

SJK Planning
Chartered Town Planners



**Sustainability Appraisal (SA) for the
Uttlesford Local Plan Scoping Report**

**Representations on behalf of the
Unsustainable Sites Action Group (USAG)**

**Hatfield Heath Parish Council
Hatfield Broad Oak Parish Council
Great Hallingbury Parish Council
Little Hallingbury Parish Council**



Contents		Page
	Executive Summary	3
1	Introduction	5
2	The Sustainability Appraisal-Structure & Content	9
3	The Four Parishes	14
4	The Call for Sites	20
5	The Representations	22
6	Conclusion	30
7	Recommendations and Actions	31

Executive summary

This representation is provided by the USAG (Unsustainable Sites Action Group) an organisation formed of the four Parish Councils of Hatfield Broad Oak, Hatfield Heath, Little Hallingbury and Great Hallingbury. A combined response has enabled pooling of resources to facilitate professional assistance.

The USAG and four Parishes would like to provide a critical friend approach to consultations and emerging evidence as the new Local Plan progresses. Endeavouring to ensure that, in particular at local level, the Parishes have clear input into plan decisions that will impact their local communities.

The key issues raised are:

- ◆ The plan process to date is not well explained, signposted or communicated and it is hoped the Council will make improvements in this regard moving forward.
- ◆ The previous local plan submission was withdrawn and one of the reasons provided to Councillors when this was voted upon was to allow an updated evidence base. No such update has taken place. At a minimum the Infrastructure Delivery Plan and the Green Belt Review should be updated as core documents to the areas resulting in the withdrawal of the Plan. Evidence older than 10 years should also be renewed to reduce vulnerability at future examination.
- ◆ The Parishes are very concerned that no clear assessment of existing communities and what creates their individual character and community has been undertaken. For this reason all four Parishes are now intending to progress Neighbourhood Plans to ensure unique character and identities are retained. The District Council should conduct a Settlement Analysis to establish Local Character and identify.

- ◆ The Call for Sites process identifies a number of large sites that would seriously undermine local character and identity across entire Parishes. It is unclear from the absence of scoring mechanism, whether this significant harm would be scored the same, as for instance, the loss of a single undesignated heritage asset. Scoring and weighting should be established as part of the scope of the SA.

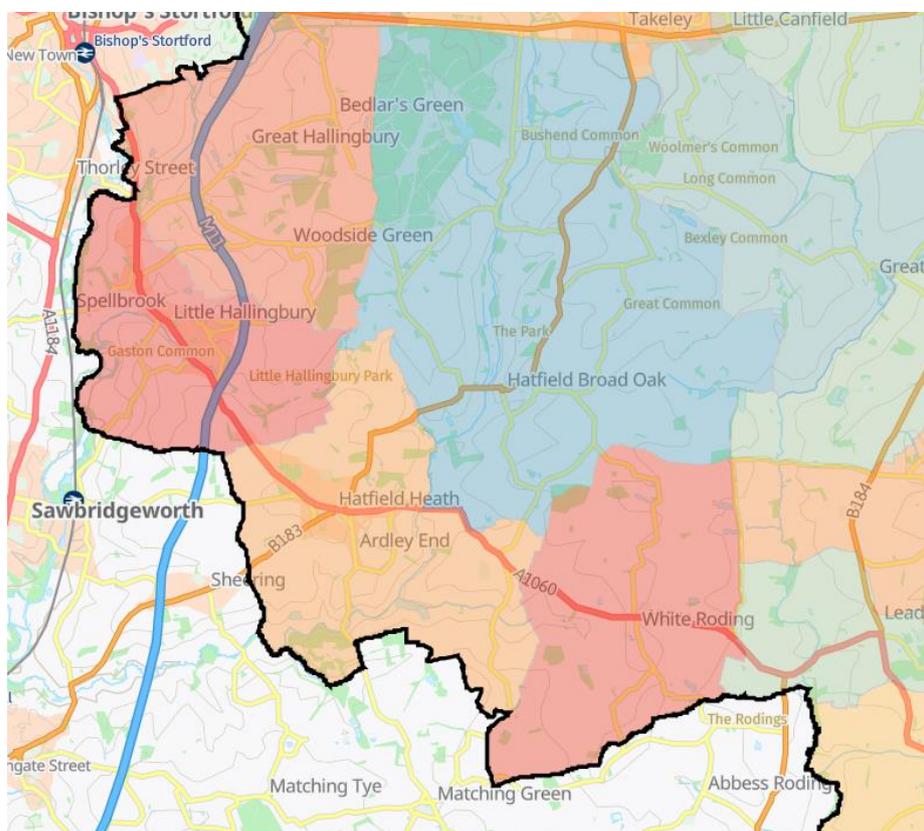
- ◆ The parishes are extremely concerned that the flow diagram for the approval of the Sustainability Appraisal mechanism appears to bear no clear resemblance to the development of the local plan key stages. Whilst consultation stages and periods are defined in statute, it is recommended that a clearer definition of the sustainability assessment criteria are fully developed before considering potential development sites, otherwise the process cannot work efficiently and effectively. The assessment criteria throughout the Local Plan process need to be understood by all engaged in the Plan process.

- ◆ Other recommendations regarding the objectives of the SA as set out within the scoping report are detailed within section 5 and recommendations for how to overcome concerns are included within section 7.

1.0 Introduction

1.1 SJK Planning and Thompson Planning Ltd have been jointly commissioned to develop and submit representations and recommendations on behalf of the 'Unsustainable Sites Action Group' (USAG). This organisation has been formed by parish councils in the south of Uttlesford most affected by the potential impact of sites proposed for inclusion in the Local Plan Process. The group's objective is to ensure that local contributions, comments and suggestions are recognised, acknowledged and included in the assessment and consultation programme. Our client for this response comprises the four parish councils of Hatfield Broad Oak, Hatfield Heath, Little Hallingbury and Great Hallingbury, with other neighbouring parish councils sharing knowledge, insight and information (more detail on the four Parishes is provided in Section 3 below).

Figure 1: Representations are submitted on behalf of Hatfield Broad Oak, Hatfield Heath, Little Hallingbury and Great Hallingbury Parish Councils.



1.2 Following the withdrawal of the previous Local Plan submission document at the Extraordinary Council Meeting on the 30th April 2020, Uttlesford District Council now seeks to adopt a new plan in 2024. The withdrawal followed Inspector concerns identified as;

- i) the District Council had failed to accurately define the locations of three new settlements,
- ii) doubts over housing delivery numbers,
- iii) the costs of the required transport infrastructure.

1.3 When determining to withdraw the Local Plan in 2020 Councillors were advised that a new Local Plan would allow a new evidence base to be produced.

1.4 USAG is very concerned that very few evidence based studies have been revised or even updated. Furthermore, there is concern that officers and Members should be clearly considering all local plan options moving forward. Essentially this new local plan process, should be just that, reflecting on where past matters were flawed and considering new approaches moving forward. This is difficult to achieve without refreshing evidence.

