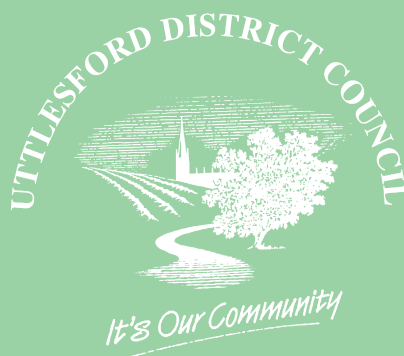


**Uttlesford Core Strategy - Further Consultation on Preferred  
Options February 2010: Summary of Comments, Report to  
the Environment Committee, September 2010**



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## Introduction 1

**1.1** This document summarises the comments received in response to the further consultation the Council carried out between February and April 2010 on the Preferred Options for the Uttlesford Core Strategy.

**1.2** The Core Strategy is one of the key documents in the Local Development Framework for Uttlesford which will gradually replace the policies in the Uttlesford Local Plan adopted in 2005. The Core Strategy will set out the long term vision and objectives including broad policies for steering and shaping development and identifying broad locations for new housing growth as well as defining areas which should be protected. Consultation has been carried out in accordance with the Council's Statement of Community Involvement which was adopted in July 2006 on the previous stages of the Core Strategy:

- Issues and Options Consultation, June 2006
- Policy Choices and Options for Growth, February 2007
- Preferred Options Consultation, November 2007

**1.3** The Further Consultation on Preferred Options was held to give people a further opportunity to comment on a number of outstanding issues. These included:

- Stansted Airport - what are the most likely scenarios and their impacts, how do these relate to other strategies. What is the evidence for the Council's position and what is the most likely scenario on which to base the Core Strategy.
- Options for 1,000 additional homes over and above the 3,000 at Elsenham - what does this mean for places and how do they perform in sustainability terms?
- Are the policies relevant to the Core Strategy i.e. are they strategic in nature, do they repeat national guidance, is there duplication between policies? Are any changes required in response to comments made at the preferred options consultation stage?
- Is the preferred approach still sound, taking into account up to date information, sustainability of approach against other alternatives and consultation responses?
- Do the key issues identified arise from the evidence?
- Are there demonstrably clear links between the Core Strategy and the Sustainable Community Strategy? The Core Strategy should be the key delivery mechanism for the spatial aspects of the CSC.
- Are there any gaps in policy coverage?

**1.4** The consultation ran from 15 February 2010 to 9 April 2010. Leaflets were sent to every household and business in the district, information was available on the Council's website and meetings were held with Parish Councils. Officers also attended the Community Forums and other meetings to answer questions on the consultation.

**1.5** Since the end of the consultation period in April officers have been capturing the comments. In total 1431 separate comments have been registered on the Limehouse consultation system. These include comments made by 22 Parish and Town Councils in the District and two adjoining parish councils. Adjoining local authorities like Epping Forest District, East Herts District Council and Cambridgeshire County Council made comments along with a number of national and local groups and organisations like the

## 1 Introduction

Environment Agency, Highways Agency, Stansted Airport Limited, the Water Companies, English Heritage, Sustainable Uttlesford and Uttlesford Futures. To access the limehouse system and view the comments go to <http://consultation.limehouse.co.uk/uttlesford>

**1.6** The main consultation document asked 31 questions on the various issues which the Council was seeking views on. The Council tried to keep the leaflet sent to all households short so that people would be able to find information on the key issues quickly. The leaflet included 7 key questions from the main consultation document. 2176 people replied to the questions in the leaflet. A summary of whether the questions were supported or objected to is set out on an excel spreadsheet which is available on the Core Strategy page on the Council's website. All the comments have been taken into account in this report.

**1.7** This report draws together some general conclusions from the representations in each section. This report does not make detailed recommendations for changes to the strategy or individual policies because the Council still has to consider the implications of the Government's decision to abolish Regional Spatial Strategies in July 2010 and the results of study work are still awaited which could have further implications for various policies.

**1.8** A list of sites being promoted through the Core Strategy is attached as Appendix 1. The type of development being proposed e.g. number of homes, type of use is given if this was provided in the representation but because of the strategic nature of the Core Strategy many agents have not gone into much detail about their clients proposals at this stage. Further information on proposed housing sites is available in the Strategic Housing Land Availability Assessment which is also available on the Council's website.

## Q1 - Housing Numbers 2

### Introduction

**2.1** The Council set out its preferred option in the Consultation as Option 4. This included a 3,000 homes in a new settlement to the North East of Elsenham, 750 new homes in larger towns and 250 homes in the villages. The following question was asked.

#### Question 1

Do you have a view on the Council's preferred option (Option 4)? Which option do you think is best in terms of finding sites for 4,000 homes in the district?

### Summary of Comments

**2.2** This question was included in the leaflet delivered to all households and 2089 responses were returned from this method. A further 160 responses were registered on the Limehouse system giving a total response of 2249. Of these 1435 (64%) were objection. 764 (34%) were comments of support or conditional support and the remaining 49 (2%) were observations.

### Household Views

**2.3** 61% of the householder objectors who gave their address details live within the CM22 6 and CM24 8 postcodes which includes Elsenham, Henham, Stansted Mountfichet, Birchanger, Ugley and Takeley

**2.4** Many of the objectors to the Elsenham new settlement proposal gave some or all of the following reasons for their objection or raised similar issues:

- concentrating so many houses in the location would not be a new settlement but would join Elsenham and Henham which would be contrary to the District Council's objectives
- the Government have rejected the "Eco Town" at North East Elsenham with the following criticisms so why is Uttlesford District Council supporting something similar (smaller but still a large development)
  - located within a water stressed area
  - greenfield location comprising versatile agricultural land
  - close to the major road network but with capacity constraints on local roads leading to the potential for congestion and pressure to upgrade and widen rural lanes
  - unsuitability of local roads for walking and cycling
  - potential to change the setting and character of historic villages
  - presence of priority habitats/species
  - grade 2 agricultural land
  - not brownfield land
  - possibly hinder the regeneration of Harlow
  - area of flood risk adjacent to the site

## 2 Q1 - Housing Numbers

- a dispersal solution would make use of existing services (some of which such as school capacity would welcome more pupils and shops which would welcome more customers) and disperse new car journeys over a wider areas.
- the selection of the option for North East Elsenham was a political decision taken before the evidence was gathered, contrary to Government guidance
- the consultation should have been more open and more prominently encouraged views on alternative options which do not include the North East Elsenham site, instead the comparative material is buried in technical documents
- the large development at North East Elsenham would gain access from narrow congested country lanes which the highways study say are unsuitable "without improvement" these "improvements" should be fully identified and tested for achievability before the site is allocated not afterwards.
- the North East Elsenham site will be too small to support a secondary school until the last house is built, at least 10 years after the development starts and capacity already exists elsewhere (contrary to one of the stated aims of a development of this size)
- the North East Elsenham site will be too small to support a supermarket leading to more car journeys on unsuitable roads
- the North East Elsenham site will be too small to support many local jobs. It would be a commuter settlement.
- the water cycle study raises concerns about water supply and sewerage capacity and calls for further investigation which should be detailed and tested for achievability before the site is allocated, not afterwards.
- affordable housing would be concentrated in a main location rather than be spread throughout the district to satisfy local needs.

### Town and Parish Councils

**2.5** 22 parish and town councils made comments on question 1.

**2.6 Little Hallingbury, Great Chesterford, Little Dunmow, Ashdon, Ickleton and Rayne Parish Councils** support the Council's preferred option. Four representations of conditional support were received from **Great Dunmow Town Council, Great Hallingbury, Great Chesterford and Hatfield Heath Parish Councils. Great Canfield and Hatfield Heath Parish Councils** agree that a new settlement is best but feel Elsenham is the wrong location. **Great Dunmow Town Council** recognises option 4 as the best option, but does not agree with the 500 dwellings proposed in Great Dunmow. **Great Hallingbury** questions the housing numbers in the first place but feels option 4 is best.

**2.7** Objections were received from the following town and parish councils: **Elsenham, Henham and Widdington Parish Councils** made detailed responses making similar comments to those listed under the household views above. **Stansted Mountfitchet, Little Easton, Arkesden, Ugley, Thaxted, Takeley, Newport, and Broxted Parish Councils** made objections based on lack of sufficient infrastructure, concerns over schools, questionable housing numbers, lack of evidence and impact on rural character of the district.

## Q1 - Housing Numbers 2

**2.8 Stebbing PC** made an representation stating that it objects to Boxted Wood and Andrewsfield development, explaining that a new settlement should be located with easy access to all main transport links and a railway station.

### Consultees

**2.9** There is support for the preferred strategy from **English Heritage** who suggest that the level of development for Uttlesford is commensurate with that proposed in many urban districts in the region, but the area lacks significant brownfield land on which to draw. The rural character of the District, and its extremely rich historic environment, mean that development on this scale is likely to have a significant impact. It is evident that the two main market towns are already under some pressure and, for this reason, the option of a new settlement at Elsenham, with smaller but significant allocations elsewhere, may present the most appropriate solution. The Stebbing Society also support the preferred option.

**2.10 East Herts District Council** is seeking to work with Uttlesford to identify, manage and seek to mitigate any adverse impacts on East Herts District arising from growth particularly at Elsenham and Great Dunmow.

**2.11** Objections have been made by the **East of England Development Agency** stating that the Core Strategy needs to identify the strategic ambitions of the Regional Economic Strategy. The **Environment Agency** consider option four to be the least favourable in terms of potential environmental damage and waste water issues. **Thames Water Property** objected expressing concerns about the ability for waste water from the new settlement to be adequately, economically and sustainably drained. Their preferred option is option 2. **Uttlesford Futures** consider that a new town in Uttlesford will distort the district's employment, retail and social pattern in its existing towns and villages. **CPREssex** object to the Council's preferred option and think that the Council should strongly resist the imposition of the housing requirements by central Government. The scale of development is not proven as being essential and is in any event woefully excessive for such a rural locations. It will destroy an attractive rural areas by turning two existing villages into a small town. It is in an area where there are clearly major issues regarding infrastructure - or the lack of, particularly issues over water, roads and insufficient rail capacity. **Saffron Walden Friends of the Earth** are objecting to all options on the basis that Uttlesford cannot sustainably accommodate this amount of housing. The **Essex Chambers of Commerce** object to the strategy. They consider that there is a need for a reassessment of the housing numbers as the recession and economic downturn may mean that the projected number of houses is no longer valid. The **Hadstock Society** object to the preferred strategy - their preference would be for Option 2.

**2.12 NHS West Essex** made observations regarding the impact on existing health care facilities the new settlement would have.

### Developers and Landowners



## 2 Q1 - Housing Numbers

**2.13** The preferred option is supported by **David Lock Associates on behalf of the Fairfield Partnership** who are promoting the Elsenham new settlement. They have submitted additional master planning work as part of their representation to show how the proposal might be developed.

**2.14** Two other promoters of new settlements at Boxted Wood and Andrewsfield are supporting the strategy because it includes provision for a new settlement but are objecting to Elsenham as the proposed location for that new settlement. Two developers promoting alternative new settlement locations at Easton Park and Chelmer Mead have objected to the Core Strategy.

**2.15** Other developers and landowners promoting land which does not feature in the Core Strategy have also objected to the preferred option. Generally they are questioning the likely delivery and sustainability of Elsenham given the infrastructure and environmental constraints.

**2.16** **GL Hearn on behalf of Enodis** do not object to any option or have any preference for any option but they are seeking the allocation of an additional 300 homes to Oakwood Park.

### Alternative Options

**2.17** In relation to the second part of question 1 which asks which option do you think is best in terms of finding sites for 4,000 homes in the district 1,155 comments were received. Of these 368 people expressed a preference for one of the other options set out in the consultation document. Their preferences were:

- Option 2 was the preferred option with 61% (224) comments in support
- Option 1 was the second favourite with 27% (99) comments in support
- Option 3 was third favourite supported in 10% (37) of comments
- and lastly was Option 5 with only 2% (8) support

**2.18** Around 755 comments were made suggesting alternative options to those above. These options included:

- Dispersal of housing around the District: 37% (283)
- Elsenham Alternative (see note below) : 32% (245)
- New settlement at Great Chesterford: 9% (67)
- New settlement at Boxted Wood: 3% (19)
- Growth to be concentrated in Saffron Walden and Great Dunmow: 3% (21)
- New settlement at Chelmer Mead: 2% (13)

## Q1 - Housing Numbers 2

- Argue smaller scale of growth: 2%(17)
- Supports new settlement in principle but not in Elsenham or those listed above: 2% (16)
- New settlement at Easton Park: 1% (9)
- Other suggestions: 9% (65)

**Note:** An alternative distribution was put forward by a number of respondents who were specifically objecting to the Elsenham new settlement proposal. This was as follows:

Assuming that 4,000 dwellings is the right number:

- Saffron Walden and Great Dunmow are large towns with significant infrastructure and services which could cope with at least 1,500 houses each, a small percentage on their existing housing numbers
- the 6 "key villages" (including Elsenham) could accommodate 130 houses each, an acceptable percentage increase on their existing housing numbers.
- the remaining small villages would then have to accommodate 12 houses each.

**2.19** 12 parish councils made representations supporting an alternative option. **Elsenham Henham Ugley and Widdington Parish Councils** all support a dispersal option. **Little Easton Parish Council** supports option 2. **Great Canfield and Takeley Parish Councils** both support the idea of a new settlement but feel that Great Chesterford is a more suitable place due to better infrastructure and road access. **Arkesden Parish Council** supports the new settlement option but suggests it should be developed between Uttlesford and Braintree, **Hatfield Heath Parish Council** also agree to a new settlement but think it should be near a major trunk road and **Thaxted Parish Council** support the Andrewsfield development. **Newport and Broxted Parish Councils** support option 5.

**2.20** Of the non household responses supporting an alternative option the majority are from agents representing landowners/developers promoting development sites in the District. Any preference for an alternative tends to be determined by the location and scale of the landowners interests but there is some support for options 1 2 and 3 and some support for a broader distribution amongst suitable smaller settlements. Two objectors have suggested reducing the number of homes proposed at Elsenham e.g. to 2500 and spreading the remainder between other villages. Takeley is suggested by two developers as a potential location for additional development.

### Conclusions

- There is concern about the overall level of housing growth within the district
- The new settlement proposal element of Option 4 has again attracted considerable opposition. People are generally concerned about its deliverability in terms of the amount of infrastructure required, its sustainability and the environmental impact.

## 2 Q1 - Housing Numbers

- The preferred alternative is for some form of wider distribution over a larger number of settlements.
- But there is some support from some of the statutory consultees for a concentrated form of development which minimises the environmental impacts of growth in the District as a whole and brings benefits in terms of funding infrastructure provision particularly in relation to education and health.
- The abolition of the Regional Spatial Strategies in July 2010 may have implications for the overall housing target if the housing numbers for the District are to be tested for soundness and subsequently subject to review. This will have implications for the housing strategy.

## Q2 - Comparative Sustainability Assessment 3

### Introduction

**3.1** The Council prepared a Comparative Sustainability Assessment (CSA) to accompany the consultation. The CSA looked at various issues in relation to the new settlement element of the preferred housing strategy and compared these with other options. The Council felt that the findings of the CSA provided justification to progress with the Core Strategy for further consultation with land to the north east of Elsenham as the key element of the housing strategy. People were asked for their views.

#### Question 2

Do you have any comments on the Comparative Sustainability Assessment?

### Summary of Comments

**3.2** There were 90 comments received in response to this question. The majority (62%) are objections. Many of the comments received in response to this question actually relate to the proposed housing distribution. The comments below only summarise issues raised about the CSA as comments about the housing distribution are covered elsewhere in this report mainly Questions 1, 4 and 15.

**3.3** **Natural England** considers that the CSA is a comprehensive assessment of the options and is in agreement with the findings. They consider it provides a robust assessment but feel there is scope to set out more detailed mitigation measures in some instances. **The Government Office** feel the CSA is particularly useful in understanding the likely implications of each option. **David Lock Associates on behalf of the Fairfield Partnership** agrees with the CSA and the relative merits of strategic scale development at Elsenham. **Thames Water Property** highlighted the need for a detailed Water Cycle Study to be carried out to assess whether constraints can be overcome. Other representations of support were also received from six individuals three of whom mentioned the importance of transport links. Locating development, **Hatfield Heath Parish Council** generally agree with the claims for the derived benefits of proximity to the railway station and one person felt that Great Dunmow had better highway links and could take more development. **Little Dunmow Parish Council** agree that settlement options under option 5 should be discounted because they perform less well in sustainability terms.

**3.4** **Lawson Planning Partnership on behalf of NHS West Essex** support the additional requirement to provide a serviced site for a new health centre as part of the new settlement rather than just land.

**3.5** **Andrewsfield New Settlement Consortium** consider the principal of a new settlement is supported by assessment but needs refinement to steer a sufficient quantum of new development to an environmentally low scoring location i.e. Andrewsfield.

### Objections

### 3 Q2 - Comparative Sustainability Assessment

**3.6** Objections have been received from a number of parish councils. **Elsenham Parish Council, Widdington Parish Council and Henham Parish Council** consider that the CSA should have tested 40 possible options instead of the nine tested. They say that the process is crude and feel that the sustainability objectives should be grouped, prioritised and weighted. They feel that Option 4 is not a runaway winner and that other new settlement options are equally capable of meeting the Council's preference for a single settlement solution. **Great Canfield Parish Council** feel the assessment is crude and contains questionable judgments, they have submitted detailed comments on the scoring within the CSA. **Great Chesterford Parish Council** object to the proposition that the site North East of Great Chesterford is a suitable alternative to Elsenham for a number of reasons. They consider the lack of weighting means the CSA is flawed. **Newport Parish Council** think that CSA is a laudable attempt to pull all the issues together but has severe weaknesses. **High Roding Parish Council** object to Boxted Wood - if O4 is to be the preference then houses must have access to all main transport links. A railway station is vital if any development is to be truly sustainable. The **Stebbing Society** also object to Boxted Wood and Andrewsfield

**3.7** The **Environment Agency's** objections related mainly to the water environment but they also felt the assessment did not give a balanced view of sustainability of the proposed growth especially in relation to the sustainability of new settlements stating there is no mention of the provision of sustainable sewage and waste infrastructure nor impacts on the environment. The water elements of sustainability objective 6 (to reduce and control pollution of air, water and soil) should include the objectives from the Water Framework Directive. Before the preferred option is confirmed a detailed feasibility study and costings need to be undertaken on the options. The Core Strategy should include a target for water use.

