

**Uttlesford District Council's Response to
The Great Dunmow Neighbourhood Plan Pre
Submission Document
2015-2032**

1.0 Introduction

- 1.1 The District Council supports the desire of Great Dunmow Town Council to produce a Neighbourhood Development Plan for its area. The Council has worked closely with the Town Council and the Neighbourhood Plan Steering Group and commits to continuing to do so.
- 1.2 We hope that you find the Council's comments useful. These comments are designed to improve the robustness and effectiveness of the Plan. If you wish to discuss any of these comments further please contact the Planning Policy Team.

2.0 Maps

- 2.2 All maps must have a licence number. At present your maps do not, and those that do are not at all clear. It is a serious offence, which could lead to a costly fine, if your licence number is not shown clearly on every single map.
- 2.3 The Plan is missing a policies map. This map shows all of the policy designations that are in the Plan. It should therefore include:
 - The Neighbourhood Plan area
 - The TDA (DS1)
 - Important Views (LSC2)
 - The Chelmer Valley (LSC3)
 - Character Areas
 - Wildlife Corridors (NE2)
 - Woodland Sites (NE1)
 - Core Footpath and Bridleway Network (GA1)

TDA Inset Map

- TDA (DS1)
- Site Allocations (DS2-DS8)
- Important Views (LSC2)
- Local Green Spaces (LSC4)
- Identified Sports Facilities (SOS1)
- Children's Play Space (SOS3)
- Cemetery (SOS4)
- Coach Park (HSTC2)
- Conservation Area

3.0 General Comments

- 3.1 Throughout the Plan Census figures have been used, it is not clear whether these figures relate only to Great Dunmow town (made up of the ward statistics) or for Great Dunmow Parish as a whole. Please could this be made clear in the text.
- 3.2 Paragraph numbers are lost on pages 13-15 and from page 44 onwards.

4.0 Notes on Neighbouring Planning

4.1 Paragraph 9: Whilst we agree that Woodlands Park Sector 4 should be included in the figures it may be useful to add a note next to it stating that it is outside the NP area.

4.2 Paragraph 20: Need to include the date the Town Design Statement was written.

5.0 The State of the Parish Today

5.1 Paragraph 26: Source needs to be included for the 71.6%.

5.2 Fig 2: This table is out of date and needs updating. A date also needs to be given along with the source. The most up-to-date table can be found on line:

<http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=1487&p=0>

5.3 Paragraph 34: Suggest the following changes to the text :

*“The UDC Strategic Flood Risk Assessment (2008), as quoted above, is the document cited by the UDC **Great Dunmow Neighbourhood Plan** Sustainability Appraisal and Strategic Environmental Assessment (2012-2015).”*

5.4 Paragraph 40: Please delete ‘Essex County Council’ as they are not the correct body to contact regarding listed buildings. Please replace with ‘Historic England’.

5.5 Paragraph 43: The date of the conservation area appraisal is needed (2007).

5.6 Page 27: Suggest a sub heading is added at the top of this page as the text is now discussing important approaches.

5.7 Paragraph 73: Essex County Council Rights of Way Improvement Plan needs a date.

5.8 Paragraph 74: Suggest the following changes to text:

“it comes from the south of the town (from Great Waltham), makes use of the Flich Way, and carries on to the north towards Saffron Walden.”

5.9 Fig 12: Date and source needed.

5.10 Paragraph 81: Dates are needed for the Employment Land Review and the Appraisal of Employment Land.

5.11 Paragraph 84: A date is needed for the Great Dunmow Business Survey.

5.12 Paragraph 90: As evidence to this statement you could use the following statistics from Commission School Places in Essex 2014-2019:

School	Net Capacity 2013/14	No. on Roll May 2014	Surplus deficit	Future net capacity	Forecast no. on roll 2018/19	Forecast surplus deficit	Forecast inc adj for new homes	Forecast surplus deficit
St Marys, Great	432	406	26	432	417	15	508	-76