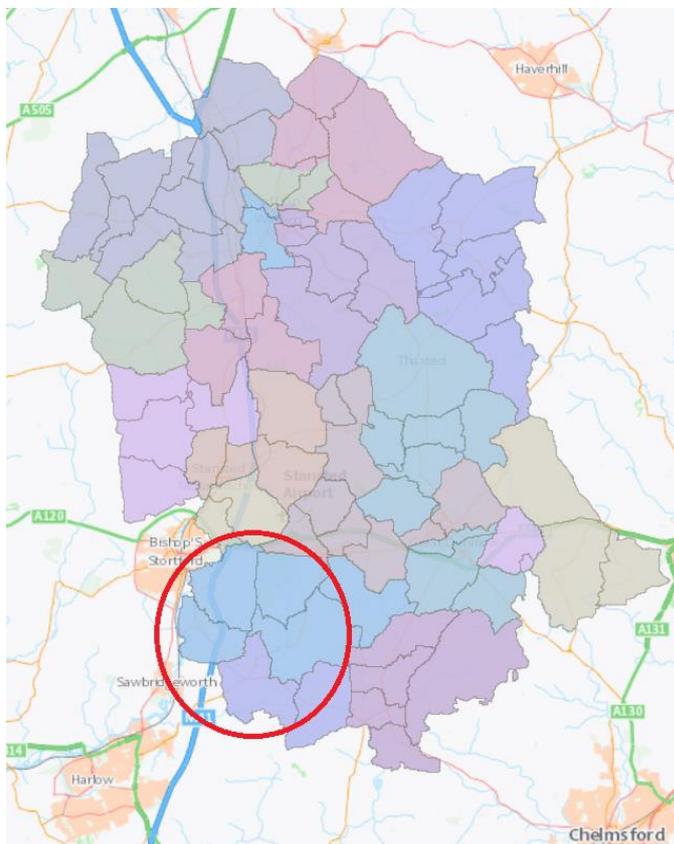
1.5 Finally, the Parishes are disappointed that the new evidence base promised to Members at the withdrawal has not materialized. There is concern that use of dated studies will leave the District Council vulnerable to critique and weakness at a future examination.

1.6 In broad terms Uttlesford needs to accommodate up to 17,000 new homes by 2040, the amount deemed necessary by the Government. Plans are already in place for more than 4,000, leaving the council to find space for 13,000 based on the last objectively assessed housing need and census data prior to Covid. The local plan process has started with a number of evidence based studies including the publication of the “Call for Sites” document. This has resulted in sites being put forward for around 6 times the number of houses required. This obviously gives the Council a challenging task to narrow down the suitable locations, having regard for what is sustainable.

1.7 USAG is very concerned about the location and volume of sites submitted, particularly the major proposal known as The Hatfield Garden Community. It is also of great concern that the

first time any Parish Council will have an opportunity to comment will be after decisions have been made by the District Council on what the available options and preferred options for the Local Plan are. Decisions that could result in severely adverse impacts will need to be challenged. Little or no time is being allowed for a consultation process, as only the statutory minimum consultation is being provided. For this reason we devote an entire section to the call for sites document.

Figure 2: The area is located at the south west corner of the District. It comprises 4 of the total number of 60 Parish and Town Councils.



1.8 The genuine concern of the group is that decisions are already being made as to what might constitute the most suitable deliverable locations for housing growth, based largely, at the moment, on locations that have been put forward in response to the “Call for Sites”. Developers and landowners have used this to propose and promote various locations within the four Parishes, with various sites, for over 7000 dwellings.

1.9 This report looks first at the structure and content of the SA document. We consider its stated purpose and how it is intended to contribute towards site selection and planned growth as part of the local plan process. We also look at the degree to which it considers local neighbourhood issues and the constraints on development locations.

1.10 To provide the context for our representations we then look at the character of the four Parishes. We refer to work already undertaken by the Council and their consultants in respect of constraints on development and assessments of landscape character and how the evidence studies to date alone are not sufficient to provide an adequate Settlement Analysis identifying what local character and community is in each Parish and Settlement.

1.11 In setting out representations in respect of the scoping document our fundamental concern is that despite the SA process presently underway and the subsequent intended Regulation 18 and 19 consultations the findings will not meaningfully influence the choice of sites. There does not appear to be a validity linking process. More work and meaningful consultations are needed at a local level before the Regulation 18 consultation stage. This will then establish whether the location or scale of development being put forward, can pass the sustainability tests, and truly provide a community led plan. The Four Parishes are actively seeking that the District Council provide a greater degree of community engagement than the statutory minimum.

2.0 The Sustainability Appraisal (Scoping Report) – Structure and Content

2.1 We have carefully read through the scoping report. It sets out the purposes of an appraisal as follows:-

“SA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising the potential for positive effects. Through this approach, the SA for the new Local Plan seeks to maximise the developing plan’s contribution to sustainable development.”

2.2 A scoping report “brings together the results on the initial stages of the sustainability appraisal process”. It explains the role as follows:-

“Sustainability Appraisal is a tool for integrating social, economic and environmental considerations into planning policy documents.”

2.3 In structuring the report the SA identifies what are called “themes” as follows:-

- Communities;
- Housing;
- Economy and employment;
- Health and wellbeing;
- Equalities, diversity and social inclusion;
- Transport, air quality and noise;
- Climate change (adaptation and mitigation);
- Land and water resources;
- Landscape;
- Historic Environment; and

- Biodiversity and geodiversity.

2.4 It is intended that presenting the scoping information under these themes will help enable the reader to easily locate the information of greatest interest to them. However, these are quite general headings with no clear definition of what is included under each heading. It would be clearer were a more structured approach adopted so that key sustainability criteria are more easily identifiable. Once agreed (i.e. subsequent to the current consultation), the suggested scope presented under the ten themes is supposed to provide a methodological 'framework' for the assessment of the draft plan and alternatives. The discussion of the scoping information under each SA theme is presented in Chapters 2 to 12 of the Scoping Report.

2.5 Under each of the themes the report provides "Key settlement summaries". This nominally includes a brief reference to Hatfield Heath but there are no references to Hatfield Broad Oak or either Great Hallingbury or Little Hallingbury. There is no detail provided as to why these settlements have been selected or other evidence study underpinning selection, indeed the description of Hatfield Heath as having brown field sites is wrong and to define the south of the district as progressively urban is clearly erroneous. The reason for analysis of these areas only is unclear. The proper and detailed analysis of the existing settlements will be key to establishing local character and identify. The main structural concern with the process is the absence of meaningful settlement appraisal. The only time the remaining three Parishes we represent are mentioned are when discussing the 'edge of Bishops Stortford'. This is hardly provision of a meaningful identity.

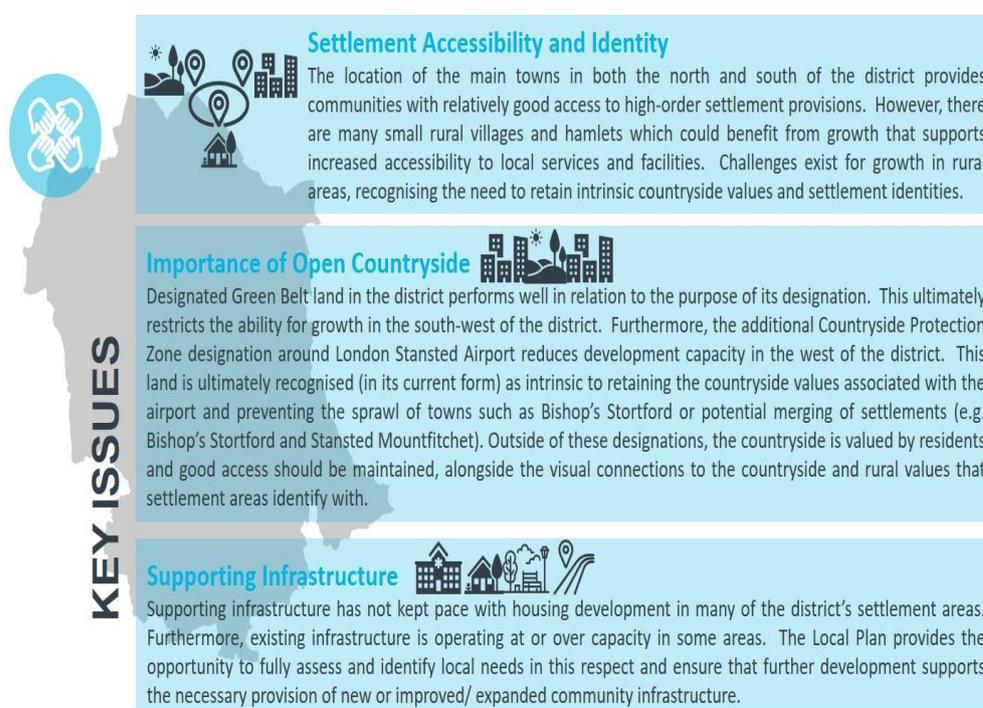
2.6 It notes that only a small number of the 60 parishes/town councils have a neighbourhood plan. No recent contact has been made with the Parish Councils to establish if there is any intention in other areas to provide a Neighbourhood Plan.

