

6. HOUSING

General Representations of Support

Ref.No: 156 Rep.No: 13

Representor: White, Saffron Walden Town Council **Agent (if applicable):**

The Town Council supports these proposals. In particular the Council offers strong support to policies H9 and H10 in their efforts to ensure a social mix and to provide affordable housing.

Paragraph 6.1

6.1 The policies on housing have the following objectives:

- **To meet the Structure Plan housing requirement and provide sufficient housing to meet locally generated requirements;**
- **To concentrate housing development in the main urban areas and other locations well related to employment and facilities; and**
- **To meet the need for affordable housing and retain mixed and balanced communities.**

Ref.No: 119 Rep.No: 34

Representor: Proto Limited **Agent (if applicable):** Littman and Robeson

These objectives are appropriate and include a recognition of the need to concentrate housing development in other locations well related to employment and facilities

Comments:

Noted

POLICY H1 – HOUSING DEVELOPMENT

Deposit Policy

The local plan proposes the development of 4,620 dwellings for the period 2000 to 2011 by the following means:

- a) **The re-use of existing buildings and previously developed land, and the use of unused land, within the settlement boundaries of the main urban areas:**
 - **Great Dunmow (230 dwellings);**
 - **Saffron Walden (420 dwellings); and**
 - **Stansted Mountfitchet (100 dwellings)**
- b) **Urban extensions to two of the main urban areas, and settlement expansions:**
 - **Oakwood Park, Little Dunmow (650 dwellings);**
 - **Rochford Nurseries, Birchanger and Stansted Mountfitchet (600 dwellings);**
 - **Takeley and Priors Green (825 dwellings); and**
 - **Woodlands Park, Great Dunmow (1175 dwellings).**

- c) **Re-use of existing buildings and previously developed land outside urban areas (575 dwellings).**
- d) **Other contributions to supply, including development with outstanding planning permission not included in the above categories (45 dwellings).**

REPRESENTATIONS RECEIVED

Representations of Support

Ref.No: 158 Rep.No: 1

Representor: Shelley, Little Canfield Parish Council **Agent (if applicable):**

We have no comments to make other than to say we are very pleased to note that no further residential development in the parish is anticipated for the next ten years.

Ref.No: 185 Rep.No: 10

Representor: McGowan, Hatfield Regis Grange Farm **Agent (if applicable):** FPD Savills

The policy includes the proposed Priors Green allocation which incorporates land concerned in this representation where the land owners are determined that their land will play an appropriate part in satisfying the allocation.

Objections

Ref.No: 16 Rep.No: 2

Representor: Stock, The Fairfield Partnership **Agent (if applicable):** Januarys Chartered Surveyors

Amendment(s) Sought: In order to achieve the targets for new housing in the district, the expansion of suitable villages in an appropriate manner will be required.

Reason(s) for Amendment(s) Sought: Target of providing 4620 new dwellings for the period 2000 to 2011 will not be achieved due to the overly optimistic assumptions about the take up of land allocated for housing.

Comments: *The assumptions that have been made are realistic and the assertion, that the new housing targets will not be achieved through the site allocations made, is substantially unfounded.*

H1

Ref.No: 20 Rep.No: 1

Representor: Wilson, Martin Grant Homes (UK) Ltd **Agent (if applicable):** RPS Chapman Warren

Amendment(s) Sought: 10% allowance should be applied to the calculations underpinning the Deposit Draft and to the figures relating to the sites with the benefit of outline planning permission and those sites with full planning permission where development has yet to commence. Appropriate calculations will indicate the need to identify further housing land allocations to ensure that the anticipated level of completions is actually achieved "on the ground".

Reason(s) for Amendment(s) Sought: H1 fails to make adequate provision for appropriate levels of residential development in the rural settlements. The Deposit Draft provides insufficient information regarding the calculations undertaken by the District Council to arrive at the allocations for housing purposes - it is not apparent whether it is reasonable to judge that all land that presently has the benefit of PP will actually be developed in the plan period.

Comments: *More information underlying the Plan's housing calculations is available as background documents. The assumptions that have been made are realistic and the assertion, that the new housing targets will not be achieved through the site allocations made, is substantially unfounded.*

Ref.No: 28 Rep.No: 1

Representor: Broadford **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: There is allotment land in the District which has been laying derelict for years and should be included in the Draft Plan for development it will help to keep the places alive.

Comments: *Unused allotment land within settlement boundaries exceptionally can be permitted for development under Policy LC1. Development could also be considered under Policy H10. However, if the Plan's strategy for market housing were lead by the availability of unused allotment land more generally, this could result in an unsustainable pattern of new development in inappropriate settlements.*

H1

Ref.No: 73 Rep.No: 1

Representor: Phillips, HBF **Agent (if applicable):**

Amendment(s) Sought: The Council need to demonstrate how they will ensure that sufficient houses can be actually completed to meet the Structure Plan requirement, if necessary by identifying additional sites.

Reason(s) for Amendment(s) Sought: The HBF is not convinced that the Structure Plan requirement will be met as a result of the Plan's proposals. There is heavy reliance on existing commitments and small sites, yet recent annual completion rates for the District are well below what is required to meet the residual requirement of 4620 houses by 2011. There is also apparently no degree of flexibility provided in the proposals and housing figures to allow for delays in delivery or non-implementation.

Comments: *Recent annual completion rates do not fully reflect the contribution of strategic sites. Completions at Oakwood Park are constrained until the new A120 is open. Other strategic sites are expected to commence in the short term, then the large Priors Green development will come on stream in 2004, again when the new A120 is open. The expected contribution of non strategic sites is in line with recent completion rates. Annual monitoring will highlight any delays in delivery so these can be addressed.*

Ref.No: 86 Rep.No: 2

Representor: Bucknell, Landowners **Agent (if applicable):** Andrew Martin Associates

Amendment(s) Sought: Urban capacity study should be carried out again to consider as many sources as possible. The capacity study should include Saling Airfield. Details should be set out in Policy H1 or the supporting text to explain the number of dwellings that are assumed to come forward over the plan period. The plan should include some "reserved" sites for longer term residential development. Andrewsfield should be identified as a reserve site.

