

SLAA Technical Consultation

Site Ref: HatfieldBO 005 MIX

Representations Prepared by:-

Unsustainable Sites Action Group

Consultation response by -

Hatfield Broad Oak Parish Council

INTRODUCTION

USAG as stated in the Terms of Engagement discussed with reps from the parishes

USAG has been formed as a Working Group of the four parishes of Hatfield Broad Oak, Hatfield Heath, Little Hallingbury and Great Hallingbury to consider and respond to a proposed development in the immediate surrounding area of the four parishes referred to in the UDC “Call for Sites” in April 2021.

Specifically, to consider matters relating to a proposed development referred as a result of the UDC “Call for Sites” as “Hatfield Garden Community” (HatfieldBO 005 MIX) and to represent the best interests of the parishes and parishioners.

To recommend action to be considered by individual parishes and assist where appropriate

To appoint specialist consultants as necessary to assist the Group in understanding the appropriate responses in terms of content and timing.

To respond to the UDC Local Plan creation process at the appropriate time.

SUBMISSION

As part of its development of the emerging Local Plan, Uttlesford District Council has contacted Town and Parish Councils inviting comments on its desktop assessment of sites that are potentially available for development. SJK Planning, was commissioned as consultant by USAG, and has contributed expert planning advice to the production of this consultation response document.

APPRECIATIVE

The Parish Councils are grateful that they have been given the opportunity to comment at this stage and hope and trust the Local Plan will be the result of full consultation and cooperation between the District and Parish Councils.

Although an early process in the producing a local plan, the importance of fact checking cannot be underestimated. We are also aware that UDC have been presented with over 300 sites and must find a fair and effective way to begin a narrowing down process. However, we have a genuine concern that site suitability and deliverability should not even at this early stage, rely too heavily on a desk-top exercise. There are significant questions regarding the methodology with several misleading or inaccurate entries on the analysis forms.

CONNECTED COMPONENTS

Uttlesford District Council has explained the links between the site assessments, the SLAA Methodology and the Sustainability Appraisal. USAG has recently put forward representations in respect of the Sustainability Appraisal (Scoping Report). The key issues raised, which still remain, are as follows:-

- 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 partly to allow an updated evidence base. An update has been started but not all reports are yet available.
- The Parishes are genuinely concerned that no clear assessment of existing communities and what creates their individual character and community has been undertaken.
- The Call for Sites process identifies several large sites that would seriously undermine local character and identity across entire Parishes.
- 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, with the possible result that proposals for the local plan structure and identification of development sites will take place before the sustainability assessment criteria and metrics are fully developed.

The genuine concern of the group is that subjective decisions are already in train 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” and the inaccurate technical evaluation, the subject of this response.

With the inaccuracies identified in this report USAG group are concerned about what might be influencing the choice of sites for a draft plan. More work and meaningful consultations are needed at a local level. This will then establish whether the location or scale of development being put forward, can truly pass the sustainability tests.

UTTLESFORD TECHNICAL EVALUATION – DESK STUDY

The purpose of this UDC technical consultation is as follows:-

- a) To review the plotted site boundaries
- b) To fact-check the results from our desktop analysis

The technical consultation is not an opportunity for Town and Parish Councils or Site Promoters to make general comments on the suitability of a site, it is for the facts to be established and ascribed to a site as data to be considered during the selection process.

The methodology essentially involved employing GIS datasets and measuring ('quantitative analysis') how each site option relates to various constraint and opportunity features. The site options appraisal methodology is presented in a table. It sets out the criteria and thresholds as well as the GIS tool used and provides further commentary, as necessary. The table recognizes data limitations.

Whilst appreciating the scale of the task facing Uttlesford District Council, USAG has a genuine concern that site suitability, sustainability and deliverability should not, even at this early stage, rely simply on a remote desk-top exercise. The fact checking exercise does not provide any information additional to the interactive map of the 'Call for sites,' however its classification and rating in this technical exercise has, as is clearly demonstrated here, many inaccuracies or discrepancies.

USAG RESPONSE TO UDC TECHNICAL EVALUATION

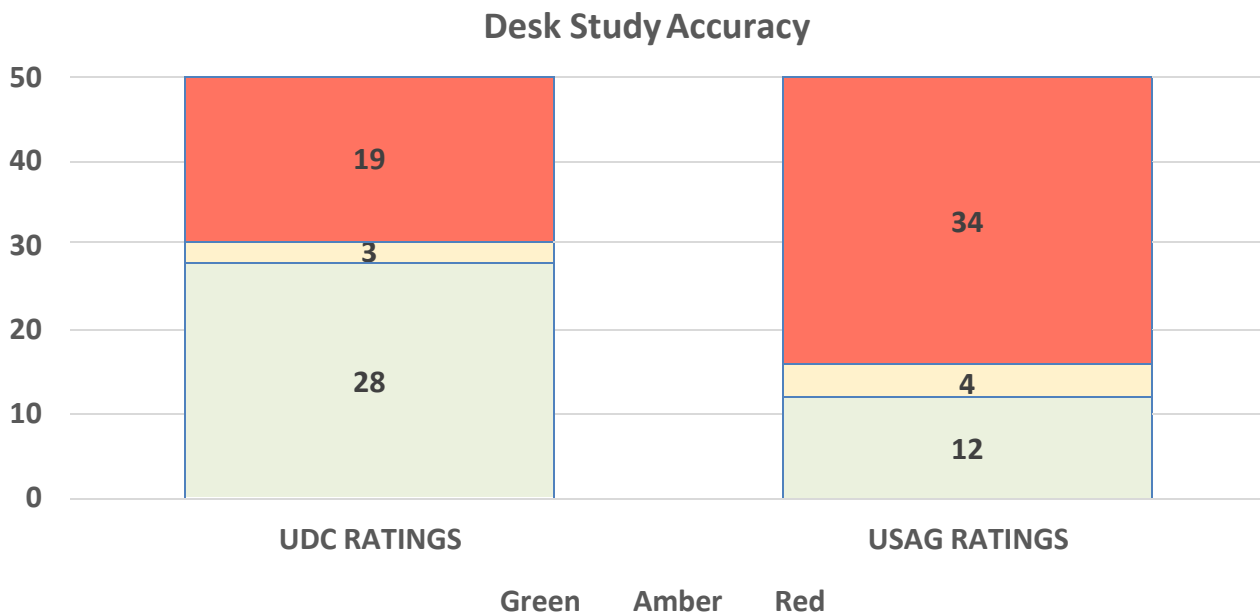
USAG has identified significant flaws in the methodology and many misleading and inaccurate entries on the form for site HatfieldBO 005 MIX.

USAG has identified these inaccuracies in this detailed submission.

Based on our findings, USAG considers the technical assessment produced by UDC has important limitations and cannot provide a realistic assessment of site suitability for a site of this size.

CONCLUSIONS

1. We have reviewed the methodology used and the facts presented in the technical assessment as executed remotely by UDC. This report and response have checked the facts from a local, 'on-the-ground,' perspective using local knowledge and expertise to correct misleading categorizations.
2. We have identified that actually 34, as opposed to the desk study's 19, categories are RED, with only 12, against the study's 28, are GREEN



3. For the site selection process, reference has been made to the vision and objectives agreed by the council in May 2021. Given the importance now attached to this early stage in the process USAG intends to revisit the consultation in this respect. Cabinet have agreed the Local Plan must be 'strategy-led' and not 'developer-led'." USAG will formulate a joint council response.
4. There is a considerable danger that decisions could or are being made without proper consultation or without an established and transparent appraisal and rating process and metric. Sustainability criteria need to be clearly identified to form the basis of an objective appraisal regime.
5. USAG has also identified several additional 'factual' criteria that should have been included in the desktop assessment. These include Access roads, lighting, pavements, width, safety, safe cycling and walking routes, provision of drinking water and other services such as sewage, surface water, electricity (houses and cars), gas, broadband, health, fire service and police provision, local amenity such as parking at local centres and transport connections, safeguarding relating to Stansted Airport, etc.
6. A proper evaluation of noise and aircraft disturbance has not been undertaken. The criterion for the onset of significant noise disturbance has been reducing over time, from 57db to 54db to 51db to the WHO recommendations of 40db. Bearing in mind the timescale for the Hatfield Garden Community it is anticipated that disturbance and annoyance criteria as well as health impacts, will ever more feature in development planning.