2.7 With regard to communities identified it concludes that the key issues include:-

Settlement Accessibility and Identity - In particular that challenges exist for growth in rural areas, recognizing the need to retain intrinsic countryside values and settlement identities.

Importance of Open Countryside - The Green Belt restricts the ability for growth in the south west of the District. Reference to rural values that settlement areas identify with.

Supporting Infrastructure - The local plan provides the opportunity to fully assess and identify local needs. However USAG say a lack of core infrastructure in rural areas would preclude large sites advancing to the next stage of evaluation, despite developer promises.



KEY ISSUES

Settlement Accessibility and Identity
 The location of the main towns in both the north and south of the district provides communities with relatively good access to high-order settlement provisions. However, there are many small rural villages and hamlets which could benefit from growth that supports increased accessibility to local services and facilities. Challenges exist for growth in rural areas, recognising the need to retain intrinsic countryside values and settlement identities.

Importance of Open Countryside
 Designated Green Belt land in the district performs well in relation to the purpose of its designation. This ultimately restricts the ability for growth in the south-west of the district. Furthermore, the additional Countryside Protection Zone designation around London Stansted Airport reduces development capacity in the west of the district. This land is ultimately recognised (in its current form) as intrinsic to retaining the countryside values associated with the airport and preventing the sprawl of towns such as Bishop's Stortford or potential merging of settlements (e.g. Bishop's Stortford and Stansted Mountfitchet). Outside of these designations, the countryside is valued by residents and good access should be maintained, alongside the visual connections to the countryside and rural values that settlement areas identify with.

Supporting Infrastructure
 Supporting infrastructure has not kept pace with housing development in many of the district's settlement areas. Furthermore, existing infrastructure is operating at or over capacity in some areas. The Local Plan provides the opportunity to fully assess and identify local needs in this respect and ensure that further development supports the necessary provision of new or improved/ expanded community infrastructure.

2.8 Whilst Green Belt status does have an influence on the character of a settlement, the fundamental aims of the Green Belt should be assessed as an independent topic from communities. Such an approach is also undertaken in the NPPF (National Planning Policy Framework) and the NPPG (National Planning Policy Guidance).

2.9 The Scoping Report looks at the other themes as listed on a district wide basis, with the only a brief reference to the villages. Paragraph 9.32 says that:-

“There are areas of brownfield land on the Brownfield Land Register at the settlement edge of Hatfield Heath” (which is incorrect). “The settlement lies within an area of high-quality agricultural land (Grade 2).”

2.10 Number 10 on the list of themes is “Landscape”, focusing on landscape character, landscape quality and visual amenity. It states that:-

The Local Plan will be required to be in general conformity with the NPPF which gives great weight to conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. The NPPF recognises the role of green infrastructure in landscape settings, as well as the importance of designated biodiversity sites, habitats, woodland, historic features, agricultural land and cultural landscapes. The positive contribution that land remediation can make in terms of addressing despoiled, degraded, derelict, contaminated and unstable land is also recognised.

2.11 The report notes the landscape objectives of National Character Areas (NCAs) and The following Statements of Environmental Opportunity (SEOs) are identified for this NCA:

SEO1: Maintain and enhance the character of this gently undulating, rural landscape by maintaining agricultural productivity and encouraging sustainable land management practices that protect and enhance the landscape.

SEO2: Protect and enhance the area’s ancient woodland cover, parkland trees, river valley plantations and ancient hedgerows, through the management of existing woods and the planting of new woods.

2.12 The identified issues in relation to planning and future development include:

- Loss of hedgerows and tree cover;
- The impacts of development on visual amenity and tranquillity;
- Increased congestion on rural roads; and
- Potential to impact areas of open countryside and diminish open areas between settlements.

2.13 The area lies within the Hatfield Forest Farmland Plateau, dominated by Hatfield Forest; a medieval forest and dispersed settlement with strong countryside connections. The ancient church and mill both provide prominent landmarks in this area. A large common is a significant feature of the settlement.



The key issues for Landscape as identified by the report

2.14 Section 13 is described “Proposed SA framework” It appears to be simply a list of very general questions such as “Maintain or enhance the quality of life for existing and future residents?” Provision for a comprehensive grading scheme should be provided and this will be explored later in greater detail.

2.15 Paragraph 14.3 states that Consultees are invited to comment on the content of this Scoping Report, particularly the evidence base for the SA, the identified key issues and the proposed SA framework. Sadly the District Council does not define which of the evidence base documents comments are being sought on. Many of the published evidence studies are simply repeated from those previously undertaken, some already in excess of 10 years old. This is clearly not appropriate for an up to date new plan. Further consultation and comments should be sought after the required updates or revisions have been made.

3.0 The Four Parishes of USAG

3.1 This section looks at the work already undertaken in looking at the potential opportunities and constraints for different character areas throughout the District. In preparing previous local plans the District Council and consultants have assessed individual villages and their surrounding countryside in some depth.

3.2 The Parishes occupy the south-west corner of the District comprising mostly open countryside and separated from the main settlement towns of Harlow and Bishops Stortford. The parishes have access to both the M11 and train services at Sawbridgeworth and Bishops Stortford stations. Sawbridgeworth station has very limited parking, no suitable setting down point for dropping passengers and does not benefit from the same number of fast trains to London as Bishops Stortford. That, coupled with the lengthy delays at the level crossing means it is not a viable option for the majority of local residents. For these reasons most locals make the journey vial local country roads to Bishop Stortford.

3.3 All four Parish Councils are intending to produce neighbourhood plans for their areas and will want to liaise and consult with the District Council in doing so. The four village settlements are Hatfield Heath, Hatfield Broad Oak, Little Hallingbury and Great Hallingbury.

3.4 Like many Village communities throughout the District the villages are set in attractive rural landscapes. They have a strong community spirit. They have local schools, shops, pubs, restaurants and sports clubs. Larger settlements, such as Bishops Stortford, provide for secondary schools, weekly shops and social and recreational need.

The District Council has undertaken a number of studies that include the rural villages and arguably to varying degrees identify some of the characteristics underpinning the individuality of each Parish, but these studies alone fail to establish what is local identity.