Reason(s) for Amendment(s) Sought: The draft plan provides an inappropriate distribution of housing throughout the District including too much emphasis upon intensive development of urban areas. Too much emphasis is attached to assumed development of unspecified windfall sites within the existing urban areas. No provision is made for a pool of allocated sites to enable reserve sites to be brought forward in the event that anticipated windfalls, or allocated sites are not forthcoming. The Rochford Nurseries site is unsuitable for 600 dwellings. The site is not suited to intensive residential development as it would result in detrimental traffic and environmental impacts to the immediate surrounding area. Insufficient precision is related to re-use of existing buildings and previously developed land outside urban areas. It is understood that the figure of 575 has been assumed based upon previous housing developments of this nature over recent years.

Comments: *An urban capacity study has been completed. This has included further work since June 2001. Its methodology is consistent with Tapping the Potential. This study has looked at urban areas. It is not necessary to consider new settlement sites in the light of its findings.*

Ref.No: 92 Rep.No: 9

Representor: Old Road Securities, Audley End Estates **Agent (if applicable):** Andrew Martin Associates

Amendment(s) Sought: The urban capacity study should be carried out again to consider as many sources of capacity as possible. Details should be set out to explain the number of dwellings that are assumed to come forward and how these assumptions have been made. Land at Rochford Nurseries should be allocated for 400 dwellings with reduced land take by increasing density to PPG3 requirements. The emerging local plan should include some reserve sites for residential development. The emerging local plan should provide scope for mixed use developments within the main urban areas.

Reason(s) for Amendment(s) Sought: The draft plan provides inappropriate distribution of housing throughout the District including too much emphasis upon intensive development of urban extensions rather than maximising use of land within existing urban areas. Too much emphasis is attached to assumed development of unspecified windfall sites within the existing urban areas. Urban capacity study is not comprehensive and in accordance with government advice it does not consider as many sources of capacity as possible. The urban capacity study fails to address potential reallocation of employment land such as the Ashdon Road Business Centre. Deposit Plan does not make reference to the monitoring or managing of the release of land for housing. No provision is made for a pool of allocated sites to

enable reserve sites to be brought forward in the event that anticipated windfalls of allocated sites are not forthcoming. Too much emphasis has been placed on the re-use of existing buildings and previously developed land.

Comments: *An urban capacity study has been completed. This has included further work since June 2001 following an audit of its methodology. Its methodology is now consistent with Tapping the Potential. This has confirmed the anticipated scale of contribution from small sites, but more detail is now available in background papers on the breakdown of sources and its spatial distribution between the urban settlements. Changes are proposed to the policy and to introduce a mechanism for managing the release of reserve capacity. There is no reason to cap the capacity at the Rochford Nursery site below 600 dwellings.*

H1

Ref.No: 93 Rep.No: 9

Representor: , Hastoe Housing Association/Springboard HA **Agent (if applicable):** Oldfield King Planning

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Concerned that policy gives insufficient recognition of links between provision of general housing and affordable housing needs. Useful to know how many of the units with permission as secured as affordable. Figures indicate that consideration should be given to identifying and targetting more sites for affordable housing and reducing the threshold below 15 dwellings in the larger settlements. Note affordability criteria and suggest a simpler approach would be to use the Housing Corporation benchmark rents. Welcome para 6.20 and suggest Annual Housing Strategy Statement is a useful way of indicating prevailing needs and a Local Plan policy cross referring to this document can keep the Plan up to date.

Comments: *Affordable housing is comprehensively considered elsewhere in the housing chapter. The scale of total housing provision is of course a factor in the amount of affordable housing the Plan can help deliver.*

H1

Ref.No: 94 Rep.No: 3

Representor: Saxon Developments Ltd **Agent (if applicable):** David Lock Associates

Amendment(s) Sought: The figures at a) should be reduced significantly particularly the provision for Saffron Walden in the light of our objection to Policy SW2. The figures for Rochford Nurseries and Priors Green at b) should also be reduced in the light of our objection to policies SM4/BIR1 and S2 respectively. The figure at c) should be reduced significantly. To contribute to making up the resultant deficit against the District's Structure Plan housing requirement "Ongar Road, Great Dunmow" should be identified at b) with the number of dwellings allocated here reflecting the extent of the deficit arising from the objection.

Reason(s) for Amendment(s) Sought: The provisions at (a), (b) and c) are excessive. Supply from a) appears to have been derived from crudely doubling the "minimum capacity" of the sites proposed for residential development at policies GD4, SW2 and SM2. These figures have not been justified while three of the sites

proposed for housing at Policy SW2 appear to be unsuitable. Supply from b) is also excessive in the context of objections to policies S2 and SM4/BIR1. Supply from c) is excessive in that Govt Planning Policy does not generally prioritise significant development outside urban areas ahead of urban extensions one of which (Ongar Road, Great Dunmow) is currently omitted from the Plan.

Comments: *The small site contributions in Policy H1 have been reviewed in the light of the additional urban capacity work, but the allocation of additional greenfield sites as urban extensions are not justified by the Structure Plan requirement. No reason to reduce the strategic site allocations.*

H1

Ref.No: 115 Rep.No: 1

Representor: Prowting Projects and Gleeson Homes **Agent (if applicable):** Boyer Planning Limited

Amendment(s) Sought: Policy H1 should be amended and its supporting paragraphs. The allocation of additional sites totalling 480 dwellings. A more detailed explanation within the Written Statement of the sources of housing supply from previously-developed land on which the strategy relies in order that they may be properly tested through the Local Plan process.

Reason(s) for Amendment(s) Sought: Housing provision strategy is insufficient to ensure with adequate certainty that the Structure Plan housing requirement will be met. It is customary for local plan housing strategies to incorporate an element of theoretical over provision. We are concerned to note that this approach has not been followed in the Draft Plan which is based on a precise match between residual requirement and supply. We propose a 10% flexibility allowance to the residual requirement so that the plan contains provisions equivalent to 5,082. As indicated above this will not result in over provision in practice because of the application of a managed release mechanism. The build rate of 420 per annum required to meet the Structure Plan requirement will require the allocation of additional greenfield sites. Our clients proposed a site at Elsenham to contribute to this requirement.