It is clear the Hatfield Garden Community fails to be sustainable on this extremely important criterion alone, let alone the other disadvantages identified in the assessment of Uttlesford District Council's desk study. Such deficiencies to health, wellbeing and peaceable enjoyment would be relevant to **any** development, of whatever scale, within this site.

- 7 The Government attaches great importance to sustainability at the local level, identifying the three strands as follows:-

economic objective – to help build a strong, responsive and competitive economy.

social objective – to support strong, vibrant and healthy communities.

environmental objective – to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimizing waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy

8. It is important to ensure that the environmental objective is not overlooked. The value of a community that depends on historic villages in countryside settings, is difficult to quantify in numbers. There is widespread recognition that such neighbourhoods should not be swallowed up and destroyed by poor planning decisions. Such considerations may be less tangible than say accessibility figures for schools and public transport uses, but no less important.
9. The parish councils are not opposed to carefully controlled growth and accept that provision must be made for new housing within the district, however they do want to see a logical, factually correct and transparent process. USAG maintains it should not be a top-down process without adequate research or consultation at the local level, where the expertise of requirements, need and sustainability reside.

RECOMMENDATIONS

1. The overall study should be revisited using expertise at the local level. This consultation response by USAG for the Hatfield Garden Community site provides a foundation for such a re-assessment.
2. The technical appraisal, once amended for the inaccuracies identified here, is a starting point for development evaluation of the site, it is certainly not the complete picture as it omits key sustainability criteria. These key criteria should be included and USAG has identified these additional criteria.

3. An updated technical appraisal can, and should, be used to demonstrate the 'gap' between the development ideal and the actual attributes of the site. By any analysis, the Hatfield Garden Community site is the wrong site, with too many negatives that would affect its future residents.
4. It is recognized that as the site is so large that accurate TRACC analysis is difficult to achieve.

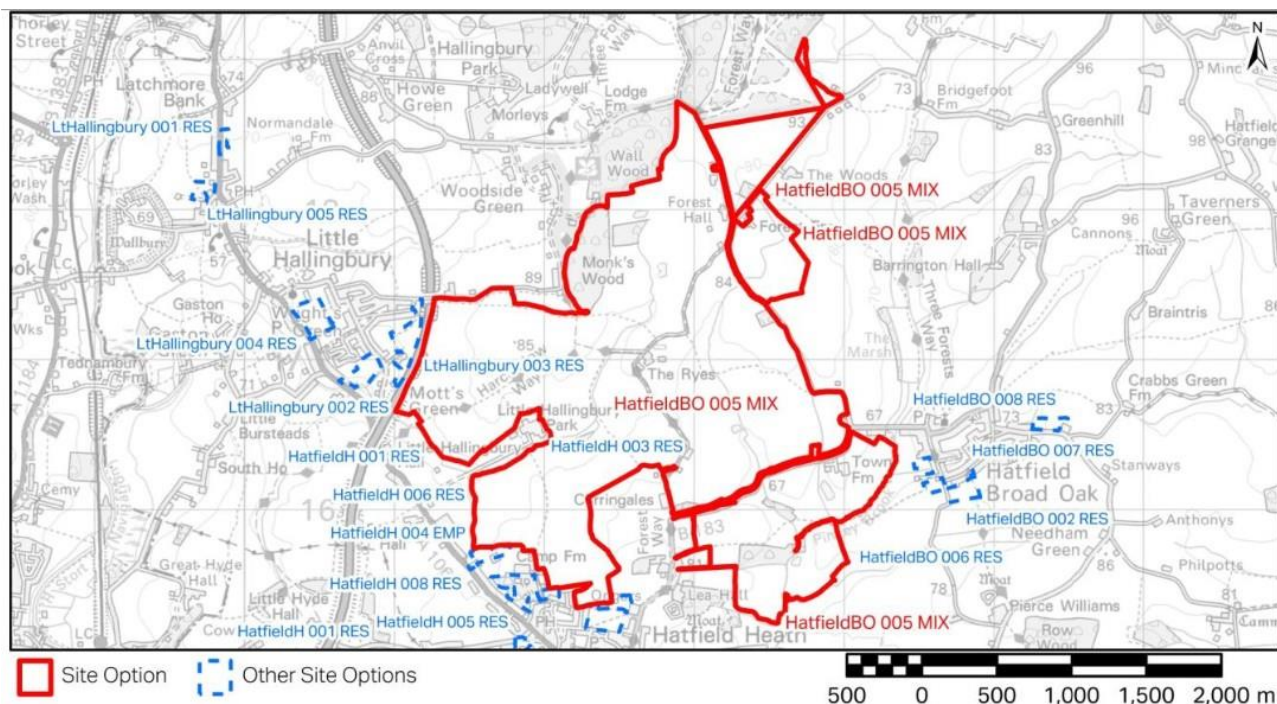
USAG DETAILED RESPONSE TO UDC TECHNICAL EVALUATION

HatfieldBO 005 MIX

Land at the Forest, Hatfield Broad Oak – CM22 7BT

Parish: Great Hallingbury CP, Hatfield Broad Oak CP, Source: Call for Sites

Area (Ha): 580.71 Hatfield Heath CP, Little Hallingbury CP



Accessibility				
Ref	UDC Assessment		USAG Factual Assessment	
1	Primary school (walking)	10 mins	Actual distances to primary schools in HBO, HH and LH are 20-30 mins	
2	Secondary school (walking)	60 mins	No secondary schools are walkable - correct	
3	Secondary school (cycling)	20 mins	Incorrect RAG (amber minimum) but correct times are 31-40 mins	
4	Secondary school (public transport)	30 mins	Incorrect RAG (amber minimum). The Uttlesford Accessibility analysis map shows that the majority of journeys would take 60 mins.	
5	Sixth form (public transport)	30 mins	Incorrect RAG (amber minimum) but journeys by public bus would in any case be in excess of 60 mins.	
6	GP and health centre (walking)	10 mins	Existing GP surgeries at Hatfield Broad Oak and Hatfield Heath would be 30 minutes or more from the residential areas of the proposed Garden Community development.	
7	Hospital (public transport)	30 mins	The Uttlesford Accessibility analysis map shows the hospital public transport to be either 50 or 60 mins plus for Herts and Essex or Princess Alexandra hospitals,	
8	Retailers that sell fruit & vegetables (walking)	10 mins	The single shop in Hatfield Heath is in excess of a 30-minute walk. The accessibility map does not show HBO as having a compatible shop.	
9	Local centres (walking)	10 mins	The centres of Hatfield Broad Oak and Hatfield Heath are in excess of 30-minute walk. Both fail to meet the definition of a 'local centre.'	

