

Sustainability Appraisal (SA) of the Uttlesford Local Plan

Interim SA Report

Non-technical
Summary

October 2023



Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Uttlesford Local Plan, which is being prepared by Uttlesford District Council (UDC). Once adopted, the Local Plan will establish a strategy for growth and change up to 2041, allocate sites to deliver the strategy and set out policies used to determine planning applications.

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. Central to the SA process is preparation of an SA Report for publication alongside the draft plan, with a view to informing the consultation and subsequent plan finalisation.

At the current time an 'Interim' SA Report is published as part of a consultation on a first draft version of the Local Plan. This is the Non-Technical Summary (NTS) of the Interim SA Report.

Structure of the Interim SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has the SA process involved **up to this point**?

- including in relation to 'reasonable alternatives'.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by considering the SA 'scope'.

What's the scope of the SA?

The scope of the SA is reflected in a list of topics, objectives and key issues/opportunities. Taken together, this list provides parameters and a methodological 'framework' for assessment.

The topics at the core of the SA framework are as follows:

- Accessibility
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Communities, equality, inclusion and health
- Economy and employment
- Health and wellbeing
- Historic environment
- Homes
- Land, soils and resources
- Landscape
- Transport
- Water

The SA process up to this point

A key element of the required SA process involves assessing 'reasonable alternatives' in time to inform the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan. As such, Part 1 of the main report explains work to develop and appraise a 'reasonable' range of alternative approaches to the allocation of land for development, or '**growth scenarios**'.

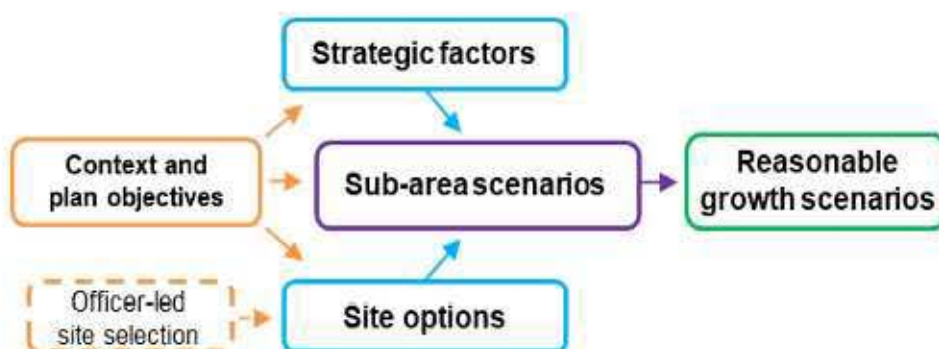
Specifically, Part 1 of the report presents–

- 1) work (by AECOM and UDC officers) to **define** the growth scenarios;
- 2) work (by AECOM) to **appraise** the growth scenarios; and
- 3) a statement (by UDC officers) that aims to **respond** to the appraisal.

Defining growth scenarios

Section 5 of the main report explains a *process* that led to the definition of growth scenarios.

Figure A: Defining growth scenarios



Section 5.2 of the report gives consideration to **strategic factors** in respect of:

- Development quantum – the Government standard method defines Uttlesford's Local Housing Need (LHN) as 684 dwellings per annum (dpa), or 13,680 homes in total over the plan period. However, there is a need to remain open setting the housing requirement at a higher figure.
- Broad distribution – a particular focus is on the question of whether it is reasonable to consider growth scenarios involving a focus of growth at one or more large-scale new settlements. The conclusion is that it is not reasonable at the current time, which is not to say that this will not be a reasonable option for the next local plan (recalling that plans must be reviewed every five years).

Section 5.3 of the main report explains a process led by UDC officers to establish a shortlist of **site options** for detailed consideration. Importantly, the focus at the current time is only on site options with a capacity of at least ~100 homes and located at a settlement within the top two tiers of the settlement hierarchy. Non-strategic sites at settlements in the third tier will be considered at the next stage.

Section 5.4 of the report then draws upon the preceding two stages of work to give consideration to growth scenarios for ten **sub-areas** (nine settlements and 'the rest of the District'). For each sub-area, consideration is given to potential ways of allocating site options in combination in order to deliver a reasonable number of homes (accounting for strategic factors). The conclusion is a need to progress: two scenarios for Saffron Walden; two scenarios for Great Dunmow; and three scenarios for Stansted Mountfitchet (including a scenario involving a small garden community to the north of the town).