Figure 3: Work already carried out by the Planning Department and consultants has identified constraints in the area. The extract above shows Ancient Woodland, Historic Landscape, Historic parkland and parks and gardens, Important Woodlands, Metropolitan Green Belt and Flood Zones.

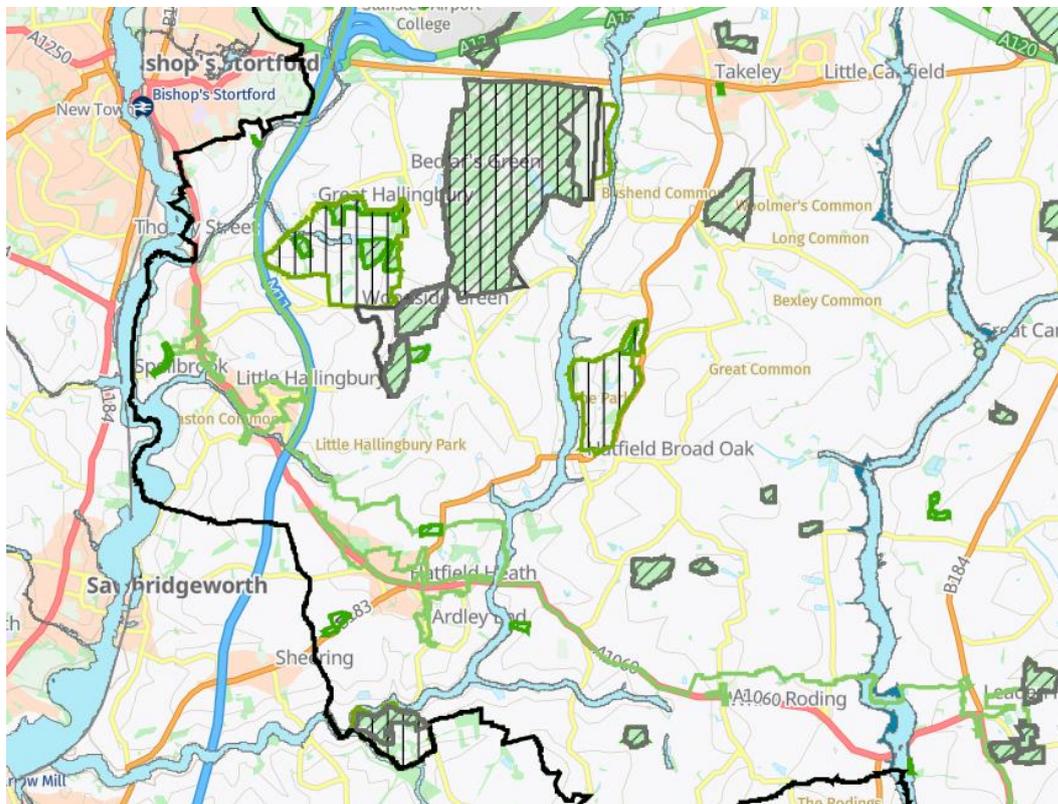
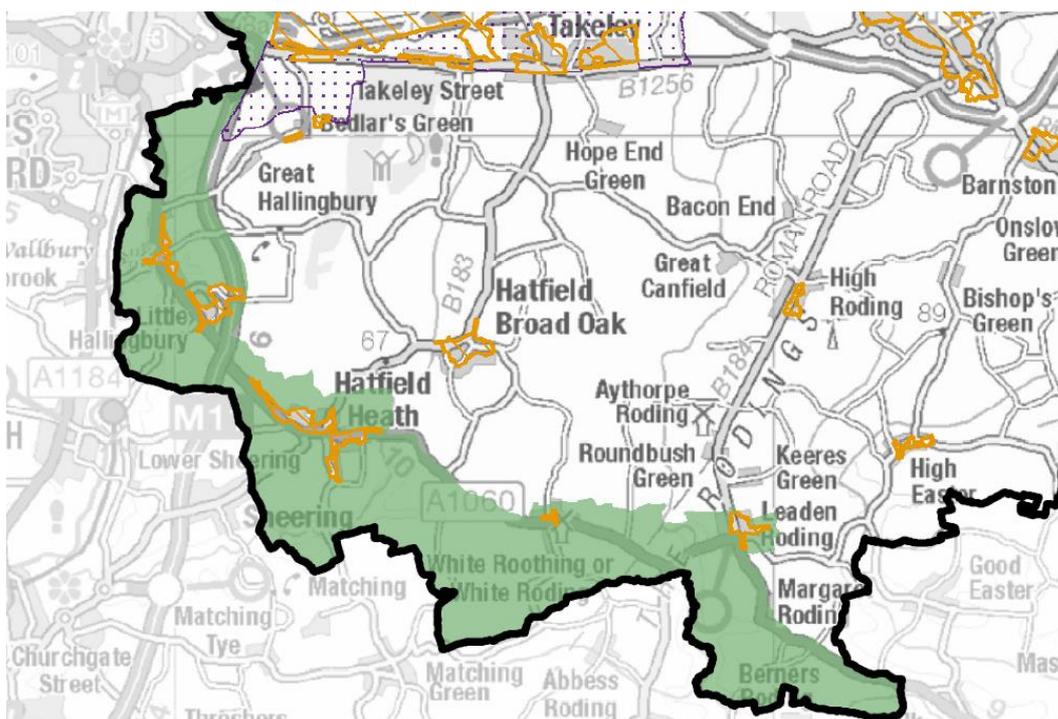


Figure 4: The Extent of Metropolitan Green Belt in the District.



3.5 An extensive survey of the landscape and countryside qualities of the District was carried out by Chris Blandford Associates in 2006. The Plan below shows the landscape areas as assessed by the report. They are:-