Accessibility				
10	Local centres (cycling)	10 mins	Incorrect RAG (amber minimum). The local centres of Hatfield Heath and Hatfield Broad Oak failed to meet the definition of a local centre. The cycling times vary from 10 to 30 mins according to where you start on the garden community site. 40% approx. being within 10 mins and 60% approx. 20 min to 30 mins. The average would be 20 mins plus.	
11	Employment centres (cycling)	20 mins	Incorrect RAG (Amber minimum). Employment centres on Uttlesford Accessibility map are in excess of 30 minutes from the garden community site	
12	Employment centres (public transport)	20 mins	Average time to nearest employment centres would be 25 minutes, i.e. just within the green RAG category.	
13	Bus network - 1 service per hour (walking)	5 mins	Incorrect RAG (amber minimum). Bus stops would be 20-minute walk minimum from the garden community centre.	
14	Bus network - 4 services per hour (walking)	40 mins	The bus stops are all in excess of a 40 min walk	
15	Railway station (walking)	50 mins	The two railway stations are in excess of 50 minutes walking distance.	
16	Railway station (cycling)	20 mins	Incorrect RAG (amber minimum). Actual journey times 30 minutes minimum.	
17	Railway station (public transport)	30 mins	Journey times would be 30 minutes plus actual	
Communities				
Ref	UDC Assessment		USAG Factual Assessment	
18	Green Belt	Intersects 9.2% of site	Green belt intersects the site, and the site is agricultural land and hence should have been protected as green belt	
19	Settlement Development Limits	<1% intersects	Site is outside villages development limits	
Health and Wellbeing				
Ref	UDC Assessment		USAG Factual Assessment	
20	Deprivation	Not classified as deprived (4 th Q)	Not classified as deprived (4 th Q)	
21	Stansted Airport Public Safety Zone	Does not intersect	Does not intersect, however is close.	
Transport, Air Quality and Noise.				
Ref	UDC Assessment		USAG Factual Assessment	
22	Air Quality Management Area (AQMA)	18.51 km	The Uttlesford Air Quality Action Plan includes reference to elevated levels of air pollution associated with the M11 and Stansted Airport	
23	Poor Air Quality Zone	0 m	Adjacent to Poor Air Quality Zones of M11 and Stansted Airport	
24	Noise Contours	Outside Noise Contours	The whole of the site is under the departure flight paths and most of the residential area is within the 54 dbA contour which defines the onset of significant disturbance. The site is also almost entirely within the 48dbA contour for night movements	
Climate Change and Adaptation.				
Ref	UDC Assessment		USAG Factual Assessment	
25	Fluvial Flood Risk	<50% intersects with flood risk zone 2 or 3	<50% intersects with flood risk zone 2 or 3	
Land and Water Resources.				
Ref	UDC Assessment		USAG Factual Assessment	
26	Agricultural Land Classification	Grade 1 to 3	All valuable grades 1 to 3 agricultural land	
27	Minerals and Waste Consultation Area	Does not intersect	Does not intersect	
28	Groundwater Source Protection Zones	Not within a SPZ	Not within SPZ	

Landscape.				
Ref	UDC Assessment		USAG Factual Assessment	
29	Countryside Protection Zone	Does not intersect	Does not intercept	
30	Tree Preservation Order	TPOs on site (12/4/40)	TPO's on site and adjacent Hatfield Forest	
Historic Environment.				
Ref	UDC Assessment		USAG Factual Assessment	
31	Conservation Area	76m HBO	76m HBO	
32	Registered Park or Garden	1.89km (Down Hall)	1.89km (Down Hall). There are however protected landscapes in the parishes.	
33	Local Historic Park or Garden	Intersects or adjacent (Hatfield Forest)	Intersects or adjacent (Hatfield Forest)	
34	Scheduled Monument	Intersects of adjacent (Ryes Moated Site)	Intersects of adjacent (Ryes Moated Site). There is also a scheduled monument in Hatfield Broad Oak.	
35	Listed Building	Intersects or adjacent (Grade II:42-44, Forrest Road, Barns inc. attached granary & cartshed approx. 30m North of Ryes Farmhouse, Ryes Farmhouse, The Forrest, The Round House or Lodge.	Intersects or adjacent (Grade II:42-44, Forrest Road, Barns inc. attached granary & cartshed at approx. 30m North of Ryes Farmhouse, Ryes Farmhouse, The Forrest, The Round House or Lodge.	
36	Archaeological Site	0 m	0 m	
37	Locally Listed Heritage Asset	166m (18/0190/LHL)	166m (18/0190/LHL)	
38	Protected Lanes	Intersects or adjacent (Great Hallingbury Monkswood)	Intersects or adjacent (Great Hallingbury Monkswood)	
39	Proximity to a Historic Landscape	6.1Km (Hazel End)	.1Km (Hazel End)	
Biodiversity and geodiversity.				
Ref	UDC Assessment		USAG Factual Assessment	
40	Essex Coast RAMS Zone of Influence	9.56Km	9.56Km	
41	Site of Special Scientific Interest (SSSI)	Intersects or adjacent Hatfield Forest	Intersects or adjacent Hatfield Forest	
42	SSSI Impact Risk Zones	Within a SSSI Impact Risk Zone for all development	Within a SSSI Impact Risk Zone for all development	
43	Hatfield Forest Zone of Influence	0m	0m	
44	National Nature Reserve	Intersects or adjacent Hatfield Forest	Intersects or adjacent Hatfield Forest	
45	Ancient Woodland	Intersects or adjacent Hatfield Elgin Coppice	Intersects or adjacent Hatfield Elgin Coppice	
46	Local Wildlife Sites	Intersects or adjacent Woodside Green	Intersects or adjacent Woodside Green	
47	Priority habitats	0m		
48	Special verges	224m	224m	
49	Geological sites	8.09Km by the village pump, Ugley Green, near Stansted Mountfitchet	8.09Km by the village pump, Ugley Green, near Stansted Mountfitchet	

Biodiversity and geodiversity.				
50	Important Woodland	Intersects or adjacent 3.01% overlap, Walls Spring.	Intersects or adjacent 3.01% overlap, Walls Spring.	

**It is clear from the factual assessment by USAG that
34 out of 50 RAG suitability criteria are RED!**

ADDITIONAL ASSESSMENT CRITERIA

USAG is of the opinion that the additional criteria identified must also be considered and rated when evaluating the sustainability of any proposed site. These include:-

Access roads, lighting, pavements, width, safety. General infrastructure.

Safe cycling and walking routes.

Provision of drinking water and other services such as sewage, surface water, electricity (houses and cars), gas broadband.

Health provision, including GP, pharmacy, dentist and other health related.

Education and Education Practicality (i.e. ambient noise levels / resources.

Employment draw.

Fire Service provision.

Police Service provision.

Local infrastructure parking (stations etc.) and

transport. Wider infrastructure impacts on neighbouring

districts.

Developing and reducing recognized noise/disturbance and annoyance criteria

Modelling based on future projections, not only current data.

FURTHER CONSIDERATIONS

Secondary Schools

One of the secondary schools (The Bishop's Stortford High School) is relocating in Jan 2023 to a different site further away thus increasing journey times.

There are 7 or 8 secondary school which serve the proposed site, it is not reasonable to calculate distance based on the nearest school; parents and children choose their school and are able to go to whichever they prefer if they meet the criteria and there is a place available.

+Safe Cycling and Walking routes.

We note from the UDC Technical note that: 'Whilst catchments outline potential reachable extents, they do not necessarily reflect that there is a safe walking or cycling route at present. Mitigation measures may be required in some locations in order to achieve the level of accessibility shown via a safe route.'

Safe cycling and walking routes are key to sustainable methods of travel. It is essential that this aspect is taken account of. If the Proformas do not currently take this into account, it is questioned when and where this will be done? Walking to school along routes without pavement and street lighting is not a realistic or safe option.

Only with safe, direct, high quality cycle routes and networks, especially segregated cycle paths will journeys be made by bike. All-weather, secure bicycle storage would also be required. Safe, traffic free, lit, dedicated cycle routes are necessary to encourage cycling. All the cycling distances are a theoretical rather than a practical option for the majority as no such facilities exist outside of the proposed development site, if even on the site.

Road Safety

The A1060 linking Hatfield Heath to Bishops Stortford is known as an area with a high incidence of speeding vehicles; the 30-mph speed limit though the villages are disregarded by many, and speed checks have confirmed this to be a significant problem. The road is the site of many accidents, photos and records of these have been provided to Essex CC Highways as evidence, alongside requests for speed calming measures.

Sewerage

It has been demonstrated that there are a substantial number of overflows into the brook in Little Hallingbury which connects to the River Stort; one of only 200 chalk streams in the world. The discharges which have been reported in Little Hallingbury feed directly into the River Stort. The streams drain part of the area proposed for garden community site. The following is an extract from an article in Bishops Stortford Independent 27th Oct 2021.

'According to the Rivers Trust, a sewer storm overflow at Hallingbury Road spilled nine times in 2020 for a total of 41 hours. In Stansted, an overflow triggered 39 times for 305 hours. At Little Hallingbury, a storm sewer discharged 59 times for 876 hours while at Takeley the total was 1,062 hours on 74 occasions. At Much Hadham, 31 breaches resulted in 201 hours of discharge.'

<https://www.bishopsstortfordindependent.co.uk/news/stortford-mp-defends-her-vote-on-allowing-raw-sewage-in-rive-9222735/>

A recent review of the Government's Environment Bill introduced a new amendment to put on a legal footing the expectation of water companies to take steps to significantly reduce storm overflows.

