infrastructure

- ✓ Opportunity to create a well planned settlement with the appropriate infrastructure.
- ✓ Infrastructure can be planned from the start and developed as settlement expands.
- ✓ Well planned new development with new facilities, shops and enhanced infrastructure will benefit Elsenham.
- ✓ Enables a greater contribution of infrastructure costs
- ✓ Adequate size to justify the provision of primary and secondary schools and other community services.
- ✓ If developed properly it could be the model of a low carbon, high tech modern town.

Employment

- ✓ Well located for people working at Stansted Airport or commuting to London or Cambridge.
- ✓ A new settlement at Elsenham is uniquely placed as it is within the catchment of towns with business sites but will also benefit from being self sufficient on a local level.
- ✓ Close to Stansted Airport which has an expanding labour force.

Transport

- ✓ Good transport links. Well located for public transport, particularly rail, minimising the amount of car travel needed on local roads.

District Character

- ✓ Least destructive for the general character of the District as a whole. Keeps housing impact on the villages to a minimum.
- ✓ Relieve pressure on the services and facilitates of existing towns and villages.
- ✓ Protects the historical and unique characteristics of Saffron Walden, Great Dunmow and Stansted Mountfitchet.
- ✓ Inability of the infrastructure in Saffron Walden and Great Dunmow to cope with large scale development.
- ✓ Minimises harm to the distinctiveness and historic character of Uttlesford's towns and villages.
- ✓ Elsenham is a fairly unassuming village and is not particularly attractive or historic.
- ✓ Low landscape and ecological value and low agricultural classification.
- ✓ Other new towns such as Bar Hill and Cambourne in Cambridgeshire have worked well.

The following are the main reasons for objection stated in representations:

Process for selecting option 4

- * Sustainability appraisal was produced after option 4 was selected
- * Not based on robust or credible evidence.
- * Why were no other options for a single development of this scale considered?
- * Coalescence of Elsenham and Henham resulting from Option 4 is contrary to 8th point of District Vision which is inconsistent. ["The local distinctiveness and historic character of our towns and villages will be preserved and enhanced and they will continue to be separate entities with green space between them"]
- * Goes against results of previous public consultation and assessment of 9 growth options against strategic objectives.

Expansion of Elsenham and Henham

- * What is meant by a "New Settlement"?
- * A new settlement of 3000 houses would go against the advice of the East of England Plan Panel Report on size thresholds.
- * Rather than a new settlement it is clearly an expansion of Elsenham and Henham.
- * No documentary evidence that open green spaces will be provided between Henham and Elsenham so they would merge to become one urban area.
- * Lack of flexibility should circumstances change and over reliance on one location for the majority of the development needs of the district could lead to high risk of failure should anything arise that affects the developer's ability to deliver.

Services and Infrastructure

- * Development of 3000 houses is of insufficient size to make provision of secondary school, GP Services, shops viable. Residents would still look to nearby towns for such services.
- * Concerns about distance of development from emergency services – hospitals; police, fire and ambulance.
- * Concerns about current low water pressure and frequent power cuts which would be made worse by development.
- * Old Mead Lane and level crossing liable to flooding which would become worse with development
- * Goes against advice given in previous consultation Policy Choices and Options for Growth consultation which stated that It is unlikely that a new settlement of 3000 homes would support significant services and facilities and the residents would *have to use existing services and facilities in nearby towns and larger villages*.

Employment

- * Because of the rail link, new residents would be more likely to commute rather than work locally and thereby discourage local employment and local services.
- * Local employment would be more likely in existing larger settlements, where there are jobs locally.

Affordable Housing

- * Creation of a single settlement would locate all affordable housing in one place which would not be of benefit to the rest of Uttlesford

Character of Towns and Villages

- * The effect on the important village character of Henham and Elsenham has been insufficiently assessed.
- * Henham has conservation area and many listed buildings and has been named as a Village of Special English Character.
- * Development would cause loss of community spirit.
- * Significant fear of an increase in crime resulting from the additional population
- * Noise and disturbance during construction.

Landscape

- * The special landscape of the area will be damaged.
- * The landscape at present is valued for walking, local beauty and wildlife.
- * The impact on the sensitive landscape between Elsenham and Henham has been given too little weight.

Public Transport

- * The railway transport is already far too overcrowded and certainly could not cope with any more commuters. The claimed advantage of Option 4 in terms of the railway station is more likely to be a disadvantage, producing a 'commuter settlement' with long distance travel to London and Cambridge for employment and shopping, thus discouraging local provision

- * Roads are too narrow to safely accommodate more buses

Mixed Developments

- * If there are new shops in the proposed development then they would detract from existing facilities in Elsenham and Henham

Education

- * Existing primary schools are at capacity and are liked for being small village schools
- * Question whether development would support a new secondary school. Even if development did include new secondary school, phasing of housing development would mean children would have to travel to existing schools, placing them under strain until new school was built.

Road Access

- * Local roads cannot cope with present traffic let alone any more. Inadequate road infrastructure to cope with construction traffic and additional population.
- * No adequate road access to the site. Particular issues being Grove Hill into Stansted, North Hall Road and rail bridge (toot toot bridge), closure of level crossing for a total of 3 hours a day; village road through Henham.
- * No documented evidence that there will be the necessary roads for the new settlement.

Tests of Soundness

- * Fails 4th 6th 7th 8th 9th tests of soundness