Finally, Section 5.5 considers how to combine the sub-area scenarios in order to form **reasonable growth scenarios** for Uttlesford as a whole. Ultimately five scenarios were defined – see Table A and the subsequent maps. Further points to note are:

- With regards to employment land, this is held constant across the growth scenarios. The emerging strategy primarily involves: two larger allocations for industrial / logistics along the A120 (each ~15 ha); an 18 ha expansion to Great Chesterford Research Park in the north of the District.
- The maps do not show permitted sites. Also, any garden community to the north of Stansted Mountfitchet would comprise only a small part of the HELAA site shown under Scenario 5.
- Table A includes a row for 'possible additional supply' noting a large site that was very recently granted permission at appeal to the west of Great Dunmow (1,000-1,200 homes).

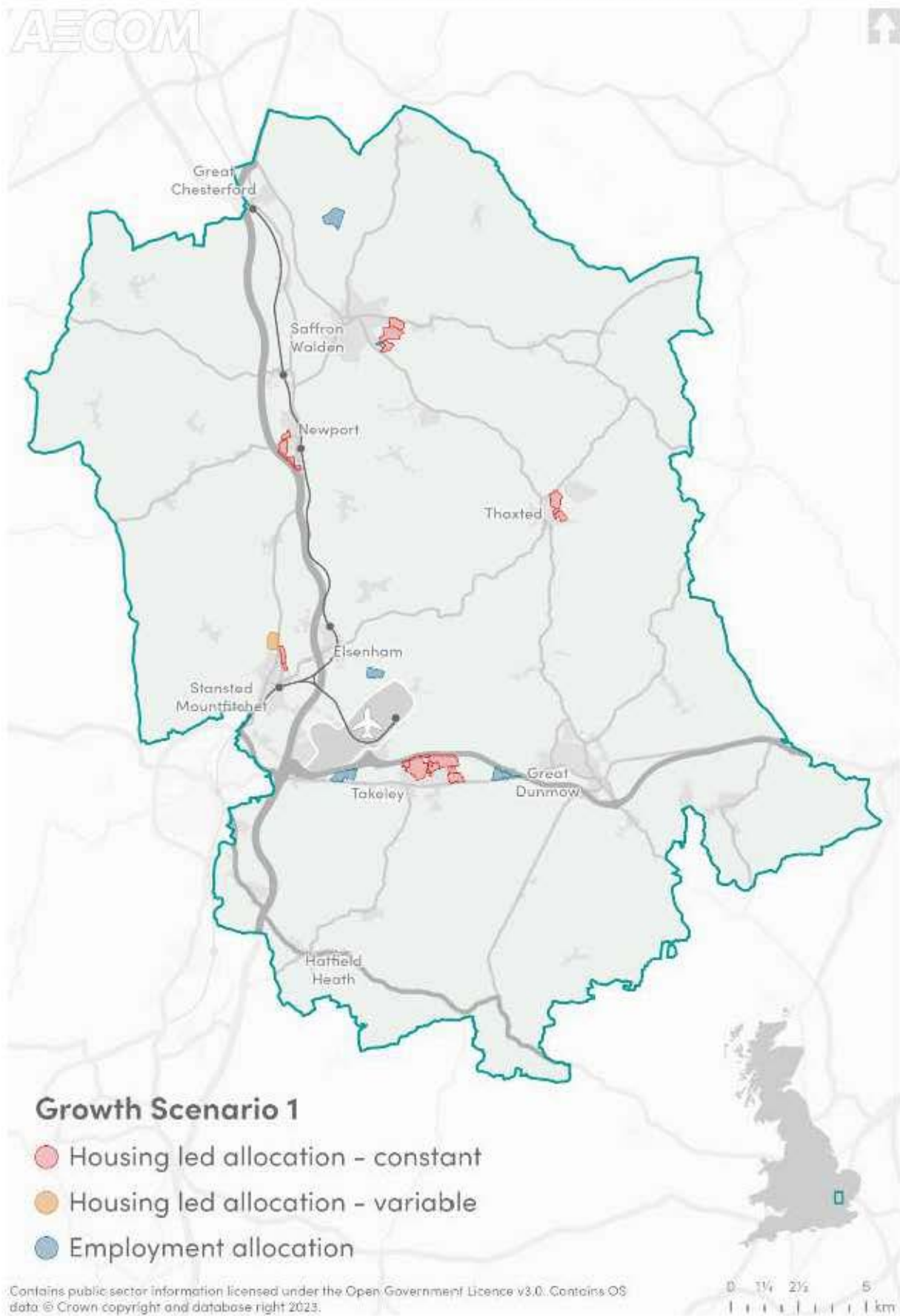
In summary the reasonable alternative growth scenarios are as follows:

