

**Hinxton Parish Council's Response to the Uttlesford District Council consultation on its  
Regulation 19 Pre-Submission Local Plan: the proposed North Uttlesford Garden Community**

This submission relates solely to the proposal of Uttlesford District Council (UDC) Local Plan to establish a new town, called North Uttlesford Garden Community (NUGC) (paras 3.94 – 3.101 and Policy SP7). The NUGC would have up to 5000 homes in the northwest of the District adjoining the boundary with South Cambridgeshire. It would share 2km of Hinxton's parish boundary and come within 1km of Hinxton's High Street. Hinxton being a small village of about 150 houses, the NUGC would have a profound adverse impact on our community. This response summarises the grounds on which **Hinxton Parish Council objects to the proposed NUGC.**

**We demonstrate that:**

- **The site of the NUGC is unjustified**
- **The NUGC would**
  - **create unmanageable and unmitigated traffic burdens for nearby villages**
  - **greatly increase flood risks for downstream villages**
  - **jeopardise South Cambridgeshire's water supply**
  - **irreparably damage the landscape for a large area of South Cambridgeshire**
  - **irreparably damage important archaeological and heritage features**
- **The burden and infrastructure costs of NUGC would overwhelmingly fall on communities in South Cambridgeshire without any prospect of financial remedy from Uttlesford**

**We formally request the opportunity to defend our case at the Planning Inspector's hearing.**

1) ***The Site:*** **There is no valid justification for this choice of site for the new town.** Over half of the proposed NUGC perimeter is actually defined by the county boundary with Cambridgeshire. UDC could not have pushed it further away from where homes might be needed in Uttlesford. There can be no legitimate rationale for making a county boundary the appropriate defining characteristic for a new town.

There is no employment-based need for a new town in this location. In their public statement of the case for the NUGC, the site developers, Grosvenor, make clear that the great majority of the employment sources they would expect the new town to serve are not in Uttlesford but in South Cambridgeshire<sup>1</sup>. They propose to meet the needs of what they call Cambridge's 'Southern Cluster', of which the only site they name that is not in South Cambridgeshire is Chesterford Research Park, of which UDC is co-owner<sup>2</sup>. But the housing needs for employees in South Cambridgeshire have already been addressed and included in the South Cambridgeshire's own Local Plan. In May 2018 SCDC reported that 'it can demonstrate a five year housing land supply'<sup>3</sup>. The greatest expansion in employment envisaged locally is on the Wellcome Trust Genome Campus, but Wellcome specifically envisages meeting its own staff housing needs<sup>4</sup>. It cannot be argued that Uttlesford has an employment-based housing need for a new town on its northern boundary.

There is no justification for selecting a green-field site for the new town. Both the other two new towns in the UDC Local Plan are to be positioned on abandoned WW2 airfields; Easton Park Garden Community covers the old RAF Great Dunmow (formerly RAF Little Easton), and West of Braintree Garden Community is largely on the site of RAF Andrews Field (formerly RAF Great Saling). It might

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<sup>1</sup> Grosvenor Estate, *North Uttlesford Garden Community: Vision Statement*, April 2018, p66

<sup>2</sup> UDC press release, 16 May 2017, 'Uttlesford District Council purchases 50% share in Chesterford Research Park'.

<sup>3</sup> South Cambridgeshire District Council, *Update on South Cambridgeshire's Five Year Housing Land Supply*, 21 May 2018

<sup>4</sup> Wellcome Trust Genome Campus: <https://www.wellcomegenomecampus.org/aboutus/futureplans.html>, June 2018

have been logical for UDC to have placed NUGC on the similar semi-industrial arable land of the abandoned WW2 airfield of RAF Little Walden (formerly RAF Hadstock), which is just 3 km to the east of the chosen site. But there is no evidence that this or any other options were considered. This is in breach of National Planning Policy Framework 2012 (NPPF2012) requirement that the choice of site be justified as the most appropriate 'compared to reasonable alternatives' or 'reusing land that has been previously developed (brownfield land)' (para 111). For whatever reason, UDC has chosen a site on unsullied hills which is highly inappropriate for a new town. They have placed it at the geographic limit of their civic responsibilities so that the main burden of consequential costs will fall on South Cambridgeshire and its nearby villages.