**3.8** **Essex County Council** consider that the limited variation in the sustainability performance between spatial options and the justification as to why a specific approach is taken is unclear to stakeholders. They also suggest that points related to the historic environment need to be reviewed.

**3.9** **English Heritage** have suggested that the measures identified for evaluation and mitigation of archeological interest need to be implemented at an early stage but feel the historic characterisation report and the historic settlement character reports are helpful parts of the evidence base.

**3.10** **Uttlesford Futures** question what they term a "pseudo scientific" approach. **CPREssex** are concerned that the methodology for differentiating the larger towns is insensitive as no weighting is given to various elements - it could be argued that any of the options will adversely affect the vast majority of sustainability objectives and should be resisted.

**3.11** **Stansted Airport Limited (STAL)** feel the appraisal should have included a criteria related to compatibility of new settlement options with committed development of Stansted as a two runway airport. STAL is particularly concerned about the impact on road and rail.

## Q2 - Comparative Sustainability Assessment 3

**3.12** Other objectors to the CSA felt that it had been produced to justify the decision rather than being an objective appraisal aimed at making the decision and there were concerns about the scoring and lack of weighting of the objectives and there may be other sustainability measures that could be used and other options which have not been fully tested. One objector feels that all embracing comparative studies are not necessary because there are so many checks and balances to minimise environmental damage. Some objectors are concerned that Great Chesterford scored relatively well in the CSA and would object to any significant development in this location.

**3.13** A significant number of the objections received are development companies and landowners seeking to promote development of a scale and/or in locations which are not supported by the CSA. A brief summary of their comments follows:

**Scott Wilson on behalf of Galliard Homes** - the CSA should inform the location not confirm it. The scoring makes it difficult to properly distinguish between contenders. Expect something more rigorous in terms of a transport assessment.

**Sworders on behalf of Clients** - The CSA is not underpinned by robust and credible evidence base and does not provide adequate support for option 4. Detailed comments on scores.

**Bidwells on behalf of Barrats** - In principal this is a logical way to compare growth options but we have points of concern and feel there is a lack of clarity and logic with conclusions reached.

**Januarys** - Do not support the findings of the CSA and question if this document provides a credible and robust evidence base upon which Option 4 is supported.

**Weston Homes** - study relies on subjective evaluation and does not weight access to employment. Option 5 deserves further consideration since it responds to the shift to more localised employment. The role of Bishops Stortford should be recognised.

**Andrew Martin Associates on behalf of Chater Homes** - Scoring for Elsenham is overly generous and that of Chelmer Mead is too low. The CSA makes a number of valid points on historic character, health and educations constraints at Saffron Walden and Great Dunmow.

**ASP on behalf of a number of clients** - the CSA raises a number of issues that reinforce ongoing concerns with the new settlement.

**Barton Willmore on behalf of Land Securities** - Methodology is unsound and the conclusions are wrong. Easton Park should replace Elsenham. The assessment is not objective. Not a level baseline of data for each sites. Objectives are too wide ranging and there is not an appropriate weighting process.

**Bidwells of behalf of Taylor Wimpey** - the CSA is not objective, there is a lack of evidence to support conclusions and the scoring is subjective.

**Bidwells on behalf of 121 Radwinter Road** - the CSA makes no reference to the viability or delivery of affordable housing.

### 3 Q2 - Comparative Sustainability Assessment

**Boyer on behalf of Gleeson Homes** - contrary to PPS12 there is no assessment of higher numbers, the process is fundamentally unsound.

**Fenn Wright Surveyors** - Greater weight should be given to the scope to expand Great Dunmow. The scale of growth proposed at Elsenham is insufficient to warrant a new secondary school and will lead to car based trips.

**Savills/Legal and General** - the CSA does not take into account the relative importance of different objectives. The CSA does not acknowledge the wider role of Stansted as an international gateway and major employment centre and key driver of the sub regional economy.

**Terence O'Rourke on behalf of Countryside Properties** - Countryside are not convinced that the CSA is fair and reasonable assessment of all realistic development options. It appears subjective. Impression is that evidence is being moulded to fit pre-established conclusion. The Comparative Transport Anyalysis provides only an initial guide and is not a basis for decision making. The scoring is not comparative. The preferred option should not score so highly in terms of transport - there is too much reliance on rail. The level of information available for each option is not the same. Not clear whether any weighting has been applied.

**Mel Dunbar on behalf of Wickfords** - Inconsistency of scoring between options. Positive scores for Elsenham depend on new infrastructure which must all be delivered for the option to perform as well as suggested by the Sustainability Appraisal.

**Humphreys on behalf of Hassobury Management Limited** - CSA lumps small villages together in Option 5 so draws conclusions that you would not make when assessing particular sites on their individual merits.

**DLP on behalf of Kier Ventures** - The CSA is a retrofit exercise but demonstrates that until infrastructure pre-requisites have been fully addressed the option for a new settlement is no more than aspirational.

**Sworders on behalf of Hitchcock** - CSA is not underpinned by credible and robust evidence base and does not provide adequate support for O4 as required by PPS12 and prove that it is more appropriate given reasonable alternatives.

**Bovis Homes** - The Council is unduly negative about the implications of expanding existing settlements will be a heavy burden on developers cashflow. Dispute assertion that the new settlement will provide greater protection to existing settlements.

**Savills on behalf of Great Dunmow Estates** - It is essential that Great Dunmow continues to perform an important role in Uttlesford as a provider of services and facilities. Any strategy involving Elsenham shouldn't have an adverse impact on this.

#### Conclusions

- While some people consider there is value in the CSA as an exercise to compare the impacts of different options objectors have questioned the methodology and evaluation process and the outcomes.

## **Q2 - Comparative Sustainability Assessment 3**



## 4 Q3 - Sustainability Appraisal of the 6 Housing Options

### Introduction

**4.1** The previous consultation in November 2007 included the proposal for a new settlement but did not explain in any detail where the rest of the housing required would be built except to state as a general guide that 750 new homes would be in the larger towns with 250 homes in the villages. To decide what scale of development might be appropriate for the towns and key villages the Council carried out a Sustainability Appraisal, looking at the social, environmental and economic impacts of six different options for distributing the housing. All the options assumed that a new settlement for 3,000 homes at Elsenham as a key element of the option. Part of the assessment work included a matrix showing the infrastructure capacity of the towns and key villages. The Council's preferred option was a variation of one of the tested options with 3000 homes in a new settlement north east of Elsenham, 500 homes in Great Dunmow, 250 in Saffron Walden, 160 homes dispersed through the key villages and 90 homes dispersed through other villages.

### Question 3

Do you have any comments on the Sustainability Appraisal of the six housing options?

### Summary of Comments

**4.2** 72 comments were received in total. 17 (23%) were comments of support or support with conditions but 47 (65%) were objections. Around half of the objections were made by landowners or agents acting on behalf of landowners or developers seeking to promote sites which would not be supported by the preferred option.

**4.3** A number of objections are made on the basis that a new settlement at Elsenham is not appropriate and contrary to the RSS and the approach is contrary to advice in PPS12. These include **Weston Homes, Bidwells on behalf of Taylor Wimpey and RPS on behalf Endurance Estates. Scott Wilson on behalf of Galliard Homes** do not consider any of the 6 options will lead to satisfactory delivery of housing and that Elsenham should not be included in any provision up to 2016. Six other people objected to the appraisal because it assumes development of a new settlement at Elsenham, three people objected to the Elsenham new settlement specifically because they did not feel it would be large enough to provide local employment. This point was also raised by a large number of objectors in relation to Q1.

**4.4** **Bidwells on behalf of 121 Radwinter Road Partnership and Benyon Fox and Hamilton** consider the options to be flawed because they are not flexible enough to cope with changing circumstances contrary to advice in PPS12 and if Elsenham proves to be undeliverable there is no contingency plan. **Natural England** support moderate development in each key village which they suggest is preferable to more intense

### Q3 - Sustainability Appraisal of the 6 Housing Options 4

development in one settlement. **Essex County Council** are particularly concerned about the potential significant impact of the new settlement on the historic environment and local road network and the viability of passenger transport services.

**4.5** Some people have commented specifically on the information presented in the infrastructure capacity matrix. **Essex County Council** have identified issues with the various options relating to their various service areas. In relation to the preferred option they are concerned that splitting the homes between Saffron Walden and Great Dunmow would place pressure on provision in both towns without providing the opportunity to establish new schools. Small scale development of 250 homes distributed throughout the district can be supported and could bring benefits to small rural primary schools. Careful consideration should be given to safe walking routes to school and minimising the need for school transport. One person has objected because not all aspects of infrastructure is covered and mentions sewage disposal, water supply, gas and electricity, internet and telephone as areas where additional information should be provided. The **Environment Agency** feel that the information presented in table 2.2 does not accurately reflect the information in the Water Cycle Study. Further analysis based on Stage 2 of a Water Cycle Study is needed. Table 2.2 raises only water quality issues which will need to be addressed. **Thames Water** have highlighted the fact that no land is available at Stansted Waste Water Treatment Works for expansion and that difficulties involved in upgrading the Sewage Treatment Works should not be underestimated. **Great Canfield Parish Council** feel that account has not been taken of interaction between this housing and the new settlement e.g. school provision, public transport times to a major hospital are questionably short and the civic amenity site for Great Dunmow should not be a factor as it must be provided even with no development, The **Highways Agency** say further evidence will be required in addition to the Elsenham Traffic Assessment to understand the collective impact of housing options including M11 junction 8A.

**4.6** There is some concern that not enough options have been tested.

**4.7** **Hatfield Heath Parish Council** object on the basis that Elsenham is presented as a non optional site for a new settlement. Sub-options should be presented in a matrix with all site options for a major new settlement. **AMA on behalf of Chater Homes** object because this appraisal does not assess the preferred options they consider that their proposals for Chelmer Mead provide a more sustainable alternative. **Sworders on behalf of Hitchcock and other clients** do not consider the appraisal is objective and based on a robust and credible evidence base and suggest this is contrary to advice in PPS12 they also suggest that options for higher allocations to other villages should be considered. This last point is supported by **Terence O'Rourke on behalf of Countryside** who suggest that the assessment should look at the benefits that greater growth in villages could deliver e.g.a new doctor's surgery.

**4.8** A number of people made comments about specific settlements in the housing options.

#### **Saffron Walden**

## 4 Q3 - Sustainability Appraisal of the 6 Housing Options

**4.9** There are concerns about the capacity of Saffron Walden to accommodate more development because of congestion, pressure on schooling and pollution.

**4.10 Essex County Council** highlights that Saffron Walden suffers from local congestion due to the historic road network and the lack of feasibility to improve the road infrastructure. 3 air quality management areas have been identified which require treatment. Dependent on the location and scale of development additional significant road infrastructure may be required to take traffic out of the historic town centre to minimise congestion and air quality issues. Highways Services have concerns about large housing provision at Saffron Walden.

**4.11 Fenn Wright Surveyors** consider that there are severe constraints on the further expansion of Saffron Walden they suggest that the the requirement for SW should be much lower and the allocation for Great Dunmow raised accordingly.

**4.12** There is some support for development in Saffron Walden from:

**4.13 DLP on behalf of Kier Ventures** promoting a site at Thaxted Road support the allocation at Saffron Walden. **Sworders on behalf of the Engelmann Trust** consider that more development should be allocated to SW and refer to their site to the east of Thaxted Road. They do not consider that the Sustainability Appraisal is objective and based on a robust and credible evidence base.

**4.14** One objector suggests that the more emphasis should be given to the potential contribution that additional housing could make in many villages and that the current stage of secondary education should not predetermine the whole strategy. He feels that a more thorough strategy would consider the possibility of a second school in an expanded Saffron Walden.

### Great Dunmow

**4.15 Essex County Council** conclude that Great Dunmow is a positive location in terms of transport for housing allocations and also benefits from existing, established services and facilities. There is no railway station but Stansted Airport, Bishops Stortford or Chelmsford are likely destinations to connect to train services. There is an existing public transport services to these destinations and with increased housing there is the opportunity to improve the existing service increasing the frequency and coverage.

**4.16** Options concentrating development in Great Dunmow are supported by **Savills on behalf of Great Dunmow Estates and Mel Dunbar on behalf of Wickfords**. Some additional sites are promoted with **DLP on behalf of Taylor Wimpey** seeking to include land at Ongar Road within the strategy saying that on the Council's own evidence base there are no reasons why development of land at Ongar Road should not be allocated. Overall, there is a substantial advantage to Dunmow from development of at least the scale indicated in the Preferred Option including land lying to the south of the town to deliver additional services where shortfalls have been identified. **DLP** have also made representations on behalf of **Kier Ventures** seeking to have land to the west of Great Dunmow identified as a potential housing location. One supporter considers that new employment is the key to sustainable community growth which means south of Dunmow

## Q3 - Sustainability Appraisal of the 6 Housing Options 4

looks favourable but as a resident of Oakwood Park is concerned about the impacts when the correct trigger points are not included in S106 agreements. Another person observes that Great Dunmow has better road access.

**4.17 Bidwells on behalf of Barratts** object on the basis that the only analytical text in this sustainability document is a one page summary of findings. This acknowledges that development in Great Dunmow can take place with less impact on the historic character of the town than at Saffron Walden and that Great Dunmow has more school capacity than Saffron Walden. Yet despite this assessment, the Council prefers option 4(iii) which proposes only 500 homes in Great Dunmow as against 250 in Saffron Walden. The sustainability appraisal does not appear to support this split of development; Dunmow is clearly the more sustainable location for growth

### Newport

**4.18 Savills on behalf of Quendon Properties** note that the sustainability appraisal of Newport identifies a shortfall of playspace, amenity space and a dental surgery and suggest that additional growth and development could be a way to address these needs.

### Takeley

**4.19** There is a some limited support for additional development in Takeley.

**4.20** One objector has suggested there should be an equal split between Dunmow and Saffron Walden possibly reduced by more in Takeley. **Carter Jonas on behalf of Bellway Homes and Countryside** say the Council's reason for supporting Option 4 (iii) because it distributes development equally amongst key settlements is contrary to the proposal to concentrate development at a new settlement in Elsenham. Their preference would be for an option which focuses development on Takeley. **Savills on behalf of Amsgal** suggest future allocations in Stansted Mountfitchet and Takeley need to be considered in the context of significant unimplemented consents. Additional allocations will contribute to critical mass needed to support future infrastructure.

### Hatfield Heath

**4.21 Swords on behalf of the Taylor Trust** consider the strategy should not exclude green belt villages and they and another objector consider that Hatfield Heath should be included in the list of key villages.

### Other Comments

**4.22 Essex County Council** feel that dispersal of 250 homes through the key villages and other rural settlements will result in localised impacts on the highways network but without the benefit of significant mitigation. However the fact that development is dispersed over a number of villages should reduce the traffic impact to a minimum at locations, where in the main, traffic congestion is not a major issue.

**4.23** A small number of people expressed a preference for one or more of the alternative options but there there is no consensus on a preferred alternative.

## 4 Q3 - Sustainability Appraisal of the 6 Housing Options

### Conclusions

- Although there are significant objections to the preferred option arising from the sustainability appraisal a large proportion of these are from people with an interest in alternative development proposals
- There is no clear preference for any of the alternative options
- The detailed response from Essex County Council and service providers like Thames Water in relation to this question will form the basis for further discussions about a viable spatial housing distribution for the District.

## Q4 - Distribution of Housing 5

### Introduction

**5.1** The Council explained how it's preferred option for the housing strategy could be delivered taking into account available services and infrastructure. This would be 3,000 homes north east of Elsenham, 500 in Great Dunmow, 250 in Saffron Walden, 160 homes dispersed through the key villages including 30 each at Great Chesterford, Takeley and Thaxted, 50 at Newport and 20 at Stansted Mountfitchet and 90 homes in total on sites in smaller villages with a primary school. People were asked for their views on the proposed housing locations.

#### Question 4

Do you have any comments on the housing locations identified above. Do you think the housing numbers are about right for each of the towns and villages? If not, what do you think the scale of development should be and do you think any alternative should be included?

### Summary of Comments

**5.2** This question was included in the leaflet delivered to all households. 1802 comments were received in the questionnaire responses that were returned a further 115 were registered on the Limehouse system giving a total of 1917. 29% are comments of support (452) or support with conditions (93). 65% (1256) are objections and 6% (116) are observations. Some of the issues raised in response to this question have also been raised in relation to other questions mainly 1 and 15 .

### Parish Councils

**5.3** The housing strategy is supported by **Great Hallingbury Parish Council**, **Great Chesterford Parish Council** who consider that the allocation of 30 homes would be possible on land already identified. **Takeley Parish Council** do not object to proposed 30 homes in Takeley.

**5.4** **Great Dunmow Town Council** disagrees strongly that 500 homes should be located in Great Dunmow. A study is required to find out exactly how much development the town can take in terms of historical and environmental impact. **Little Easton Parish Council** also object to 500 homes in Great Dunmow because they think it is an excessive amount given existing and committed development without risk to character.