Any new development at the garden community site will add additional wastewater to an already overstretched sewerage system. The land is currently arable and will assist in absorbing storm water; building on these 580 hectares will reduce the ability of that land to do so.

Accessibility

Public transport.

The timetable for the local bus route no 5 has been revised as at 3rd Nov 2021 due to driver shortage and will be reviewed again in Jan 2022. There are now fewer than one bus an hour. In addition, this route does not go direct to Bishops Stortford station or a secondary school for the majority of the day, as it diverts via the H&E Hospital.

There is no direct bus route to Sawbridgeworth station.

The stated journey times are theoretical and based on a full and regular service with increased frequency.

DETAILED ANALYSIS OF ASSESSMENT CRITERIA AND OUTCOMES

Each assessment criterion has been numerically referenced in the UDC table above. The following narrative explains the updated and more factually correct assessments detailed in the additional columns above.

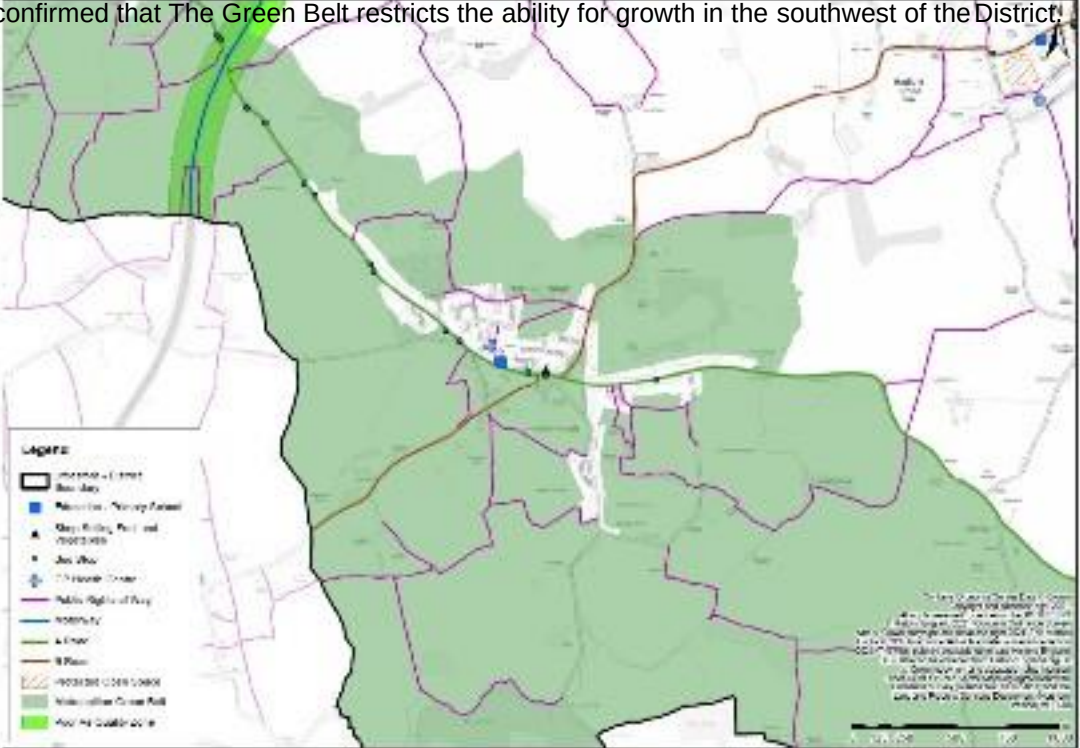
However, it should be noted that much of the TRACC analysis is inappropriate as the planned infra-structure is not there to check. Walking times will vary enormously

Ref	Accessibility
	Firstly, the RAG table has incorrectly colour rated the criteria even using UDC's own appraisal methodology. Therefore, certain RAG Ratings are incorrect even before a factual assessment. Secondly, the distances to schools are calculated on the basis of the nearest, rather than the first available. Schools in Hatfield Heath are oversubscribed in Uttlesford, other schools are outside the district. Distances also appear to be calculated from the closest boundary of the site, rather than either were indicated on the developer's masterplan or the centre of the proposed development. On this basis all distances and times are artificial. Public transport is unreliable and currently is closer to one every two hours on the B183. The bus service ends about 8:30 pm and yet the airport has a slew of night workers that need transport after this time, so it means that the zero-carbon objective is not achievable. The bus route for no 5 does not run on a Sunday. There is no direct bus to Sawbridgeworth Station. The train station at Sawbridgeworth is hence unsuitable, together with insufficient car parking capacity. The Harlow Gilston Village may induce increased pressure on Sawbridgeworth station It is questionable whether Bishops Stortford Station has sufficient parking to also accommodate the new communities North of Bishop's Stortford. USAG considers these additional factors have not been included in the analysis criteria. The Uttlesford Accessibility analysis has been used to calculate the factual distances / times and these have been used in the RAG table.
1	Primary school (walking)
	The Uttlesford Accessibility analysis map shows all primary schools in LH, HH, HBO currently in existence to be either a 20 min or 30m min walk. THIS BOX SHOULD BE RED NOT GREEN
2	Secondary school (walking)
	No Secondary schools shown on the map are walkable. RED BOX CORRECT 60 mins plus.

3	Secondary school (cycling)
	The Uttlesford Accessibility analysis map shows cycling to secondary schools to be a 30- or 40-mins ride. THIS BOX SHOULD BE RED NOT GREEN. It should be clearly noted that all and any cycling to existing secondary schools would be on unsafe, unlit country lanes or roads. There are no cycle paths and would be undertaken in the dark during the winter evenings. Journeys by bicycle are not safe for children. The infrastructure does not exist and would not exist outside even any proposals by the developer, to facilitate cycling to schools.
4	Secondary school (public transport)
	There are no direct public buses services to the secondary schools, consequently, journey by public bus would take longer than the ECC service. The Uttlesford Accessibility analysis map shows that the majority of journeys would take 60 mins. THIS BOX SHOULD BE RED NOT GREEN.
5	Sixth form (public transport)
	Sixth forms are based at the same 8 secondary schools. Journeys by public bus would be in excess of 60 mins. THIS BOX SHOULD BE RED NOT GREEN.
6	GP and health centre (walking)
	There are GP surgeries at Hatfield Broad Oak and Hatfield Heath. The Uttlesford Accessibility analysis map shows these to be 30mins or more walk from the site and even the residential areas of the proposed Garden Community. There are no pavements from Hatfield Broad Oak and certain parts of Hatfield Heath and walking would be dangerous and impractical. THIS BOX SHOULD BE RED NOT GREEN.
7	Hospital (public transport)
	There are two hospitals nearest to the proposed site, Herts and Essex and Harlow Princess Alexandra. To travel by public transport from the garden community to Harlow hospital involves changing bus at Hatfield Heath, adding more time to the journey. This hospital is the more used of the two. The Uttlesford Accessibility analysis map shows the hospital public transport to be either 50 or 60 mins plus from the 'Land at the Forest' site. THIS BOX SHOULD BE RED NOT GREEN.
8	Retailers that sell fruit & vegetables (walking)
	The single shop Hatfield Heath (Co-Op) is in excess of a 30-minute walk. However, the UDC Technical note states:

	<i>A dataset comprising 'Local Centres' was also defined. The definition was agreed by the working group as a location with both a Post Office and retailer selling fruit and vegetables within its store.</i> There is no Post office at Hatfield Heath and consequently this should not be classed a 'Local Centre' according to the agreed definition. Hatfield Broad Oak does have a Post Office, but the Uttlesford Accessibility analysis map does not show Hatfield Broad Oak as 'a centre selling fruit and veg;' which should also exclude Hatfield Broad Oak from being classed as a 'Local Centre' according to the agreed definition. There are no pavements from Hatfield Broad Oak and certain parts of Hatfield Heath and walking would be dangerous and impractical. THIS BOX SHOULD BE RED NOT GREEN.
9	Local centres (walking)
	The local centres are at Hatfield Heath and Hatfield Broad Oak. The majority of the garden community site is shown on the map as in excess of a 30 min walk. There are no pavements from Hatfield Broad Oak and certain parts of Hatfield Heath and walking would be dangerous and impractical. In addition, Hatfield Heath does not have a Post Office and hence does not fit the definition. THIS BOX SHOULD BE RED NOT GREEN.
10	Local centres (cycling)
	The villages centres (although not 'Local Centres' according to the definition) are at Hatfield Heath and Hatfield Broad Oak. The cycling times vary from 10 to 30 mins according to where you start on the 'Land at the Forest' site. 40% approx. being within 10 mins and 60% approx. 20 min to 30 mins. The average would be 20 mins plus. In addition, Hatfield Heath does not have a Post Office and hence does not fit the definition. By strict definition, the nearest local centres are Sawbridgeworth or Bishop's Stortford, which are in excess of 30 minutes. THIS BOX SHOULD BE RED NOT GREEN.
11	Employment centres (cycling)
	All employment centres at Bishops Stortford, Takeley, Stansted Airport, Start Hill are shown on the Uttlesford Accessibility analysis map as being in excess of 30 mins cycle from the 'Land at the Forest' site. It should be clearly noted that all and any cycling to existing employment centres would be on unsafe, unlit country lanes or roads. There are no cycle paths and would be undertaken in the dark during the winter evenings. Journeys by bicycle can be dangerous and it would be irresponsible to base analysis on unsafe conditions. THIS BOX SHOULD BE RED NOT GREEN.