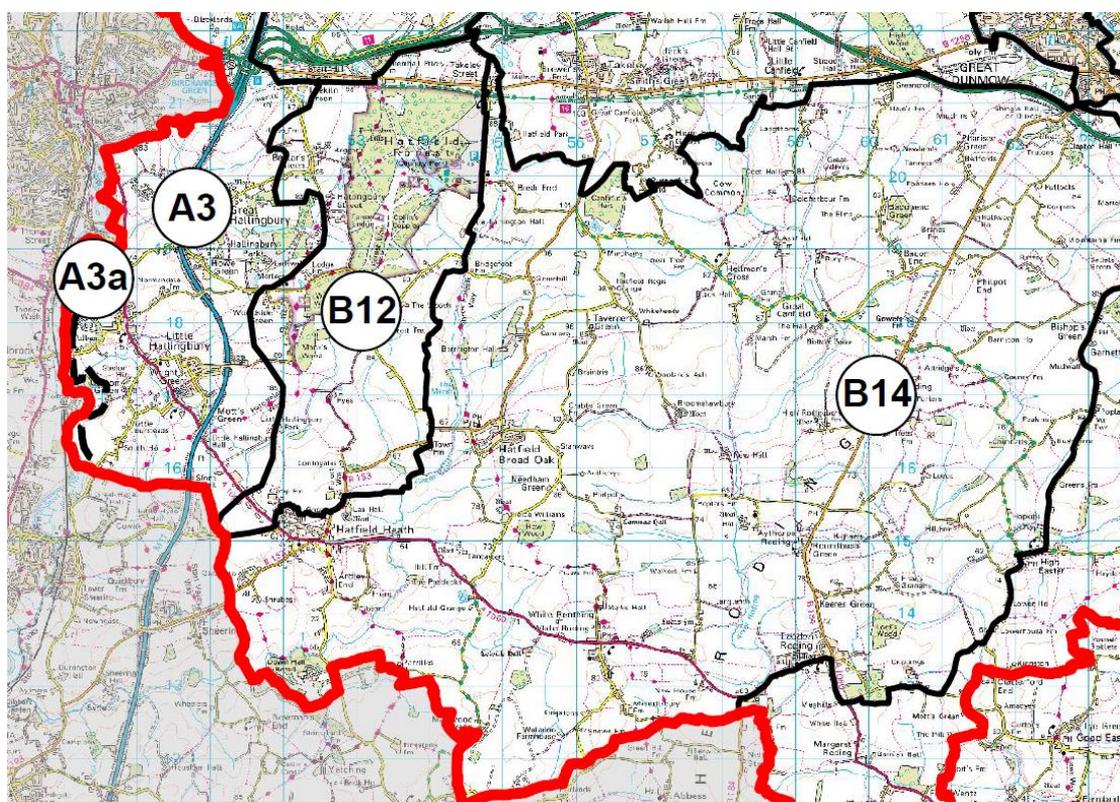
A3 and A3a STORT RIVER VALLEY

B12 HATFIELD FOREST FARMLAND PLATEAU

B14 RODING FARMLAND PLATEAU

3.6 For all three areas the suggested strategy is to seek to “protect and enhance positive features that are essential in contributing to local distinctiveness and sense of place through effective planning and positive land management measures”.

Figure 5: A3 STORT RIVER VALLEY, B12 HATFIELD FOREST FARMLAND PLATEAU AND B14 RODING FARMLAND PLATEAU



Key Characteristics

A3 STORT RIVER VALLEY

3.7 Gently sloping, sometimes steep river valley slopes dominated by arable farmland. Small to medium scale field pattern defined by hedgerows, tree belts, woodland blocks in places. Location of River Stort well delineated by riverbank trees. Continuous views down the valley from higher ground, and at some bridging points.

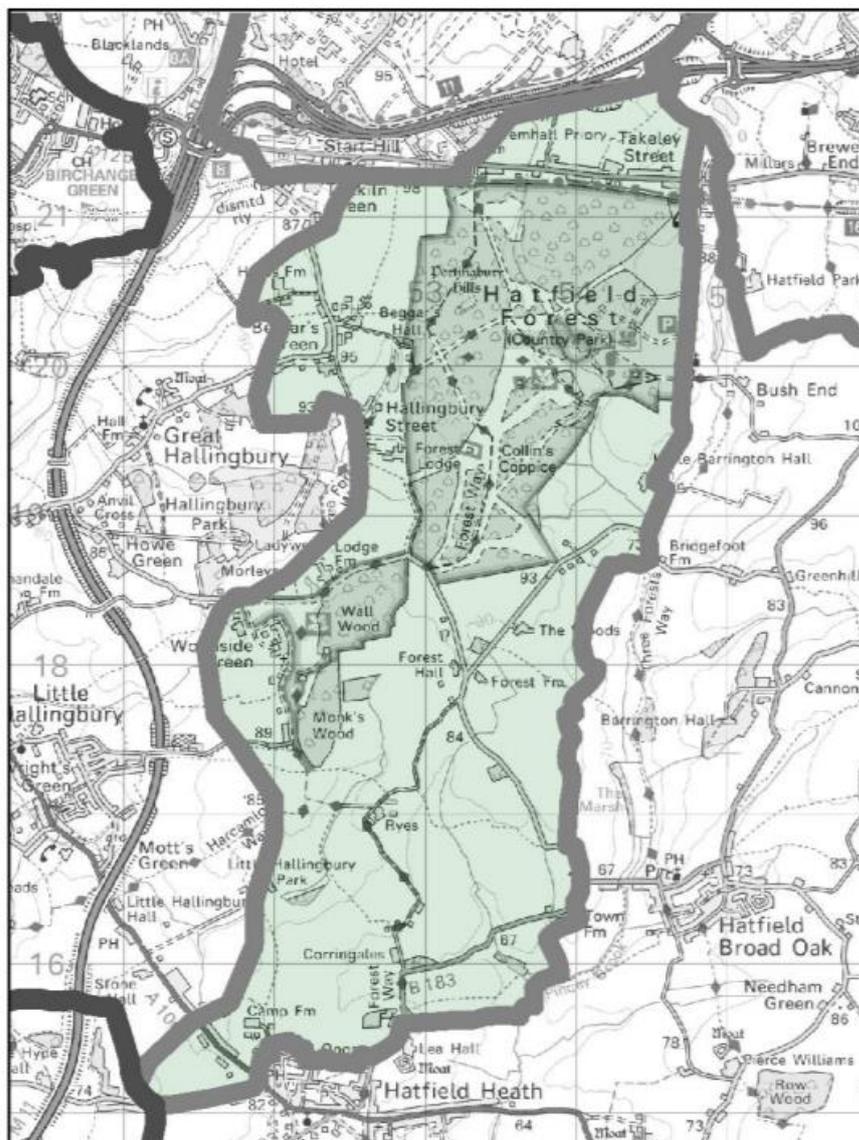
Proposed Landscape Strategy Objectives Conserve - seek to protect and enhance positive features that are essential in contributing to local distinctiveness and sense of place through effective planning and positive land management measures. Enhance - seek to improve the integrity of the landscape, and reinforce its character, by introducing new and/or enhanced elements where distinctive features or characteristics are absent. Restore - seek to reinforce and/or reinstate historic landscape patterns and features that contribute to sense of place and time depth, by repairing distinctive elements that have been lost or degraded.

B12 HATFIELD FOREST FARMLAND PLATEAU

3.8 Gently undulating arable farmland that forms part of the glacial till and Central Essex Farmland. Hatfield Forest, an important area of ancient woodland, forms the distinctive character of this landscape. The forest area is intimate and enclosed, while the arable farmland to the south has a much more open character, although framed by distant woodland. Field pattern is a mixture of irregular in the forest and semi-regular to regular outside the forest. Settlement pattern is dispersed through the forest alongside wooded greens and lanes, while to the south the farmsteads are quite scattered. Modern housing is also found throughout the forest, usually well integrated within their own grounds and enclosed by woodland. Harcamlow Way and Forest Way cross the area. The proximity of Stansted Airport affects the tranquillity of the area.

Proposed Landscape Strategy Objectives Conserve - seek to protect and enhance positive features that are essential in contributing to local distinctiveness and sense of place through effective planning and positive land management measures.

Figure 6: THE HATFIELD FOREST FARMLAND PLATEAU



B14 RODING FARMLAND PLATEAU

3.9 Though the settlements are regularly dispersed their scale is small, and this makes the area feel more remote than it actually is, given the proximity of Stansted Airport to the north. Roads ring the area but internally it is winding lanes and tracks that give access to most farmsteads. A comprehensive network of public rights of way criss-crosses this countryside,

including the Three Forests Way national trail. The texture of this landscape is layered in all seasons, from smooth green fields in spring to summer's golden grain, then the coarse stubble after harvest, all framed by the changing deciduous woodland and hedgerows. It is an area with moderate to strong tranquillity.

Proposed Landscape Strategy Objectives Conserve - seek to protect and enhance positive features that are essential in contributing to local distinctiveness and sense of place through effective planning and positive land management measures.

3.10 In addition to the landscape studies the new plan and appraisals should not ignore the well-established adopted Local Plan. The plan has always sought to protect the countryside for its own sake, whilst accepting the evolution of economic activity that is part of life in rural areas and is in sympathy with its character. This has been the cornerstone of planning policy throughout the District for a number of years.