**5.5** **Great Canfield Parish Council** do not think that enough account has been taken of the interaction between this housing and 3,000 homes in a new settlement. **Hatfield Heath Parish Council** are concerned about ribbon development between Takeley and Canfield. **Little Hallingbury Parish Council** consider that Little Hallingbury could only accommodate around 6 homes.

## 5 Q4 - Distribution of Housing

**5.6 Thaxted Parish Council** consider that future development in Thaxted must take account of the shortfalls which already exist. Water supply and sewage are at capacity and there is a shortage of green space and play area provision. Thaxted Primary School and GP surgery are already oversubscribed. The Parish Council would support future development of number of sites identified in the Strategic Housing Land Availability Assessment including the Molecular Products site, Claypits Farm and Barnards Fields but they have concerns about the increase in traffic volume which could arise from development at Weddow Road and they have identified two alternative sites at Weaverhead Lane and land at Monk Street which is being promoted by the landowner for a mix of market and low cost homes.

**5.7 Newport Parish Council** suggest a strategy where there should be a pro rata spread of additional housing to the communities that have not had huge development recently moderated in very small villages and with controlled release of green belt land. **Broxted Parish Council** suggest all 4,000 homes should be dispersed through the district with the majority attached to existing towns. They consider larger villages like Stansted and Broxted should take a share with the remainder being spread around smaller villages. Broxted feels that 20-30 in the villages with some affordable housing would strengthen the local community and help to support local shops, pubs etc. **Ugley Parish Council** do not support the new settlement and suggest that Ugley could accommodate around 10-30 new homes.

### Consultees

**5.8 Cambridgeshire County Council** accept the proposed scale of growth at various settlements on the basis that it is unlikely to cause any adverse impact on service provision in Cambridgeshire.

**5.9 LPP on behalf of NHS West Essex** make the important point that as well as identifying numbers of doctor's, dentists etc the Council needs to take into account the capacity of existing health care provision and they have provided as part of their representation a summary of the impacts on housing growth in various settlements. In relation to Great Dunmow and Saffron Walden there is insufficient capacity to accommodate the additional number of new homes on top of the new sites already coming forward but this scale of growth would not be enough to warrant a new surgery and it would be difficult to meet patients needs. 3,000 homes at Elsenham would warrant a new health facility. The existing facilities in Great Chesterford would be able to cope with the level of growth being suggested i.e. 30 homes. Stansted Surgery is currently at capacity but a new surgery is being planned. Newport surgery is currently not able to take any more patients but the new facility in Stansted Mountfitchet may be able to take some of the growth. Takeley is served by a number of practices which could not cope with an additional 30 homes given the ongoing expansion of the villages with the Prior's Green development but the growth in Takeley and Great Dunmow could jointly warrant a new facility to be built to accommodate both areas of growth.

**5.10 Anglia Water Services Ltd** have identified Elsenham, Great Chesterford and Thaxted identified as areas with major constraints to the provision of infrastructure/waste water treatment to accommodate proposed growth. They stress the need for a detailed Water Cycle Study to be carried out.

## Q4 - Distribution of Housing 5

**5.11 Saffron Walden Friends of the Earth** can't see how Saffron Walden can take 250 homes given the constraints. They agree with the assessment of the constraints set out in the consultation document.

**5.12 English Heritage** are concerned that the settings of historic towns and villages should be protected, including key views. They are also very concerned about any development at Great Dunmow to the east and north and in Saffron Walden to the West and North West. They identify the town and country interfaces as most sensitive. The setting of the Church and other key buildings could be damaged by ill sited development on higher ground to the east of town. Thaxted village is very sensitive and any peripheral development should be stringently assessed and restricted to local need. The approaches from the countryside to the historic core and the soft urban/rural interface are critical to the appreciation of this historic settlement.

**5.13 CPREssex** have expressed concerns about additional building in Saffron Walden because of Air Quality and school capacity issues and suspect that the same might be true of Great Dunmow.

**5.14 Ickleton Parish Council** consider it unlikely that Saffron Walden can accommodate large increases in house building due to traffic congestion and air quality. This view is also shared by the **Ickleton Society** who say significant development in Saffron Walden is not sustainable for the following reasons; public transport links are not good, the town has air quality issues, access to the M11 at Junction 9 is limited and not enough secondary school capacity. They would prefer 750 homes in Great Dunmow with minimal development in Saffron Walden.

**5.15 The East of England Development Agency** consider an economic strategy is needed to support the new settlement proposal.

### Developers Land/ Owners

**5.16** A list of sites which developers and landowners are seeking to have included in the Core Strategy is attached as Appendix 1. Generally the distribution of housing is supported by those whose sites fall within the broad areas of search indicated in the consultation document. There are objections that the broad areas of search for Saffron Walden and Great Dunmow are too restricted or the numbers are too low and other areas should be included e.g the east of Great Dunmow. Some people feel that Stansted Mountfitchet should play a larger role in the strategy. Additional areas are also being suggested for the key and other villages. The main case being made for increasing the number of new homes in villages is that it will help to support local services.

### Summary of Household Responses

- A number of people have questioned the need for the total number of houses.



## 5 Q4 - Distribution of Housing

- There is mostly support for the scale of development suggested in Great Chesterford but for no more than 30 homes because of potential issues with school capacity.
- There are mixed views on the development proposed in the key villages of Newport, Thaxted and Stansted Mounfitchet. The scale of growth proposed in these settlements is accepted by some but others feel the numbers suggested are too high.

**5.17** A number of alternative housing distributions have been put forward in the household questionnaire responses:

- The most frequently suggested alternative is the one which was also suggested in response to Question 1 i.e. 1500 in Saffron Walden and Great Dunmow, 130 in Key Villages and 12 in each of the smaller villages. There were also some variations to this with ranges of development being suggested.
- Some people suggested more development should be focused in Saffron Walden and Great Dunmow
- There was some support for a change in the split between Great Dunmow and Saffron Walden with Saffron Walden taking more.
- Some people felt that Saffron Walden could not cope with the 250 suggested because of transport, pollution and school capacity issues.
- More dispersal with increases across all settlements which could be some percentage of the existing number of homes.

## Conclusions

- There is concern about the capacity of the district to accommodate the level of development set out in the Regional Spatial Strategy
- The abolition of the RSS and the Government's new localism agenda may provide an opportunity for different levels of growth to be tested.
- The preference seems to be for some form of wider distribution strategy but at the RSS level of provision this may result in scales of development, particularly in the key villages which are too high for people to find acceptable and too low to secure the delivery of supporting infrastructure.
- It may be difficult to achieve a consensus view on the appropriate level of growth in any particular settlement.

## Q5 - Development Scenarios for Stansted Airport 6

### Introduction

**6.1** In relation to Stansted Airport the Council considered that there were three principal scenarios for Stansted Airport which should be tested against the Sustainability Objectives. These were Scenario 1 - effectively a "no growth" scenario with passenger throughput broadly in the range of 20-35 million passengers per annum (mppa). Scenario 2 - recognising the implementation of the Generation 1 planning permission granted on appeal in 2008 which would see passenger numbers increase to 35 mppa on the existing runway and Scenario 3 - implementation of BAA's Generation 2 proposals with passenger numbers rising to 68 mppa during the plan period with a second runway. S3 performed poorly against the sustainability objectives. S1 performed best against the sustainability objectives but revised demand forecasts suggest that the G1 permission will be implemented so the Council's assessment is that Scenario 2 (G1 delivery) represents the most appropriate assumption for the LDF.

#### Question 5

What are your views on the scenarios for development at the airport. Do you agree that scenario 2 represents the most realistic scenario? If not please say what your preference would be and why.

### Summary of Comments

**6.2** 76 comments were recorded on Limehouse. The question was also included in the leaflet delivered to all households and 1922 comments were received in response making a total of 2000 responses altogether. The split between objections and support is about even. 49% and 48% but quantifying the responses to this question has been more difficult than some of the other questions due to some uncertainty about some of the representations. Many of the objectors to the new town to the north east of Elsenham have used a standard response for this question saying "as there is planning permission for 35 mppa S2 is a false scenario. There is no case for further expansion" These responses have generally been recorded as objections since they imply no expansion beyond current passenger numbers but they could equally be regarded as support for S2 as being most realistic but with no further development beyond this.

**6.3** S2 was supported by the **Environment Agency, English Heritage, Hatfield Heath, Little Easton, Stebbing, Great Hallingbury, Ickleton, Takeley, Newport and Great Chesterford parish councils, Essex County Council, Cambridgeshire County Council, East Herts and Epping Forest District Councils, Stop Stansted Expansion, the Stebbing Society, Chater Homes** and around 950 individuals. **Great Canfield Parish Council** supported S2 with the following conditions. They are concerned that the CPZ should be retained and that airport related uses should be restricted within the airport perimeter was also an issue raised by **Essex County Council**. The need for adequate infrastructure and transport policy to be in place to support any expansion was also mentioned in some representations. Essex County Council said that the Core Strategy should contain sufficient policy direction to make sure that impacts are

## 6 Q5 - Development Scenarios for Stansted Airport

minimised and mitigation adopted. Sarah Kenyon, the natural sciences officer at Saffron Walden museum expressed concerns about the impact of activities on nature conservation sites and queried the scope of the plan to propose mitigation for sites affected outside the airport boundary.

**6.4** Of the 427 people who objected to S2 and expressed a preference for an alternative 88% of these would prefer Option 1. **Friends of the Earth** and **CPREssex** and some residents would only support S1. Some people expressed a preference for S1 but accepted that planning permission has been granted for an increase in passenger numbers to 35 mppa and that this was the most likely outcome. A number of people queried the likelihood of 35 mppa being reached within the plan period. There are also those that stated that they would reluctantly accept S2 but were strongly opposed to further growth beyond that already permitted for G1. People who supported S3 did so mainly on the basis of the jobs which might be provided.

**6.5 Stansted Airport Limited** object to the Council's assumption that G2 will not take place during the plan period. They feel that the Core Strategy should recognise the commitment in national and regional policy for the development of a two runway airport and should plan properly for its consequences. Development of the Airport to a two runway airport was also supported by the **East of England Development Agency** and the **East of England Local Government Association (previously the East of England Regional Assembly)** on the basis that the airport is an important factor in making the region competitive for business and to deliver sustainable economic growth. S3 was supported by **Galliard Homes**, **Gleeson Homes** and some residents.

**6.6** In both objectors and supporters representations there were comments about the need for the Core Strategy to be flexible. The **Government Office** would like to see more flexibility so that the vision and objectives can still be achieved if circumstances change. The Government Office also felt that objectives 15 (Stansted Airport) and 16 (access to the airport) should be reworded to give greater focus on delivery (see Q7 below). **Legal and General** suggested that the Sustainability Appraisal of the Scenarios focused too much on local objectives and did not take into account other options like the possibility of a narrow spaced runway. Other options such as an offshore airport were also suggested. **Essex Chamber of Trade** considered that no policy should be adopted which would hinder proposed development should national policies mean a 2nd runway is required.

**6.7** Some representations made the link between growth at the airport and housing development **Broxton Parish Council** felt that with a gradual increase in the number of passengers there was unlikely to be a significant increase in employment and no allowance needed to be made for this in planning housing delivery. **Cemex** said that the Core Strategy should allow for a review of housing growth to support a revised airport expansion scenario. **Standard Life**, promoting an employment site at Warmans Farm also consider the Core Strategy should include provision for wider expansion.

## Q5 - Development Scenarios for Stansted Airport 6

**6.8** The **Highways Agency** in their comments referred back to their consultation response on the G2 planning application. This set out the need for the delivery of mitigation measures required on the trunk road through conditions and a legal agreement to secure the non-trunk road highway schemes and other associated Surface Access Strategy measures associated with the application.

### Conclusions

- On balance the view seems to be that S2 is a realistic basis on which to proceed with the LDF.
- Following the election in May 2010 the coalition government published its programme for government this contained the statement that permission for additional runways at Gatwick and Stansted will be refused. Following this Stansted Airport Limited announced on the 24 May 2010 that it was withdrawing its application to build a second runway at the airport. The Government has also announced its intention to abolish Regional Spatial Strategies.
- The decision to withdraw the application and the lack of any national and regional policy context for growth at the airport confirms that S2 remains the most appropriate assumption for the LDF.

## 7 Q6 - Emerging Spatial Strategy

### Introduction

**7.1** Taking into account the housing options and the scenarios for Stansted Airport the Council presented its emerging spatial strategy for the District for people to comment on.

#### Question 6

Do you have any comments on the emerging spatial strategy?

### Summary of Comments

**7.2** 103 comments were received in response to this question. Two thirds 66 (64%) of the responses were objections 22 (21%) were comments of support or conditional support and the rest were observations.

### Representations of Support

**7.3** The representations of support and conditional support include **Little Easton, Takeley and Hatfield Heath Parish Councils**. Hatfield Heath Parish Council particularly supports policies to safeguard the Metropolitan Green Belt and Countryside Protection and these elements are also supported by some individuals. Takeley Parish Council support the current policy for affordable housing. **Great Canfield Parish Council** support the strategy but do not think that the case has been made for the Elsenham new settlement.

**7.4** **The Government Office for the East of England** point out that the policies are a mixture of strategic and development control policies and this makes it repetitive and there is also repetition with national policies. **East of England Local Government Association (Previously EERA)** confirm that the Core Strategy conforms generally to the East of England Plan but suggest that many policies could benefit from including further detail from the supporting text.

**7.5** **LPP on behalf of NHS West Essex** are generally in support but feel that the capacity of existing primary health care facilities should be included to provide clearer indication of level of impact likely to be experienced as a result of proposed growth (see question 4 for further details). In relation to rural settlements the Trust has a statutory duty to provide health care facilities and as part of NHS modernisation and rationalisation strategies it may be that additional facilities are required in certain areas at the same time as other facilities are identified as being surplus to requirements so there must be flexibility within the overall strategy as well as specific policies to allow this to happen. They support objectives to reduce car travel and promote walking and cycling.

**7.6** **David Lock Associates on behalf of Fairfield Partnership** support the emerging spatial strategy as the most appropriate and flexible approach to meeting the growth requirements of Uttlesford District. **DLP on behalf of Kier Ventures** support the analysis of Saffron Walden and suggest that the site they are promoting at Thaxted Road fits

## Q6 - Emerging Spatial Strategy 7

well with this. They also support the strategy as long as it provides for the allocation of land west of Dunmow. **Savills on behalf of Great Dunmow Estates** consider the strategy is consistent with East of England Plan and support development at Great Dunmow but request that the Core Strategy should make it clear that potential development locations in Great Dunmow are only to the south and west of the town. **DLP on behalf of Taylor Wimpey** support the strategy allocating land at Great Dunmow and suggest that land at Ongar Road should be considered for 140 homes. The strategy is also supported by **Indigo Planning on behalf of Sainsbury's**.

### Representations of Objection

**7.7 Radwinter Parish Council** object to future development concentrated at a few locations and the exclusion of villages from the strategy.

**7.8 Essex County Council** consider that the timescales set out in the strategy are inconsistent, that the strategy lacks local reference and that the strategic objectives are general and not spatially specific to Uttlesford. The **Theatres Trust** are also concerned that the policies lack local distinctiveness and more detailed explanation and detailed guidance needs to be included. **Cambridgeshire County Council** are concerned that there is no vision addressing climate change. Objectives 8 and 9 should be more positive. New development should enhance historic character and landscape in all cases not just where possible. Objective 2 related to Stansted should be modified by addition of words "at sustainable locations" in relation to employment associated with the airport. **Natural England** also suggest that the strategy should specifically cover design and climate change issues. The **Environment Agency** make the comment that the emerging strategy is biased towards economic factors such as functionality of settlements, employment opportunities and transport links and that reference should to be made to adapting to climate change including creation of multi functional new green spaces which contribute to flood risk management pollution prevention etc. They require a detailed water cycle study to be carried out and this is also supported by **Thames water**.

**7.9 East of England Development Agency** say that the plan should recognise catalytic and induced investment from airport associated growth and it should reflect the strategic ambitions of the Regional Economic Strategy. **Stansted Airport** are concerned that the retention of the CPZ is not compatible with the commitment in national and regional policy for 2nd runway at Stansted.

**7.10 Saffron Walden Friends of the Earth** have concerns about a number of objectives and are particularly concerned about air quality, where they would like to see a specific policy linked to some form of Supplementary Planning Document. They support proposals for employment uses in Saffron Walden but are concerned about the statement on retailing in the town.

**7.11 CPREssex** think the strategy should be reassessed once the final housing programme has been agreed and ask if there is any evidence to show that people on the housing list want to live at Elsenham. Affordable housing should be located throughout the district with weighting towards those areas which provide most employment.

## 7 Q6 - Emerging Spatial Strategy

**7.12 Head of Governors at Great Easton School** has identified a need for additional development in the catchment areas of small village schools to enable them to survive.

**7.13** A representative of local congregations of **Jehovah's witnesses** is pleased to see a requirement for a site in the new settlement for a place of worship but is concerned there may be a need for two sites and there are pressing needs for places of worship in Great Dunmow, Saffron Walden and Stansted which are not being met in the current strategy.

**7.14** Other objectors are objecting to specific aspects of the spatial strategy e.g. the new settlement at Elsenham the scale/location of development in particular settlements, a second runway at Stansted Airport, the exclusion of Hatfield Heath and Clavering from the list of Key Villages, the need for some adjustment to green belt boundaries. The Core Strategy should acknowledge the draw of Cambridge, Chelmsford, and Bishops Stortford.

**7.15** Objections have been made by a number of developers promoting sites and/or areas of land for development which currently do not feature in the spatial strategy. A list of developers and the sites they are promoting is attached at Appendix 1

### Other Comments

**7.16** The **Highways Agency** observe that development proposals need to be supported by appropriate transport policies and measures that will minimise future traffic growth and encourage sustainable travel modes.

**7.17 BAA Safeguarding** have requested that suitable safeguarding policies are included in the Core Strategy. Model policies are suggested.