**2) *Traffic*: The NUGC would inflict unmanageable traffic burdens on Hinxton and neighbouring villages with no prospect of mitigation.** The access proposed to and from the NUGC site is irresponsibly restricted. It is to be exclusively from the A1301/B184 Walden Road, primarily from Stump Cross roundabout. This road has a winding, single-carriageway with many blind curves, and there is no proposal to improve it. Primary site access from the road is proposed via Field Farm Drive (SP7:8) off Stump Cross roundabout, for both construction traffic and later for all NUGC traffic. This would be totally inadequate for the number of accessing vehicles implied by both the initial rate of construction and later by the 5000 home community proposed. Eventually several thousand vehicles could be expected to attempt to enter this roundabout at rush hour. The A1301/B184 Walden Road would be brought to a standstill.

The transport 'solutions' proposed are purely speculative and based on neither valid evidence nor agreed cross-boundary co-operation (SP7: 6-8). No access is proposed to or from the east. Access from the south is heavily restricted by being either through Great Chesterford and Littlebury or via Saffron Walden's High Street on the Walden Road. Junction 9 on the M11 does not permit access to or from the north or west. The claim that traffic from the NUGC into Cambridge would use the A11 to Fourwentways and then the A1307 into Cambridge neglects new developments around Haverhill, the expansion of Granta Park and the acknowledged current inadequacy of the A1307.

All NUGC site access to or from the north and west would be via the A1301 and A505. The severe inadequacies of these roads are well-documented. They are already seriously congested at peak times. For example, the traffic survey conducted in 2017 by MayerBrown for the Sawston Trade Park application<sup>5</sup> stated: 'It is concluded that both the A505/A1301 roundabout and the M11/A505 roundabout are currently over capacity in both the morning and evening peak periods ...the junctions assessed are currently operating at capacity.' For example, the assessment conducted by Granville Consultants in 2015 for expansion of Granta Park<sup>6</sup> reported that the A505/A1301 roundabout operated 'over capacity in the 2015 base year'. The UDC Local Plan modelling takes no account of other developments in prospect along the A1301 such as the expansion of the Wellcome Trust's Genome Campus, Sawston Trade Park, and the Spicers site by Whittlesford. These roads would inevitably carry the major traffic burden of the NUGC. The UDC Local Plan has no significant proposals to finance their improvement. The consequent increase in congestion and rat-running would paralyse traffic, and consequently paralyse economic life, for the villages of Hinxton, Ickleton and Duxford.

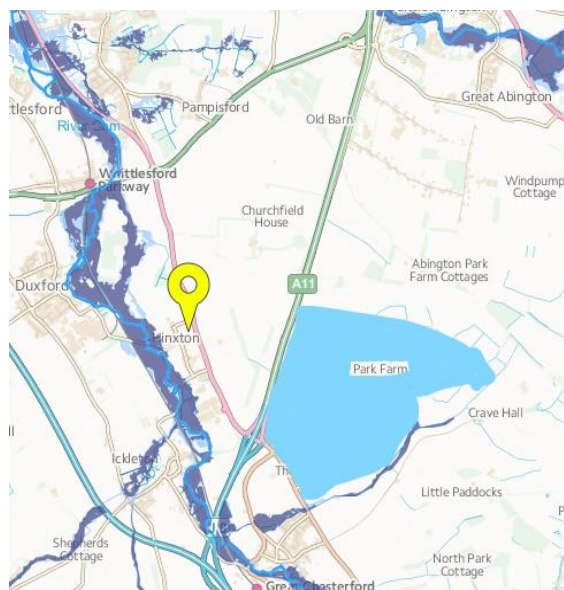
**3) *Flood risk*: The NUGC would greatly increase the flood risk to the downstream villages of South Cambridgeshire.** The proposed site of the NUGC (indicated in turquoise on the map) is on higher ground wholly in the watershed of the River Cam. The dark blue on the map indicates areas of Zone 1 risk, maximum likelihood of flooding in any year. The villages of Ickleton, Hinxton, Duxford, Whittlesford and further down-stream, as well as the Wellcome Trust's Genome Campus, are already