- Scenario 1 – Low growth across all sub-areas
- Scenario 2 – Scenario 1 plus higher growth at Saffron Walden
- Scenario 3 – Scenario 2 plus higher growth at Great Dunmow
- Scenario 4 – Scenario 3 plus additional expansion north of Stansted Mountfitchet
- Scenario 5 – Scenario 4 plus garden community north of SM, minus expansion to the north of SM

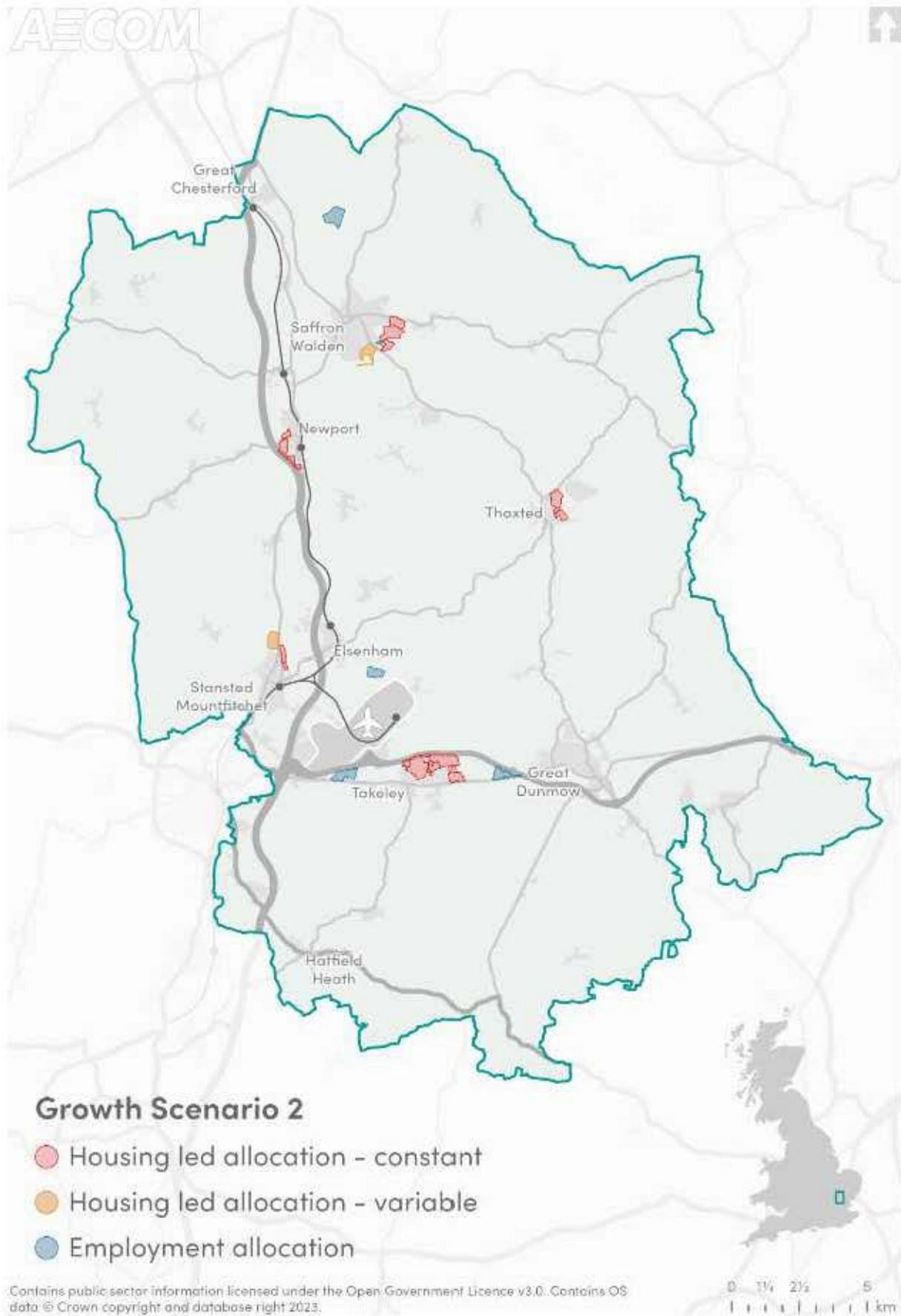
Table A: The reasonable alternative growth scenarios

