

Sawbridgeworth Town Council

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Response by
Sawbridgeworth Town Council
to the
East Herts District Council
Draft District Plan
Preferred Options Consultation

Preamble

Sawbridgeworth Town Council has held three open days over the period of the Consultation to learn the views of the parishioners of the town on the subject of the Preferred Options contained in the East Herts District Council Draft District Plan (DDP).

The first two were held on the Farmers' Market days on Saturday 01 March and Saturday 05 April 2014. The third took place as an integral part of the Annual Town Meeting which was held on Monday 14 April 2014.

The role of the Town Council at this stage is to respond to the Preferred Option document. It is not the intention of the Town Council to be negative, however STC endorses the views of the large number of respondents who have already aired their views through the open days held at the Town Council and consultation at the Annual Town Meeting.

Introduction

There are three principal areas in the Preferred Options Consultation that are of concern parishioners of Sawbridgeworth. They are:

- Chapter 8: Sawbridgeworth
- Chapter 10: Villages
- Chapter 12: The Gilston Area

These will be commented upon in turn, however, the general tenure of opinion must first be considered.

Executive Summary

General

The key areas of concern of a general nature that is reflected by consultation with local people are:

- There is a need for a bypass before increasing housing since the existing road network is at saturation level
- There is a need for improved transport links, without which there is no point in housing more people in the area (para 8.1.1)
- It is fundamental that in future any “affordable” homes should be made available for local people as a priority. This principle should be enshrined in Policy. (para 8.1.5)
- There are alternative sites that must be considered in addition to those highlighted in the Preferred Options statement.
- A number of the points made in the Stop Harlow North (SHN) response are relevant.

West Road

The responses of over 250 entries to the portal shows that the key areas of concern in the SAWB2 and SAWB3 Preferred sites are:

- Traffic access
- Schools
- Reduction of Green Field spacing between towns
- Air pollution
- Threat to watercourses
- Surgery capacity
- Not needed to support employment

Villages

- Irrational to separate Spellbrook from Sawbridgeworth
- Hayter is a major employer in the area (170) – key to economic growth
- Not practical to develop a discrete Neighbourhood Plan

Gilston Area

- An unsustainable development
- No exceptional circumstances to justify a change in the Green Belt Boundary
- Devastates landscape integrity
- Infrastructure deficit
- Exceeds environmental capacity
- Devastating effects of cumulative development

Chapter 8: Sawbridgeworth

As a principle STC accepts that future development planning should be conducted to cater for future needs but must also be mindful of the existing communities.

STC believes there should be provision within the plan for affordable homes to be made available expressly for local people.

It is acknowledged that if Sawbridgeworth is to follow the spirit of the DDP in providing a framework for future development to meet the expected housing needs to 2031, then a share of this development can be expected within the Town. We do not believe that the current single geographical site focus on one site either side of West Road is tenable as there are no possible measures to mitigate the acute transport issues such a development would cause on a constricted residential road.

If the volume of building at the level indicated as 400 unit is justified, then consideration should be given to dispersing the units to other sites in a way that the road transport infrastructure can be amended.

In order to preserve the principle of the Green Belt it would be expected that the DDP would seek to compensate for Green Belt land compromised by these sites by including the equivalent areas in a re-ordered boundary.

It is acknowledged that the rail transport is currently running at capacity on the Cambridge – London Liverpool Street line and is therefore a constricting factor.

It is noted that without a s106 Agreement to enforce some contribution from developers to support reinforcement of local infrastructure the proposed development would exert unacceptable; stress and destabilise the existing Health, Education and utility services.

Stop Harlow North – In general terms the development of prime farming land rather than lower classed land would seem to be in conflict with the NPPF para 12.

The specified development area lies immediately under the southerly landing approach flight path of London Stansted airport where planes pass at 5000 feet.

The DDP seems focused on homes rather than correlating housing needs with centres of employment which would promote the plan as a sustainable solution by aiming to reduce out-commuting and one of the greatest pressures on transport provision.

West Road Area

The role of the Town Council at this stage is to respond to the Preferred Option document. It is not the intention of the Town Council to be negative, however STC endorses the views of the large number of respondents who have already aired their views through the open days held at the Town Council and consultation at the Annual Town Meeting.

The overwhelming view was to object to the West Road proposals (SAWB2 and SAWB3) in their present form.

The main thrust of objection to what is considered to be an ill-considered set of options are infrastructure pressures and the impact on quality of the environment and life. Specific issues are:

Traffic access

There clearly is no practical way of mitigating the road connection issues which would result from sitting 400 additional home on a local residential road/lane coupled with congestion problems on the adjoining trunk road. The specific statement (para 8.2.8) shows a misunderstanding of the locality.

