

**Committee:** Environment Committee

**Agenda Item**

**Date:** 18 November 2008

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**Title:** Uttlesford Core Strategy – Summary of Representations Received in Response to the Preferred Options Consultation

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Item for Information

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### Summary

This report provides members with a summary of the key issues arising from the representations received on the Core Strategy Preferred Options consultation. Accompanying this report is a document which summarises the representations received.

### Recommendations

For Members information

### Background Papers

Uttlesford Core Strategy – Preferred Options Consultation, November 2007  
Letters and e-mails of representation.

### Impact

Communication/Consultation	Considering feedback from consultation stages is an essential element in the preparation of the core strategy
Community Safety	N/A
Equalities	All representations are captured
Finance	N/A
Human Rights	N/A
Legal implications	Effective consultation on the core strategy is a statutory requirement.
Sustainability	Sustainability Implications are assessed
Ward-specific impacts	All
Workforce/Workplace	N/A

## Situation

- 1 As members will be aware the consultation on the Council's Preferred Options for the Uttlesford Core Strategy began on 30 November 2007 and ended on 11 January 2008. An overview of the representations received was presented to this Committee for information in June 2008 but this overview only reported the representations received on the policies and options for growth. The document which accompanies this report is now a complete summary of the representations received on all aspects of the preferred options document.
  
- 2 The representations are an important element in Members' further consideration of the Core Strategy and how it should be moved forward but there are other factors which also need to be taken into account in developing a sound Core Strategy namely:
  - The outcomes of study work
  - Ongoing Government consultation on the eco-town (see report)
  - The situation with regard to Stansted Airport

Until these have progressed further and more information becomes available officers will not be in a position to recommend appropriate responses to the issues raised in the representations. The accompanying document does not therefore contain any comment on or analysis of the representations or recommend any changes. This will be the subject of further reports to this committee.
  
- 3 The Government Office have advised that the Core Strategy cannot be considered sound unless there has been some assessment of the implications for the district strategy arising from different levels of growth at Stansted Airport. They consider that there is no articulation of what the Airport White Paper means for Uttlesford as a whole, what the options are or what the preferred option is for Stansted. They expect to see a preferred option based on evidence and a Sustainability Appraisal as well as other options which have been considered. In response to the Government Office comments a further round of consultation is being planned for next summer. This consultation will be informed by evidence being gathered for the G2 Inquiry. This additional consultation will also provide an opportunity for some of the key issues arising from the preferred options consultation as set out below to be considered further.
  
- 4 Housing – There is general concern about setting housing targets, especially for affordable housing without the results of the Strategic Housing Market Assessment (SHMA). The Government Office say that the Core Strategy should include a housing trajectory. The 10% contingency built in to housing provision in DC1 and DC2 although supported by some has attracted some criticism. The SHMA report is due early in 2009 and the results of this will be

taken into account in the next consultation. The Strategic Housing Land Availability Assessment (SHLAA) is currently underway. This will provide information on availability of housing land on a site by site basis that will also assist with developing the housing trajectory. The housing trajectory is also updated each year in the Annual Monitoring Report and will be included in the Core Strategy.

- 5 Infrastructure – The Government Office and others have suggested that more consideration should be given to what infrastructure will be required to demonstrate that the strategy is realistic and deliverable. An infrastructure plan will be developed through ongoing discussions with service providers and as study work e.g. the water cycle study and transport assessments are completed. The infrastructure plan as well as details of what infrastructure is needed will contain details on how and when it will be delivered, how it will be funded and who will be responsible for the delivery. The infrastructure plan will be submitted with the Core Strategy.
- 6 Countryside Protection – currently there are five policies in this section of the core strategy. DC4 defines the Metropolitan Green Belt, DC5 and DC6 protect the Countryside and Agricultural Land, DC7 defines the Countryside Protection Zone and DC8 covers landscape character. There is some concern that DC5 and DC6 simply repeat national policy and should be deleted. Go-East is also concerned that the Council’s approach to countryside protection represents a “business as usual” approach rather than demonstrating it is the preferred approach having considered and assessed the alternatives. To retain policies DC5 and DC6 it must be demonstrated that they have a specific Uttlesford focus. Issues with the CPZ can be addressed though the next stage of consultation which will look specifically at various scenarios for the airport.
- 7 Retailing – There is some concern about the suggestion in the preferred options document (para 5.22) that edge of town retailing might be supported. There is currently no overall strategy for retailing within the District – a point picked up by EERA. The current focus of the retail policy is the market towns and there is no strategy for a retail hierarchy ranging from village shops to provision of a new retail centre in the new settlement. Officers consider that there may be a case for exploring this further in the next round of consultation.
- 8 Flooding – The Environment Agency have expressed concern that without undertaking a water cycle study the Council risks the Core Strategy being found unsound. They have also objected to the flood risk policy. A water cycle study is being undertaken and the other concerns can be overcome with wording changes to the policy and the supporting text in discussion with the Environment Agency.