Supply component	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
Completions	980	980	980	980	980
Permissions prior to 1 st April 2023	5,800	5,800	5,800	5,800	5,800
Estimate of permissions since 1 st April 2023	650	650	650	650	650
Possible additional permissions	?	?	?	?	?
Windfall allowance	1,650	1,650	1,650	1,650	1,650
Large village allowance	1,000	1,000	1,000	1,000	1,000
Allocations at Takeley	1,636	1,636	1,636	1,636	1,636
Allocations at Thaxted	489	489	489	489	489
Allocations at Newport	412	412	412	412	412
Allocations at Great Chesterford	0	0	0	0	0
Allocations at Elsenham	0	0	0	0	0
Allocations at Hatfield Heath	0	0	0	0	0
Allocations at Saffron Walden	845	1,280	1,280	1,280	1,280
Allocations at Great Dunmow	0	0	869	869	869
Allocations at Stansted Mountfitchet	390	390	390	690	140
Stansted Mountfitchet Garden Community	0	0	0	0	1,500
Total homes	13,852	14,287	15,156	15,456	16,406
% above LHN (13,680)	1	4	11	13	20

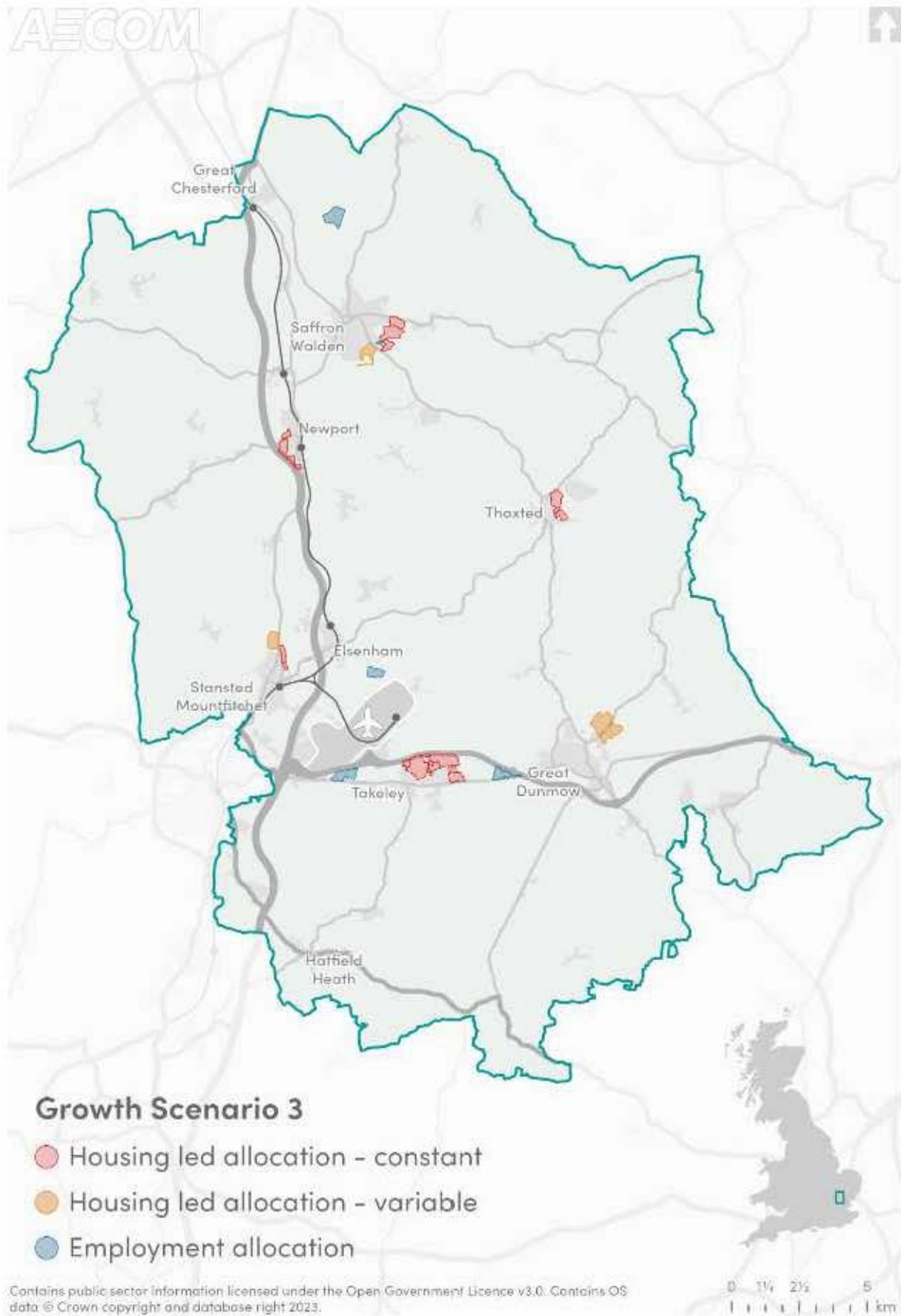
Reasonable growth scenario 1: Constant allocations plus land north of Stansted Mountfitchet