Comments: *More information underlying the Plan's housing calculations is available as background documents. The assumptions that have been made are realistic and the assertion, that the new housing targets will not be achieved through the site allocations made, is substantially unfounded. Overprovision would be contrary to advice in PPG3 that plan should not allocate more land than necessary to meet the Structure Plan requirement.*

H1

Ref.No: 118 Rep.No: 8

Representor: Bryant Projects **Agent (if applicable):** DLP Consultants Ltd

Amendment(s) Sought: Policy H1 should be revised to address a more realistic strategy to ensure that there will be an adequate supply of housing land available at all times. Ensure that adequate new housing is built within the plan period. Enable the orderly development of housing schemes with suitable contingencies to enable the monitoring of implementation to lead to appropriate management of supply. Ensure a greater range and choice of housing sites. Reduce the expected reliance on windfall

housing provision in the rural areas away from from the principal towns. It would be helpful to include within the text supporting Policy H1 or an Appendix to the Plan a more detailed breakdown of housing commitments

Reason(s) for Amendment(s) Sought: Question whether the four principal urban extensions are likely to be fully implemented within the remaining period of this local plan and given the first realistic dates for the implementation of schemes at Takeley and Stansted we consider that there will be a shortfall in the housing provisions required by the plan. There is an insufficient range of housing sites available as the best means of ensuring the provision of a genuine range and choice of housing types, tenures and location. The limited number of housing sites will also have an adverse effect on the need to increase the overall rate of completions in the District. In Dunmow we question whether the concentration of development in one single major urban expansion area is desirable or advisable. We question the extent to which both urban capacity sites and existing commitments are likely to be implemented in full. Consider that the allowance for brownfield sites outside the built up areas is excessive.

Comments: *More information underlying the Plan's housing calculations is available as background documents. The assumptions that have been made are realistic and the assertion, that the new housing targets will not be achieved through the site allocations made, is substantially unfounded. The contribution from small sites outside urban areas reflects recent annual completion rates for this source. Although the Plan makes provision for a limited number of large scale developments, this should not adversely affect completion rates, given the buoyancy of the local housing market and the active involvement of developers in progressing these sites.*

H1

Ref.No: 119 Rep.No: 35

Representor: Proto Limited **Agent (if applicable):** Littman and Robeson

Amendment(s) Sought: Urgently review the need for other sites to make up the shortfall in locations that are accessible to employment and transport hubs

Reason(s) for Amendment(s) Sought: Object to part (b) as it is appropriate to release only a limited number of large sites to substantially meet the Structure plan requirement when there is a real risk that some of these may not come forward. With regard to Oakwood Park, Little Dunmow, planning permission was granted in 1997 and this should therefore be left as a commitment rather than a local plan allocation. The Rochford Nurseries, Brichanger and Stansted Mountfitchet allocation is too extensive and has poor regard to environmental, economic and traffic factors.

Comments: *No sound basis for assertion that some of the large sites will not come forward. The allocation of 600 dwellings to the Rochford Nursery site fully takes into account relevant site specific factors.*

H1

Ref.No: 120 Rep.No: 3

Representor: , Laing Strategic Land Ltd **Agent (if applicable):** Sellwood Planning

Amendment(s) Sought: Add a new category to Policy H1 "(E) green field housing allocations"

Reason(s) for Amendment(s) Sought: The components of land supply are too optimistic and will not achieve the Structure Plan housing provision to 2011. Additional sites should be allocated to ensure the housing provision is achieved.

Comments: *The respective contributions to supply are considered robust and new greenfield allocations are not justified by the Structure Plan requirement.*

H1

Ref.No: 139 Rep.No: 1

Representor: CWS Pension Fund Trustees Ltd **Agent (if applicable):** Jones Lang Lasalle Ltd

Amendment(s) Sought: Redistribute the allocations in Policy H1 and in particular the allowance in part (d) of the policy to enable appropriate extension of settlements such as those listed under Policy H2.

Reason(s) for Amendment(s) Sought: Part (d) of policy H1 is insufficient in relation to the contribution that could come from appropriate small scale extensions to villages. Policy H2 of the adopted Structure Plan acknowledges in the sequential approach that small scale housing provision may be provided in small towns and villages. Policy H2 of the Deposit plan allows infilling. If one dwelling were permitted in each of the villages listed it would effectively use up the allocation of H1(d). There is no allowance for appropriate extension of settlements listed in H2 and no indication in text as to whether consideration has been given to meeting local community needs in this way.

Comments: *The contributions to supply from allocations and other sources will meet the structure plan requirements and no new greenfield allocations in villages are needed. Housing development in villages may not meet any community needs unless it is social housing, which can be considered under Policy H10.*

H1

Ref.No: 141 Rep.No: 2

Representor: Penn, Persimmon Homes (Essex) Ltd **Agent (if applicable):** RPS Chapman Warren

Amendment(s) Sought: A 10% allowance should be applied to the calculations underpinning the deposit Draft. In that way the number of completions assigned to Uttlesford District in the Replacement Structure Plan will be achieved in the Plan period. The appropriate calculations will indicate the need to identify further housing land allocations to ensure that the anticipated level of completions is actually achieved 'on the ground'.

Reason(s) for Amendment(s) Sought: Policy H1 fails to make adequate provision for appropriate levels of residential development in the rural settlements. Insufficient information is provided justifying the housing allocation figures. It is not apparent whether it is reasonable to judge that all land with permission will be developed. Also raise objection to the perception that all previously developed sites within the urban areas, described in Policy H1, can be built out by 2011.

Comments: *More information underlying the Plan's housing calculations is available as background documents. The assumptions that have been made are realistic and the assertion, that the new housing targets will not be achieved through the site allocations made, is substantially unfounded.*

H1

Ref.No: 142 Rep.No: 2

Representor: , Wickford Development Co Ltd **Agent (if applicable):** Melville Dunbar Associates

Amendment(s) Sought: Policy H1 should be amended to take into account an accurate discounting figure. The figures considered to be appropriate will be put forward at a later date.