Education

School places are clearly and demonstrably under pressure as evidenced by current reports (April/May 2014) of the failure to provide local places for local children. The provision of an additional form of entry at Mandeville School (para 8.1.6) is clearly inadequate. There is no provision for developing further places in anticipation of further demand on places.

Reduction of Green Field spacing between towns

The Urban Extension proposed involves the change in Green Belt boundaries and reduces the buffer zone between towns (para 8.1.3). The proposal will not prevent urban sprawl (para 4.1.1)

Air pollution

This has been acknowledged as a significant problem and is naturally associated with traffic problems and the additional congestion that will be inevitable under the Preferred Option proposals. (para 8.1.1)

Threat to watercourses

The statement made in the section subsequent to (para 8.2.8) acknowledges the significant issues relating to urban drainage and sewerage which will be

introduced by replacing the adequacy of the natural environment by an urban extension to the town

Surgery capacity

Although acknowledging the increase in demand for services including healthcare, even the current (May 2014) planning application for increasing the capacity of the Central Surgery will serve only to play catch up on current inadequacies and is woefully inadequate for future growth.(para 8.5.2)

Not needed to support employment

The statement that Sawbridgeworth has a limited employment offer (para 8.1.8) (para 8.3.2) suggests that the proposals at SAWB2 and SAWB3 are disproportionate.

To mitigate the impact upon the area other sites should be considered. For example it is important to the historic environment of the area that a site of international importance is considered and protected. (para 8.1.9)

Rivers Orchard Area

The Rivers Orchard Site is a site of international renown and of great historical importance for the reasons outlined here. It is the wish of the Town Council that the site be preserved in perpetuity as a community asset and to be enhanced by regular maintenance and provision of a visitors centre. In recent years a Friends Group ,later to become Rivers Nursery Site and Orchard Group had undertaken voluntary supervision of the site and had promoted it's interest. In March 2014 an announcement was made that the RNSOG intended to dissolve and would cease activity. This has now been replaced by the newly formed Rivers Heritage Site and Orchard.

The contractual owner, Deville Estates, has published a desire to develop part of the site and we believe they intend to respond to the consultation. They have expressed an intention to cede a large proportion of the site to the community as part of the proposition to develop. The Town Council's view is that ideally the whole of the current site should be preserved for community use. However we should like to keep an open mind on the matter and see what the land owner has in mind in terms of what may be protected in perpetuity. We should reserve judgment therefore based on the nature of the offer, the desires of the local community following consultation, and the suitability of the site for the proposed uses.

Rivers Nursery was established by John Rivers who came to Sawbridgeworth from Berkshire. The very significant influence of the Rivers family on the history of Sawbridgeworth is permanently acknowledged and enshrined in the town's coat-of-arms.

The importance of the Rivers' legacy to the community of Sawbridgeworth cannot be over-estimated. Part of this inheritance is the Rivers Nursery Site and Orchard which is a wonderful treasury of different fruit varieties and a very rich habitat for ever-expanding numbers of diverse flora and fauna. It is the home for almost 600 fruit trees on a four acre site, comprising 76 different apple varieties, including the eponymous Thomas Rivers' apple. The orchard contains the most extensive collection of plums in England – at least 30 different types are present. 15 pear varieties have been recorded and cherries are the next fruits to be identified. The Orchard includes the Conference pear and the Czar plum, two of the most well-known of the many fruits that have been raised or introduced by the Rivers family.

The Rivers' Nursery Site and Orchard stands out as a place of beauty

At the height of its prosperity in the late 19th century, land owned or rented by the Rivers family for horticultural purposes amounted to approximately 400 acres. It is a remarkable fact that the 21st century remains of the orchard is only one-hundredth (1%) of this figure. It is a very significant part of the 'green' lungs of Sawbridgeworth, whose residents enjoy its appeal on many levels. Every effort must be made to ensure that this haven of enormous bio-diversity attracts, and is given, higher levels of security and stewardship.

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Chapter 10: Villages

Spellbrook has been classified as a “Group 2 Village”

STC does not understand why the village of Spellbrook is not included with Sawbridgeworth from a planning perspective as they share the same community facilities and are an integral part of the economic environment of the town.

This is a **fundamental flaw** in the approach to producing this plan and shows a significant misunderstanding of the inter-relationship of these constituent parts of the area. Failure to acknowledge this relationship will render any short, medium or long term plan invalid. (para 8.1.8)

There is no recognition in the DDP of the employment offered by the long established business of Hayter. This is contrary to the suggestion that there is no employment in the area. Other employment is offered at the Rapid Platforms site.