**7.18 English Heritage** question whether the level of growth remains appropriate if figures are linked to major expansion of the airport. They suggested that there may be an argument to phase significant proposed urban extensions to Great Dunmow over longer period to reflect slower expansion of Stansted and sensitivity to change of the historic settlement.

### Conclusions

- A significant number of objections to the emerging strategy are from developers/landowners promoting alternative sites.
- The abolition of Regional Spatial Strategies in July 2010 may have implications for the overall housing target if the housing numbers for the District are subject to review. This will have implications for the Spatial Strategy

## Q7 - Objective 15 - Stansted Airport 8

### Introduction

**8.1** A result of the work on the development scenarios for Stansted the Council had identified a need to make a change to the Core Strategy objective related to growth at the airport to state that the Core Strategy will need to be sufficiently robust to accommodate at the airport at around 35 million passengers a year. .

#### Question 7

Is this amended objective appropriate in the light of the discussion in Chapter 3 about the different possible scenarios for growth at the airport?

### Summary of Comments

**8.2** 32 representations were received in response to this question. 14 (47%) were objections. 14 (44%) were representations of support or support with conditions and the remaining 3 (9%) were observations

**8.3** The representations in response to this question reflect the responses to Question 5 with support for the proposed change to the objective from **English Heritage, Saffron Walden Friends of the Earth, Little Easton, Hatfield Heath, Great Canfield and Great Hallingbury Parish Councils, Chater Homes** and some individuals. These recognise that the airport has planning permission for 35 million passengers per annum on the existing runway and that development of a second runway is unlikely within the plan period.

**8.4** There are concerns from **Galliard Homes** and **Legal and General** who are both promoting development that this is not an appropriate approach to take since it fails to recognise the economic benefits the airport could bring.

**8.5** **CPREssex** felt that S1 was the most appropriate and object to the amended objective because it recognises the higher level of growth.

**8.6** The **Government Office** object to objectives 15 and 16. They do not consider that they sit well with the objectives because they are concerned with making sure a strategy is in place that is flexible enough to deal with uncertainty around Stansted Airport and making sure there is enough access and capacity to meet demand. They think the objectives should be reworded to focus on delivery.

**8.7** Some people felt that the proposed change to the objective was too definite so that it either would not take account of lower levels of growth which they thought was more likely or that it would not allow for expansion.



## 8 Q7 - Objective 15 - Stansted Airport

### Conclusions

- The reworded objective reflects the most likely Scenario for the airport as discussed in relation to Q5 above. There is support for this approach. No further changes are proposed.

## Q8 - Maintaining Existing Employment Sites 9

### Introduction

**9.1** The Council identified an issue with allocated employment sites where employment uses are not coming forward and there is pressure for alternative uses. The Council was considering options to overcome this issue including continuing to safeguard these sites. Releasing sites for alternative uses or to release part of the site for an alternative use such as housing but to retain part of the site for employment. The Council asked people for their views on these options.

#### Question 8

Do you think the Council should maintain existing employment sites? Do you support the use of employment land for housing? For the larger sites it would be possible to have a mixture of employment as long as the employment was not noisy or polluting. Do you think this would work?

### Summary of Comments

**9.2** This question was included in the household questionnaire. 1352 comments were received in total 712 (53%) supported the use of employment land for housing, a further 159 (12%) were support with conditions There were 386 (29%) objections and 95 (7%) observations.

#### Support for Change of Use

**9.3** Generally people who support the use of employment land for housing think it is an appropriate use of underused employment land or land which has been allocated for employment use for some time but where no development has happened.

**9.4** The suggestion that employment land should be released for housing is supported by **Great Hallingbury Parish Council** and they agree that a mix of housing and employment could work. **Little Easton Parish Council** consider that mixed use remains a less attractive option because of pollution, noise and accessibility to open space. **Great Canfield Parish Council** generally support the proposal but consider that the Dunmow Business Park should be kept for employment because it is preferable to other potential locations in Dunmow for proposed B2/B8 uses and is close to Stansted and M11. **Newport Parish Council** support releases on a careful and selective basis and Great Chesterford Parish Council say only if all attempts for employment have been exhausted. **Broxted Parish Council** feel that small businesses and housing might work but that larger or less friendly business should be located on dedicated sites outside the district if necessary. **The Stebbing Society** support re-use only if alternative provision is made and mixed development only where employment is offices. They are also concerned that provision for parking is addressed.

**9.5** Developers/landowners who are promoting use of employment land for housing or mixed use support the proposal these include **Bidwells on behalf of 121 Radwinter Road Partnership** and **January's on behalf of Ridgeons**. **Savills on behalf of Great**

## 9 Q8 - Maintaining Existing Employment Sites

**Dunmow Estates** who are promoting mixed use on the site allocated for a business park at Great Dunmow say change of use should be considered on a site by site basis. **Sworders on behalf of a number of clients** support the release of employment land if no longer appropriate but object to a mix of employment and residential.

**9.6** From the household questionnaires representations of support fall into two main categories

- People who support the use of employment land for housing but object to housing and employment on the same site
- People who support the use of employment land for housing and also support mixed use.

**9.7** Of the people who supported the use of employment land for housing some people mentioned that the employment land should be replaced elsewhere. A significant number of people who support a mix of employment and housing on the same site think this would only be acceptable with controls on noise and pollution, people also mentioned the need for suitable arrangements for traffic, including parking arrangements to avoid conflicts arising particularly with heavy lorries and the need for appropriate landscaping. Other controls included the type of employment with offices or craft type units being preferred to industrial uses. One person made the point that restrictions on the type of use could be counter productive if apprenticeships etc are to be encouraged.

### 9.8 Objections to Change of Use

**9.9 Takeley Parish Council** think that mixed housing/employment sites have very limited potential. They consider it is more important to protect quality of life. They would like existing employment sites to be reviewed to make sure they are appropriate and can be delivered and if not then housing might be an option. They agree that the new settlement should include employment and do not support the development of a business hub at Stansted Airport. They suggest UDC should consider reduced/discounted business rates as a way of meeting business needs.

**9.10** The **East of England Development Agency (EEDA)** supports the protection of all employment areas unless clear evidence suggests otherwise and they say the Strategy should be informed by up to date Employment Land Review. (which is nearing completion) They also suggest that there should be more detail in the plan about locations which will be identified to meet the needs of business. They refer to an EEDA study which identified Stansted as a regional gateway and logistics site which serves strategic demand for passenger and freight distribution and which has a clear vision and planning permission to intensify the use and develop a business hub. They consider that this should be recognised in the Core Strategy.

**9.11 Saffron Walden Friends of the Earth** do not think that the Council should allow employment land to be used for housing or mixed development and that the Council should remove the possibility of potential windfall gains to try and force owners to use employment sites. They say there is no need for employment on greenfield sites. **Uttlesford Futures** consider the policies are defensive, protective and reactive rather than developmental, proactive and strategic. They add that the consultation concentrates

## Q8 - Maintaining Existing Employment Sites 9

too much on housing and not enough on employment and economy. They see a need to develop strategies for different areas of the District and stress that more employment land must be made available if growth of jobs is to be achieved.

**9.12 CPREssex** suggest employment sites should be retained because if the owner believes they will get planning permission for housing there is no incentive to provide employment land so the policy should be firm. **Essex Chambers of Commerce** consider that adequate provision for employment is essential and they urge the council to identify sufficient land allocations within the strategy.

**9.13 Essex County Council** consider the policy should contain more detail informed by evidence base highlighting where business is likely to locate and the nature of business and/or sectors that are expanding or contracting. They say the Council should also demonstrate whether new employment sites will be located on PDL and that alternative uses for sites should be considered in line with PPS4.

**9.14** Generally developers and landowners promoting sites for housing development outside settlement boundaries are not supportive of proposals to release employment allocations/uses within towns for housing e.g. **AMA on behalf of Chater Homes, Fenn Wright, DLP on behalf of Taylor Wimpey**

**9.15** Some people, particularly agents acting on behalf of landowners/developers are concerned that the decision to release sites should only be made on the basis of robust and up to date information through the Strategic Housing Land Availability Study and an Employment Land Assessment. This includes **David Lock Associates on behalf of the Fairfield Partnership, Bidwells on behalf of Barretts, and Sworders on behalf of the Engelmann Trust** who add that if mixed use is appropriate the amount of land released should be limited to that required to cross subsidise the redevelopment of the employment element into viable employment space to minimise speculation and ensure a long term supply of employment land.

**9.16** The main reason that people completing the household questionnaires have for objecting to the change of use is the potential loss of job opportunities leading to more commuting out of the district, some of which will be by rail which people say is already overloaded. Others are concerned that employment sites should be available to meet housing growth and that if land is lost now when the recession is over there will not be enough land available.

**9.17** Some people have suggested sites for new employment allocations in response to this question e.g. a site at Watch House Green Felsted for mixed use, including employment land and **Halcrow on behalf of Cheergrey** requesting that further land at the Elsenham Industrial Estate should be allocated for employment use.

### Other Comments

**9.18 English Heritage** consider that the current policy at the airport is appropriate and enables the rural context of the airport to be maintained. **Stansted Airport Limited** support the safeguarding of land within the airport but say that the policy should also refer to safeguarding in the context of an expanded airport.

## 9 Q8 - Maintaining Existing Employment Sites

### Conclusions

- There is some support for the use of employment land for housing and the principle of mixed use schemes subject to certain safeguards.
- The Council should use information from the updated Employment Land Review and the SHLAA to inform decisions about potential sites

## Q9 - New Employment Sites in Greenfield Locations 10

### Introduction

**10.1** In order to address the employment land issue the Council had suggested in the previous consultation that firms could be allowed to expand onto unallocated greenfield sites where the proposals met criteria. This approach would not be in line with advice in Planning Policy Statement 4 which seeks to direct employment to existing centres. The alternative would be to continue to designate sites or to acknowledge that Uttlesford can only support firms to a certain point and that all needs may not be able to be met within the district. People were asked for their views on these options.

#### Question 9

Do you think the Council should keep provisions in the policy to allow new employment sites on greenfield sites in certain circumstances? Are there any other measures which the Council could use to support firms to grow within the District?

### Summary of Comments

**10.2** This question was included in the leaflet delivered to all households and 1767 comments have been received. The proposal was supported by 32% of those who answered the question. The majority (53%) of people responding to this question objected to the proposal to allow new employment sites on greenfield sites.

**10.3** The proposal was supported by **Sworders on behalf of various clients, AMA on behalf of Chater Homes, Bovis Homes, Boyer Planning on behalf of Gleeson Homes, Martin Robeson Planning Practise and Newport and Broxton Parish Councils** Great Chesterford Parish Council generally supported the proposal but they did say care was needed to avoid a situation where a company changes ownership and commences operations not previously envisaged - this point was also made by a number of Great Chesterford residents. **Great Hallingbury Parish Council** support in exceptional circumstances only. **The Stebbing Society** consider there is a need to have sensible balance between employment and the environment and this should only be allowed as a last resort and in exceptional circumstances with each potential situation being considered on its merit.

**10.4** A significant number of people supporting this approach were objectors to the Elsenham new settlement who felt that large sites even in greenfield locations were likely to be more attractive to employers and therefore more likely to be delivered than the likelihood of any significant employment being created in North East Elsenham. Other supporters made it clear that employment on greenfield sites should only be considered as a last resort. and should be subject to controls on size, access and traffic etc

**10.5** **Little Easton Parish Council** think development in the countryside should only be allowed where agricultural buildings have fallen into disrepair and would be enhanced by light industry. **Weston Homes** would like to see maximum flexibility to make sure that a balance is achieved between jobs and homes which they say is particularly

## 10 Q9 - New Employment Sites in Greenfield Locations

relevant in smaller settlements. **Uttlesford Futures** have identified a need for separate employment strategies in different areas of the district and also the need to establish a hierarchy and be flexible. Flexibility was also raised by **Sworders** who are seeking to develop part of the auction house site to the north of Stansted Mountfitchet to provide workshops for trades associated with the antiques business e.g. upholsterers etc who would benefit from being located close to the auction house.

**10.6** Other conditions which people have suggested include controls on size, access to road and rail, traffic, making sure that a high percentage of employees will be local etc

**10.7** Objectors include **Saffron Walden Friends of the Earth, Takeley Parish Council, CPREssex**, and also some developers promoting development land under alternative strategies including **Countryside Special Projects, Savills on behalf of Legal and General** promoting proposals for 7,000 jobs in new Stansted business hub, **Scott Wilson on behalf of Galliard Homes** on the basis that important employment opportunities will be created through the new settlement element of spatial strategy, and **Bidwells on behalf of 121 Radwinter Road Partnership. Essex County Council** consider the policy should set out areas where greenfield development is deemed appropriate with more detailed development management criteria to support it..

**10.8** A large number of objectors completing the household questionnaire did not accept there was a need to make provision on greenfield sites because alternative approaches were available including:

- Use of brownfield land
- Unused commercial property/land is available
- Focus on cottage industries/start ups in existing facilities
- More flexibility Approaches e.g. in allowing change of use of rural agricultural buildings.
- Accept that companies will move out of the district

**10.9** Some objectors are not convinced that the employment needs within the District are great enough to justify the release of greenfield land and they were generally concerned about the loss of agricultural land.

**10.10** Some people did make suggestions for other measures that the Council could look at to support firms to grow within the District - these included:

- Explore financial incentives including lower taxes, lower rents/rates for vacant properties
- development of high speed broadband especially to facilitate more home working.

## Q9 - New Employment Sites in Greenfield Locations 10

- Help should be given to local companies to take on local workers by allowing unemployment benefit to be used as a subsidy
- Subsidies/grants for employers who assist young people with travel to work

### Conclusions

- The proposal to release greenfield sites for employment site is not generally supported and it is likely that without the prospect of a new settlement the level of objection might have been greater.
- The results of the Employment Land Review and other study work still in progress will inform alternative strategies for providing for employment needs with the District.



## 11 Q10 - Other Employment Issues

### Introduction

**11.1** The Council had identified two key issues which had not previously been addressed in the employment strategy. These were the requirement for an employment element within the proposed new settlement at Elsenham. The other was the need to include reference to the conversion of rural buildings. People were asked if there was anything else which they thought should be included.

#### Question 10

Are there any other issues which you think need to be addressed in the Employment Strategy?

### Summary of Comments

**11.2** 46 comments were made in total. 17 comments were objections (37%) 10 (22%) were support and 19 (41%) were observations and many were making points about the employment strategy generally and not necessarily identifying other issues which should be included as asked in the question. The issues raised generally fall into the following categories.

- The new settlement at Elsenham
- Stansted Airport
- Employment in rural areas
- Other Issues

### Elsenham New Settlement

**11.3 David Lock Associates on behalf of Fairfield Partnership** promoting the new settlement at Elsenham support the amendments to the policy and state that the level of floorspace will be reviewed as proposals are developed. They are looking to provide a balance between homes and jobs and provide a range of employment premises including start up and follow on units in a variety of locations. The **East of England Local Government Association (previously EERA)** suggested that the role of new settlement in providing various types of employment land should be described in the policy. **Essex County Council** suggest that the Core Strategy should include a centre network hierarchy policy which sets out the role and function of the towns within the district with appropriate consideration being given to the role, scope and nature of the Elsenham centre. The **East of England Development Agency** say an economic strategy is required for Elsenham and that any application should demonstrate market demand for the development including marketability and attraction of the location and how economic activity and investment on the site may displace activity from more sustainable locations like Harlow.

## Q10 - Other Employment Issues 11

**11.4** A number of people who object to the new settlement proposal at Elsenham have objected to this policy because the new settlement is included and in the same way as others have responded to other questions have expressed doubt that the development will not provide enough local employment, leading to out commuting. **DLP Planning on behalf of Kier Ventures** have expressed doubts about the realistic viability of delivering significant employment at Elsenham. **Bidwells on behalf of Barratts** make the point that it is essential that employment land at the new settlement is assessed by the evidence base. They are concerned because there are still some unknowns i.e. whether the market will demand the floorspace proposed, what type of jobs will be generated, what impact this will have on existing settlements. They are also concerned about the impact on the rural transport network. **Uttlesford Futures** are concerned that a new town will distort the district's employment retail and social pattern. **Countryside Properties** are promoting the allocation of range of employment sites within areas of existing employment or on the edge of existing settlements along the A120 which they say has advantages over a single site at Elsenham.

### Employment Related to Stansted Airport

**11.5** **Cambridgeshire County Council** refer to Policy E7 in the East of England Plan which limits employment at Stansted Airport to that directly associated with the airport and say that the Core Strategy Policy should make it clear that the business hub at Stansted will be for airport related uses.

**11.6** **East of England Development Agency** want to see the strategic ambitions from Regional Economic Strategy expressed in the Core Strategy which should recognise the catalytic and induced investment from airport associated growth and place this in an effective policy context which will promote sustainable economic growth. **Savills on behalf of Legal and General** consider that the employment strategy is inconsistent with aims of the Regional Economic Strategy because it does not make any reference to employment related to Stansted Airport and should recognise benefits of development of a business hub at the airport. **Indigo Planning on behalf Standard Life** would like the Core Strategy to include provision for wider expansion of Stansted Airport and identify suitable sites to provide associated airport related facilities. They are promoting a specific site at Warmans Farm. One objector says the core strategy should not provide houses for workers at Stansted and, ignore low cost houses for certain jobs. **Sworders on behalf of various clients** request that the criteria in the employment strategy policy which says that land should be allocated in DPD's for B2 and B8 industrial/warehousing close to the M11 and Stansted should be expanded to include B1 as well as B2 and B8 uses.