Reason(s) for Amendment(s) Sought: The number of dwellings estimated to be derived from a) and c) in H1 could be an over estimate because all the figures may not have been discounted at the appropriate rates in accordance with government guidance. There could be a demonstrable shortfall in the number of dwellings that can be brought forward. Obvious location to meet shortfall is Sector 3 (i) Woodlands Park. Site has infrastructure available, accessible to Dunmow and airport, already allocated for residential use. Site has capacity of 17 dwellings at density of 30d/ha. If even further land required then land at Sector 4 should be considered. Also wish to present arguments about the sustainability at Woodlands Park in comparison to other urban extensions and settlement expansions suggested by the Council and whether Woodlands Park represents the most appropriate site in which to locate any additional housing to meet Structure Plan requirements.

Comments: *More information underlying the Plan's housing calculations is available as background documents. The assumptions that have been made are realistic. An urban capacity study has been completed. This has included further work since June 2001 following an audit of its methodology. Its methodology is now consistent with Tapping the Potential. This has confirmed the anticipated scale of contribution from small sites, but more detail is now available in background papers on the breakdown of sources and its spatial distribution between the urban settlements. Changes are proposed to the policy and to introduce a mechanism for managing the release of reserve capacity.*

H1

Ref.No: 144 Rep.No: 6

Representor: Bryant Homes Limited **Agent (if applicable):** Vincent and Gorbing

Amendment(s) Sought: Policy H1 should be amended to distinguish between airport related housing sites and general housing sites and to include reference to longer term development at north west Takeley. The Proposals Map/Inset Maps should be amended to reflect these changes. The contribution of existing buildings and previously developed land towards meeting the plan's housing requirements should be reviewed.

Reason(s) for Amendment(s) Sought: Land at North west Takeley should be identified as an "area of special reserve" for longer term development needs. The Plan should be amended to distinguish between housing sites that are airport related and those that are general housing sites, as identified in the current adopted Local

Plan. We also object on the grounds that the Plan (and the associated Urban Capacity Study) over estimates the contribution that existing buildings and previously developed land both within the settlement boundaries of the main urban areas and outside the main urban areas will make towards the Districts housing provision. The contribution from the rural areas is particularly high.

Comments: *No sites need to be identified as ones where development will be held back until employment growth at the airport justifies their release. This is because employment growth at the airport and its multiplier effect has been much more modest than expected than when the concept was inserted into previous development plans 10 to 15 years ago. All estimates of contribution to housing supply are robust.*

H1

Ref.No: 150 Rep.No: 1

Representor: Reed, Birchanger Parish Council **Agent (if applicable):**

Amendment(s) Sought: The site should remain at 400 houses as set out in the existing district plan

Reason(s) for Amendment(s) Sought: Council object to the increase in numbers on the Rochford Nursery Site from 400 to 600 for three reasons. The increased density will lead to more pressure being exerted on the green belt. Insufficient information available concerning availability of infrastructure particularly the road system to cope with vastly increased volume of traffic. No increase should be considered until the question of further airport expansion is decided.

Comments: *There are no sound reasons for capping the capacity of this site below 600 dwellings. The transport and other effects of development with 600 dwellings have been fully explored.*

H1

Ref.No: 156 Rep.No: 12

Representor: White, Saffron Walden Town Council **Agent (if applicable):**

Amendment(s) Sought: Addition of a new policy "provision is made for the development of approximately xx houses at yy site. Such housing will only be permitted subject to a section 106 agreement to ensure zz hectares of public open space suitable for public playing fields

Reason(s) for Amendment(s) Sought: In general terms the Town Council support this proposal to limit additional housing within the town to approximately 420 dwellings. Notwithstanding this however the Town Council would accept some modest additional development but only in return for the provision by Section 106 agreement of free, substantial adequate and suitable public open space.

Comments: *Housing development cannot be required to make up an existing deficiency in public open space in a settlement. The principle of a modest scale housing allocation cannot turn on the quantity of open space offered.*

H1

Ref.No: 186 Rep.No: 4

Representor: Siemens Pension Fund **Agent (if applicable):** Colliers CRE

Amendment(s) Sought: Policy H1 should be amended to include land at Folly Farm, Great Dunmow with an indicative provision of 1,200 dwellings identified

Reason(s) for Amendment(s) Sought:

Comments: *A new green field site is not justified by structure plan requirements, particularly a site on this scale.*

H1

Ref.No: 188 Rep.No: 3

Representor: Raiswell, Sport England **Agent (if applicable):**

Amendment(s) Sought: This policy should be amended or a separate policy introduced which refers to the need for new large-scale housing developments to provide sufficient open space to meet the needs of the population based on a specified criteria/formula. Policy LC5 achieves this for play facilities but there is no equivalent policy for outdoor sport and recreation.

Reason(s) for Amendment(s) Sought: No reference to the need for large scale housing developments to provide for outdoor/indoor recreation

Comments: *This issue is addressed in the relevant local policies relating to individual site allocations.*

H1

Ref.No: 198 Rep.No: 1

Representor: Baker and Metson **Agent (if applicable):** Strutt and Parker

Amendment(s) Sought: Land to the north west of Oakwood Park should be included as an housing allocation.

Reason(s) for Amendment(s) Sought: Cannot support H1 - c) - It will result in sporadic development in the open countryside. Support the re-use of urban land for peripheral development to form new urban extensions, however 575 dwellings in the open countryside by the means of using redundant farm buildings will not create sustainable patterns of development. Additions to smaller settlements such as Oakwood Park would provide a sustainable opportunity for housing growth albeit on a small scale. Planned small scale housing development in locations such as Oakwood Park can provide for the much needed improvement to existing facilities. In terms of sustainability additional housing growth as part of the ongoing works at Oakwood Park would be appropriate. Site is to the north west of Oakwood Park.