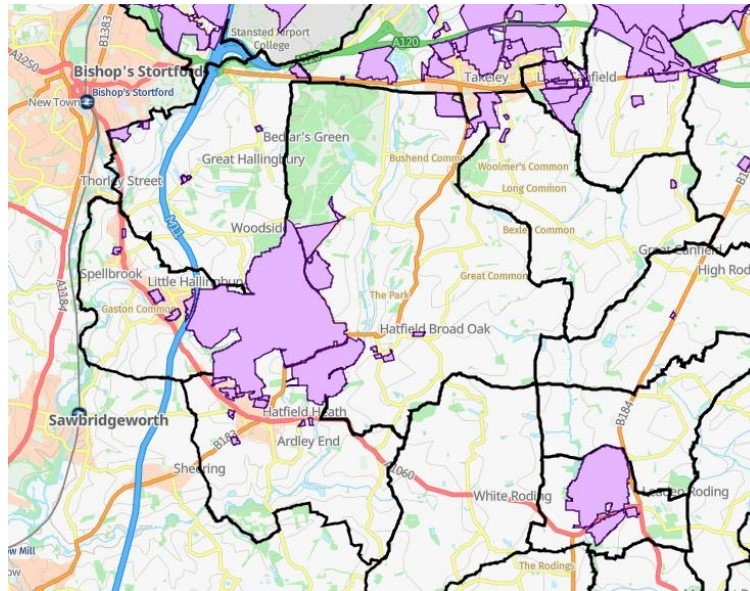
12	Employment centres (public transport)
	The employment centres on the Uttlesford Accessibility analysis map at Bishops Stortford, Takeley, Stansted Airport and Start Hill are shown as being between 30, 40 or 50 mins from the garden community site. A generous assessment would place the journey time as 'at least 25 minutes' THIS BOX SHOULD BE AMBER OR RED NOT GREEN.
13	Bus network - 1 service per hour (walking)
	The area is served by one route no 5 operated by Stephenson's. This route is subject to cancellations due to lack of drivers, and we are advised that the timetable is under review and may be reduced from the current one bus per hour. Most bus stops are in excess of 40 mins walk as shown on the Uttlesford Accessibility analysis, however, would be a minimum of 20 minutes from the garden community site. THIS BOX SHOULD BE RED NOT GREEN
14	Bus network - 4 services per hour (walking)
	The Uttlesford Accessibility analysis map shows this relates to buses which stop on the Stortford to Sawbridgeworth/Harlow Road. The bus stops are all in excess of a 40 min walk with some nearing 60 minutes. THIS BOX SHOULD BE RED NOT GREEN.
15	Railway station (walking)
	There are two stations, Sawbridgeworth and Bishops Stortford. Most people use Bishops Stortford station due to there being more frequent trains, better parking and drop off facilities. Both stations are too far to walk, and the routes are unlit and do not have pavements for much of the way. The Uttlesford Accessibility analysis shows the distance to be in excess of 60 mins. THIS BOX SHOULD BE RED NOT GREEN.
16	Railway station (cycling)
	The Uttlesford Accessibility analysis shows the cycling distance to be in excess of either 30 or 40 mins. Commuting to work by bicycle is difficult as there are significant hills to negotiate along the route to Bishop's Stortford and Sawbridgeworth. Only with safe, direct, high quality cycle routes and networks, especially segregated paths, would journeys be made by bicycle. All-weather, secure bicycle storage would also be required. Safe, traffic free, lit, dedicated cycle routes are necessary to encourage cycling. THIS BOX SHOULD BE RED NOT GREEN.

17	Railway station (public transport)
	There is no direct bus service to Sawbridgeworth station. Buses are rarely used by commuters to Bishops Stortford due to their infrequency. The Uttlesford Accessibility analysis map shows the journey time by public transport as in excess of 50 mins, with an actual minimum of 30 minutes plus. THIS BOX SHOULD BE RED NOT GREEN
Ref	Communities.
18	Green Belt
	9.2% of the site is stated as being within Green Belt. All the land on the site's Southwestern boundary is also Green Belt. The Green Belt was established to provide protection from urbanization from nearby towns by keeping the land permanently open. The proposed site being agricultural did not require the Green Belt to be extended beyond the area surrounding the villages of Little Hallingbury and Hatfield Heath. However, given the development proposal which has been submitted, this Green Belt boundary should have been extended. Any large development against this Green Belt boundary would be detrimental and negate the benefit of the existing Green belt. The figure of 9.2% is misleading. Although a small a proportion of a site extending to 580 Hectares the area of green belt referred to is the only area in the southern part of the District and at the moment protects the small sustainable communities of Hatfield Heath and Little Hallingbury. Any loss of Green Belt should in principle attract a red "negative" scoring. The Sustainability Appraisal has confirmed that The Green Belt restricts the ability for growth in the southwest of the District! 