Dunmow								
Great Dunmow Primary	420	405	15	420	425	-5	516	-96

6.0 Development Standards

- 6.1 Figure 15: This map needs a key. What is the blue line on the map? Ongar Road North and South should be included in the TDA as they both have planning permission.
- 6.2 Policy DS1: Development Limits: Should include Ongar Road North and South as allocations, as both have planning permission.
- 6.3 Policy DS2: TDA The Existing HRS Site: Add 'site' at the end of the first paragraph. Bullet point one mentions a specific site this policy relates to, however, in paragraph 1 of the policy it is not so specific. This policy requires a 1.8ha landscape buffer to the north and west of the site which is welcomed. There is an additional requirement for a substantial 20m buffer to the existing properties of Parsonage Downs, plus a substantial open green space in the centre of the development which connects to a green-strip pathway around the site. Has the site been adequately assessed to demonstrate that it can take this amount of open space plus provide the 100 dwellings required? Has a viability assessment been completed based on this policy approach? This policy doesn't stipulate a requirement for bungalows, unlike the other housing policies.
- 6.4 Policy DS3 Land South of Stortford Road: This policy should include Policy DS4 as you don't want one happening without the other. The map should be updated to include the blue shaded area for the school and the last paragraph should be deleted. At present the map only shows the housing development area, yet the policy talks about both. Policy DS3 continues with a requirement for a buffer either side of the Flitch Way but the allocation only exists to the north of the Flitch Way, which again suggests that the site map needs to be amended to include the school site. However, does a substantial buffer, which is required on ecological grounds, pose problems for the operation of the school, in particular the playing fields. ECC have very stringent requirements in relation to school sites and probably won't accept the requirement to have a buffer. If this ends up outside of the school site who maintains it?
- 6.5 Bullet point 5: LAPs should be included in the brackets.
- 6.6 Policy DS4 Land adjacent to Butleys Lane (land south of Stortford Road): Delete policy and map as it is to be included in policy DS3 (see above comment).
- 6.7 Justification DS4:TDA Land West of Woodside Way: In the first sentence delete 790 and replace with 850.
- 6.8 Policy DS5 Land West of Chelmsford Road (Smiths Farm): This policy is supported.
- 6.9 Policy DS6 Land West of Chelmsford Road Waste Transfer Station: This policy is supported.

- 6.10 Policy DS7 Woodlands Park: Replace 'Tree Protection Orders' with 'Tree Preservation Orders'.
- 6.11 Policy DS8 Land at Brick Kiln Farm: Suggest that the following bullet point is included as it was in UDC Submitted Local Plan:
'Access into the existing public open space on the eastern and western sides of the River Chelmer'
- 6.12 Policy DS9 Building for Life: Building for Life assessment to be submitted with the planning application is not a requirement for applications submitted to Uttlesford District Council. It is not a national requirement or part of our local requirements. We don't have a policy to justify the request and it will not be possible to implement a policy in respect of applications only relating to Great Dunmow. Therefore we cannot accept the wording of this policy. We can encourage developers to take the approach, but not insist on it.
- 6.13 Policy DS10 The Case for Space: The DCLG has published "Technical housing standards – nationally described space standard". This supersedes the RIBA document.
- 6.14 Policy DS11 Hedgerows: This policy is supported.
- 6.15 Justification DS12 Eaves Height: There is a quote from English Heritage, however, there is no reference as to what document this came from. English Heritage has changed its name and is now Historic England.
- 6.16 Justification DS13 Rendering, Pargetting and Roofing: At the end of the first paragraph delete *'...by nearly half the population.'*
- 6.17: The second paragraph states there was an English Heritage report, what report was this? The name is now Historic England.
- 6.18 Policy DS13 Rendering, Pargetting and Roofing: The wording appears muddled and it is unclear with regards to house finishes.
- 6.19 Policy DS14 Integration of Affordable Housing: This policy is supported.
- 6.20 Page 74, Fig 24 and 25: The tables need a source and date.
- 6.21 Page 75: A new SHMA has been published for Uttlesford. It would be worth updating the figures in Fig 26.
- 6.22 DS15 Local Housing Needs: This policy is confusing as it appears to be asking for 100% of dwellings to be 3 bed or less. It is also contrary to the new Strategic Housing Market Assessment 2015 which shows that the District is in need of 3 and 4 bed market houses. Please see below:

Figure 76: Market and affordable housing mix by LA (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

		East Herts	Epping Forest	Harlow	Uttlesford	TOTAL
MARKET HOUSING						
Flat	1 bedroom	710	430	170	140	1,400
	2+ bedrooms	810	450	30	80	1,400
House	2 bedrooms	1,510	1,020	610	690	3,800
	3 bedrooms	5,640	4,090	1,690	4,290	15,700
	4 bedrooms	2,740	1,580	50	3,110	7,500
	5+ bedrooms	770	510	-	1,410	2,700
Total Market Housing		12,200	8,100	2,500	9,700	32,500
AFFORDABLE HOUSING						
Flat	1 bedroom	820	570	100	320	1,800
	2+ bedrooms	470	450	550	330	1,800
House	2 bedrooms	1,210	710	940	850	3,700
	3 bedrooms	1,410	1,180	1,400	1,060	5,100
	4+ bedrooms	310	310	360	220	1,000
Total Affordable Housing		4,200	3,200	3,400	2,800	13,600
TOTAL DWELLINGS		16,400	11,300	5,900	12,500	46,100

6.23 To ask for a different mix in your policy you will need evidence.

6.24 The Council require 5% bungalows on all schemes of 10+ dwellings. This should be repeated in this policy.

7.0 Landscape, Setting and Character

7.1 Policy LSC1 Landscape Setting and Character: This policy is supported.

7.2 Policy LSC2 Important Views: Support in principle, but it should be noted that view 5 is now affected by a proposal granted on appeal.