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<sup>5</sup> (S/2284/17/OL) MayerBrown/Shrimplin|Brown, Further response to Cambs County Council, 11 October 2017, paras 1.18, 1.19, p378

<sup>6</sup> (S/1110/15/OL) Glanville, Transport Assessment, Phase 2 Land, Granta Park, 30 April 2015

vulnerable to flooding despite having substantial water meadows<sup>7</sup>. Listed buildings such as Hinxton Mill are at risk as well as domestic houses. There is no weir or water control point on the Cam in Uttlesford downstream of Great Chesterford by which increased water flow could be regulated.



The NUGC, a town of up to 5000 houses, would have massive implications for the speed and volume of water run-off. This is crucial to both flood risk and adequate aquifer recharge. Paved areas have a double effect of both speeding up run-off and also reducing absorption into the ground. The proposal for the NUGC asserts that use of ponds and absorbent surfaces could moderate this but offers no evidence on the present hydrological position, let alone on the consequences of proposed water management. The assertion by the site developer, Grosvenor, that 'NUGC has the potential to reduce the risk of flooding ... at Great Chesterford and the communities living downstream of the site'<sup>8</sup> is supported by no evidence whatsoever. Without commitment it is without value.

Uttlesford DC cannot possibly offer assurances about maintaining permeable surfaces in the longer term; it would be impossible for UDC to enforce the maintenance of absorbent surfaces by future householders. Global warming can be expected to produce periods of much more intense rainfall than in the past, punctuated by periods of much less rainfall; these circumstances, by increasing run-off and decreasing infiltration, will greatly increase the likelihood of floods. At a time of already rising flood risk, the NUGC would alter the pattern of water-flow for the River Cam downstream in unproven ways and would do so substantially and unpredictably.

4) ***Fresh water and sewerage:*** **The NUGC jeopardises both the quality and supply of South Cambridgeshire's fresh water.** For Cambridge Water, which supplies South Cambridgeshire, 97 per cent of the water 'comes from boreholes drilled into the chalk strata south of Cambridge'<sup>9</sup>. The recharge of the aquifers tapped by the boreholes depends on rainfall infiltrating into the soil and percolating into the rock below. Uttlesford proposes to site the NUGC, with over a square mile of largely impermeable surface, on top of these strata. The whole site is on land classified by the Environment Agency in 2017 as groundwater source protection zones of High to Intermediate vulnerability<sup>10</sup>. This would decrease infiltration and consequently, as well as increasing flood risk downstream, would reduce groundwater recharge.

The 2017 Uttlesford Water Cycle Study found that a major impact of NUGC would be variations in water quality and quantity, discharged to receiving watercourses from the NUGC site itself and from the water recycling centre that would serve the site. The present shared sewerage facility that serves Great Chesterford, Hinxton and Ickleton is at full capacity and would require major upgrades to both the treatment processes and associated sewerage networks.<sup>11</sup> UDC's proposal for the use of 'smart, innovative and sustainable water efficiency/re-use solutions that fosters climate resilience' (SP7: 18) is evidentially unsupported wishful thinking.

<sup>7</sup> <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastings=549644&northings=244978&address=100090171955&map=RiversOrSea>

<sup>8</sup> Grosvenor Estate, *North Uttlesford Garden Community: Vision Statement*, April 2018, p72

<sup>9</sup> <http://www.cambridge-water.co.uk/customers/about-your-water-supply>