Comments: *The expected contribution of non strategic sites is in line with recent completion rates. Changes are proposed to the policy and to introduce a mechanism for managing the release of reserve capacity if necessary. There is no requirement for any new greenfield site, particularly on any significant scale in this location, which has relatively poor access to local centres compared with the allocated sites.*

H1**Ref.No: 201 Rep.No: 4****Representor:** Countryside Properties PLC **Agent (if applicable):** Strategic Land and Planning

Amendment(s) Sought: Delete all capacity figures from policy H1 pending further assessment. Make provision to additional housing as necessary to meet the structure plan requirement, plus contingency provision for possible additional strategic requirements during the plan period.

Reason(s) for Amendment(s) Sought: We do not disagree with the intention to find a substantial part of the Districts housing requirement from within the existing built up areas of the larger settlements. However the numbers of dwellings at each of the settlements significantly exceeds the aggregate number of dwellings identified in the respective area policies for these towns. We are concerned that the methodology conceals the size of the overall windfall contribution which is being relied upon and secondly that this tends to lead to the greenfield requirement being underestimated and we object to the numbers of dwellings suggested in Part (a). Support the principle that urban extensions and settlement expansions should be the next areas to be looked at for housing. Object to the capacity figures indicated for Oakwood Park, Rochford Nursery and Woodlands Park all of which require re-assessment on a consistent and objective basis taking into account current policies and all other relevant planning considerations.

Comments: *The expected contribution of non strategic sites is in line with recent completion rates. Annual monitoring will highlight any delays in delivery so these can be addressed. The assumptions that have been made are realistic and the assertion, that the new housing targets will not be achieved through the site allocations made, is substantially unfounded. Changes are proposed to the policy and to introduce a mechanism for managing the release of reserve capacity. The local plan cannot anticipate the new structure plan requirement. This will be addressed in a review of the local plan as soon as it is appropriate to do so.*

H1(b) Housing allocation**Ref.No: 203 Rep.No: 1****Representor:** Croudace Ltd **Agent (if applicable):** Charles Planning Associates

Amendment(s) Sought: Amend description to refer to a site capacity of about 710 dwellings.

Reason(s) for Amendment(s) Sought: The Rochford Nurseries site should be identified as having a capacity of about 710 dwellings, in order to more properly reflect the advice at paras 57 and 58 of PPG3 Housing March 2000.

Comment: *Transport effects justify constraining the site capacity to 600 dwellings, which still achieves a net housing density of 30 dwellings per hectare.*

H1**Ref.No: 205 Rep.No: 3****Representor:** Enodis Property Developments **Agent (if applicable):** GL Hearn Planning

Amendment(s) Sought: Amend policy H1 by increasing figure of 650 for Oakwood Part to 820. Greenfield allocations should be reduced by some 170 dwellings. Consequent changes to paragraph 6.3 should be made.

Reason(s) for Amendment(s) Sought: The Plan fails to take into account the increased capacity of the Oakwood Park site resulting from the ability to improve the Felsted Sewage Treatment Works, thus reducing the extent of the cordon sanitaire. Making full use of the capacity of the Oakwood Park site, which is brownfield land, would avoid the need to make greenfield allocations elsewhere.

Comments: *The factors relevant to this proposal are being fully explored at a local inquiry, which is still in progress. The Council's objections are as set out in its evidence to the inquiry.*

H1

Ref.No: 208 Rep.No: 13

Representor: Muller, English Nature **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Whilst EN has no objection to the principle of redeveloping brown field sites, this policy must be set in the context of our comments in objections 2(201.1) and 9 (208.9) ie that all development proposals (whether for brown field sites or elsewhere) need to be assessed against a set of sustainable development criteria including biodiversity.

Comments: *A sustainability appraisal of the Plan's proposals has been carried out. This included consideration of whether each proposal/ local policy would contribute to biodiversity objectives.*

H1

Ref.No: 211 Rep.No: 1

Representor: Hunt, South Cambridgeshire District Council **Agent (if applicable):**

Amendment(s) Sought: Consideration should be given to allocating land for housing development in Great Chesterford to meet this sub regional need. Consequential amendments to H1 and the Great Chesterford Inset Map

Reason(s) for Amendment(s) Sought: Great Chesterford is the largest village in close proximity to Hinxton Hall which forms part of the cluster of R and D companies that are the Cambridge Phenomenon. Regional planning guidance for East Anglia supports the further growth of the economy of Cambridge Sub-Region which extends out to the ring of market towns including Saffron Walden and encompassing Great Chesterford. There is currently an imbalance between homes and jobs in this southern part of South Cambridgeshire District but there are limited opportunities in sustainable locations in close proximity to Hinxton Hall within South Cambs to provide new residential development of a scale that would impact on this, because of the rural character of the area and small scale of local villages with limited services and public transport. Given sustainability objectives Gt Chesterford represents an opportunity to provide new homes in a larger village close to Hinxton Hall. It is identified as one of Uttlesfords larger villages and key settlements

Comments: *There are similar settlements to Great Chesterford in the southern part of South Cambs close to Hinxton Hall. Inevitably, this campus will draw labour from an extensive catchment, and it is not accepted as an over riding justification for development in Great Chesterford. As the only significant parcel of previously developed land in the village is proposed for employment uses, a housing allocation would require a greenfield site.*

6.1 - 6.29

Ref.No: 216 Rep.No: 1

Representor: Bailes, Hertfordshire County Council **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: The County Council's main interest is the Plan's relation to Stansted Airport. No mention is made of the progress in meeting the "airport related" housing requirement of earlier plans. It is assumed that the major housing sites allocated in the District are considered sufficient to meet any outstanding Stansted related demand for 15 million passenger throughput to 2011

Comments: *The concept of identifying sites as ones where development will be held back until employment growth at the airport justifies their release has effectively been overtaken by monitoring of the effects of airport development to 14 mppa. Employment growth at the airport and its multiplier effect has been much more modest than expected than when the concept was inserted into previous development plans 10 to 15 years ago.*

H1

Ref.No: 217 Rep.No: 8

Representor: Pelham Homes Limited **Agent (if applicable):** Barton Willmore Planning Partnership

Amendment(s) Sought: Delete the number of 600 dwellings in relation to Rochford Nurseries and replace with 720 dwellings. This is to be corrected throughout the Plan and in any reference to the land at Rochford Nurseries Stansted.