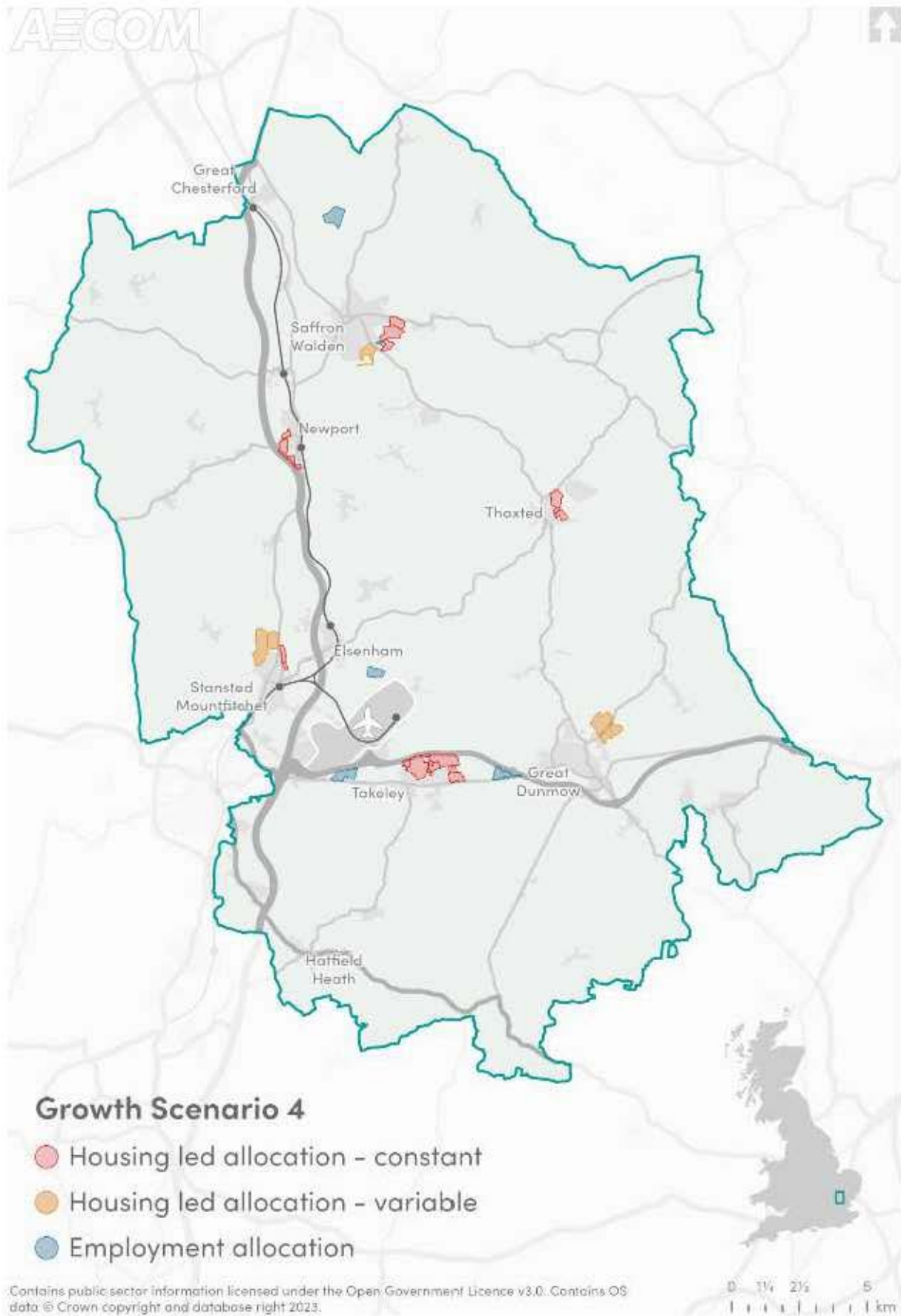
Reasonable growth scenario 2: Scenario 1 plus land south east of Saffron Walden