### Employment in Rural Areas

**11.7** One supporter considers that employment land should be adjacent to village boundaries. **Takeley Parish Council** are objecting to the current policy for the conversion of rural buildings and have requested that the policy should be strengthened to address drainage, light and noise pollution and achieving suitable access from major routes,. **East of England Local Government Association (previously EERA)** have commented that the policy could refer to economic needs in rural areas and that opportunities for employment growth through additional visitors should be expressed **Martin Robeson**

## 11 Q10 - Other Employment Issues

**Planning Practise** feel the importance of the rural economy which is currently included in the countryside section should also be included this chapter. **Weston Homes** would like to make sure that small scale jobs and housing growth is encouraged in key and smaller villages.

**11.8 Uttlesford Futures** suggest that a roof tax should be introduced to pay for infrastructure and that. The Council should establish an economic development capability to help deliver new jobs. The rural economy will be affected by the need to produce food which cannot depend on fossil fuels. There is a need to provide a significant number of village based affordable homes linked to agricultural economy financed through roof tax on housing elsewhere in the district. The strategy should provide wildlife corridors and green spaces predefined in a Supplementary Planning Document to make coherent network within which housing and industrial/commercial development takes place. The strategy should encourage jobs in green technology and give full weight to development of cultural and tourist economy including first class (non-airport related) hotel accommodation. The District Council should commit to the "keep trade local" strategy and set in place measures to carry out regular audit of its service procurement processes and operating costs.

### Other Issues

**11.9 Hatfield Heath Parish Council** feel the Core Strategy should take into account the needs of those who live in the district but work elsewhere, particularly in relation to transport. **Halcrow on behalf of Cheergrey** suggest it is unwise to rely on the 2006 Employment Land Study and that flexibility and a range of sites is needed to help economic recovery another person agrees that a mix of employment types is essential and should not rely on one major employer. The Council has commissioned an updated Employment Review and **DLP on behalf of Kier Ventures** welcomes the intention for further consultation following the publication of this work. **The Highways Agency** welcomes the fact the the employment sites are aligned with the housing development and/or Stansted which will assist in the policy objective to reduce reliance on motor vehicles. **Essex County Council** advise that to make sure the Core Strategy is consistent with Planning Policy Statement 4 (PPS4) it should set floorspace thresholds for the scale of edge of centre and out of centre development. **Indigo Planning on behalf of Sainsburys** say the proposed policy should have regard to full range of economic development recognised in PPS4. **Saffron Walden Friends of the Earth** make the general observation that the Council should encourage employment expansion as far as it reasonably and sustainably can and one person feels that small firms should be encouraged especially if they offer a service but not if they create heavy traffic.

### Conclusions

- The future role of employment land at Stansted Airport is being considered as part of the Employment Land Review.
- The Employment Land Review will also help in confirming the appropriate distribution of employment locations within the strategy

## Q11 - Getting Around 12

### Introduction

**12.1** The Council had redrafted the policy on Accessible Development to include more detail about what the strategy for transport and accessibility in the District should be.

#### Question 11

In your view does this set out a realistic and workable strategy for transport in the District? If not are there any other measures which should be included?

### Summary of Comments

**12.2** 37 comments were received in response to the question. 12 (32%) were comments in support of the strategy with 5 (14%) comments of conditional support. There were 13 (35%) objections to the strategy and 7 (19%) observations.

**12.3** The policy was supported by **Natural England, Stebbing and Takeley Parish Councils, Bovis Homes, David Lock on behalf of Fairfield Partnership, Savills on behalf of Great Dunmow Estates, Fenn Wright Surveyors** and some individuals.

**12.4** **Saffron Walden Friends of the Earth and CPREssex** support the policy but feel that more work should be done to improve cycle and pedestrian links and that this should not just be restricted to those in new developments. **NHS West Essex** would like to see health care facilities linked to other development by pedestrian and cycle routes. Making sure there is good broadband access is suggested as another means of reducing car travel.

**12.5** Most of the objections to the policy are on the basis that it is unrealistic and unworkable. People feel that there is no reasonable alternative to the private car in terms of public transport because the buses are slow, irregular and unreliable. **Little Easton Parish Council** stresses that this particularly disadvantages the young, elderly and those on lower incomes. In terms of rail travel parking at stations is felt to be inadequate and at the same time there are fewer and fewer facilities available in villages. **Hatfield Heath Parish Council** would like to see more detail as to how the policy will work. **Essex County Council** objects on the basis that the policy repeats national policy and is does not give a local context. **Countryside Properties** is concerned that the policy makes no mention of accommodating the impact of traffic associated with new development. **Galliard Homes** are promoting a new settlement in the A120 Corridor which they say will benefit from existing good quality infrastructure, and development will be of a critical mass to support a high quality local bus service connecting towns and villages in the corridor.

### Conclusions

- There is a level of support for the policy but more work could be done to identify additional measures to overcome the objections.

## 13 Q12 - Housing Contingency Figure

### Introduction

**13.1** In the housing need policy at the Preferred Options stage the Council had included an additional 10% contingency figure. After carrying out the Strategic Housing Land Availability Assessment (SHLAA) and having more information about which sites are capable of being delivered the Council was suggesting that there was no longer any need for the housing figure to include a contingency.

#### Question 12

Do you agree that it is right not to include a contingency figure when enough sites are available?

### Summary of Comments

**13.2** 55 comments were received in response to this question. On balance there were far more objections to the proposed change (67%) than representations of support (27%) but most of the objections were made by development companies or agents acting for landowners promoting land for development within the District.

**13.3** There were representations of support from **Saffron Walden Friends of the Earth, CPREssex, Stebbing, Widdington, Takeley, Henham and Elsenham Parish Councils** and some individuals. **Little Easton Parish Council** and **Amsgal Properties** registered conditional support. Amsgal felt that while there was no need for a contingency figure the housing figures should be expressed as a minimum requirement to give some flexibility.

**13.4** **Chater Homes, Bovis Homes, Enodis Property Developments and Swords** on behalf of a number of clients object on the grounds that a contingency figure is required for the Core Strategy to comply with guidance in Planning Policy Statements 3 and 12. **Galliard Homes, Strutt and Parker on behalf of clients and Countryside Properties** were concerned that not all the housing sites would come forward as the Council was predicting and that without the contingency figure the housing delivery could fail to meet the housing requirement set out in the Regional Spatial Strategy and would therefore fail one of the tests of soundness.

**13.5** **January's and Great Dunmow Estates** agreed with expressing the housing as a minimum requirement but felt a contingency figure should be included as well. **Taylor Wimpey, Kier Land and Barratts** felt that some contingency provision was needed but that this should not just be a simple percentage figure but that a mechanism should be set out in the Core Strategy for bringing forward sites e.g. those identified in the SHLAA if it appeared that the housing delivery rates were falling below what was required in order to meet the target. **Endurance Estates** suggest that flexibility should be provided either through a contingency or allocating more small sites. **ASP on behalf of clients** suggest that the overall provision should be increased and a contingency figure should also be included.

## Q12 - Housing Contingency Figure 13

### Conclusions

- As a result of the abolition of the Regional Spatial Strategies by the new Coalition Government in July 2010 the housing numbers for the district will be subject to further testing and may be reviewed.

## 14 Q13 - Criteria for Gypsy Sites

### Introduction

**14.1** The publication of the Essex Gypsy and Traveller Accommodation Assessment meant that more information was available on Gypsy and Travellers requirements. The Council considered that this information could be used to formulate criteria for identifying sites for gypsies and travellers. Views were sought on the list of criteria, which were: Sites need to be close to a settlement which has local services; Visual impact and character of the area; safe and convenient access to the road network and provision for parking, turning and servicing; location on a public transport routes and: if the site is to be used for business the impact on nearby residential properties in terms of noise, dust etc.

#### Question 13

Do you think that these criteria are the right ones to take into account? Do you know of any sites which you think might be suitable?

### Summary of Comments

**14.2** This question was included on the leaflet delivered to all households and 1599 comments were received in response. A further 25 comments were registered on the Limehouse system making a total of 1624. 882 respondents (54%) felt that the criteria were the right ones to take into account. A further 86 (5%) were generally in support but with some conditions. Around 466 or 29% of respondents objected to the criteria. The remaining comments were observations

**14.3** The representations of support included **Little Easton Parish Council, the Stebbing Society and Newport Parish Council**. Objectors to the new settlement proposal at Elsenham noted that gypsy and traveller groups prefer small sites in rural areas and supported this. The **East of England Local Government Association (previously EERA)** noted that the site allocations document will need to allocate sites and highlighted the fact that regional policy suggests opportunities should be taken for additional Gypsy and Traveller sites should be provided at major developments like Elsenham.

**14.4** The **Environment Agency** commented that the selection criteria should include the availability of and capacity for sewage disposal. The **Government Office** commented that the criteria should be in the policy not the supporting text to make sure they have sufficient weight. **Little Dunmow Parish Council** are concerned that the factors to be taken into account are inconsistent with each other and until Essex County Council and Uttlesford District Council have a system that can respond quickly and effectively to the needs of travellers and the local community it is unwise to position sites close to established settlements. If sites are to be needed for business this will exacerbate the problems. One person objected to the criteria on the basis that sites close to schools are not good for gypsy children who can be subject to bullying. Most families send their children to schools further away to let them integrate before people find out they are

## Q13 - Criteria for Gypsy Sites 14

gypsies. 9 times out of 10 gypsies would not want to live near the settled community. **English Heritage** consider that it would be appropriate to include an additional criteria about the impact on nationally designated assets and their settings.

**14.5** The following general objections were raised by those people who responded to the household leaflet:

- Don't agree there is need to make provision for any sites
- Gypsies and Travellers should finance and provide their own sites.
- Sites should be away from existing homes
- Objections to the sites being used for businesses - this should take place in more locations designated for business use.
- Concerns about crime

**14.6** A number of locations were suggested for sites including expanding existing sites at Little Dunmow and Stansted Mountfitchet, along the major routes like the M11 and the A120, the new settlement locations. Only a relatively small numbers were suggested by people with an interest in the land. These included land at Watch House Green Felsted and Wicken Bonhunt. A couple of people suggested that the selection of suitable sites must be done in consultation with Parish Councils.

**14.7** The **Essex Chamber of Trade** observed that over the years sites have become more permanent in character reflecting the need for the elderly and younger members of this community to have a permanent base (for schooling and other reasons). While the national average for the number of caravans per pitch is 1.7 it can be anticipated that this will change, with longer terms of residence, rather than just over-wintering. The need for more permanent types of structure on the sites will increase as well, and this needs to be taken into account in the strategy. Sites commonly incorporate open storage of vehicles and trade equipment which can be unsightly. So sites with less visual impact should be identified.

### Conclusions

- The Council should consider the need for the additional criteria suggested.
- The criteria including any revisions/additions should be included in any revised policy rather than the supporting text
- Need to follow up on the suggested sites in consultation with Parish Councils, Essex County Council, landowners and Gypsy and Traveller representatives.



## 15 Q14 - New Policy on Phasing of Housing Delivery

### Introduction

**15.1** The Council was suggesting that a new policy should be included about the phasing and delivery of housing to make sure that delivery remains close to the overall strategic requirement of the housing strategy and make sure that the scale and timing of housing is co-ordinated with new infrastructure.

#### Question 14

Do you agree with the proposed policy?

### Summary of Comments

**15.2** There were 50 comments received in response to this question. 25 (50%) were objections. 18 (36%) were support or support with conditions and 7 (14%) were observations.

**15.3** There is support for this policy from the **JTS partnership, David Lock Associates on behalf of Fairfield Partnership, LPP on behalf of the West Essex PCT and Little Easton Parish Council**. Support from **Saffron Walden Friends of the Earth, CPREssex** and others is generally conditional on supporting infrastructure being provided early in the development process and continuously delivered along with each phase of any housing development. **Takeley Parish Council** suggest that formal agreements should be drawn up involving all stakeholders to make sure that this happens.

**15.4** The **Environment Agency** have requested that the policy be strengthened so that development does not come forward without adequate and sustainable sewerage and waste water treatment capacity and **Thames Water** have a similar approach requiring development to be phased with the necessary infrastructure to support it in order to avoid flooding, pollution etc.

**15.5** **GL Hearn on behalf of Enodis** suggest that the phasing policy should set out that intensification of development on existing sites should be the first priority for locating additional housing.

**15.6** Objectors to the policy highlight the lack of any provision if the housing strategy identified should fail to deliver. **Bidwells on behalf of Taylor Wimpey and Kier Ventures** suggest the housing trajectory presents an overly optimistic view of housing availability. **Fenn Wright, Taylor Wimpey, Endurance Estates, Countryside Properties and Bidwells** on behalf of clients question the reliance on the north east of Elsenham, particularly in the current economic situation and suggest that a more flexible approach is needed in case the development does not come forward as set out in the housing trajectory. The **Government Office** thinks the Core Strategy needs to be clearer about the mechanism for housing delivery at Elsenham and **Amsgal** require targets and milestones for Elsenham to be included in the plan. **Barretts and Januarys** think that a deliverable phasing plan is required. **Sworders** on behalf of various clients suggest that phasing should be contingent on the delivery of infrastructure and should

## Q14 - New Policy on Phasing of Housing Delivery 15

not be used to suppress housing delivery. **Bovis Homes** object to the phasing policy on the grounds that the overall strategic requirement does not reflect demographic forecasts. **English Heritage** are concerned about the impact of additional development on Great Dunmow. They suggest that to reduce these impacts housing sites at Dunmow could potentially be phased over a longer period. **East of England Local Government Association (previously EERA)** request the inclusion of policies on implementation and monitoring to be consistent with the East of England Plan.

### Conclusions

- The abolition of Regional Spatial Strategies in July 2010 including the East of England Plan means that overall housing numbers are likely to be subject to review - this may have an impact on annual delivery rates but a phasing policy which sets targets and is subject to annual review and monitoring will still need to be included within the Core Strategy.
- The issues of sewerage and waste treatment capacity are dealt with under other policies

## 16 Q15 - Housing Strategy

### Introduction

**16.1** The housing strategy policy was amended to take account of the updated housing requirement. New guidance was also included in the policy on the proposed new housing sites and the new settlement.

#### Question 15

What are your views on the suggested distribution of housing?

Do you agree with the criteria for identifying sites in the towns and villages and what the development of the sites should incorporate?

Do you agree with the broad description of what is sought at the development at Elsenham?

### Summary of Comments

**16.2** 91 comments were received in response to this question 57 (63%) of which were objections. 25 (27%) of comments were support or conditional support and the remaining 10% were observations.

**16.3** Comments of support were received from **Stebbing Parish Council, JTS Partnership, ASP on behalf of clients and Savills on behalf of Great Dunmow Estates. Cambridgeshire County Council** consider that the location of the new settlement is suitable in relation to new employment at Stansted because any new settlement south of Cambridgeshire would have to be sufficiently far south within the M11 corridor to be close to employment at Stansted and other centres closer to London.

**16.4 English Heritage** made the following general observations - The level of housing proposed is very challenging in a rural area with sensitive historic environment and settlement character will be threatened if the rate of development is maintained. Great Dunmow has not yet assimilated Woodlands Park. Saffron Walden has traffic problems and townscape sensitivities. Large scale development will need to be planned with greater sensitivity to design, local character, quality and sense of place. Pleased to see the criteria recognises the importance of architectural character. Welcome the commitment to protect the character and identity of Henham but an additional bullet point could be added to reflect and be sensitive to historic landscape and archeological interest.

**16.5** More specific comments have been received in relation to Saffron Walden, Great Dunmow, the Elsenham New Settlement and the other villages as follows:

#### Saffron Walden

## Q15 - Housing Strategy 16

**16.6 Saffron Walden Town Council** accept 250 homes in Saffron Walden but no more due to air quality, road infrastructure, school places and water/sewage problems. One objector considers that Saffron Walden cannot be developed until sewage and air pollution problems have been solved. **DLP on behalf of Kier Ventures** support the housing distribution for Saffron Walden but think that the policy should be more specific and state that development at Saffron Walden should be to the south east adjoining Thaxted Road and developed in conjunction with new employment provision. **Bovis Homes** consider that the plan should identify the south east edge of Saffron Walden rather than just the edge. **January's** consider that priority should be given in Saffron Walden to brownfield development and that other text changes are needed to make sure the strategy is clear and robust.

### Great Dunmow

**16.7** There are objections to the scale of development being proposed in Great Dunmow from **Great Dunmow Town Council, Little Easton Parish Council** and two others who feel that there has already been overdevelopment in Great Dunmow and there should be a better balance between the scale of development being proposed in Great Dunmow and that proposed in Saffron Walden.

**16.8 DLP on behalf of Taylor Wimpey** - support the allocation for Great Dunmow subject to allocation of land at Ongar Road and on behalf of **Kier Ventures** support housing to the south and west of Great Dunmow. **Blue Sky Planning on behalf of Siemens** support the allocation of 500 homes for Great Dunmow and suggest that the site they are promoting to the west of Great Dunmow could accommodate 435 homes.

### The Elsenham New Settlement

**16.9 Essex Wildlife Trust** suggest that development should follow the same principles as an "eco town" with sustainable housing development and low carbon energy production, good public transport links, green infrastructure and accessible natural green space including sustainable drainage and allotments

**16.10 David Lock Associates on behalf of Fairfield Partnership** request that the wording of the revised policy for Elsenham should be reviewed. They object to the reference to providing the highest standards of low carbon development and request that there should be a reference to viability so that the requirement reads 'incorporate the highest viable standards of low carbon development.' They also object to the requirement for a 10-15 minute frequency circular bus service which they say is over precise.

**16.11 Weston Homes** object to the focus of so much development in a new settlement. Bidwells on behalf of various clients object to the strategy on the basis that Option 4 has not been demonstrated to be more sustainable than Option 1. The need for transport and infrastructure provision has not been mentioned and there is no evidence of viability, phasing or deliverability for the proposed Elsenham site.

## 16 Q15 - Housing Strategy

**16.12** A number of other people expressed their objection to the new settlement proposal. Issues raised include traffic/access problems, unrealistic proposals for bus services, unrealistic assumptions for employment, the concept of the green ring being described as "illusory" .