3.11 Whilst these studies have all assessed discrete topics that influence the Local Parish areas, they do not in themselves establish what is the local community. There is no clear appraisal of the pattern of design of the Parish areas, the community hubs or the architectural identity of the areas. Without having conducted a settlement analysis it is difficult to understand how the Council can reasonably assess whether a plan option or recommendation will protect or enhance an identity of a settlement? Mindful of this the four Parishes would like to engage with the Council to define their Parish identities and will endeavour to use the neighbourhood plan process to support this objective.

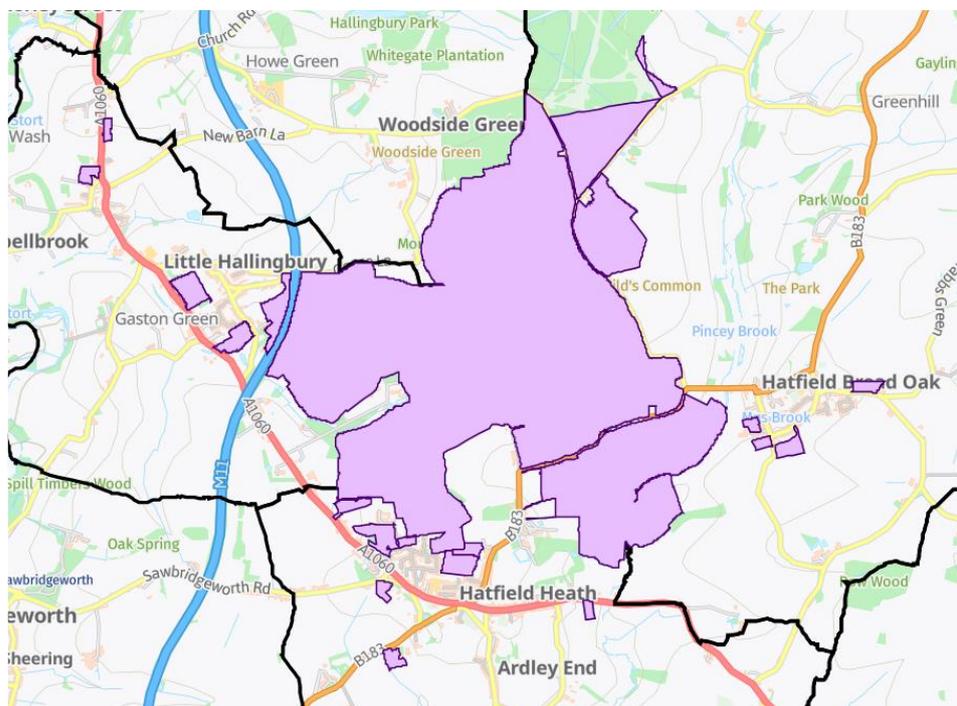
4.0 The “Call for Sites”

4.1 The Council’s website explains the “Call for Sites” process. It states that:-

“The new Local Plan is required to allocate sites to meet the housing, employment and other needs of the district. To better understand the availability of sites for allocation, the council undertook a 'call for sites' in the winter/spring of 2021. This was open to site promoters, town and parish councils, residents and others to submit sites to the Council for consideration. For the first time, the Council also asked for 'green sites' to be submitted to the Council.”

4.2 An interactive map containing basic details for the 299 submitted sites has been made available.

Figure 7 : The extent of the sites identified between the villages.



4.3 The website states further that:-

“The Council will consider these sites, alongside any that the Council chooses to identify, when developing the Local Plan. No decision has been taken at this stage on which sites to include in the Local Plan.”

The sites will be assessed over the summer, and a technical consultation for town and parish councils will be carried out in the autumn to help ensure that factual information for each site is correct. The draft (Regulation 18) Local Plan is scheduled for consultation in March 2022.

Decisions on which sites to allocate will be based on the strategy that the Council is developing at the moment. As part of this process, the Council agreed a draft vision and objectives at Cabinet on 27 May 2021. This will ensure the Local Plan is 'strategy-led' and not 'developer-led'.”

4.4 The process has identified 299 potential sites for development, including around 800 acres (324ha) of farmland at Bollington Hall in Ugley, which could take 4,800 homes, 447 acres (181ha) at Tye Green, Elsenham, with space for 500 dwellings, and a 1,433-acre (580 ha) plot in the middle of Little Hallingbury, Hatfield Heath and Hatfield Broad Oak for 6,500 houses.

4.5 The scale and location of the proposed sites and the uncertainty in relation to how decisions will be made has caused ongoing concern for a number of local communities. The process as described above as relying on a draft vision and objectives established by a Local Plan Leadership Group This appears to be a process carried out behind closed doors, without any input being invited from local parish councils. The twelve elected Members deciding the strategic future direction of the Council over the next plan period is a concern.

4.6 The only clue there is on the selection process is a reference to the vision and objectives agreed back in May. There appears to be very little information in this respect and there has been no consultation exercise. Neither is there any reference to how the Sustainability Appraisal might fit in with or influence the site selection process.

5.0 The Representations

5.1 Our comments with reference to individual sections of the report are as follows:-

Introduction (Page 1)

1) The purpose of the Sustainability Appraisal and the local plan process

5.2 The report says that the aim of the SA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising the potential for positive effects. The Council has not indicated the grading, weighting or score approach to be adopted when considering the assessment of significance of impacts. The Parishes would like at least a positive, neutral, negative and unknown approach adopted to discern between impacts with a preference for a further significant positive and significant negative inclusion also.

5.3 In respect of the evidence base the public perception, informed by local news, is that the sites are being proposed by the Council, which is of course not the case. It should be made clear that given the constraints throughout the District, in particular the protection of open countryside, many of the suggested sites will not meet all sustainability requirements, including the Hatfield Garden Community site.

2) The general and District wide themes as a basis for the SA.

5.4 There are 11 themes under which the report makes a reference to the key settlements and arrives at key issues.

Several of the themes relate to wide ranging issues with reference to national legislation and guidelines. The report does not attempt to focus on whether the themes might be relevant to different parts of the District or how they might influence policy evolution or the site selection process. There is no clear direct link between the themes and the categories of the evidence

base on the Council's website. Equally previous plan policies as adopted or withdrawn do not directly correspond with themes.

The Scoping Report does not emphasise the importance of local character and distinctiveness and how this might be assessed. It cannot rely on Neighbourhood Plans as very few are currently in place and the evidence studies conducted to date cannot be relied upon to provide a wholistic settlement appraisal. For this reason the USAG is encouraging a Settlement Analysis be undertaken with active engagement of the Parishes.

5.5 It will be critical for sustainability to be considered down to a neighbourhood level. Most people's daily lives revolve around their neighbourhood. A neighbourhood's sustainability reflects both individual behaviour, such as walking and cycling, and the built environment that links people together locally and with the wider region. Improving sustainability at a neighbourhood level contributes to more sustainable environments on a wider scale. Getting neighbourhoods right is therefore important both for the people who live in them and the resources they consume.

It is not clear how the officers will be arriving at draft policies and preferred locations. There are only vague references at the moment to "a vision and objectives". There is a clear danger of pressure and influence from developers and landowners.

5.6 Ultimately the aim of a sustainability appraisal should be to help choose the right policy approach and spatial strategy and narrow down the most suitable and sustainable locations for new housing development. Critical to this assessment is to understand distinct local needs and sustainability, rather than what are more vague or general visions and objectives.