Reason(s) for Amendment(s) Sought: The number of dwellings proposed to be completed at the Rochford Nurseries Site is underestimating the potential of the site. It is important to base any housing supply estimate on the PPG3 net developable areas of the sites. We believe a more detailed assessment of densities in line with PPG3 is needed in correlation with potential housing supply on the four major sites. The land at Rochfords has a net developable areas of 20.59 hectares. At a density of 35 dwellings per hectare this would translate as 720.65 dwellings across the entire site. PPG3 requires a range of between 30 and 50 dwellings per hectare. In many cases the character of the semi-rural environment would be compromised with a blanket application of 50 dwellings per hectare. A figure of 35-40 dph would fulfill the requirements of PPG3 and lessen the impact in many cases of necessary developments. Therefore in applying a density of 35 dph a figure more appropriate to the local environment of 720 dwellings is proposed for Rochfords.

Comments: *Consideration of the transport effects justifies capping the capacity of this site at 600, which at 30 dph net still falls within the range required by PPG3.*

H1

Ref.No: 217 Rep.No: 5

Representor: Pelham Homes Limited **Agent (if applicable):** Barton Willmore Planning Partnership

Amendment(s) Sought: In accordance with PPG3 the following sequential order of development locations will be appropriate: (v) on previously developed land within the main urban areas of Great Dunmow, Saffron Walden and Stansted Mountfitchet as defined on the Proposals Map(vi) on land identified as urban extensions to the main urban areas of Great Dunmow, Saffron Walden, and Stansted Mountfitchet as defined by the proposed settlement boundaries for these areas. (vii) on land identified as major additions to the settlements of Takeley and Felsted as defined by the proposed settlement boundaries for these areas. (viii) as settlement expansion schemes in the settlements of Elsenham, Great Chesterford, Takeley and Thaxted as defined by the proposed settlement boundaries. Development should be compatible with the settlement's character and setting while attempting to ensure the most effective use is made of the land allocated

Reason(s) for Amendment(s) Sought: The 750 dwelling completions proposed in H1 (a) does not reflect the lack of availability of some development sites. Para 6.1 does not make reference to the principles of sequential test order outlined in PPG3 para 30. We propose the same sequential order for the location of new development as proposed in Policy S1.

Comments: *It is accepted that the supporting text would benefit from amendment to refer to the principles of the sequential test order outlined in PPG3. In relation to H1 (a) changes are proposed to the figures.*

H1

Ref.No: 217 Rep.No: 4

Representor: Pelham Homes Limited **Agent (if applicable):** Barton Willmore Planning Partnership

Amendment(s) Sought: The 750 dwellings completions proposed in H1 (a) should be reduced by 20% or 150 dwellings. The urban extension at Rochford Nurseries should be increased in capacity to 720 dwellings. The estimate of 575 dwellings should be reduced by 20% - 115 dwellings: other contributions H1(d) should either be clearly identified or excluded from the land supply and accounted for in windfall expectations.

Reason(s) for Amendment(s) Sought: We dispute the availability of housing land identified in Policy H1 and seek corrections. The estimate of 575 dwellings does not reflect land not available for development. Other contributions H1(d) should either be clearly identified or excluded from land supply and accounted for in windfall expectations.

Comments: *The expected contribution of non strategic sites is in line with recent completion rates. Annual monitoring will highlight any delays in delivery so these can be addressed. More information underlying the Plan's housing calculations is available as background documents. The assumptions that have been made are*

realistic and the assertion, that the new housing targets will not be achieved through the site allocations made, is substantially unfounded. An urban capacity study has been completed. This has included further work since June 2001 following an audit of its methodology. Its methodology is now consistent with Tapping the Potential. This has confirmed the anticipated scale of contribution from small sites, but more detail is now available in background papers on the breakdown of sources and its spatial distribution between the urban settlements. Changes are, however, proposed to the policy and to introduce a mechanism for managing the release of reserve capacity.

H1**Ref.No: 220 Rep.No: 14****Representor:** Parker, Essex County Council, Learning Services **Agent (if applicable):****Amendment(s) Sought:**

Reason(s) for Amendment(s) Sought: As you do not indicate in the deposit draft local plan where the extra units might be located within these three towns to make up the numbers listed on page 25 I reserve the right to come back to you on possible developer contributions once this information is available. Where we have indicated that we will require developer contributions for primary and/or secondary school places there will be based upon the Department for Education and Skill cost multiplier which for the 2001/2002 financial year is £4,798 per primary school age pupil and £6,383 per secondary age pupil. These figures will need to be index linked under a Section 106 agreement.

Comments:*Noted.***H1****Ref.No: 230 Rep.No: 2****Representor:** Swindlehurst, Local Agenda 21 Built Environment Working Group **Agent (if applicable):****Amendment(s) Sought:** Clarification of figure required.

Reason(s) for Amendment(s) Sought: It is not possible to relate the figure of 420 dwellings for Saffron Walden to the inset because of the small site remainder.

Comments: *More information underlying the Plan's housing calculations is available as background documents.*

Concluding comments on objections to Policy H1:

As a result of further urban capacity work on the potential contribution to supply of small sites some changes are proposed to Policy H1. This has involved for each of the three urban settlements an assessment of the potential contribution to supply from:

- *Subdivision of existing dwellings*
- *Flats over shops;*

- *Vacant previously developed land, derelict land and buildings not specifically allocated on the proposals map;*
- *Intensification;*
- *Redevelopment of existing housing;*
- *Redevelopment of car parks; and*
- *Conversion of existing commercial buildings.*

The work has concluded that contributions to supply are only really likely from some intensification and redevelopment of existing housing. The conclusions of this work should feed into Policy H1 rather than estimates based on historic rates of supply from small sites.