- 9 Resources and Renewable Energy – Objectors have suggested there is a need to strengthen the commitment in this section and expand it to include other related matters e.g management and minimisation of waste. Other objectors have also suggested that there is a need for a district wide strategy to reduce carbon emissions overall. This should be a result of achieving sustainable development but it could be explicitly stated early on in the document.
- 10 Health and Community Facilities – The Government Office and others say there is repetition between Policy LC1 which requires health and community facilities in new development and policy DC3 which has the general infrastructure requirements. It is agreed that there is repetition and this policy could be deleted but there is a strong emphasis on community well-being within the Sustainable Community Strategy and this should be reflected in the Core Strategy.
- 11 Growth Options – full consideration cannot be given to the representations on the growth options until the outstanding study work has been completed. This includes the transport assessment and the comparative sustainability study. Methods by which members will be advised of the outcomes of the study work were agreed at the LDF Task Group on 20 October 2008 (see minutes attached).
- 12 Omissions – it has been suggested that there should be additional policies on green infrastructure, design and climate change. Some objectors have raised concerns that in relation to some objectives the policies are not sufficient to deliver the objectives or that there are no relevant policies e.g. the issue of Air quality has been highlighted because it is covered by objective 17 in the Stansted Airport section but there is no policy. Policies in the Core Strategy must be necessary and not repeat national guidance, be locally specific and strategic in nature. Policies related to the control of development will be included in the Development Control DPD.
- 13 Sustainability Appraisal – In response to representations received a Comparative Sustainability Assessment of the preferred growth option is being prepared. This will consider all the issues raised about the new settlement ranging from accessibility to wildlife, how the impact of these issues could be mitigated against and whether the other growth options or other locations being proposed as new settlements would have a greater or lesser impact on these issues. Furthermore additional consultation to take place next year will be subject to Sustainability Appraisal as will the Submission Core Strategy.

- 14 Monitoring – In relation to a number of policies and objectives people have raised the issue of lack of specific targets and indicators and arrangements for monitoring. Monitoring the effectiveness of policies is an important element of plan preparation and review and also has to be reported in the Annual Monitoring Report. The monitoring framework will be included in the next consultation stage so that people have the opportunity to comment on it before the submission consultation.
- 15 The Government Office expressed concern over the structure of the document. The Submission document is therefore likely to have a different format to the Preferred Options Document. Their suggested format is to set out the basic introduction, scene setting (including policy context, details of the consultation undertaken to date) followed by a brief description of the essential characteristics of the area, flowing directly from this the critical issues, problems and challenges facing the area. This could then be followed by the spatial vision for the area followed by the strategies to achieve the spatial vision and the core policies which contain the activities and actions to deliver the strategy. The latter needs to include delivery mechanisms which can be monitored to ascertain how effective the overall strategy is. This may have an impact on how representations, particularly those suggesting specific textual changes, are considered as that text may not exist in the final document.

### Risk Analysis

Risk	Likelihood	Impact	Mitigating actions
The submission core strategy could be found to be unsound	4 In terms of the current position, the evidence base is inadequate	3 Were the core strategy found to be unsound at public examination, stages would have to be repeated	Complete the programme of technical studies. Undertake further consultation to test: the implications of technical studies for the options; and the strategy to be submitted for public examination

1 = Little or no risk or impact

2 = Some risk or impact – action may be necessary.

3 = Significant risk or impact – action required

4 = Near certainty of risk occurring, catastrophic effect or failure of project.