### Other Villages

**16.13** **Savills on behalf of Pryor Farms** welcome the role for sites on the edge of key villages but object to the restriction of such development to brownfield sites only. **Saffron Walden Friends of the Earth** suggest that in considering sites on the edges of key towns and villages the policy should take account of available infrastructure, air quality and other environmental issues. **Sworders on behalf of a number of clients** say that more robust evidence is needed in regard to the functioning of rural settlements. They consider that the phrase "rural sustainability benefits" is too vague and social and economic issues should be balanced with reducing carbon emissions.

**16.14** There have been requests for Hatfield Heath, Clavering and Oakwood Park to be added to the list of key villages.

**16.15** One individual is concerned about the possibility of additional homes at Oakwood Park and a resident of Oakwood Park has referred to this development as an example of the implications for the quality of new developments when developers don't deliver the necessary facilities as agreed and on time.

**16.16** One person suggests that the housing requirement should be broken down into smaller developments and others are suggesting there should be more "organic" growth at a wider range of settlements. **Savills on behalf of Quendon Properties** refer to the sustainability of existing facilities in villages etc relying on there being enough trade. Such facilities will need a growing market if they are to survive - it is essential that this is also considered when identifying sites.

### Alternative Proposals

**16.17** A significant number of the objections were from developers and land owners promoting alternative sites as set out below.

**Scott Wilson on behalf of Galliard Homes** - Boxted Wood

**Terence O'Rourke on behalf of Countryside Properties** - Takeley

**Savills on behalf of Amsgal** - Stansted Mountfitchet and Takeley

**AMA on behalf of Chater Homes** - land between Great Dunmow and Little Dunmow

**Fenn Wright Surveyors** - Land to the east of Dunmow at Dunmow Park

**GL Hearn on behalf of Enodis** - Oakwood Park

## Q15 - Housing Strategy 16

**Pegasus Planning Group on behalf Grant and Bloor Homes** - Housing requirement should be extended to 2031 in line with RSS review and CS should recognise the strategic role of Stansted Mountfitchet.

**Gittings** - Reduce growth at Elsenham by 500 and add 250 to nearby settlements including Stebbing and 250 to other smaller villages.

**RPS on behalf of Endurance Estates** - The distribution does not provide for future development of key villages 30 dwellings in Thaxted is too low.

**Woods Hardwick on behalf of Coleman Properties** - Land south of High Street and Henham Road Elsenham should be included in any area of search for a new settlement.

### Infrastructure

**16.18** Other comments focus on the infrastructure requirements of the development strategy:

**16.19 The East of England Local Government Association (previously EERA)** suggest that the Core Strategy could be improved by further description of the cultural facilities required along with growth at Elsenham and other settlements. **Natural England** - Support the revision of the policy which provides greater detail but still consider the Core Strategy requires an overarching policy on green infrastructure. In relation to Elsenham it is set within a landscape with moderate to high sensitivity to change and the need to protect landscape character should also be included as a requirement within the policy. **Sport England** consider that the references in policy should make sure that existing community/open space is protected and new provision is made and consideration also needs to be given to how non residential development will make provision for community infrastructure. **CPREssex** say the policy must take into account environmental factors such as air quality and available infrastructure and **Sustainable Uttlesford** have suggested detailed wording changes for the policy to protect and enhance biodiversity and provide a network of green infrastructure:

**16.20** There is concern about the water implications of the proposed development. **The Environment Agency** have requested that a detailed Water Cycle Study is progressed to clarify whether the suggested distribution is deliverable. They do not think that the policy is flexible enough and a revised housing strategy should also refer to proximity and availability of waste water infrastructure. The need for a detailed Water Cycle Study is supported by **Thames Water** who are concerned about achieving effective/adequate waste water treatment for Elsenham. They consider a detailed water cycle study will be required to assess whether the constraints can be overcome and until this is known the Council should not commit to this element of the Core Strategy. **Newport Parish Council** are concerned that the Water Cycle Study shows that Newport has only modest capacity for expansion before major investment is required in sewage and water facilities.

## 16 Q15 - Housing Strategy

**16.21 Essex Police** request additional requirements to meet policing needs associated with the proposed developments to be financed through tariff based contributions. **Essex County Fire and Rescue Service** identify the need for planning conditions or design criteria to mitigate the risk of fire.

**16.22 John Lawson Planning Partnership on Behalf of NHS West Essex** have raised concerns that the level of growth proposed for certain settlements will not be served by existing facilities and not generate enough from developer contributions to provide additional infrastructure. The capacity of existing infrastructure needs to be taken into account in addition to its location. The Council needs to liaise regularly with infrastructure providers. Flexibility is requested for the requirement to incorporate the highest standards of low carbon development. The policy should be amended to say where feasible and viable.

**16.23 National Grid** have requested to be involved in the preparation, alteration and review of development plan documents affecting their assets.

**16.24 Uttlesford Area Access Group** consider the Core Strategy should address the provision of supported care accommodation. The access group would favour the provision of bungalows to meet wheelchair accessible standards.

### Conclusions

- The abolition of Regional Spatial Strategies in July 2011 means that the overall housing numbers will be subject to further testing and review.
- This could have implications for the housing strategy but the Council will need to address issues of concern to service providers.

## Q16 - Infrastructure Provision 17

### Introduction

**17.1** In the previous consultation the policy on infrastructure provision focused on what infrastructure was required rather than the mechanisms for its delivery. In this consultation the Council suggested that the requirements for infrastructure should be set out in the Housing Strategy Policy (see question 15 above) and a new policy would be introduced which would set out the mechanisms for delivering the infrastructure requirements identified in the Core Strategy. The consultation identified alternative approaches i.e. to continue to fund infrastructure provision through legal agreement and Section 106 contributions associated with a particular development or to introduce some sort of tariff or "roof tax" approach where contributions from all development would be pooled. People were asked to their views on these alternative approaches.

#### Question 16

Do you have any views on the three approaches identified?

### Summary of Comments

**17.2** 34 comments were received in response to this question. It is difficult to capture the breakdown for support and objection because of the nature of the question.

**17.3** There does not appear to be any consensus on a preference for collecting developer contributions through a roof tax or Section 106 agreements. Some support a roof tax principle on the basis that this is fairer. Some developers would seem to favour S106 agreements e.g. **Savills on behalf of Great Dunmow Estates, David Lock Associates on behalf of the Fairfield Partnership and DLP on behalf of Taylor Wimpey and Kier Ventures. Scott Wilson on behalf of Galliard Homes** considers a new settlement is the best opportunity to achieve necessary improvements to infrastructure.

**17.4** There is some support including from **Little Easton Parish Council** for a hybrid system where both S106 and a roof tax is used. Some people were concerned about the likelihood of a successful outcome from the Council making agreements with developers to secure the delivery of sufficient infrastructure. Some people object to the principle of a "community" levy which they see as a levy on householders and therefore unacceptable. **Cambridgeshire County Council and Weston Homes** refer to the need to take into account new regulations which came into force on 6 April 2010. **Note** - the new Government has announced it's intention to produce further guidance on this which is still awaited.

**17.5** **Essex County Council** consider that the viability assessment should look at affordable housing. The District Council should use "the developers guide to infrastructure contributions". The policy should also make it clear that consideration should be given to mitigation measures.



## 17 Q16 - Infrastructure Provision

**17.6 Sport England** are concerned that sports provision should be on the list whether a S106 or a tariff system is used. They would not support targeting large developments only as most development in a rural district like Uttlesford is likely to be small. **Natural England** agree with proposal to delete the current policy and replace it with a policy setting out mechanisms but the policy need to recognise that Green Infrastructure encompasses all open spaces and an additional policy is needed on green infrastructure. **Cambridgeshire County Council** say the policy should seek a net gain in green infrastructure and the district council should work with neighbouring authorities to ensure cross border consistency of provision. **Sustainable Uttlesford** also suggest that the policy needs to take account of green infrastructure and recommends that the Local Authority should adopt the Natural England ANGST standards.

**17.7 JLPP on behalf of NHS West Essex** suggest a tariff system may not be the most equitable solution for the provision of health care facilities **Thames Water** support the policy on infrastructure but suggest that more specific policy support is needed on water and sewerage infrastructure. They have suggested detailed policy requirements in their representation.

**17.8** The **Theatres Trust** say the policy on infrastructure does not provide guidance as to where infrastructure is deficient and what development should be sought. **DLP on behalf of Taylor Wimpey and Kier Ventures** feel there should be a clear statement about implementation and monitoring before submission - this can be supported by a separate infrastructure delivery program but the key infrastructure elements should be in the Core Strategy itself. **SW Friends of the Earth** are concerned to make sure that all the issues relating to infrastructure provision previously covered in the infrastructure policy are covered by other policies. They are not happy that the proposed housing strategy policy covers all or even most of the issues and would therefore resist the deletion of the infrastructure policy until it is clear that the revised policy approach is adequate. In relation to the alternatives suggested they ask whether the Council could use either method depending on which appears to be most appropriate at the time.

### Conclusions

- There is support for a detailed policy framework which will set out a mechanism for collecting contributions from new development to pay for infrastructure provision associated with the development.
- There is no consensus on what an equitable system might be
- New government guidance is awaited on provisions and further work will be needed once this new guidance is published.

## Q17 - Green Belt Review 18

### Introduction

**18.1** Following the preferred options consultation the Council carried out its Strategic Housing Land Availability Assessment (SHLAA) - this showed that there were enough sites outside the Green Belt which are available and suitable for housing and could be delivered within the plan period. This would mean that there would be no need for any changes to the Green Belt boundaries in order to deliver the housing required.

#### Question 17

Do you think there should be a review of the greenbelt boundaries to allow small-scale/limited development on the edge of villages within the green belt?

### Summary of Comments

**18.2** This question was included on the leaflet delivered to all households and 1,937 comments were received in response. 1162 (60%) object to a greenbelt review. 710 (37%) comments were in support of a greenbelt review, 47 comments were logged as conditional support (2%) and 15 (1%) observations were made.

**18.3** A significant number of those supporting a greenbelt review were objectors to the Elsenham new settlement proposal. They consider that the "Green Belt" is an outdated concept when pressures of the countryside were largely a result of steam train and non-motorway travel times to London and that it is entirely artificial to divide the District into Green Belt and non Green Belt over 50 years later. They think that the attractive countryside such as that around Elsenham and Henham should be saved from development rather than save indifferent countryside merely because it is protected by an out dated policy. They refer to the East of England Plan and Natural England comments supporting a review of Green Belt boundaries and consider that the District Council should be bold and look at all settlements, regardless of the Green Belt designation in order to accommodate growth.

**18.4** Of the non household responses **Natural England** support a review to establish whether the release of land for housing would enhance the rural economy. **Broxton Parish Council** support a review but the majority of responses are from agents representing landowners/developers promoting development sites currently within the greenbelt including **Sworders and Strutt and Parker** on behalf of various clients, **Weston Homes, Countryside Special Projects and Savills on behalf of Pryor Farms**.

**18.5** In relation to the conditional support some people consider that any releases of greenbelt land should be small scale and others including **Uttlesford Futures and Newport Parish Council** suggest that releases should only be considered when supported by the parish council. **CPRE Essex** suggest that the limited release of small parcels adjacent to existing settlements can provide sustainable ways of providing affordable housing but this can already occur under current policy.

## 18 Q17 - Green Belt Review

**18.6** Objectors include **Stansted Mountfitchet, Little Easton, Hatfield Heath, Stebbing, Great and Little Hallingbury, Takeley and Great Chesterford Parish Councils and the Stebbing Society. Andrew Martin Associates on behalf of Chater Homes** also object to a review.

**18.7** The **Environment Agency** suggest that any development on released land should be exemplary in design incorporating green roofs, rainwater harvesting and sustainable drainage.

### Conclusions

- The majority of people would not support a review of current green belt boundaries.

## Q18 - Countryside Policy 19

### Introduction

**19.1** The Countryside protection policy and the text explaining the strategy was expanded to try and give a more local dimension to the policy.

#### Question 18

Do you think the suggested changes explain the strategy for development in the countryside more clearly than that suggested in the Preferred Options consultation? If not what further changes would you suggest?

### Summary of Comments

**19.2** 30 Comments were received in response to this question - 16 (53%) of support or conditional support and 12 (40%) objections. The rest (6%) were observations.

**19.3** Supporters included **Stebbing and Little Dunmow Parish Councils, DLP on behalf of Taylor Wimpey and Kier Ventures, CPRESsex, and Natural England. Saffron Walden Friends of the Earth** note that Uttlesford has an enormous amount of agricultural land but no public space and suggest that the policy should seek to protect areas which support biodiversity or provide accessibility. They also suggest allotments should be provided in all new developments.

**19.4** Some people have commented in relation to this question that Option 4 including a new settlement is contrary to policies to protect the countryside. Others have commented more generally that there should be no development on greenfield sites in the countryside and that all development should be on brownfield sites. One person has suggested that there should be exceptions to countryside policy to allow villages to exercise small changes subject to parish council approval.

**19.5** **The Government Office for the East of England** feel that there is some repetition and suggest the district council might want to combine DC6 and this policy - (this is what the Council was actually proposing in the document. They also suggest that Policy DC7 (The Countryside Protection Zone) appears to be in conflict with Planning Policy Statement 7. **East of England Local Government Association (previously EERA)** suggest the policy could reflect the role of the urban fringe for provision of access to green infrastructure. **David Lock Associates on behalf of Fairfield Partnership** say that the policy should reflect PPS 7 and that the protection of agricultural land is only one consideration.

**19.6** Some developers think that the proposed approach is too restrictive and there should be recognition that some agricultural land will have to be sacrificed e.g. **Martin Robeson Planning Practice and Scott Wilson on behalf of Galliard Homes**

**19.7** **Martin Robeson Planning Practise** consider the proposed approach to be extremely restrictive and suggest that the policy should be deleted.

## 19 Q18 - Countryside Policy

### Conclusion

- There is support for this approach

## Q19 - Landscape Character 20

### Introduction

**20.1** The Landscape Character policy was changed to make more reference to the Landscape Character Assessment and explain in more detail what the Council's approach to development would be.

#### Question 19

Do you think the proposed changes overcome the objections to the previous policy?  
If not what changes would you like to see?

### Summary of Comments

**20.2** 16 comments were received in response to this question. 11 comments were support or conditional support (69%). 4 were objections (25%) and 1 observation.

**20.3** Comments of support were received from **Little Easton and Stebbing Parish Councils and Natural England**

**20.4** **Takeley Parish Council** feels the policy should include provisions for landscape improvement. **Martin Robeson Planning Practise** consider that the policy is generally in accordance with PPS7 but feel it should be expanded to include best quality agricultural land, biodiversity importance etc and incorporate a sequential test element to identify development sites. They think the policy could also make reference to the sensitivity of the area around Stansted Airport and particular characteristics that need protecting. One person supports the policy but questions whether the Council will take this seriously in light of the proposal for a new settlement at Elsenham.

**20.5** **Scott Wilson on behalf of Galliard Homes** promoting a new settlement at Boxted Wood suggest that major new development should be directed away from sites with specific constraints and ask how the proposed new settlement at Elsenham can be consistent with the implementation of the Countryside Protection Zone? Another objector feels the proposal to build at Henham is inconsistent with the objective of enhancing landscape character. **Cambridgeshire County Council** suggest that the policy should be more positive with development enhancing landscape character in all cases not just "where possible". One person felt that there should be no development in the countryside and another was concerned about the damage to the landscape from development/redevelopment of individual residential sites owing to the height and mass of modern dwellings and requesting that the policy should explicitly deal with this.

### Conclusions

- Any large scale strategic development will have some impact on landscape character so the strategy needs to minimise these impacts as much as possible.
- Other objections are mainly around the details of the policy rather than the principles and these can be addressed in rewording etc.

## 21 Q20 - Historic Environment

### Introduction

**21.1** The Council was suggesting changes to this policy to refer to studies like Town Design Statements and the Conservation Area Appraisals.

#### Question 20

Do you think this new policy will overcome the objections?

### Summary of Comments

**21.2** 19 comments were received in response to this question. 13 of these (69%) were support or conditional support. 5 (26%) were objections and there was one observation.

**21.3** Comments of support included **Little Easton Parish Council, Cambridgeshire County Council, Blue Sky Planning on behalf of Siemens and CPRESsex** .

**21.4** **Stebbing Parish Council** support the policy but object to the proposed Boxted Wood development because of its potential impact on Stebbing. **Uttlesford Futures** think it is important to back up Conservation Areas with legal orders and action. **Natural England and English Heritage** consider it would be useful to add a reference to the protection of the settings of historic features as well as the features themselves. **Stansted Airport Limited** highlighted the fact that land take for the 2nd runway would directly affect Listed Buildings and Ancient Monuments and the Core Strategy should acknowledge the unavoidable impact of the development on the historic environment and that the impacts of the airport should be minimised.

**21.5** **Essex County Council** object to the policy on the basis that the wording should be reconsidered following the publication of Planning Policy Statement 5. **DLP on behalf of Taylor Wimpey and Kier Ventures** consider that the wording goes beyond the Listed Building and Conservation Area Act and is therefore wholly unacceptable. **Terence O'Rourke on behalf of Countryside Properties** suggest that the policy should be extended to cover development remote from the site - a reference to the potential impact of traffic from the proposed development at Elsenham on the historic core of Stansted Mountfitchet. One other objector to the policy raised concerns about impact of proposed development at Elsenham on the historic interest of Stansted Mountfitchet and Henham

**21.6** **English Heritage** consider the revisions represent an improvement but are still unsure whether the policy will be considered locally distinctive enough and that more specific reference to the heritage assets of Uttlesford might help. This was also mentioned in one of the other comments. They confirm that national policy context is now PPS5 and not PPGs 15 and 16 and request that the text should also refer to the definition of heritage assets.