5.7 The focus must be on local needs and the natural environment. The scoping report largely adopts a global approach to the District without assessing local characteristics and the sustainability or otherwise of existing settlements and their surroundings. A more focused approach will be needed in consultation with local people. The Four Parishes would welcome further engagement.

5.8 The SA should not ignore the current adopted plan. It is not out of date in terms of its role in protecting open countryside. There are no fundamental contradictions with the NPPF in this respect and it has served the District well since Adoption in 2005.

5.9 Comments in relation to the key issues are provided below;

Communities

Being swallowed up by a new settlement for example, or disproportionate housing provision, could destroy the local character and identity.

5.10 Comments offered in relation to Hatfield Heath are brief and shallow in content, for example in relation to health and well-being that :-

“The settlement contains one healthcare centre and has limited open space provisions. However, footpaths provide residents across the settlement with access to the surrounding countryside.” It is of course surrounded by open Green Belt countryside.

We cannot find any reference to Hatfield Broad Oak or the Hallingburys.

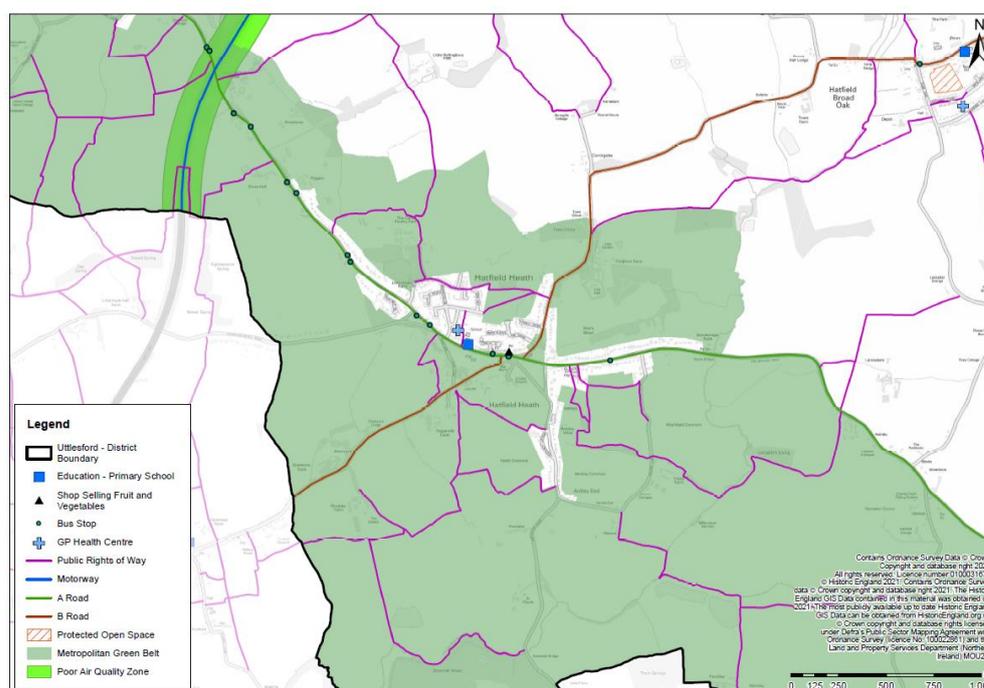
5.11 The Local Plan requires a more in-depth analysis of local identity facilities and character. As previously noted a Settlement Analysis should be undertaken to define local character and community within each settlement/parish, to provide a baseline for assessing the impact of proposal plan options and growth.

5.12 The plan making process must have full regard and fully appreciate the importance of the natural environment on the character of this part of the District. The loss of some 580 ha of open and attractive countryside on the Hatfield Garden Community site, with a lack of infrastructure, inadequate services and inadequate connectivity via minor local access roads, cannot ever come close to being a sustainable option for housing growth.

5.13 The NPPF recognises the benefit of a range of local provisions supporting community needs, including in rural areas. The framework seeks to protect settlement and community identities, including through the protection and retention of Green Belt land. Local Plans should seek to provide an assessment of local services and facilities, their strengths, weaknesses and future community needs, but such infrastructure appraisal should be also undertaken not just at community level, but considering relationships of provision between settlements and across the district..

5.14 The District Council should look more closely at its own process of setting out constraints, which include Green Belt and protected woodland and the well-established Local Plan policies to protect the open countryside throughout the District. **Green Belt protection is a fundamental policy aim that should not be diluted to consideration at a community level only.**

Figure 8: Hatfield Heath is a small sustainable community protected by Green Belt.



Housing

5.15 When considering the range of housing types and tenures relative to needs, the Council should also consider whether private rent should be encouraged through policy, to promote independence amongst those who can not buy but can afford independence from housing lists and to promote social mobility.

5.16 The Council has failed to consider through the scope of the site where the origin of housing need is derived from. Inevitably the predominant driver for new homes will be organic growth within the district, either from expanding populations or changing housing needs such as separation/family division. Where organic growth in housing need arises the demand for homes is commonly close to origin. Family units usually desire to stay close to family and local ties. Growth should be planned with this in mind to retain communities, build on established social ties and sense of place. The SA should consider as an assessment question whether locally derived housing need is met by the option/proposal. Similarly future growth should consider changing household structures, such as children living at home for longer and care of dependant older relatives.

Consideration should also be given on how to identify limits to what growth is acceptable, to avoid developers increasing provision in a piecemeal fashion.

Economy and Employment

5.17 Concern is raised regarding the assessment question 'Facilitate employment growth in attractive locations with good accessibility, particularly by more sustainable modes of transport'. The word ATTRACTIVE is particularly subjective. What is meant here is surely appropriate; being both desirable, for the employee/homeowner and appropriate for the company/employer and at the same time sustainable. Consideration to implementation of Sustainable modes of transport is also required. Transport must be funded and in place prior to not after development.

5.18 It is concerning that the Council has determined within the SA criteria that to support growth and expansion at Stansted is an objective, given the recent Judicial Review filed regarding expansion at the airport this appears contradictory and the Council should consider whether a more appropriate assessment is whether the plan options support activity at the airport and job growth, but being clear this does not necessarily mean expansion or an increase in passengers and flight activity. Growth options must also consider health, environment, air quality and noise impacts of potential sites directly under the CLN departure areas.

Health and Wellbeing

5.19 The Four Parishes welcome the approach taken in respect of health and wellbeing, but consider that public green space also needs careful management. Recent times have highlighted how quickly pressure on our open spaces can erode the quality of these spaces to the detriment of enjoyment and the spaces under pressure. Where access to countryside is being enhanced it should be accompanied by appropriate signage, litter and dog foul provision to manage the increased use promoted. Where this is not possible, enhanced use should be reconsidered. Thus the Council should consider whether enhanced use of open spaces can be adequately supported to mitigate harm to the space arising from intensification of use and this should be incorporated into the SA criteria.

Equality, diversity and social Inclusion

5.20 The Four Parishes would comment that rural areas are by nature more remote from facilities and services. This may be an issue for those not owning a car or on low incomes, meaning rural growth may prove a challenging option when delivering homes that include affordable housing. Larger land allocations in rural settings without adequate access to facilities can lead to isolation with mobility becoming a barrier to accessing basic facilities. Similarly rural areas frequently suffer inadequate footpath provision to service wheelchairs, mobility scooters and prams. Access to daily facilities should be considered as part of social equality and inclusion assessments.