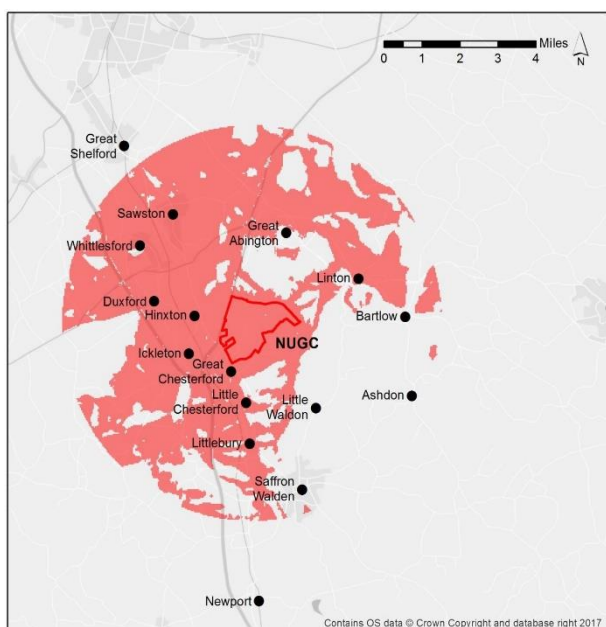
<sup>10</sup> Environment Agency, Groundwater Source Protection Zones, webmaps 2018

<sup>11</sup> [http://sercle.org.uk/wp-content/uploads/2017/06/Uttlesford\\_waterWCS\\_Update\\_-\\_24.01.17\\_1\\_FINAL\\_low\\_Environment\\_Agencyres.pdf](http://sercle.org.uk/wp-content/uploads/2017/06/Uttlesford_waterWCS_Update_-_24.01.17_1_FINAL_low_Environment_Agencyres.pdf)

This is most water-stressed part of the United Kingdom and climate change promises increased variance of rainfall and increased frequency of heat waves such as that of 2018. The Cam Valley Forum has authoritatively reported that 'For decades we have had a 56cm annual rainfall mean. Despite this, the water table around Cambridge has fallen steadily over the past century and all the springs sourced from the chalk aquifer and their downstream watercourses are now regularly depleted.'<sup>12</sup>

It should be noted that Uttlesford's own electorate would not be affected by this new town siting decision. Uttlesford uses a quite different water supplier, Affinity Water, whose ground and surface water sources in their relevant Stort zone are well to the south and untouched by NUGC<sup>13</sup>. Uttlesford is acting wholly irresponsibly by proposing to place this new town gratuitously on top of one of Cambridgeshire's main aquifers.

**5) Landscape: The present view of the site from substantial tracts of Cambridgeshire, Hertfordshire and Essex would be irreparably damaged by the placing of the NUGC on these hills.** Having the town on a hill would be in marked contrast to the valley settlements that characterise the area. The land rises sharply from the vale south of Cambridge, from 50m to 100m in only a



kilometre, and is a dominant feature for a considerable distance across the Cam valley. The visibility analysis<sup>14</sup> shown here demonstrates that the visibility of the present site within a five mile radius, before any development, is overwhelmingly (by perhaps 4:1) greater in South Cambridgeshire, in the northern half of the diagram, than in Uttlesford. If we consider longer views, and the added height of proposed NUGC buildings, and the light pollution of NUGC at night, the impact on South Cambridgeshire would be even more disproportionate.

The site is mainly Grade 2 (very good) agricultural land, largely arable and also graced with some mature woodland. By erasing this, the NUGC would be clearly in breach of the NPPF2012 requirement of 'protecting and enhancing valued landscapes' (para 109)

House building has recently been judged inappropriate by a Planning Inspector even for the nearby part-industrialised abandoned WW2 airfield. Planning permission for 35 dwellings was applied for in 2014 on the disused RAF Little Walden airfield, a plateau site just 3 km along the ridge to the east of the proposed NUGC site and at the same height above sea level. This was rejected on appeal. The Planning Inspector (G. D. Jones) judged that an aspect with 'significant weight' was that 'the proposed residential development would be a discordant addition to the rural landscape at odds with and harmful to the character and appearance of the area'<sup>15</sup>. That comment could be applied with far greater force to the proposed NUGC development nearby, which would have over one hundred times more houses and would be on an unspoiled, hilly terrain of woods and fields.