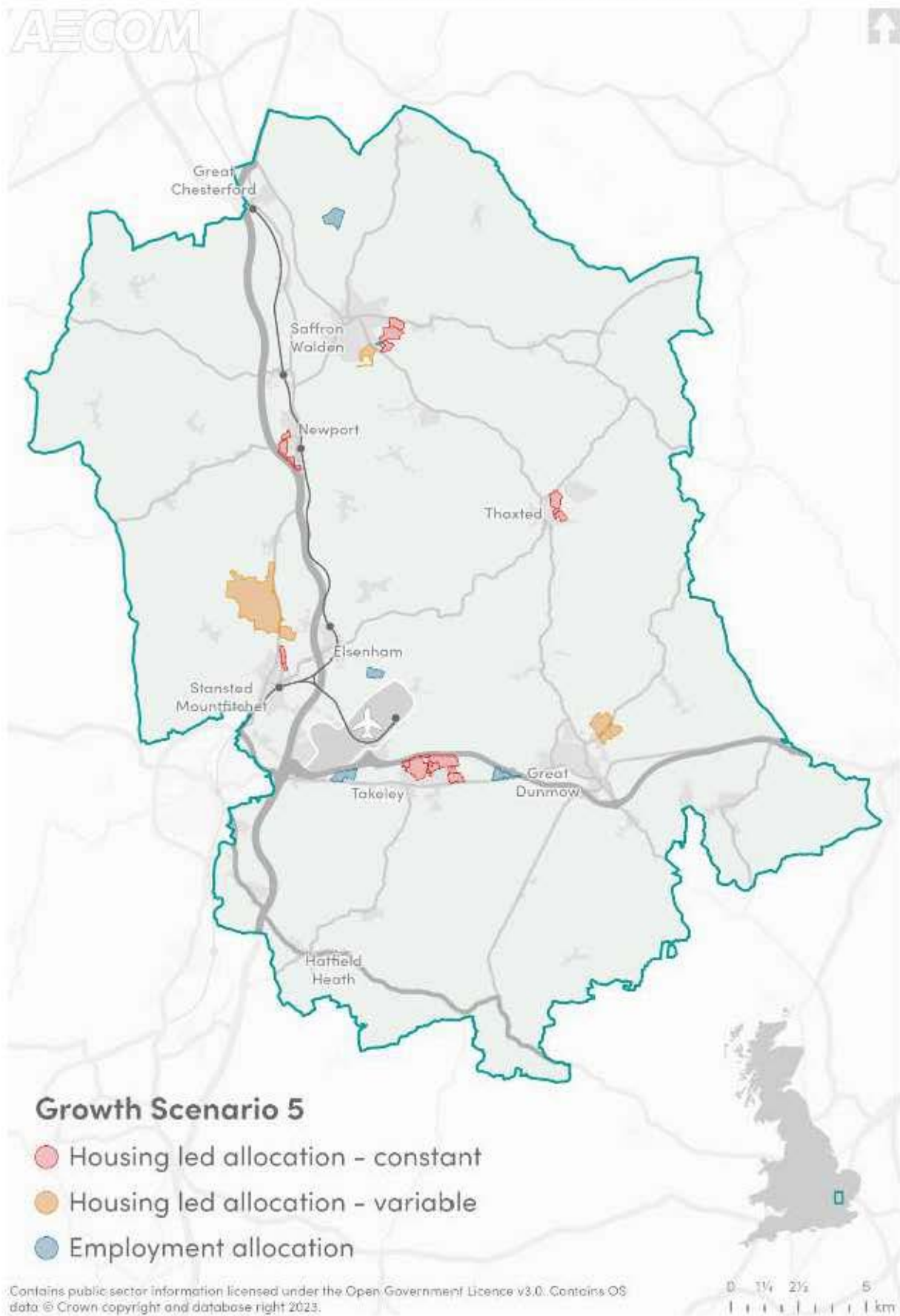
Reasonable growth scenario 3: Scenario 2 plus land east of Great Dunmow (Church End)



Reasonable growth scenario 4: Scenario 3 plus additional land north of Stansted Mountfitchet



Reasonable growth scenario 5: Scenario 4 plus small GC north of SM, minus



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Appraising growth scenarios

Section 6 of the main report presents the appraisal of reasonable alternative growth scenarios, including within a summary appraisal 'matrix', which is reproduced below.

Within each row, the aim is to **1**) rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence); and then **2**) categorise performance in terms of 'significant effects' using red / amber / light green / green.