Transport, Air Quality and Noise

5.21 The District Council has included no provision of assessment for lighting impacts. Dependent on the scale of development, light pollution from homes may be considerable, but also increased highway capacity may result in previously unlit streets needing illumination. This can significantly alter the rural landscape at night and the character of rural communities.

5.22 The District Council has also failed to include consideration of flight paths from Stansted. There are associated safety, noise and air pollution issues. Any proposed future expansion plans for the Airport should be included in considerations.

5.23 There is no inclusion for the consideration of waste. Both storage, disposal and transport provision associated with refuse should be considered.

Climate Change

5.24 The SA Scoping Report does not clearly identify, but it is assumed that the District Council will consider not just flood plains but surface water flooding also when considering new development and will consider any potential allocations cumulatively not just in isolation.

Land and Water Resources

5.25 No comments to make

Landscape

5.26 There should be a reference to the constraints identified previously by the Planning Authority, including landscape studies, within which there are particular references to the character and importance of the countryside surrounding Hatfield Heath, Hatfield Broad Oak and the Hallingburys.

5.27 There should be a more detailed summary provided in para 10.18 of the SA that improves the description of the smaller settlements on the edge of Bishops Stortford. Contrary to what is stated in para 10.18 in the SASR the area around the Hallingburys in the south is rural, as it is surrounded by Green Belt and is relatively peaceful when compared to the edge of Bishops Stortford. Little Hallingbury along with Great Hallingbury both have ancient churches and Little Hallingbury also has a mill. There are strong country-side connections here.

Historic Environment

5.28 Consideration of the historic evolution and character of the village/settlement should be included.

Biodiversity and Geodiversity

5.29 Biodiversity net gains should be required and deliverable on site. A greater emphasis on the protection and enhancement of wildlife corridors is required, with an emphasis on linking key habitats such as the Hatfield Forest.

6.0 Conclusion

6.1 Before putting forward representations we have read carefully through the document and considered its relevance to the local plan process and how its conclusions might relate to the area covered by the four Parish Councils. We make no apologies for concentrating on how sustainability objectives should be tackled at the local neighbourhood level.

6.2 We have also considered how a Sustainability Appraisal might have a useful role in moving forward sustainable options for the location for new housing. We have however questioned how it fits in with the “Call for Sites” exercise and also in respect of the work currently being carried out in respect of an overall housing strategy. The lack of clarity on process directly reflects the absence of meaningful engagement at a Parish and community level. It is very much hoped that the Council will seek to improve this moving forward.

6.3 It is important that local people have a say in the process in accordance with government requirements. We have seen that developers are investing in the promotion sites for over 7000 houses, far in excess of locally derived requirements in the USAG area. There is a real danger that decisions are being made without proper consultation or without an established and transparent appraisal process. Sustainability criteria need to be clearly identified to form the basis of an objective appraisal regime. For example, there is no mention of safeguarding related to Stansted Airport, a clear determinant that would prevent development effectively at the end of the runway, immediately under departure routes. It is clear that the Hatfield Village Community falls foul of every sustainability measure currently in place.

6.4 The Parish Councils are not opposed to carefully controlled growth and accept that provision must be made for new housing. They do however want to see a logical and transparent process. They also ask that it does not become a top-down process without adequate research or consultation at the local level.

7.0 Recommendations and Actions

7.1 We accept that a local plan must be put in place and that the District Council need to work to a realistic timetable. Careful thought is however required to ensure that the process responds to both local needs and Government guidance. The new NPPF has reinforced the need for sustainable development. Our recommendations and actions in respect of the local plan process are as follows:-

- Increased local engagement beyond the mandatory minimum, accompanied by clear explanation of the process undertaken and the role in the wider plan making progress.
- There needs to be a more rigid link between the Sustainability Assessment criteria and the site assessment process. Currently it could appear the development and approval of the Sustainability Appraisal might not be complete prior to the further consideration of sites. This of course must not happen.
- The Sustainability Appraisal requires more focused research into the character of each village as a baseline, looking at landscape setting, individual character and identity, and local infrastructure. Such a settlement analysis would be of significant interest to Parish Councils. This process may include how settlements have historically evolved to conserve character.
- Also in line with Government advice the Council should be working closely with neighbourhood and parish planning groups to properly appraise suggested locations for housing. The local plan process must allow sufficient time for meaningful consultation at the neighbourhood level. The Parish Councils would welcome engagement groups to assist in assessing site merits.
- Green Belt objectives should not be diluted into community issues only as Green Belt has fundamental objectives as enshrined in the NPPF.

- The environmental objective in the new NPPF is now to protect and enhance biodiversity, whereas before the requirement was simply to contribute to these matters. The plan must therefore demonstrate that housing growth will not be at the expense of biodiversity.
- It is important to be clear that the sites as put forward through the call of sites exercise are no more than suggestions at this stage. All site suggestions must be subject to rigorous sustainability testing.
- The origin of housing need should be considered to avoid fragmenting communities.
- The impacts of light pollution should be considered.
- Management of open space access should also be considered alongside promotion as increased pressure on open spaces can erode their quality.
- Impacts on fluvial and surface water flooding should be considered alongside cumulative impacts when considering plan options.
- Accessibility in respect of facilities and social mobility and footpath provision for those with wheelchairs/scooters and pushchairs should be considered.
- Refuse and waste management, storage and transportation should be considered within the SA.

7.2 Finally, given the absence of clear headings and categories throughout the Scoping Report, it is recommended that headings/subheadings throughout the SA are used including the following list (that is not intended to be exhaustive but instead used to complement the themes identified by the Council in the Scoping Report) This would ensure proposals and options are consistently assessed, the methods used are transparent and that all participants or readers can identify where issues were considered.

Green Belt

Whether any of the key purposes of the Green Belt as identified in the NPPF are undermined by the proposals

Core Infrastructure

Highways and roads capacity and key remediation cost implications

Public transport capacity and remediation cost implications

Transport

Local and regional train capacity

Local bus capacity, routes etc.

Delays to local public transport caused by route changes to accommodate developments

Additional public transport hubs/servicing requirements.

Extra private hire capacity

Highways

Increased road use and capacity

Additional capacity that would need to be created

Planning for 4 cars per household to reflect common family ownership in rural areas

Core service vehicles

Delivery/private services (Amazon etc)

Medical

Hospital capacity

GP capacity

Emergency services capacity

Health

Not building under flight paths (Stansted NPR's)

Residential issues (parking, neighbours, lighting etc)

Sporting facilities

Safety

Safeguarding impacts of Stansted Airport

Stansted Departure routes

Agriculture

Loss of prime productive agricultural land and associated produce

Loss of carbon receptors

Services

Water capacity and supply

Sewage capacity and supply

Gas capacity and supply

Electricity capacity and supply, inc high power for electric vehicles.

Internet and Telephone capacity and supply

Waste disposal capacity and supply

Policing capacity

Fire and rescue capacity

Social services capacity

Social care capacity

Council services capacity

Environmental

Noise and nuisance

Air quality (aircraft from Stansted)

Air quality (increased private cars and commercial traffic)

Waste treatment

Natural resources capacity and supply (aggregates and materials etc)

Heritage Assets

Biodiversity

Loss of biodiversity

Protected species

Loss of woodlands and habitats

Impact on Hatfield Forest and other protected landscapes

Economic

Local employment capacity and / or generation opportunities

Distant employment

Competing/conflicting economic drivers

Employees from outside the local area

7.3 The USAG are pleased to have the local parish views considered and very much hope for a more active engagement moving forward.

SJK Planning



September 2021