## Q20 - Historic Environment 21

### Conclusions

- The Council will need to make sure the point about the protection of the settings of historic features is adequately covered in any review of this policy.
- In relation to the potential impact of the second runway on historic assets this is no longer considered to be an issue as set out in response to Question 5 above.
- Need to make sure that references to national guidance are consistent and up to date at the next stage of preparation of the Core Strategy.
- The heritage assets of Uttlesford are an important part of what makes the District distinctive. If English Heritage still feel that this is not reflected adequately in the Core Strategy then this should be addressed.



## 22 Q21 - Open Space

### Introduction

**22.1** The shortage of open space and play space was identified as an issue for the District but previous consultation stages had not specifically addressed this issue. A new objective to protect existing open space and provide new facilities and a new policy to support this objective was therefore suggested.

#### Question 21

Do you support the addition of this new objective, and policy in the Core Strategy - if not what additional changes would you like to see?

### Summary of Comments

**22.2** 21 comments were received in response to this question. The majority of these (90%) were support or support with conditions

**22.3** Comments of support include **Scott Wilson on behalf of Galliard Homes, DLP on behalf of Taylor Wimpey, Weston Homes, Fenn Wright Surveyors and Lawson Planning Partnership on behalf of NHS West Essex, Little Easton Parish Council.**

**22.4** **Natural England** consider the policy should be expanded to take into account the multiple functions that open space can provide - commonly referred to as green infrastructure but an open space policy which addresses multi functional network of open spaces would be similarly effective.

**22.5** **Saffron Walden Friends of the Earth** consider that open space provision should be accessible i.e. within very easy walking and cycling distance to residential areas and have raised concerns that in Saffron Walden central green spaces are being built on and are proposed to be replaced on peripheral sites. **Stebbing Parish Council** are concerned that recent development has been deficient in amenity land and facilities. **Takeley Parish Council** have suggested that the policy should also include ancient hedgerows, greens, woodlands and protected lanes.

**22.6** Other suggestions for inclusion in the policy were country parks, green roofs and green heating, minimum specifications for green space provision with extra for blocks of flats, and the need for the policy to encourage the extra provision of open space in existing settlements.

## Q21 - Open Space 22

**22.7** David Lock Associates on behalf of the Fairfield Partnership have assumed joint school use in their master planning work for the new settlement at Elsenham. They are concerned that the policy approach finally adopted should not rule out this sort of approach.

### Conclusions

- The Council will need to consider the suggestions in any revised Core Strategy, particularly in relation to the points made by Natural England about the definition of and approach to Green Infrastructure.

## 23 Q22 - Nature Conservation and Geological Sites

### Introduction

**23.1** The Council was suggesting changes to the preferred options policy to make the policy clearer and refer to the Essex Biodiversity Action Plan.

#### Question 22

Do you think these suggested changes would overcome the objections to the preferred options policy. If not what other changes do you think should be made?

### Summary of Comments

**23.2** 18 comments were received in response to this question - half of which were support or conditional support.

**23.3 Little Easton and Stebbing Parish Councils and Scott Wilson on behalf of Galliard Homes** support the proposed changes. Galliard Homes are promoting a new settlement at Boxted Wood as providing significant opportunities to enhance natural habitats and diversity. Stebbing Parish Council are concerned about the potential impact of this development on Boxted Wood, an ancient woodland.

**23.4 Natural England** and one individual support the proposed changes as making improvements to the policy but feel it still does not overcome all objections and should be worded more strongly and excluding words like "where possible".. Natural England think a new policy on green infrastructure should be included. They consider that the Core Strategy fails to recognise that green infrastructure includes biodiversity sites and open spaces. The Core Strategy does not adequately exploit the multiple benefits of a co-ordinated approach to open space provision in the District. **Uttlesford Futures** consider that a roof tax is needed to enhance the countryside and biodiversity. **Sustainable Uttlesford** have suggested detailed rewording for the policy

**23.5** There were objections to the policy from the **Environment Agency, Sustainable Uttlesford** and two individuals. The Environment Agency would like to see new wording introduced to say that development should not make meeting the requirements of the Water Framework Directive more difficult to achieve. One objector is concerned that the policy makes no reference to ponds/rivers/streams which are all subject to degradation/pollution and seeks a balance between effectiveness of drainage and value as habitat.

**23.6 Takeley Parish Council** think the policy should include protection of waterways Three individuals made observations including the best way to enhance biodiversity and habitats is to leave them along. One person asked how the policy would relate to small infill schemes because they didn't feel desk top studies would be adequate and one person observed that it was important to give the same consideration to people who wanted to live in the countryside as biodiversity and the Green Belt.

## Q22 - Nature Conservation and Geological Sites 23

### Conclusions

- The Council will need to consider the suggestions for rewording the policy in any review of the Core Strategy
- The Council will need to consider the issue of "Green Infrastructure" and make sure this is dealt with in a consistent and appropriate way.
- Additional work on the development of the 2006 open space audit into an open space strategy will be an important element of the evidence base to support the Council in making these changes to the Core Strategy.

## 24 Q23 - Retail Issues

### Introduction

**24.1** The Council did not propose a policy for the retail strategy because an update of the District Retail Study was still outstanding at the time the further preferred options consultation was prepared. Instead the Council set out what it considered to be the main issues and some alternative approaches

#### Question 23

The Council would welcome your comments on this preliminary assessment of the issues which the retail strategy will need to address. Do you have any comments on the alternative approaches to new development suggested? Are there any other issues which should be considered?

### Summary of Comments

**24.2** A total of 25 comments were received in response to this question. 2 (8%) were support. 5 (20%) were support with conditions 7 (28%) were objections and 11 (44%) were observations.

**24.3 Indigo planning on behalf of Sainsbury's and GL Hearn on behalf of Tesco**, both of which are promoting additional retail floorspace in Saffron Walden consider that the Core Strategy should remain flexible and not exclude the development of edge of centre and out centre retail sites. Sainsburys are promoting their site on Thaxted Road in Saffron Walden as an opportunity to redress convenience expenditure loss.

**24.4** Some individuals also support edge of town/out of town retail for Saffron Walden on the basis that this would help to relieve traffic problems in the centre. One person suggested that this should only be for goods not available within the town centre. Some developers promoting housing sites including **Fenn Wright Surveyors DLP on behalf of Taylor Wimpey and Kier Ventures** are suggesting that the viability and vitality of existing centres is likely to be best assured by permitting growth within and adjoining market towns which can support a wide range of local shops and services. This approach is also suggested by a small number of individuals and is also made in relation to supporting village shops where some development may help the viability of a village store.

**24.5 David Lock Associates on behalf of the Fairfield Partnership** agree that NE Elsenham should contain a range of retail floorspace with services and recreation. Their current assumptions include retail floorspace of 5,300m<sup>2</sup>. One individual, however objects to the strategy on the basis that it assumes a major new development at Elsenham. Other objectors to the Elsenham proposal think that the Elsenham sites will be too small to support a supermarket leading to more car journeys on unsuitable roads.

**24.6 Barton Willmore on behalf of Waitrose** consider that to comply with Planning Policy Statement (PPS) 4 the policy should refer to retail development being within Saffron Walden and Great Dunmow town centres suggesting that the Core Strategy

## Q23 - Retail Issues 24

may be prejudiced if new development is permitted outside the town centres. They consider that extensions to existing food stores should be considered before edge or out of town locations and consider that the Waitrose store in Saffron Walden has the potential to expand. The primary shopping area should be defined in the LDF and the Waitrose store should be included within it in order to protect convenience floorspace within the town centre. They refer to the need for an up to date retail study to assess need.

**24.7 Saffron Walden Friends of the Earth (FoE)** - have expressed the view that the policy contravenes PPS4 and the Regional Spatial Strategy and fails to recognise Saffron Walden and Great Dunmow in the retail hierarchy. FoE are strongly opposed to edge of town retail they say it is contrary to PPS4 and all principles of sustainable development. They refer to the Hephher Dixon report which said convenience expenditure retention was very good and comparison expenditure as good as expected given the position of Great Dunmow and Saffron Walden in the hierarchy and conclude it is completely unrealistic to expect all comparison goods could be met within the district. Policy EC3.1, and specifically EC3.1d in PPS4, requires that local authorities should set floor space thresholds for the scale of edge of centre and out of centre development which should be subject to an impact assessment. The Core Strategy should reflect this - the statutory maximum of 2500 sq.m is clearly far too high for small centres such as Saffron Walden and Great Dunmow and a far lower limit should be adopted. **The Government Office** also feel it is unclear where retail development is to be concentrated They note that the plan makes reference to Saffron Walden and Great Dunmow but suggest it needs to refer to a hierarchy and it would be helpful to provide some indication of the amount of retail development expected at different centres over the plan period. These views are also reflected in comments made by the Theatres Trust. **The East of England Local Government Association (Previously EERA)** considers that the document should be clearer on linkages between the employment strategy policy and the function of market towns and other rural settlements and that the policy should also acknowledge cultural and leisure aspects of the market towns.

**24.8 Little Easton Parish Council** consider it is essential to retain the rural market town characteristics of SW and Great Dunmow. **Stebbing Parish Council** consider that each town centre should be allowed to develop full range of retail facilities

**24.9 CPREssex** - Do not support out of town retail outlets. Support English Heritage statement within policy there must be consideration of impacts and clear demonstration of need. They are of the view that the High Street in Saffron Walden is declining and the Council needs to consider what should be done to address this.

## 24 Q23 - Retail Issues

**24.10 Takeley Parish Council** and others have suggested measures which could be considered to help the town centres. Takeley Parish Council suggest small businesses should be encouraged with market incentives, pedestrianisation should be reviewed and park and ride schemes implemented. Other suggestions include encouraging markets, supporting small shops with sensitive rating policies and cheap parking

### Conclusions

- The Council will use the results of the Retail Assessment currently underway to review retail strategy and develop a retail hierarchy for the District

## Q24 - Character of Market Towns 25

### Introduction

**25.1** Changes were suggested to the Character of the Market Towns policy to refer to approved design guidance.

#### Question 24

Do you have any comments on the proposed changes to this policy? Do you think this policy should remain as a separate policy or should it form part of the policy framework for the retail strategy outlined in Chapter 18?

### Summary of Comments

**25.2** 17 comments were received on this policy. Of the 9 people who expressed a preference 6 supported the policy remaining separate, largely because people felt that the policy should apply to other types of development e.g. employment, tourism and residential within the towns centres and not just retailing but one person felt that it should still be a core part of the policy framework for the retail/commercial strategy. **DLP on behalf of Kier Ventures** suggested that the policy might be better placed in the Development Control DPD because it sets out the approach to the delivery of development rather than being part of the spatial distribution strategy.

**25.3 English Heritage** support the revised policy. They consider that it gives a much more robust policy position and successfully integrates historic interest as an ingredient of sense of place and sits well with Planning Policy Statement 5.

**25.4** One person felt that the historic character and quality of Stansted Mountfitchet should also be included.

**25.5 AMA on behalf of Chater Homes** promoting development at Chelmer Mead do not consider that the revised policy provides enough protection for Great Dunmow or Saffron Walden and that growth should be directed elsewhere.

**25.6** Two people consider that only development on brownfield sites is acceptable within the towns.

**25.7** One individual suggested that there was some ambiguity about the extent of the area covered by the policy and queried whether this was to be the same as the Conservation Areas.

### Conclusions

- There is support for maintaining this as a separate policy.



## 25 Q24 - Character of Market Towns

- Stansted Mountfitchet is not defined as a market town within the strategy and is not included in this policy for that reason.
- The areas to which this policy will apply need to be clearly defined.

## Q25 - Sustainable Development and Use of Natural Resources

26

### Introduction

**26.1** To reduce repetition the Council suggested that the policy on Natural Resources should be expanded to explain the preferred strategy in more detail, to address issues not previously covered in this policy like noise, crime and vandalism and to cover issues currently in policies LC2 (Health Impacts) and LC3 (Accessibility) which the Council suggested could be deleted.

#### Question 25

Does this policy cover all the relevant issues? Do you agree that this suggested policy covers the issues in Policy LC2 and LC3 which could now be deleted.

### Summary of Comments

**26.2** 24 comments were received in response to this policy. There were 8 (33%) comments of support. 7 (29%) comments of conditional support. 5 (21%) objections and 4 (17%) observations.

**26.3** **Takeley and Little Easton Parish Councils and Fenn Wright Surveyors** support the policy. **Stebbing Parish Council** feel that all building must be to the highest standards and include renewables. **Scott Wilson on behalf of Galliard Homes** promoting a new settlement at Boxted Wood consider that a new community is the best way to achieve high standards of sustainability. **John Lawson Planning Partnership on behalf of NHS West Essex** support the inclusion of the issues previously covered by L2 and L3 and agree that these policies can be deleted. **Savills on behalf of Great Dunmow Estates** consider that the revised policy provides a firm base for considering development proposals.

**26.4** **Uttlesford Futures, Sustainable Uttlesford** and one individual suggest that Uttlesford should adopt an SPD on air quality to deal particularly with air quality issues in Saffron Walden.

**26.5** **CPREssex and Saffron Walden Friends of the Earth (FoE)** consider that development should not be permitted unless sufficient natural resources are available to service the development without harm and one individual says that resource management is a given for all future development. FoE particularly referred to the assessment in the Water Cycle Study that no additional water is available and they can't see how this can be reconciled with the large scale development proposed.

**26.6** The **Environment Agency** object to the policy - they feel it needs to be substantially strengthened to include specific targets for water efficiency particularly if the Council carries through such a large scale development of 3000 houses. They also think the policy should include reference to sustainable drainage systems (SUDS). They have suggested detailed wording changes which would be needed to overcome their objection.

## 26 Q25 - Sustainable Development and Use of Natural Resources

**26.7 The East of England Local Government Association (previously EERA)** suggest that the policy should include reference to sustainable non-motorised travel, that the District Council should consider seeking water consumption targets in advance of Government requirements and that the Core Strategy should indicate how waste management and recycling apply to new developments.

**26.8** Two individuals have commented that the wording in the policy is too vague with words like "should" and "encourage" which should be replaced words like "must" and "will". Another person suggests that there is an inherent ambiguity in the term "sustainable" in the requirement to use sustainable building materials because in a strict sense it would be too onerous and expensive but on a looser definition it becomes impossible to interpret.

**26.9** One individual suggests the District Council should encourage any environmentally efficient development and another suggests the type of adaptations new development should include e.g. water butts, surface water should go to wet ponds, all new buildings should have solar panels. Each community should have the ability to provide renewable energy for street lighting.

**26.10 Cambridgeshire County Council** made the observation that consideration should be given to the government objective to be carbon neutral by 2016. The vision needs to be more aspirational and reflect government objectives more effectively. The revised policy is an important basis for resource issues and objective 12 should be higher up the hierarchy.

### Conclusions

- The Council will need to consider further the most appropriate way to deal with the air quality management issue in Saffron Walden
- The Council will need consider the wording changes suggested by the Environment Agency in any revision of the Core Strategy

## Q26 - Renewable Energy and Energy Efficiency 27

### Introduction

**27.1** The preferred options policy on renewable energy only related to stand alone schemes and did not include the integration of renewable energy into new development so the policy was changed to address this.

#### Question 26

Do you think the proposed changes will overcome the objections and provide a sound strategy for use of renewable energy in the District?

### Summary of Comments

**27.2** There were 27 comments in response to this question 14 (52%) were support and 5 (19%) were conditional support. There were 4 (15%) objections to the policy and 4 (15%) observations.

**27.3** Supporters included **Little Easton PC and Stebbing PC**, the **Environment Agency and Natural England** who were pleased to see their previous recommendations have been implemented and consider the proposed revisions strengthen the policy.

**27.4** **Saffron Walden Friends of the Earth** felt the use of the term overriding in terms of the potential constraints goes too far and the word exceptional might be better, one objector suggested the word significant should be used instead. **Uttlesford Futures** consider that the District Council should urgently engage a sustainability resource to act as champion and exemplar for community engagement in sustainability and climate change issues. **Terence O'Rourke on behalf of Countryside Properties** supports use of renewable energy where viable and practicable but feel that the policy should be more flexible to allow for use of different technologies. **CRPEssex** do not think the policy goes far enough. A cautious approach is required to wind turbines/farms because they have high environmental impact but are not very efficient. **Januarys** support the objectives but consider that text changes are required to make sure the policy is clear, flexible and therefore sound. The 10% target in the text should be written into the policy and the words where practical and viable should be added. One person considers that the policy would only be justified alongside a reduction in car use.

**27.5** The **East of England Local Government Association (previously EERA)** suggested that as the District Council already has a 10% target for renewable energy in new development that the Council should consider referring to and exceeding the Government aim and timetable for advancing levels of the Code for Sustainable Homes and for non domestic buildings. **John Lawson Planning Practise on behalf of NHS West Essex** consider that the policy should be amended to be consistent with policy ENG1 in the East of England Plan and include reference to decentralised renewable or low carbon energy sources. **BAA Safeguarding** raised the issue of turbines and the problems these can cause for aviation not just as a physical obstacle but because of the interference with radio frequencies.

## 27 Q26 - Renewable Energy and Energy Efficiency

**27.6** One person felt that the requirements in the policy were too rigid and that energy from renewable sources should be encouraged rather than permitted.

**27.7** **Cambridgeshire County Council** feel that as this chapter deals with a broad range of issues that it should be renamed Adapting to and Mitigating Climate Change in accordance with the new duty arising from the 2008 Planning Act to include climate change policies in LDFs.

### Conclusions

- The Council will need to consider the requests for wording changes when reviewing the Core Strategy
- The Council will need to address the issue of wind turbines and the potential impact on aviation

## Q27 - Reducing Flood Risk 28

### Introduction

**28.1** The wording of the flood risk policy was changed largely to reflect the comments made by the Environment Agency at the previous consultation stage.