Two small employment sites in Saffron Walden still in active use are proposed to be deleted as allocation sites. Although they may still come forward as windfall sites, their capacity has been discounted and some adjustment needs to be made to H1 as a consequence.

Master Plan work on the Priors Green site at Takeley/ Little Canfield suggests that it can accommodate more than 700 dwellings, taking into account the capacity of pockets of previously developed land within the policy area. This needs to be reflected in the policy figures.

It is acknowledged that there is inevitably some uncertainty over windfall contributions to supply and the implementation of all allocated sites, a reserve housing site has been identified in Saffron Walden. This is part of the site allocated in the deposit plan for a business park. It would only be released for development before 2011 if monitoring indicated that there would otherwise be a shortfall in the housing supply and a failure to meet the structure plan requirement. A new H# policy is required to deal with this.

Recommendation:

Delete policy as in deposit draft and substitute:

POLICY H1 – HOUSING DEVELOPMENT

The local plan proposes the development of 4,620 dwellings for the period 2000 to 2011 by the following means:

- a) **The re-use of existing buildings and previously developed land, and the use of unused land, within the settlement boundaries of the main urban areas:**
 - **Great Dunmow (195 dwellings);**
 - **Saffron Walden (340 dwellings); and**
 - **Stansted Mountfitchet (121 dwellings)**
- b) **Urban extensions to two of the main urban areas, and settlement expansions:**
 - **Oakwood Park, Little Dunmow (650 dwellings);**
 - **Rochford Nurseries, Birchanger and Stansted Mountfitchet (600 dwellings);**
 - **Takeley and Priors Green (924 dwellings); and**
 - **Woodlands Park, Great Dunmow (1175 dwellings).**

- c) **Re-use of existing buildings and previously developed land outside urban areas (570 dwellings).**
- d) **Other contributions to supply, including development with outstanding planning permission not included in the above categories**
 - **Bellrope Meadow Thaxted (18 dwellings)**
 - **Brocks Mead Graet Easton (20 dwellings)**
 - **Hassobury (7 dwellings).**

Additional explanatory text:

Windfall sites are expected to contribute 18% of supply. This is a realistic figure taking into account the rural nature of the district.

The allocation of sites has taken into account:

- **The availability of previously developed land;**
- **The location and accessibility of sites;**
- **The capacity of existing and potential infrastructure;**
- **The ability to build communities**
- **Constraints such as flood risk.**

A search sequence has been followed, starting with the re-use of previously developed land in urban areas identified in an urban capacity study, then urban extensions and finally two other key sites within the A120 transport corridor, with its potential to support public transport.

There are seven strategic sites, that is those with a capacity of more than 50 dwellings. Three of these are on previously developed land. Development of the Oakwood Park site commenced in 1999 and is expected to be completed in 2006/7 taking into account the limit of 305 occupations prior to the new A120. Development of the Printpack site, Radwinter Road, Saffron Walden started in 2001/2 and will be completed in 2002/3. Development of the Thaxted Road Saffron Walden site is expected to start in 2003/4. A substantial part of the largest site, the Woodlands Park green field site at Great Dunmow had planning permission at the beginning of the plan period and its development is expected to extend throughout the plan's duration with completion in 2010/11. The Rochford Nurseries greenfield development in Birchanger/ Stansted is expected to be supplying houses in 2003/4 following off site infrastructure works. The greenfield site in Takeley village is also expected to be supplying houses in 2003/4 with the final phase of 20 being occupied in 2004/5 after completion of the new A120. The larger Priors Green green field development will be phased so that first occupations are also in 2004/5 after the new A120 opens. Implementation of this extensive site is likely to extend throughout the remainder of the Plans' duration with completion in 2010/11. A combination of a strong housing market and site specific factors will mean that the objective of securing housing on previously developed land before taking green field sites will be achieved in the district. This outcome is one of the effects of phasing development selectively in relation to off site highway infrastructure.

An eighth strategic site may be required if windfall sites do not materialise as expected. This is a greenfield site, which would be an urban extension to

Saffron Walden south of Ashdon Road. In order to ensure that no more greenfield land is released than necessary, it will only be developed if monitoring of housing supply indicates that there will be a significant shortfall against the structure plan housing requirement.

New Policy H#

The following urban extension site will only be developed before 2011 if monitoring of housing supply indicates that the total proposed provision of 4,620 dwellings between 2000 and 2011 as set out in Policy H1 is unlikely to be achieved. Supplementary planning guidance will be prepared enabling the release of the site if its development should prove necessary before 2011:

- Land south of Ashdon Road Saffron Walden (150 dwellings).

Paragraph 6.2 – 6.3

- 6.2.** The structure plan requirement for the period 1996 to 2011 is 5,600 homes. Between 1996 and 2000, 980 homes have been completed. This local plan accordingly needs to show how 4,620 homes will be provided over the period 2000 to 2011. Over 40% already had planning permission in April 2000. There were permissions for 318 homes (net) on sites for 11 dwellings or less and permissions for 1,575 homes on sites for 12 or more dwellings. Some of these were under construction, others not yet started. The key element is the remainder.
- 6.3.** It is important to strike a balance between making effective use of developed land within settlement boundaries and protecting their character. Uttlesford's urban areas are relatively small and the opportunities for development in them limited by relatively few potential sites. This is why 70% of the housing provision is proposed in urban extensions and two major settlement expansions. Much of this land already has planning permission, but this plan seeks to make effective use of these large sites, acknowledging that outstanding commitments may constrain what can be achieved on a specific site. Elsewhere, the opportunities for development in a linear loose settlement sensitive to its character may be different from those in a village where historically buildings have been more clustered. Proposals will also need to respect the character of village approaches. Some have an abrupt break between settlement and countryside. Others have a more gradual transition with well spaced out properties, a characteristic that must be retained.

Objections

6.2.

Ref.No: 9 Rep.No: 1

Representor: Baldwin, Cambridgeshire County Council **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: The Plan does not make reference to the Cambridge Sub Region Study which included the Saffron Walden area within its boundaries and involved the participation of your authority. I would, therefore have

expected to see a clear acknowledgement of the Cambridge Sub Region Study and an indication of how the Plan responds to the sphere of influence exerted by Cambridge.