Table A: The reasonable growth scenarios – summary appraisal findings

Topic	Scenario 1: Low growth	Scenario 2: SW	Scenario 3: SW, GD	Scenario 4: SW, GD, SM	Scenario 5: SW, GD, UGC
Accessibility	4	3	2	1★	1★
Biodiversity	2	1★	1★	1★	1★
Climate change adaptation	=	=	=	=	=
Climate change mitigation	=	=	=	=	=
Communities, equality, health	2	1★	2	2	2
Economy and employment	5	4	3	2	1★
Historic environment	2	1★	3	3	4
Homes	5	4	3	2	1★
Land and soils	=	=	=	=	=
Landscape	=	=	=	=	=
Transport	2	1★	2	2	2
Water	=	=	=	=	=

The appraisal serves to suggest that **Scenario 1** performs quite poorly overall. However, it is important to note that the appraisal reflects an assumption that Scenario 1 would lead to a risk of unmet housing need (if the housing requirement is set below LHN) or unplanned growth (if the housing requirement is set at LHN without a sufficient supply buffer). In practice, this assumption may not hold true because supply from permissions will likely increase prior to plan finalisation (see discussion in Section 5.5).

For the **other scenarios** the appraisal shows a mixed picture. In this regard, it is important to be clear that the appraisal is undertaken without any assumptions regarding the degree of importance that should be assigned to each of the SA topics. Also, it should be noted that under several topics the appraisal conclusion is finely balanced, such that new evidence could serve to tip the balance of favour.

Having made these overarching comments, the following bullets consider the topic headings in turn:

- Accessibility – the higher growth scenarios would reflect a highly proactive approach to securing new schools capacity alongside new homes, with a high degree of delivery confidence.
- Biodiversity – the growth locations in question are subject to limited biodiversity constraint (Takeley is a key consideration, including given proximity to Hatfield Forest), hence low growth performs poorly.
- Climate change adaptation – flood risk is often a key climate change adaptation consideration for local plans, but the growth locations in question are subject to limited constraint.
- Climate change mitigation – it is not clear that any of the scenarios would lead to a particular built environment decarbonisation opportunity, in the context of the ambitious local 2030 net zero target.
- Communities, equality, health – there are wide-ranging factors, but the appraisal reflects a view that there is a case for avoiding new supply at Great Dunmow given the extent of recent/committed growth.
- Economy and employment – there is a preference for a higher growth strategy, including with a view to ensuring a balance between housing growth and employment land supply.
- Historic environment – this is a key issue for a number of the variable growth locations, although less so Saffron Walden. However, there is also an urgent need to adopt a Local Plan with a robust supply.
- Homes – there is support for higher supply to enable a housing requirement set at LHN along with a robust supply (also possibly flexibility for unmet needs). Specific needs require further work.
- Land and soils – Uttlesford is strongly associated with high quality (grade 2) agricultural land but this is also the case for neighbouring areas. There is some grade 3 quality land at Stansted Mountfitchet.
- Landscape – a number of the growth locations are subject to constraint. However, there is also an urgent need to avoid further growth coming forward in the absence of an up-to-date plan.
- Transport – there is a need for further work to examine the traffic constraint to growth at Great Dunmow (also Thaxted), although the growth location in question benefits from good proximity to a town centre.
- Water – there are limited concerns on the basis of the evidence presented in the Water Cycle Study (2023), although there is a need to confirm wastewater treatment capacity at Great Dunmow.

Consultees are encouraged to comment on the merits of the growth scenarios, with a view to supporting efficient plan finalisation. However, it is recognised that consultees will also wish to propose scenarios other than those presented above. Equally, it is recognised that consultees will wish to comment on specific sites. Such suggestions / comments should be informed by the discussion in Section 5 of the main report, which goes through a process to define the five growth scenarios appraised above.

The preferred growth scenario (text provided by UDC)

The preferred scenario is **Scenario 3**, which the appraisal shows to perform reasonably well relative to the alternatives. Scenario 3 gives rise to a degree of tension with certain sustainability objectives, as is inevitable in the context of a local plan, and it is recognised that there are certain arguments in favour of supporting an alternative approach, but Scenario 3 is judged to represent sustainable development on balance. There is good potential to address the identified tensions through policy (see the Draft Plan appraisal below), and adjustments can also be made to the sites and spatial strategy subsequent to the current consultation, taking into account consultation responses received.

Appraisal findings at this stage

Part 2 of the Interim SA report presents an appraisal of the current Draft Local Plan.

Conclusions are presented below.

Accessibility (to community infrastructure)

Given the detailed requirements around schools and wider community infrastructure, and on the assumption that infrastructure delivery is achievable in practice, it is appropriate to predict a **moderate or uncertain positive effect** on the baseline, including recalling that the baseline situation is one whereby housing growth would continue to come forward in a relatively unplanned way. Moving forward, there is a need to account for consultation responses from key organisations, including the County Council, and undertake further work including in collaboration with landowners.