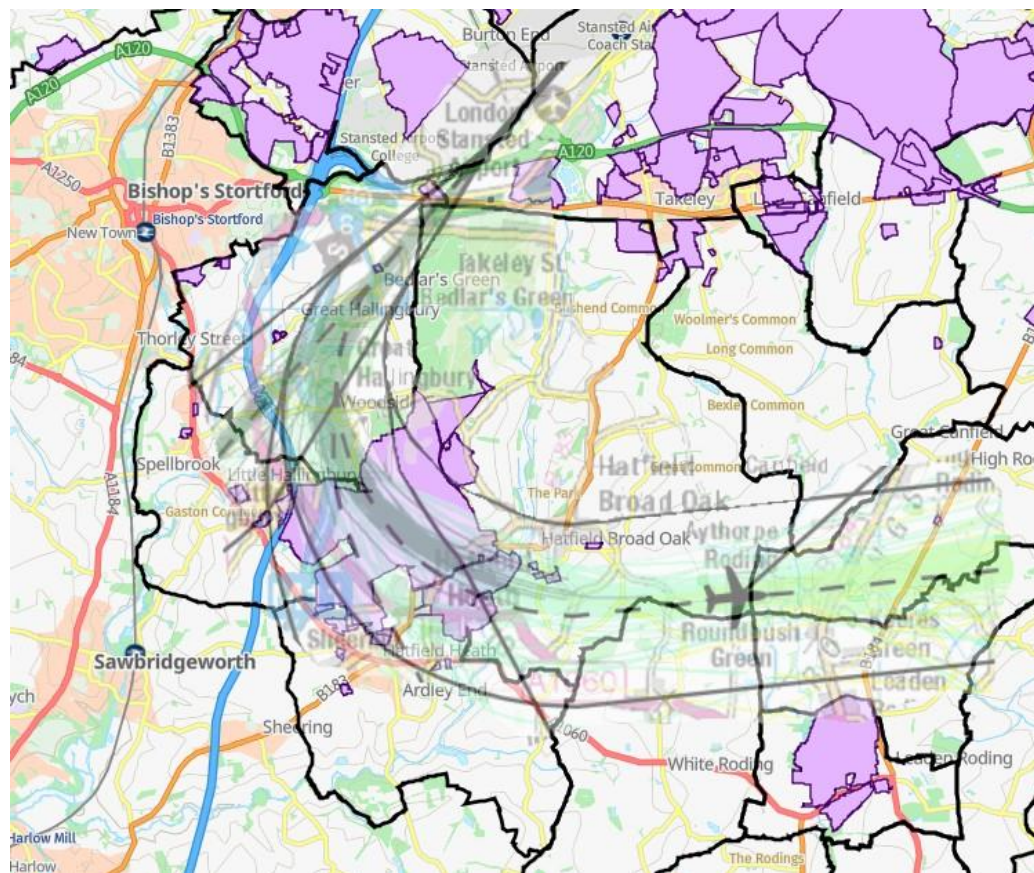
19	Settlement Development Limits
	The Proforma appraisal states 'Within development limits (< 1% intersects)'. Looking at the settlement limits in the Uttlesford District Local Plan 2005, the last approved Local Plan, the development boundaries for the villages surrounding the site are marked in black. The site is outside the village development limits shown on this map. Over 99% (some 575 HA) is open land not within a settlement boundary. https://www.uttlesford.gov.uk/media/1046/Uttlesford-Local-Plan-2005-inset-maps/pdf/local-plan-2005-inset-maps-colour.pdf?m=637570352841730000 The key to the map is given below https://www.uttlesford.gov.uk/media/6748/Uttlesford-Local-Plan-2005-inset-maps-proposals-key/pdf/Proposals_key.pdf?m=637570342185230000 THIS BOX SHOULD BE RED NOT GREEN
Ref	Health and Wellbeing.
20	Deprivation
	No comment
21	Stansted Airport Public Safety Zone
Ref	Transport, Air Quality and Noise.
22	Air Quality Management Area (AQMA)
	Uttlesford acknowledges that the principal sources of air pollution are transport related with nitrogen dioxide (NO₂) and fine particles (known as PM₁₀). The Council has been monitoring levels of air quality for over 20 years, with pollution levels being high close to the motorway (M11) and airport (Stansted). Uttlesford only has an action plan for air quality for the Saffron Walden area although the action plan also mentions monitoring throughout the district, specifically levels of NO₂, fine particulates (pm 10 and pm 2.5), ozone close to the National Trust Hatfield Forest, and hydrocarbons close to Stansted Airport. Particulate matter (pm) is fractioned into pm₁₀ which includes all particles smaller than 10 microns (including pm 2.5) and pm 2.5 comprising all particles smaller than 2.5 microns (1 micron is 1000th of a millimetre). The action plan states Saffron Walden town centre has consistently shown the highest levels of air pollutants, along with areas close to the M11, where residential exposure is not (at the time of the report) present. However, the garden community site is immediately adjacent to the M11, a noted source of air pollution, as well as under the departure routes for Stansted Airport. As a rural area, car ownership and use within Uttlesford is high. Fewer households in Uttlesford do not own a vehicle than any other Essex district, and more households own 2, 3, or 4 than any other Essex district. The projected vehicle ownership and use associated with the proposed garden community would cause a further deterioration in air quality, principally because rural journeys are usually of short duration from cold due to the lack of local infrastructure. THIS BOX SHOULD BE AMBER AT LEAST

23	Poor Air Quality Zone
	The UDC report highlights the site as being in a Poor Air Quality Zone. THIS BOX IS RED
24	Noise Contours
	Firstly, it must be said that the RAG rules relate to outdated noise contour levels. The 57dba contour has been superseded by a lower level of 54 dB LAeq for SOAEL (Significant Observed Adverse Effect Level). In 2014, the DoT commissioned a research paper Survey of Noise Attitudes ('SoNA'), designed to investigate attitudes towards aviation noise and how these have changed over time. This was published in February 2017 and builds on the levels outlined in the Department for Environment, Food and Rural Affairs ('Defra') Noise Policy Statement for England ('NPSE') It says: "significant community annoyance previously observed around 57 dB LAeq is now observed from 54 dB LAeq. This finding is supported by another study by Defra which suggests a LOAEL for aviation lies in the range of 50-54 dB LAeq, well below the current 57 dB measure of the onset of significant community annoyance The DfT Impact Assessment ('IA') for Assessing Aviation Noise Impacts states that the intention is to set 51dB LAeq for daytime and 45dB LAeq for nighttime as the LOAEL (Lowest Observed Adverse Effect Level) threshold. For night noise, the World Health Organization ('WHO') recommends that "considering the scientific evidence on the thresholds of night noise exposure indicated by Lnight as defined in the Environmental Noise Directive (2002/49/EC) ('END'), an Lnight of 40dB should be the target of the night noise guideline ('NNG') to protect the public, including the most vulnerable groups such as children, the chronically ill and the elderly". Indeed, locations of schools and areas of vulnerability should not be located in area of the Hatfield Garden Community Site. Reference can also be made to the standard for building regulations for schools known as BB93 Acoustic Design of Schools – performance standards. https://www.gov.uk/government/publications/bb93-acoustic-design-of-schools-performance-standards The Government's Aviation Policy Framework ('APF') dated March 2013 states: <i>"The Government recognizes that noise is the primary concern of local communities near airports, and we take its impact seriously. As a general principle, the Government therefore expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. This means that the industry must continue to reduce and mitigate noise as airport capacity grows."</i> Since the March 2013 APF, government policy on aviation noise has been undergoing emerging changes both for Airspace Policy and Aviation Strategy leading to a revised Aviation Policy Framework. Changes are, inter alia, designed to increase community protection against aviation noise harms. Included are 'lower threshold levels for the onset of community annoyance together with health and quality of life impacts. The Government admitted "...recent evidence suggests people are becoming more sensitive to noise at lower levels and that the number of flights overhead can be a more significant factor than the average noise level. Consequently, the average noise metric is increasingly outdated as the true measure of aircraft noise disturbance. It is being supplemented by 'number above' metrics which provide contours for total numbers of aircraft noise events that exceed a range of maximum noise levels. This is a much better assessment of what people actually hear. All of European departures on Stansted's Runway 22 would produce noise events for the garden community site.

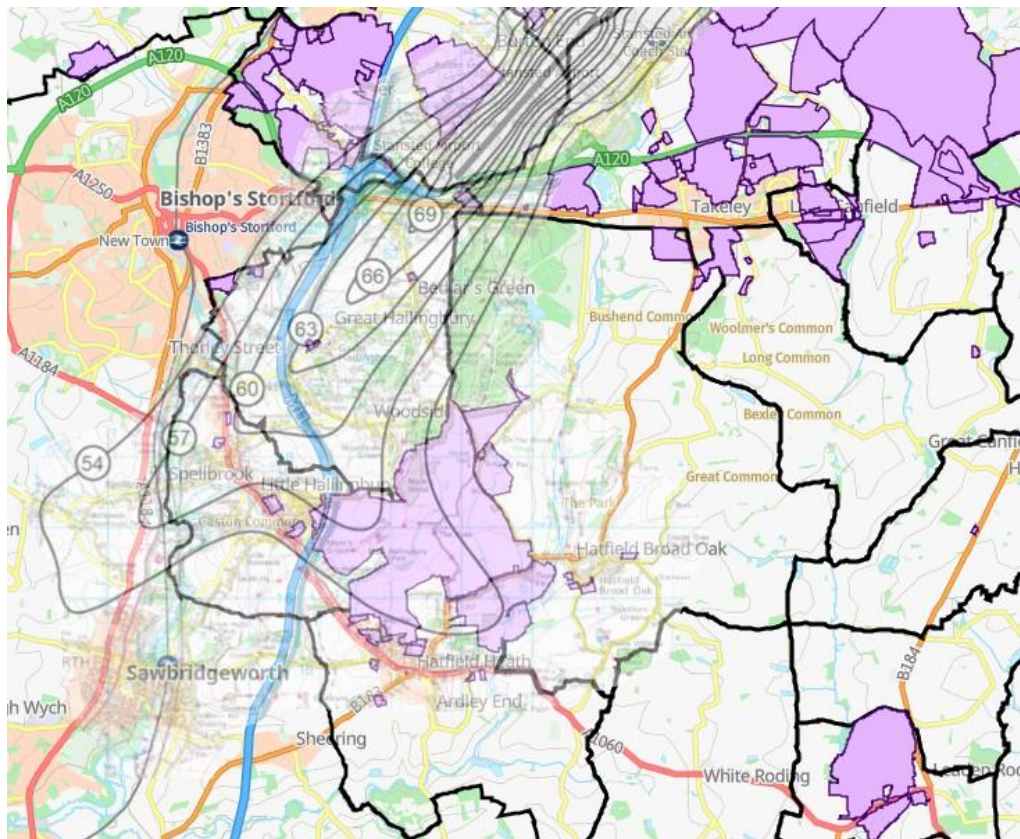
With the airport growing and having recently obtained permission to extend to 43mppa it is incumbent not only on the airport to reduce its noise output. The WHO states that "To reduce health effects, the GDG strongly recommends that policy-makers implement suitable measures to reduce noise exposure from aircraft in the population exposed to levels above the guideline values for average and night noise exposure. For specific interventions, the GDG recommends implementing suitable changes in infrastructure. Those changes in infrastructure impose a duty on LPA's to ensure no new communities are built in areas of unsustainable noise.