7.3 Policy LSC3 The Chelmer Valley: Essential utility works are generally permitted development and we have no control over them. Could the GHQ Line pill boxes be a non-statutory heritage assets?

7.4 Policy LSC5 Assets of Community Value: This policy is supported.

8.0 The Natural Environment

8.1 Page 91 Justification NE1: In the second paragraph what are the dates of the reports you refer to?

8.2 Policy NE1 Identified woodland sites: This policy repeats national policy. SSSI's are protected by law under the Wildlife and Countryside Act 1981 (as amended). And the NPPF stresses the importance of woodland and local wildlife sites. You could turn this into a position statement promoting good management of these sites.

8.3 Paragraph 2: Delete all reference to the policy map and replace with the figure number. The term Policies Map is used for a map which shows all policy designations on it. (see comment on page 1) The date of the Tarpey reports needs to be given.

- 8.4 Paragraph 3: A date for the Hughes-Grieg report needs to be given.
- 8.5 Page 95, Map: This map needs a figure number.
- 8.6 NE2 Wildlife Corridors: The policy states that the map is overleaf when it isn't. Support in principle, but need to be aware that there may be some conflict with safety of operations at Stansted Airport so there may be some restrictions on the type of trees, plants or amount of waterbodies that can be established when within the control of planning.
- 8.7 Policy NE3 Street Trees on Development Sites: Same comments as above in relation to Stansted Airport.
- 8.8 Justification NE4 Screening: What report has English Heritage produced and what is the date? Also note name change to Historic England.
- 8.9 Policy NE4 Screening: Same comments as above in relation to Stansted Airport.
- 8.10 Page 99: A date needs to be included for the Essex Sports Facilities Strategy

9.0 Sport and Open Spaces

- 9.1 Policy SOS1 Identified Sports' Facilities: This policy is supported.
- 9.2 Policy SOS2: Sporting Infrastructure Requirements: There is no evidence to support the inclusion of this policy. It is not enough to say there is a deficit and it is a priority area. Where has the 30 unit threshold come from? Developer contributions can only be collected in relation to designated schemes and then a maximum of 5 contributions per scheme. What criteria are they wishing to use for the calculation of contributions? Who is going to calculate the requirement and how is it going to be monitored? Has a viability report been carried out on this policy?
Ensuring sporting provision is open for community use is not a land use planning issue and something neither this Plan, nor the Local Plan can enforce. It is therefore suggested that this policy is made into a position statement, excluding the 30 unit threshold.
- 9.3 Policy SOS3 Children's Play Space: This policy is supported.

10.0 Getting Around

- 10.1 Policy GA1 Cycle Footpath and Bridleway Network: This policy is supported.
- 10.2 Policy GA2 Integrating Developments (Paths and ways): This policy is supported.

11.0 The High Street and Town Centre

- 11.1: Policy HSTC1 Uses and Variety: Where is primary shopping frontage identified? If they have been taken from the Local Plan then a map needs to also be included in this Plan. Given the new permitted development rights for change of use from A1 to residential, this policy may be considered to be contrary to current regulations. However, the majority of the A1 uses are within the Conservation Area or are in listed buildings and therefore would require planning permission anyway. Who is going to keep an up-to-date list of all the shop uses in the primary and secondary areas for this policy to be implemented? At present the Council

do a town centre survey every year but this may not be frequent enough to ensure a policy like this is enforced.

11.2: Policy HSTC2 Coach Park: This policy is supported.

12.0 The Economy

12.1 E1 Employment Land: This policy is supported.

12.2 Policy E2 Loss of Employment Land: This policy is contrary to the permitted development rights set out in the Town and Country Planning (General Permitted Development) (England) Order 2015. It could be amended to, "Where planning permission is required" in the same way as HSTC1.

13.0 Healthcare, Education and Infrastructure

13.1 HE11 Medical Facilities: The Council understands the issues behind the policy aims, however, the criteria for new medical centres rests with NHS England. The Council would apply the County Car Parking Standards; the NP would need to provide evidence to show why a different standard would apply.

13.2 HE12 Secondary School Provision: This policy is supported, however, it should be noted that Essex County Council are the deciding planning authority for schools in their control.

13.3 HE13 Primary School Provision: This policy is supported, however, it should be noted that Essex County Council are the deciding planning authority for schools in their control.

13.4 HE14 Conversion to Educational Use: This policy is supported.