Biodiversity

Given the detailed green infrastructure and policy requirements set out above, aligned with relatively limited biodiversity sensitivity at the majority of the proposed allocations, it is appropriate to predict a **moderate or uncertain positive effect** on the baseline, including recalling that the baseline situation is one whereby housing growth would continue to come forward in a relatively unplanned way. Consultees will wish to scrutinise the green infrastructure strategy and comment on potential issues to address / opportunities to realised via the local plan growth strategy. Also, it is recognised that there is a need for further collaboration with Natural England in respect of Hatfield Forest impacts and mitigation.

Climate change adaptation

A **neutral effect** is predicted. Flood risk can be a key issue for some local plans, but is not a major issue for the current proposed local plan (subject to consultation with the Environment Agency). There are range of other important climate change adaptation / resilience considerations, but these are appropriately considered under other topic headings.

Climate change mitigation

A **neutral effect** is predicted on the baseline, accounting for established objectives, in particular accounting for the District's ambition of 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 through consultation, 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.

Communities, equality, inclusion and health

A **neutral effect** is predicted. Despite the clear benefits associated with 'getting a plan in place' and the strong focus on directing growth so as to realise community infrastructure objectives, there is a need for further scrutiny of the proposal to direct further growth to Great Dunmow. Also, it is important to recognise that the current proposed spatial strategy is very different to that previously proposed through the withdrawn local plan (2020), which focused growth at three large new settlements, with commensurately low growth at existing settlements. The views of the local community / key local stakeholder organisations are sought through the current consultation and will feed-in subsequently.

Economy and employment

A **moderate or uncertain positive effect** on the baseline is predicted. The approach to allocating land for employment is highly proactive, although there is a need for further work to confirm the suitability of certain proposed allocations and there is also a need to confirm that the proposed over-supply in respect of land for R&D does not create an issue for neighbouring areas or in terms of commuting. The proposed development management policy framework is supported, including policy for town centres.

Historic environment

It is appropriate to flag a **moderate or uncertain negative effect** at this relatively early stage in the plan-making process, ahead of consultation with Historic England and other key stakeholder organisations. 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 new supply at Great Chesterford). Also, it is recognised that a significant amount of work has been undertaken in respect of site masterplanning and site-specific policy requirements. However, there are constraints to growth at all the key settlements.

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).

Homes

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.

Land, soils and other resources

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.

Landscape

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.

Transport

As per the discussion above under 'Landscape', whilst the appraisal in Section 6 flagged a significant concern in respect of the proposed growth strategy, after having taken account of development management policies and emerging site-specific policy is appropriate to predict a **broadly neutral effect** on the baseline. There will be a need for further detailed work in collaboration with key partner organisations including National Highways and the County Council. The current Draft Local Plan seeks to avoid the pitfalls experienced with the previous withdrawn local plan, by avoiding an over reliance on costly and uncertain major new/upgraded transport infrastructure, but there are nonetheless a range of transport-related assumptions that will require further detailed scrutiny.

Water

A broadly **neutral effect** is predicted, in light of the Water Cycle Study (2023) and given stringent proposed DM policy, including in respect of water efficiency. However, there will be a need for ongoing consideration of wastewater treatment capacity, water quality, water resources and the water environment, including in discussion with the Environment Agency and Affinity Water, and recognising sensitivities around chalk streams (also noting ongoing work for the Greater Cambridge Local Plan).

Overall conclusion

After having accounted for the proposed growth strategy alongside development management policy (including site-specific policy), and after having accounted for established sustainability objectives (see Section 3), the appraisal predicts **moderate or uncertain positive effects** under four headings (Accessibility, Biodiversity, Economy/employment and Homes), but flags **moderate or uncertain negative effects** under two headings (Historic environment and Land/soils). Under the remaining topic headings the appraisal concludes broadly **neutral effects**. The appraisal does not predict significant positive effects under any of the topic headings, nor does it predict significant negative effects. There is every likelihood of being able to predict more strongly positive effects at the next stage of plan-making (Regulation 19), at which time there will be the potential to draw upon consultation responses and the outcomes of further detailed work, e.g. in terms of site specific policy and whole plan viability.

Cumulative effects

It is good practice to give stand-alone consideration 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.
- **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 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 in respect of capacity along the A120.
- **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** – it appears that 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.
- **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.

Next steps

Subsequent to the current consultation it is the intention to prepare the proposed submission version of the Local Plan. This will be a version that the Council believes is 'sound' and intends to submit for Examination. The proposed submission version of the Local Plan will then be published alongside the formal SA Report, with the intention of subsequently submitting the Local Plan for examination alongside representations received. At Examination, the Inspector will then consider representations before concluding on necessary modifications. Once found to be 'sound' the Local Plan can be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'. Section 11 of the main report discusses monitoring.