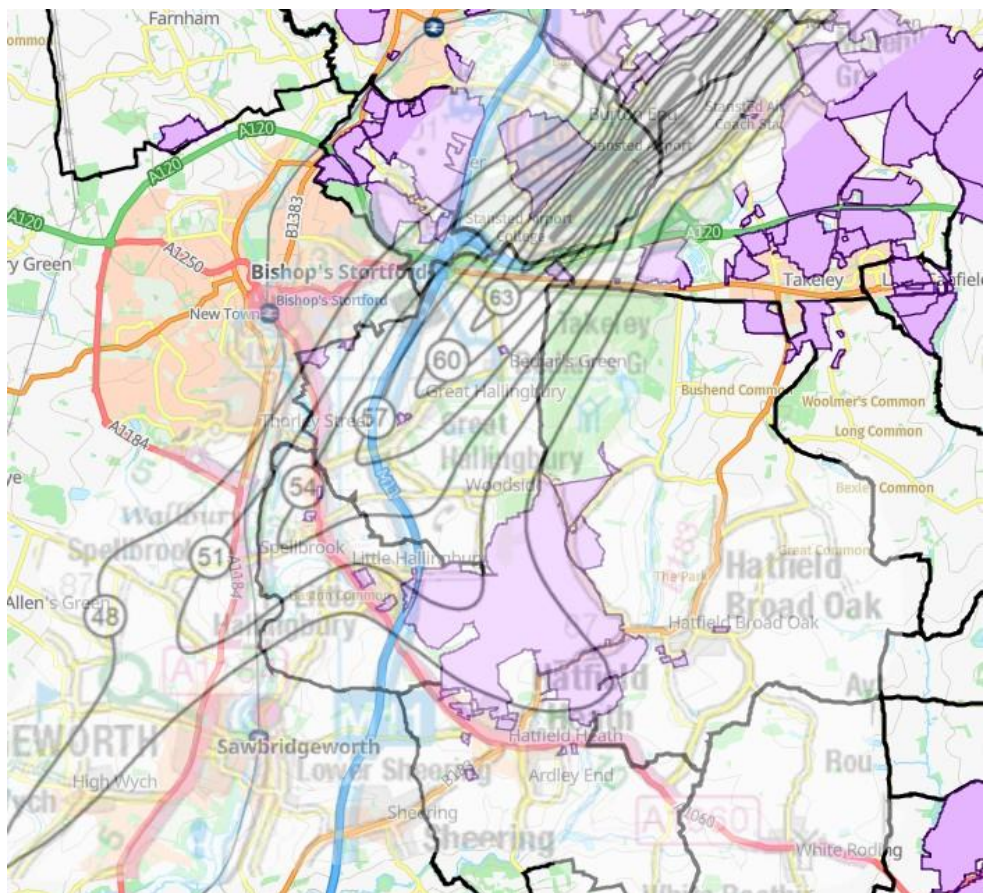
The Garden Community Site



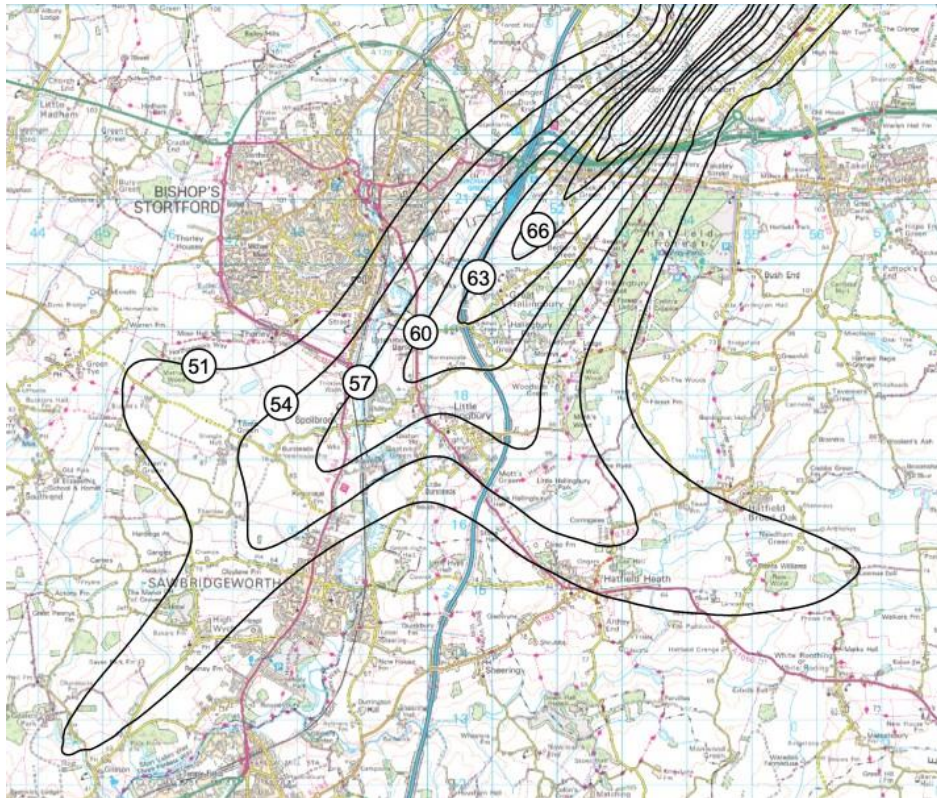
The CLN 22 Departure route for Stansted
(Immediately over the garden community site, all below 3,000 ft)
DfT/CAA guidance says that aircraft noise reduction is a priority up to 7,000ft