The visual impact of NUGC on Hinxton and nearby villages would be extreme. The hills of the site define their eastern horizon and that of the upper Cam valley. Hills that are currently arable land and woodland would be transformed by the NUGC with almost continuous buildings along the escarpment

<sup>12</sup> The Cam Valley Forum Response to the Cambridge Water Company's *Water Resource Management Plan* Consultation, March 2017

<sup>13</sup> <https://stakeholder.affinitywater.co.uk/docs/WRMP-Annual-Review-June-2015.pdf>

<sup>14</sup> Courtesy of Nick Burton

<sup>15</sup> Appeal decision, The Planning Inspectorate, APP/C1570/W/143000725 & 3000780, para48

above the A11 and over the horizon. At night the lights of the new town would be raised above us. They would be extensive, intrusive and unavoidable. They would dominate the Cam valley in a large arc, from NNE round to due west, visible as far as Madingley 15km away. The photographs show the visibility of the site from within Hinxton village (Fig 1), and also the extent to which it dominates the village from a distance (Fig 2). No promised 'Development Plan Document' or other instrument of planning procrastination could offer the means to prevent this damage. Nothing could mitigate the visual impact of the NUGC. Nothing could ameliorate its colossal light pollution and night-time impact on Hinxton and other villages.



Fig 1 - View due east from north end of Hinxton village; the NUGC site includes the fields on the horizon to right of the wood



Fig 2 - View east across Hinxton from the low ridge to the west of River Cam (Hinxton church spire just visible to the left); the NUGC site includes the entire visible horizon apart from the left-hand one quarter of the picture

The landscape impact of the proposed NUGC is in flagrant breach of Uttlesford DC's own stated policy 'C1: Protection of Landscape Character' in the present Regulation 19 Pre-Submission Local Plan. This requires that 'Cross-valley views in the river valleys are maintained with developments on valley sides respecting the historic settlement pattern....' 'It preserves or enhances the landscape pattern and structure of woodland areas, hedgerows and individual trees...' and 'It preserves and enhances the historic landscape character of field patterns....' (para 11.6). It can only be concluded that Uttlesford's view is that the standards that it considers to be appropriate for its own communities do not apply to the communities of South Cambridgeshire whose landscape the NUGC would most damage.

**6) Heritage and Amenity: The NUGC would erase or endanger land of unique heritage value.** The site is a valuable local amenity of rolling fields and woodlands, accessed by well-maintained and well-used public footpaths. But it is also crossed by a footpath of far greater national cultural significance, the Icknield Way. This is one of the oldest long-distance trackways in Britain, predating Roman occupation, running from Bury St Edmunds to Salisbury. Although the modern Icknield Way Path skirts the NUGC site to the east, touching it on Cow Lane, this is misleading in heritage terms. Ancient trackways typically took the form of a braid of parallel paths some of which would here have been to the west, crossing the NUGC site. The new town would do irremediable archaeological damage to the Icknield Way. We also endorse the comments of Great Chesterford Parish Council which has described in its objections the jeopardy in which the Roman Temple and other Roman remains are placed by the NUGC.

The NUGC poses a profound and gratuitous threat to Hildersham Wood, a 7 hectare biological Site of Special Scientific Interest. Although this is in Cambridgeshire, it lies on the county boundary directly abutting the NUGC site. Natural England reports that: 'Hildersham Wood is an ancient woodland of ash-maple type lying on the chalky Boulder Clay. Its ancient origin is reflected in the rich variety of woodland plants and associated communities which it supports. Such woodland habitat is now very localised in extent, both locally and in lowland England as a whole. In a Cambridgeshire context the wood is notable for a number of locally rare species.'<sup>16</sup> The ancient heritage woodland has unique character because it has evolved intact on that site over at least the last several hundred years and is truly irreplaceable. The wood adjoins the ancient deer park on this ridge. The UDC Local Plan proposes that its new town would 'Provide soft transition zones around the boundaries of the deer park, open tree screens and ditches. This is particularly important along the northern boundary of the deer park which abuts the County boundary and Hildersham Wood, an area of ancient woodland' (SP7:4b/15b). In reality, however, this is wishful thinking. There cannot possibly be any credible guarantees that the microclimate, drainage, and lack of disturbance that are necessary to protect so delicate an environment can be assured when a town of 5000 dwellings is to be constructed directly next to it. It is contrary to NPPF2012 requirement that 'proposed development of land within or outside a SSSI likely to have an adverse effect on an SSSI ... should not normally be permitted' (para 118). NUGC would unavoidably destroy the irreplaceable heritage of Hildersham Wood.