The suggestion that the Parish Council should plan for its community needs by preparing a Neighbourhood Plan again shows a **fundamental misunderstanding** of the civic structure of the area. Spellbrook lies within the parish of Sawbridgeworth and has no individual identity of its own. Hence it is unable to represent its own needs in isolation.

Chapter 12: The Gilston Area

Sawbridgeworth Town Council also objects to Chapter 12 and Policy GA1 of the draft District Plan. Major development in the Gilston Area, whether for 3,000, 5,000 or 10,000 dwellings, would be unsustainable and contrary to the National Planning Policy Framework in a number of respects.

Proposals to develop land to the north of Harlow have been hotly debated since 1980, but have been consistently rejected following examinations in public. Until the publication of the current consultation document, East Herts Council has always maintained its opposition to development. In the draft District Plan, the Council appears to argue that there is no choice but to provide for a net increase of 15,000 dwellings over the period 2011 – 2031. In selecting the area to the north of Harlow, the Council has chosen the easy option in terms of its alleged availability. STC believes that this is fundamentally the wrong choice. (see paragraphs 1.1 – 1.15)

The proposal as set out in policy GA1 is unsustainable and is contrary to policies in the NPPF. In the NPPF (paragraph 47), it is stated that local planning authorities should meet their objectively-assessed need for housing “as far as consistent with the policies in this Framework.” STC believes that East Herts Council cannot demonstrate the “exceptional circumstances” required to change the established Green Belt boundary. Further, it is considered that a number of policies in the NPPF indicate that development in this area should be constrained. (see paragraphs 2.1 – 2.11)

The Green Belt to the north of Harlow performs a number of strategic functions in accordance with the NPPF. Its boundaries are robust and long-established, and a key function is to protect the special character of Harlow, as defined in the Gibberd Master Plan. (see paragraphs 3.1 – 3.3)

It is clear that any development would have a devastating effect on the landscape integrity of the area. Landscape is a critical element of the Gibberd Master Plan for Harlow and its design principles. Development would remove an extensive tract of open countryside, much of which is high quality agricultural land. It would lead to farm fragmentation and a range of urban fringe problems. (see paragraphs 4.1 – 4.5)

In terms of environmental capacity, the proposal would cause considerable harm, both to its biodiversity and the protection of habitats and species. There would be a particular impact on the Hunsdon Meads SSSI, as well as to the historic landscapes of the Stort Valley. Further to the west, the European sites at Rye Meads would be endangered, and it would be difficult to mitigate the potential effects. The

development area would be under the incoming flight path of aircraft using Stansted Airport. This factor seems to have been ignored. Decreases in air quality are also a sensitive issue. (see paragraphs 5.1 – 5.7)

There are clearly a number of concerns about infrastructure provision, particularly in terms of water supply and drainage. Studies have identified a considerable infrastructure deficit, which could not be overcome by receipts from the Community Infrastructure Levy. There are serious misgivings as to whether infrastructure providers could supply the necessary infrastructure within the necessary timescale. (see paragraphs 6.1 – 6.5)

Transport is already a major concern in the Harlow area. It is clear that, without massive investment, the effects of a major development could not be mitigated. There are already severe pressures in the area, not only on the road network, but also in terms of public transport. It is extremely unlikely that investment in transport would be forthcoming. (see paragraphs 7.1 – 7.7)

Although Policy GA1 acknowledges that a range of social and community facilities would need to be provided, the area would be largely dependent on Harlow for higher order provision. There are already considerable stresses on hospital and education provision in Harlow, and it is difficult to envisage how these problems could be overcome. (see paragraphs 8.1 – 8.4)

There is a conspicuous lack of proposals for business and employment provision in the Broad Locations policies. In this area, the major focus would be on Harlow, with high levels of out-commuting. STC has argued for a more balanced form of development, rather than a housing-led solution. Once the area is designated, STC is concerned that Harlow Council and the house building companies will campaign for higher levels of growth in the longer term. (see paragraphs 9.1 – 9.5)

STC believe that the cumulative effects of development would be devastating. The identity of individual villages would be threatened. There would also be a cumulative effect on the viability of East Herts market towns, including Sawbridgeworth. (see paragraphs 10.1 and 10.2)

For all the above reasons, STC submits that the District Plan, in its current form, would fail the tests of “soundness” at the examination stage. A District Plan containing Policy GA1 would fail because:

It would be unsustainable and inconsistent with the NPPF objectives of achieving sustainable development;

It could not be justified, as the policy is not based on clear and proportionate evidence;

It would not be effective and would not be deliverable, given the enormous gaps in infrastructure which cannot be overcome;

It would be clearly inconsistent with national policy, as set out in the National Planning Policy Framework and National Planning Practice Guidance.