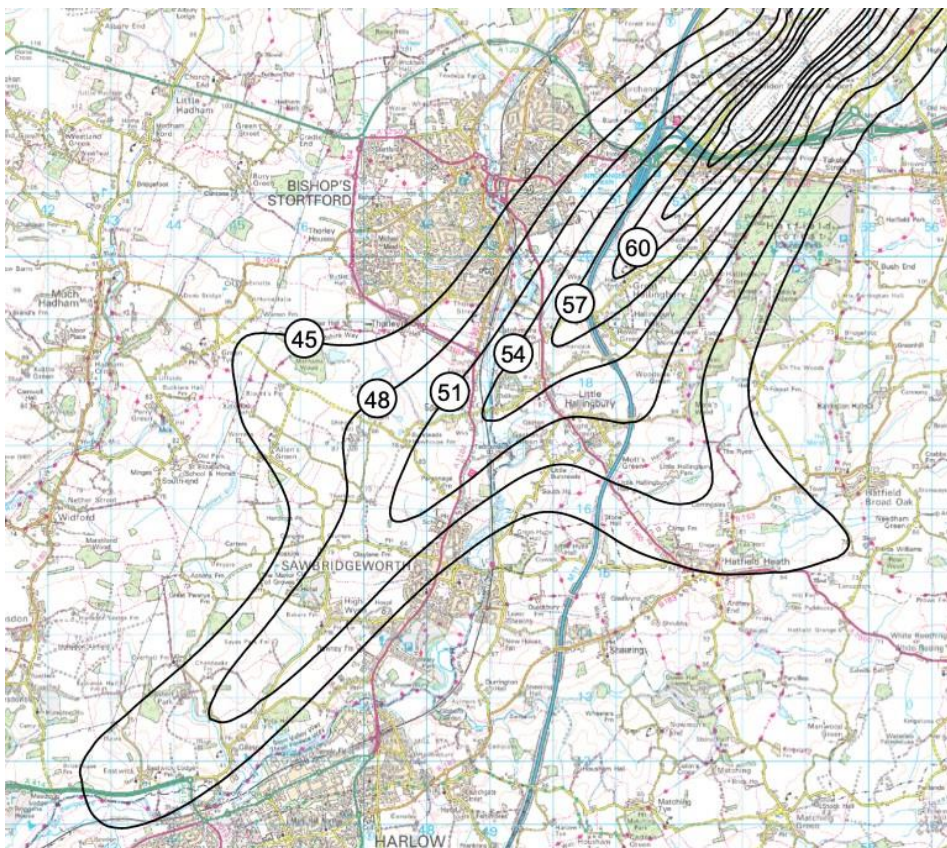
The 2019 54 dB daytime noise contour



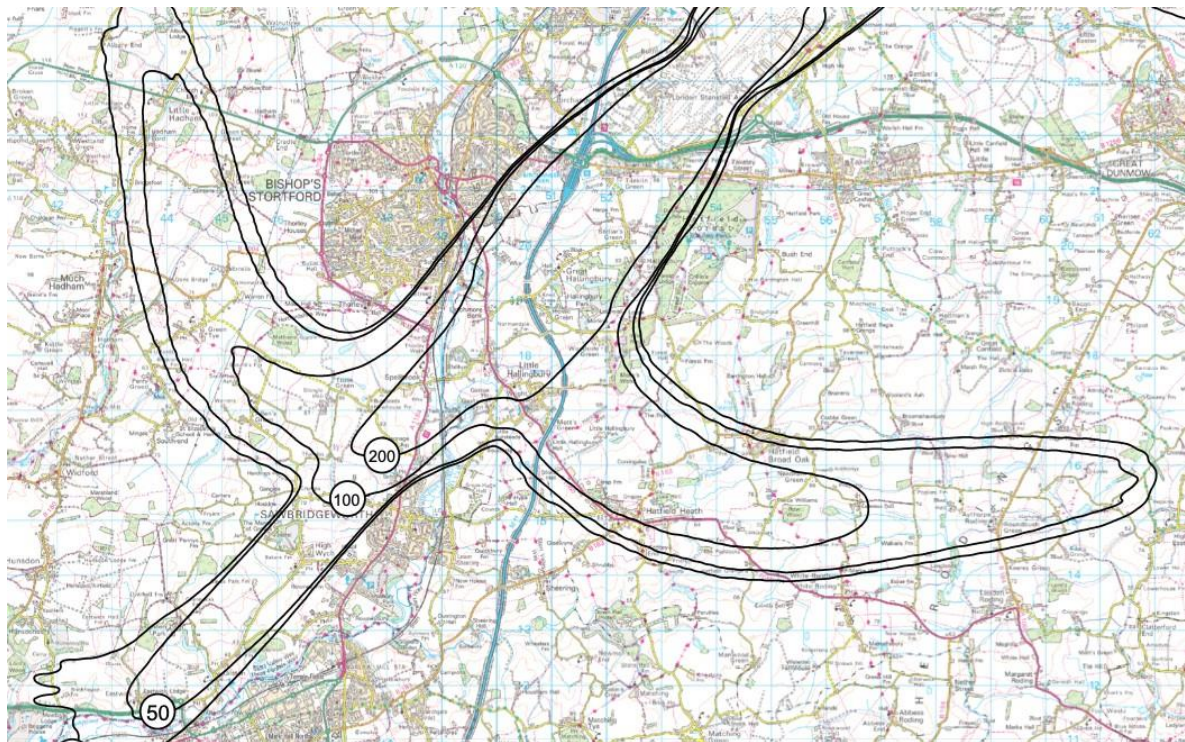
The 2019-night noise contours showing the entire site well within the 48 dB contour and above the WHO guidelines



With expansion of Stansted now granted, the inquiry was evidenced with projected noise contours for 2032.
Clearly all of the garden community site falls within the 51dB contour



The entire site falls within the 45 LAeq contour
in excess of the night-time limits recommended by WHO.



When using the more respected 'N' contours (numbers above), denoting the number of events above a defined noise threshold, it can be seen there would be between 100 and 200 noise events per day of 65db over the garden community site.

Much of the site would be at a higher noise event level and these contours should be established. These are actual events rather than 16-hour averages. This alone makes the garden community site not only unsustainable but unbearable place to live with considerable health and wellbeing impacts.

The WHO recommends that schools should not be located in areas within contours of 35 dB. It is often good practice to teach children in the open air when possible and they have to spend a considerable part of their day outside at lunchtime and during break time.

The report on children's learning suggests that building new schools within this noise area is unacceptable.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/446311/noise-aircraft-noise-effects-on-health.pdf

The proximity of Stansted Airport would make lessons inside and out impractical and result in health, hearing and wellbeing issues.

The reason for including this information is to demonstrate that the sustainability and technical criteria used by Uttlesford is flawed and should be re-evaluated.

THIS BOX SHOULD BE RED NOT GREEN

Ref	Climate Change and Adaptation.
25	Fluvial Flood Risk
	The entry on the form says that less than 50% of the site intersects with Flood Risk Zone 2 and 3. Conversely however this means that a large part of the site does intersect with the flood zones. This is not a positive. THIS BOX IS AMBER

Ref	Land and Water Resources.
26	Agricultural Land Classification
	The Government website grades the garden community site as Grade 2 – very good quality agricultural land. https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::provisional-agricultural-land-classification-ale-england/explore? Grade 2 is defined as: 'Land with minor limitations that affect crop yields, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown. On some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops, such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than grade 1.' The best and most versatile (BMV) agricultural land should be protected from significant, inappropriate or unsustainable development proposals. To improve the environment is critical to the Government's 25-year plan to protect the environment and the protection of the best agricultural land is one of its cornerstones. THIS BOX IS RED
27	Minerals and Waste Consultation Area
	No comment THIS BOX IS GREEN
28	Groundwater Source Protection Zones
	No comment THIS BOX IS GREEN
Ref	Landscape.
29	Countryside Protection Zone
	Does not intercept, however, the form does not refer to countryside as protected by the current Local Plan or the intersection with Hatfield Forest. THIS BOX IS GREEN
30	Tree Preservation Order
	THIS BOX IS RED

Ref	Historic Environment.
	It is clear from the entries that the limited space allows that there would be a serious impact on several historic assets. Not all the Listed Buildings in the area are mentioned. Sensitive key characteristics and landscape elements within this character area include the intimate and enclosed Hatfield Forest (where dispersed farmsteads nestle in woodland clearings that also contain wood pasture and grazing cattle). This area, which also has strong historic integrity, is sensitive to changes in land management and also to potential new development.
31	Conservation Area
	THIS BOX IS GREEN
32	Registered Park or Garden
	THIS BOX IS GREEN
33	Local Historic Park or Garden
	THIS BOX IS RED
34	Scheduled Monument
	THIS BOX IS RED
35	Listed Building
	THIS BOX IS RED
36	Archaeological Site
	THIS BOX IS RED
37	Locally Listed Heritage Asset
	THIS BOX IS GREEN
38	Protected Lanes
	THIS BOX IS RED
39	Proximity to a Historic Landscape
	THIS BOX IS GREEN
Ref	Biodiversity and geodiversity.
40	Essex Coast RAMS Zone of Influence
	THIS BOX IS GREEN

41	Site of Special Scientific Interest (SSSI)
	THIS BOX IS RED
42	SSSI Impact Risk Zones
	THIS BOX IS RED
43	Hatfield Forest Zone of Influence
	THIS BOX IS RED
44	National Nature Reserve
	THIS BOX IS RED
45	Ancient Woodland
	THIS BOX IS RED
46	Local Wildlife Sites
	THIS BOX IS RED
47	Priority habitats
	THIS BOX IS RED
48	Special verges
	THIS BOX IS GREEN
49	Geological sites
	THIS BOX IS GREEN
50	Important Woodland
	THIS BOX IS RED