**7) Other infrastructure The proposed NUGC would make substantial demands on the infrastructure of South Cambridgeshire but offers no assurances as to their financing.** The schools and surgeries and other facilities of South Cambridgeshire, like those of north Uttlesford, are currently at full capacity. A development on the scale of NUGC, substantially larger in its number of houses than Hinxton, Ickleton, Duxford and Great Chesterford combined, would make enormous demands as it grew over the 2020s on these and the other nearby communities amidst which it would be inserted. The UDC Local Plan makes no significant proposals to install its own infrastructure in advance. The proposal repeatedly refers to Town and Country Planning Association 'garden community' principles, but these have no legal significance whatsoever. Such statements would only be worthy of consideration if they provided specific guarantees of:

- (a) the percentage of the added land value arising from development that was to be 'captured' for infrastructure,
- (b) the amount of the added land value that was to be made available for infrastructure in advance of house building,
- (c) the extent to which Uttlesford DC would share this and Section 106 money with South Cambridgeshire DC, on which the greatest cost burden would fall, and

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<sup>16</sup> <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1001251.pdf>

(d) an arrangement whereby affordable housing would be made fully available to people currently living in South Cambridgeshire as opposed to being exclusive to those living in Uttlesford.

Without assurances on all these four points, any Uttlesford promises to mitigate the infrastructural burden of the NUGC on South Cambridgeshire are empty and have no substance.

**8) Inadequate consultation: There has been derisory community engagement and observation of due process.** Hinxton is the village second most affected after Great Chesterford by the proposed NUGC. When the UDC published its evaluation in response to its call for sites in 2016, Hinxton formally submitted comments which challenged material matters of fact related to flooding, traffic, landscape character and infrastructure<sup>17</sup>. We have received no response to these comments, nor to those that we submitted in 2017 at the Reg 18 stage<sup>18</sup>. At our request we have appeared before UDC to state our concerns<sup>19</sup>. The formal public events on NUGC organised by Grosvenor on behalf of UDC could not be considered consultation; at them Grosvenor made often inconsistent statements of intentions and vacuous pledges and they made no concessions to public objections. The present Reg 19 version of the UDC Local Plan neither addresses nor contradicts any of the factual points we have raised. It offers no more than evidentially unsupported and unconvincing wishful thinking that the impacts of NUGC on landscape, traffic, flooding, aquifers and other issues can, in some wholly unspecified way, be mitigated. The NUGC proposal has been developed by a process of dictat which has treated our threatened communities with contempt.

There appears to have been no significant consultation by UDC with South Cambridgeshire District Council (SCDC). Despite the substantial impact that the NUGC proposal would have on South Cambridgeshire, in July 2018 SCDC reported that discussions have not taken place with UDC on common housing concerns and, further, that ‘no agreed position has emerged with regard to the NUGC and especially regarding its transport and landscape impacts on South Cambridgeshire’<sup>20</sup>. The process of inserting NUGC into Uttlesford’s Local Plan has totally ignored the representations and interests of our South Cambridgeshire communities on which it would bear so heavily.

**9) Conclusion: The choice of site for NUGC has no valid justification. The process by which it has been developed is indefensible. Its massive costs in traffic, landscape damage, increased flood risk, aquifer damage, light pollution, heritage, and infrastructure would overwhelmingly be borne by Hinxton and neighbouring villages of South Cambridgeshire. No District Council would permit so great an imbalance of development costs between two neighbouring parish councils for which it was responsible. We call on the Planning Inspector to prevent this happening across our district and county boundary. The proposed NUGC is unsustainable and it should be rejected.**

William Brown (Chair, and on behalf of, Hinxton Parish Council)

7 August 2018

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<sup>17</sup> Submission from Hinxton Parish Council 26 March 2016

<sup>18</sup> Submission from Hinxton Parish Council 31 August 2017

<sup>19</sup> Statements made to UDC at Saffron Walden on 24 May 2017, 23 August 2017, 29 November 2017 and 31 May 2018

<sup>20</sup> Draft SCDC response to consultation on Pre-Submission Draft Uttlesford Local Plan (Reg 19), paras 22 and 63