#### Question 27

Do you support the proposed changes to this policy. If not what other changes do you think should be made?

### Summary of Comments

**28.2** There were 16 comments in total received in response to this question. There were 7 (44%) comments of support and 4 (25%) of conditional support and 5 (31%) objections.

**28.3** The revised policy was supported by **Little Easton PC** and six individuals. **Stebbing PC** while supporting the policy generally were concerned that any development at Boxted Wood would aggravate flooding problems. One person highlighted the issue of maintenance and felt that landowners and councils should clean out ditches, drains and rivers to improve water flow. One person was concerned that any flood risk assessment must be really robust.

**28.4** The **Environment Agency** objected to the revised policy saying that the wording is confusing and disjointed. They suggested new wording for the policy which would overcome their objections including reference to the use of sustainable urban drainage.

**28.5** The issue of SUDS was also raised by **Takeley Parish Council** who felt that more emphasis was needed on drainage and surface water drainage. **Cambridgeshire County Council** who felt that examples of forms of controlled drainage (SUDs) could be provided in Objective 14 to be consistent with PPS25 and **Natural England** who suggested DC15 should be changed to "encourage" the use of SUDS.

**28.6** Another person commented that the problem with Flood Risk Assessments is they are based on historical data. Indications are that flood events will become more frequent. Planning for 100 year events is no longer enough.

### Conclusions

- Any revision of the Core Strategy should take into account the wording changes recommended by the Environment Agency

## 29 Q28 - Access to Stansted Airport

### Introduction

**29.1** The Council suggested additional text to support this policy to make clear the framework within the surface access need of the airport will be met.

#### Question 28

Do you think the proposed changes explain the strategy for access more clearly?

### Summary of Comments

**29.2** There were 17 comments in relation to this question. Just over half (53%) were objections. 7 (41%) comments of support/conditional support were received including **Little Easton, Stebbing and Takeley Parish Councils**

**29.3 Saffron Walden Friends of the Earth** are concerned about the existence of a stand alone transport policy for the airport and the fact that there are capacity constraints on the rail network generally but service improvements have tended to be focused on the airport. Infrastructure and public transport access should only be acceptable where it has no detrimental effect on services provided to the rest of the district. This is a theme which runs through a number of the other objections.

**29.4 Hatfield Heath Parish Council** would like to see rail and bus termini at the airport considered as mode interchanges independently of the air travel element. This point is picked up by another objector who feels that although the station is part of the national bus and rail system with a wider function than conveying people to and from flights in practice it is difficult for people to use it in this way because there is no provision for private car access to pick up or drop off at the rail and/or bus and coach station and there is no pedestrian access.

**29.5** The **East of England Local Government Association (previously EERA)** suggest that the policy could reflect demand management measures to reduce private transport. **David Lock associates on behalf of the Fairfield Partnership** suggest that the policy wording could highlight the need to maintain a high standard of local public transport access into the airport at all times.

**29.6** One objector feels the Council should continue to consider all scenarios for the airport until it becomes clear that a scenario will not happen, particularly in relation to transport policies.

### Conclusions

- This policy is specifically related to access at the airport but the Core Strategy will also need to address accessibility within the district generally.

## Q29 - Health and Community Facilities 30

### Introduction

**30.1** The Council proposed that the policy on Health and Community Facilities should be deleted because it duplicates policy criteria set out elsewhere in the Core Strategy.

#### Question 29

Do you agree that this policy should be deleted because these issues are covered by other policies in the Core Strategy?

### Summary of Comments

**30.2** There were 19 comments in response to this question. 8 (43%) were representations of support/conditional support 11 (58%) were objections.

**30.3** **NHS West Essex** would only support the deletion of this policy if the suggested amendments to other policies are implemented. **Sport England and Stebbing Parish Council** support the deletion with some conditions. Sport England on the basis that policy DC2 and any revised policy on infrastructure confirms that community facilities including sports facilities will be required as part of development proposals. Stebbing Parish Council are concerned that there should be easy access to all forms of health provision within the district.

**30.4** The objectors include **Saffron Walden Friends of the Earth, the Theatres Trust and Essex County Council**. SW Friends of the Earth did not consider it was clear that this issue was adequately dealt with elsewhere. Essex County Council feel the policy should refer to other services e.g. schools, libraries, adult social care, integrated youth services, waste management and green infrastructure. The Theatres Trust felt that the policy should focus on the enhancement of existing community facilities and not just the provision of new facilities as part of development proposals. 5 people felt that the issue of health was important and should continue to be covered in a separate policy.

### Conclusions

- The Council's proposal to delete this policy is not supported by the majority of respondents.
- More work is required to make sure that the issues raised are adequately addressed in the Core Strategy.



## 31 Q30 - Health Impacts

### Introduction

**31.1** In the Further Preferred Options Consultation the Council was suggesting that the focus and scope of the policy on use of natural resources (Policy DC13) should be expanded to include the issue of health impacts. This then meant that there was some duplication and the Council suggested that this policy should be deleted.

#### Question 30

Do you agree that this issue is covered by Policy DC13 and that this policy should be deleted?

### Summary of Comments

**31.2** There were 11 responses to this question. There were 6 (54%) comments of support/conditional support and 4 (36%) objections and 1 (8%) other comment. 1 objector didn't agree that these issues were covered by the proposed new policy. One of the supporters suggested that air quality should be included as an additional issue in DC13. **Stebbing Parish Council** consider that DC13 must be strong enough to control all health impacts of development.

### Conclusions

- There is support for the deletion of this policy subject to DC13 dealing with all health impacts of development including air quality.

## Q31 - Accessibility and Other Comments 32

### Introduction

**32.1** The Council suggested in the Further Preferred Options Consultation that this policy should be deleted because it duplicates policy criteria set out elsewhere in the Core Strategy.

#### Question 31

Do you agree that this policy repeats issues covered in Policy DC13 and could be deleted?

### Summary of Comments

**32.2** There were 12 comments in total in responding to this question. There were two objections to the proposal to delete this policy. One person was concerned about accessibility in a more general sense as it related to the proposed new settlement and the road links to it. The rest of the comments including **Stebbing Parish Council, Fenn Wright Surveyors** and 3 agents acting for clients with land interests within the District (**Savills for Great Dunmow Estates, Terence O'Rourke for Countryside and DLP for Taylor Wimpey**) support the proposal to delete this policy.

### Conclusions

- There is support for the proposed deletion of this policy

### Other Representations

**32.3** Some representations were received on other topics not specifically covered by the questions the Council asked in the consultation document.

### The Vision

**32.4** The **Environment Agency** feel that the Vision should incorporate some reference to climate change and have suggested wording changes which would overcome their objection.

**32.5** The vision statement on transport was described as by one person as "wishful thinking".

### The Objectives

**32.6** As a general comment 1 person questioned whether the objectives were achievable. Another person felt it would not be possible to obtain all objectives without radical changes to district infrastructure.

### Objective 1 - Employment Growth

## 32 Q31 - Accessibility and Other Comments

**32.7** One person felt that the Council should do everything possible to support local companies. Someone else suggested that it would be useful to carry out a survey to ask businesses about their requirements and identify areas where they would prefer sites to be located.

### Objective 11 - Function of the Market Towns

**32.8** CPREssex consider that objective 11 is in breach of Planning Policy Statement 4

### Objective 13 - Reducing Emissions

**32.9** Cambridgeshire County Council felt that this objective should be higher up the hierarchy and renamed Adapting to and Mitigating Climate Change to reflect national, regional and local objectives to address climate change issues.

### Objective 17 - Air Noise, Ground Noise and Air Quality

**32.10** CPREssex consider that objective 17 should be rephrased in more positive terms.

### Objective 18 - Hatfield Forest

**32.11** One person suggested that Objective 18 should also include reference to air and noise pollution.

### Appendices

**32.12** The Appendix to the consultation document consisted of a list of work which the District Council has compiled as it's evidence base to support the Core Strategy. Sport England raised specific issues about the Green Space Audit and Essex County Council suggested that the evidence base should include the Essex Childcare Sufficiency Assessment and the Essex Children and Young People's Plan.

### Glossary

**32.13** Essex County Council feel that the glossary should include a definition of community facilities which makes reference to education and childcare. Anglia Water Services have requested that the definition of Water Cycle Study should be expanded on.

### New Policy on Pollution

## Q31 - Accessibility and Other Comments 32

**32.14** The Environment Agency suggest that there should be a policy to make sure that new development minimises all kinds of pollution including noise and light pollution and where possible seeks to reduce emissions in order to protect the natural environment. They have suggested how such a policy might be worded.

### Conclusions

- The Council will take these comments into account in revisions to the Core Strategy.

## **32 Q31 - Accessibility and Other Comments**

## List of Developer and Landowners Site Interests Appendix 1

Table 1.1 List of Developers/Landowners and Site Interests

| Agent                          | Representing                              | Site or Land Interest  |
|--------------------------------|---|--|
| Andrew Martin Associates (AMA) | Chater Homes                              | Chelmer Mead - sustainable new development on a choice of scales e.g. 750 homes, 3,000 new homes.  |
|                                | Andrewsfield New Settlement Consortium    | New settlement on land at Andrewsfield, Near Stebbing.   |
| ASP                            | Cory Wright                               | Land at Hafield Park Farm, Pumping Station, Takeley Street<br>Land at Bonningtons Farm, Takeley  |
| ASP                            | Mr Temple and Mr Duncanson                | Land at North View and 3 The Warren Little Canfield  |
| ASP                            | Knight Developments                       | Land off Sampford Road, Thaxted  |
|                                | Barlow                                    | Land between A120 and B1256 at Dunmow West for community uses such as medical centre or emergency services or hotel<br>Huntingfields House, Stortford Road (30-40 homes) |
| Barton Willmore                | Waitrose                                  | Retail Issues  |
| Barton Willmore                | Land Securities                           | New Settlement at Easton Park  |
| Bidwells                       | Taylor Wimpey                             | Land north of Stansted Mountfitchet (approx 100 homes)   |
| Bidwells                       | Taylor Wimpey                             | Land south of Newport (50+ homes)  |
| Bidwells and Roger Tym         | Barratt Strategic and the Trembath Family | Land west of Great Dunmow (1000 new homes, school and community facilities)  |
| Bidwells                       | 121 Radwinter Road Partnerships           | Willis and Gambier Site, Radwinter Road, Saffron Walden  |

## Appendix 1 List of Developer and Landowners Site Interests

| Agent                 | Representing                              | Site or Land Interest   |
|-----------------------|---|---|
| Bidwells              | Benyon Fox and Hamilton                   | Land south of Stanley Road, Four Acres and Rookery Close, Great Chesterford.  |
| Blue Sky Planning     | Siemens Benefit Scheme and the Kier Group | Land west of Great Dunmow (approx 435 homes with element of mixed use e.g small parade of shops/offices)  |
|                       | Bovis Homes                               | Kiln Court, Thaxted Road, Saffron Walden  |
| Boyer Planning        | Gleeson Homes                             | Old Mill Farm, Elsenham (around 150 homes)  |
| Carter Jonas          | Bellway Homes and Mr Philpot              | Land at Takeley, south of the Flitch Way and east of the mobile home park   |
| Carter Jonas          | Countryside Properties (Southern) Ltd     | Land adj Highfield, Dunmow Road, Takeley, west of Morrells Green. (approx 40 homes)   |
| David Lock Associates | Fairfield Partnership                     | 3,000 homes in a new settlement on land to the north east of Elsenham along with employment provision, community facilities and supporting infrastructure |
| DLP                   | Kier Land                                 | Mixed use urban extension south east of Saffron Walden. 250 homes, 3.69ha employment land, open space and community development.                          |
| DLP                   | Taylor Wimpey                             | South of Ongar Road, Great Dunmow (140 homes)   |
| Drivers Jonas         | Cemex                                     | Land at Frogs Hall Farm, Little Canfield  |
| Edward Gittinns       | Landowner                                 | Land at Bran End, Stebbing  |
| Fenn Wrigh Surveyors  | Landowner                                 | Dunmow Park (100+ homes)  |

## List of Developer and Landowners Site Interests Appendix 1

| Agent                            | Representing                       | Site or Land Interest  |
|----------------------------------|------------------------------------|--|
| GL Hearn                         | Enodis                             | Oakwood Park extension to existing residential development (300 homes)                                   |
| GL Hearn                         | Tescos                             | Retail Issues  |
| Halcrow                          | Cheergrey Properties               | Further employment provision at the Elsenham Industrial Estate (now referred to as Elsenham Meadows)     |
| Indigo Planning                  | Sainbury's Supermarkets            | Retail Issues  |
| Indigo Planning                  | Standard Life Investments          | Warman's Farm, Burton End, adjacent to Stansted Airport - airport related development.                   |
| January's                        | Rigeons                            | Land north of Ashdon Road, Saffron Walden (175-200 homes as part of an employment led mixed development. |
|                                  | JTS Partnership                    | Development at Thaxted (west of village)   |
|                                  | Latham C                           | Land at Bolford Street, Thaxted  |
| Lucy Carpenter                   | Pyle Family                        | Matching Road, Hatfield Heath  |
| Martin Robeson Planning Practise | Landowner                          | Land at Start Hill for employment purposes.  |
| Melville Dunbar                  | Wickford Development Company       | Sector 4 Woodlands Park, Great Dunow, Brick Kiln Farm 1 and 2, St Edmunds Lane, Great Dunmow             |
| Pegasus Planning Group           | Bloor Homes and Martin Grant Homes | Urban extension to the north of Stansted Mountfitchet  |
| RPS Group                        | Endurance Estates                  | Land east of Wedow Road, Thaxted   |
| Savills                          | Legal and General and Hines        | Proposed business hub at Stansted Airport including  |



Appendix 1 **List of Developer and Landowners Site Interests**

| Agent             | Representing                             | Site or Land Interest   |
|-------------------|--|---|
|                   |  | offices, hotels, research and development facilities, education and training campus and logistics and distribution centre.          |
| Savills           | Countryside                              | Land at Stansted Road, Birchanger   |
| Savills           | Great Dunmow Estates                     | Great Dunmow Business Park - mixed use development of homes and employment uses.  |
| Savills           | Pryor Farms                              | Land to the south of Stansted Mountfitchet  |
| Savills           | Quendon Properties                       | Land between the M11 and Frambury Lane, Newport   |
| Savills           | Amsgal Properties                        | Land south of Dunmow Road, Takeley  |
| Scott Wilson      | Galliard Homes                           | A new settlement at Boxted Wood along with employment provision, community facilities and supporting infrastructure                 |
| Strutt and Parker | Mr Balson                                | Land west of Mill Road, Felsted   |
| Strutt and Parker | The Battlement Trust                     | Land to the West of Stansted Mountfitchet   |
| Strutt and Parker | The Chelmsford Diocesan Board of Finance | Land to the north of Dunmow Road, Takeley<br><br>Land to east of B1383 Rickling Green<br><br>Land to the west of Hall Close, Henham |
| Strutt and Parker | Gemmill Brothers                         | Land at Elm Farm to the East of Stansted Mountfitchet   |
| Strutt and Parker | Hamilton/Turner and Wright               | Land to the north east of Chelmsford Road, Barnston   |

## List of Developer and Landowners Site Interests Appendix 1

| Agent             | Representing            | Site or Land Interest   |
|-------------------|-------------------------|---|
| Strutt and Parker | Mr Haylock              | Land to the west of the High Street, Hempstead<br>Land adjacent to Harvey Way, Hempstead                        |
| Strutt and Parker | Pegasi Management Ltd   | Land east of Belchamp Lane, Rickling Green<br>Paddock Land to the west of Brick Kiln Lane Quendon               |
| Strutt and Parker | Mr Wormwald             | Land to the south east of High Easter Road, Barnston.   |
|                   | Mr and Mrs Suckling     | Elmside, Finchingfield Road, Little Sampford  |
| Sworders          | Hargrove                | Employment Land M11/Stansted, West of Takeley   |
| Sworders          | Messrs Corke            | Land west of Takeley  |
| Sworders          | Birchanger Hall Farms   | Land at Birchanger  |
| Sworders          | D and MA Hill           | Land at Newport   |
| Sworders          | Noble                   | Land at Clavering   |
| Sworders          | Tayler Trust            | Land at Hatfield Heath  |
| Sworders          | WRC Morton and Co       | Site previously known Parsonage Farm, Birchanger now the M11 Business Link                                      |
| Sworders          | Pimblett                | West of Stansted Airport  |
| Sworders          | Engelmann Trust         | Saffron Walden (East)   |
| Sworders          | The Morton Trust        | Land west of Elsenham   |
| Sworders          | The Ash Family          | Land at Takeley   |
| Sworders          | Arnold Hitchcock and Co | Clavering   |
| Sworders          | G.E. Sworder and Sons   | Auction House, north of Stansted - employment   |
| Terence O'Rourke  | Countryside Properties  | Proposed extension to Takeley. Representation presents two levels of growth - 750 homes or 2,000 homes with new |

## Appendix 1 List of Developer and Landowners Site Interests

| Agent                    | Representing          | Site or Land Interest   |
|--------------------------|-----------------------|---|
|                          |                       | employment, community facilities etc consistent with each level of growth.                    |
|                          | David Warn            | Watch House Farm Felsted, mixed housing and employment with possible Gypsy and Traveller Site |
|                          | Weston Homes          | Little Hallingbury  |
| Woods Hardwick Planning  | Coleman Properties    | Land south west of Hall Road, Elsenham  |
|                          | Richard Yeldham       | Land at Monk Street, Thaxted  |
| Rupert Kirby             | Ford Farm Partnership | Land east of St Edmunds Lane, Great Dunmow (250 homes)  |
| Robson Warren Architects | W Heard               | Land east of Brick House, Wicken Bonhunt  |