Comments: *The sub regional study will feed into the preparation of the new regional planning guidance for the East of England and any significant implications for the part of the sub region in Uttlesford will be addressed in a future review of the Plan.*

6.2

Ref.No: 164 Rep.No: 10

Representor: Bellway Homes **Agent (if applicable):** FPD Savills

Amendment(s) Sought: Suggest policy - applications for renewal of planning consents for residential development on greenfield sites will only be permitted where there is an identifiable need to meet the District's housing requirement and there is no more sustainable site available which better meets the criteria in para 31 of PPG3

Reason(s) for Amendment(s) Sought: The large amount of sites with the benefit of planning permission are significant in terms of the Council's land supply and it is imperative that the Council take a responsible approach if those permissions are not implemented within the lifetime of the planning consent and they come to the Council for renewal. To this end we would suggest that the plan would benefit from an upper case policy or even lower case text to ensure that the renewal of planning permissions will not be granted automatically but they will be reassessed in line with case law and against the relevant and appropriate planning policies and guidance such as that contained within PPG3. Such a policy base will then ensure that planning permissions granted by renewal will not conflict with the emerging local plan policies

Comments: *This is unlikely to be an issue, but guidance in PPG3 will be a material consideration.*

6.3

Ref.No: 119 Rep.No: 36

Representor: Proto Limited **Agent (if applicable):** Littman and Robeson

Amendment(s) Sought: Delete in final sentence "a characteristic that must be retained"

Reason(s) for Amendment(s) Sought: An amendment is sought to the final sentence such that village characteristics are described without determining on that basis alone whether it rules out further development.

Comments: *It is accepted that this phrase is unduly prescriptive.*

Recommendation:

Delete the words "a characteristic that must be retained."

POLICY H2 – INFILLING WITH NEW HOUSES

Deposit Policy

Policy H2 – Infilling with new houses

Infilling with new houses will be permitted on land in each of the following settlements if the development would be compatible with the character of the settlement and, in addition, for sites on the edge of the built up area, its countryside setting:

Arkesden	High Roding
Ashdon	Leaden Roding
Barnston	Littlebury
Berden	Little Easton (Duck Street)
Birchanger	Little Hallingbury
Chrishall	Manuden
Clavering (incl. Hill Green)	Newport
Debden	Quendon & Rickling Green
Elmdon	Radwinter
Elsenham	Saffron Walden
Felsted	Sewards End
Great Chesterford	Start Hill
Great Dunmow	Stansted Mountfitchet
Great Easton	Stebbing
Great Hallingbury	Takeley
Great Sampford	Takeley Street
Hadstock	Thaxted
Hatfield Broad Oak	Wendens Ambo
Hatfield Heath	White Roding
Hempstead	Wicken Bonhunt
Henham	Widdington
High Easter	

The boundary of each settlement for the purposes of this policy is defined on the proposals map.

REPRESENTATIONS RECEIVED

Representations of Support

H2

Ref.No: 38 Rep.No: 4

Representor: , Gosling & Robson Trusts **Agent (if applicable):** Bidwells
Support policy which is practical and reasonable in relation to clients concerns as landowners

Ref.No: 137 Rep.No: 1

Representor: Coxeter, **Agent (if applicable):** FPD Savills

This policy is supported because it identifies High Roding as an appropriate village for some infilling. It is also a suitable village for somewhat greater but still small scale development as adduced in further representations on behalf of thisobjector.

Objections

Ref.No: 18 Rep.No: 2

Representor: Parker, **Agent (if applicable):** Bidwells

Amendment(s) Sought: Delete the word "infilling with" from the policy wording

Reason(s) for Amendment(s) Sought: Policy should not be too restrictive to merely allow infilling, where other larger sites may exist for development within a settlement. Each application should be considered on its merits. There are a number of settlements listed in Policy H2 which are subject to estate -scale development allocations.

Comments: *The policy is not intended to limit the scale of development to infilling if a suitable windfall site were to come forward. It is also true that some of the settlements listed have allocated sites. Changes to the policy are recommended.*

H2

Ref.No: 76 Rep.No: 2

Representor: **Agent (if applicable):** PJ Rayner and Co

Amendment(s) Sought: Adopted Plan policy H6 should be retained to allow development of infill sites beyond settlement boundaries. To change the wording of draft policy S7 and H2 and the development limits of the other villages inset maps to allow for minor sites to be developed for housing. Retain the village inset maps for villages removed in the draft deposit plan for consideration by your Council for inclusion in the emerging review of the District Local Plan.

Reason(s) for Amendment(s) Sought: The removal of adopted policy H6 and the strict control of new development as stated in draft policy S7 and the allocation of housing in policies H1 and H2 will remove any opportunity for the public to have choice of new housing in the rural district other than on large high density housing estates. Infill policy has allowed some housing development in the area to prevent the rural areas from becoming stagnant show pieces. The "other villages" listed have the same or smaller settlement boundaries as the development limits. There is no allowance for these other villages to evolve. There will be no opportunity for infill in the eleven villages which previously had development limits but for which no settlement boundaries are shown.

Comments: *The decision not to have settlement boundaries for eleven villages that had development limits in the adopted plan implies that their development potential is extremely limited. There may however be scope to re-use rural buildings, replacing an existing home of infilling of a narrow gap in an otherwise substantially built up frontage. This is consistent with encouraging a more sustainable development pattern.*

H2

Ref.No: 125 Rep.No: 4

Representor: Lipinski, Cala Homes (South) Ltd **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: CALA Homes objects to Policy H2 because it only allows for infill forms of development within the boundaries of the settlements.

Comments: *The policy is not intended to limit the scale of development to infilling if a suitable windfall site were to come forward. It is also true that some of the settlements listed have allocated sites. Changes to the policy are recommended.*

H2

Ref.No: 139 Rep.No: 2

Representor: CWS Pension Fund Trustees Ltd **Agent (if applicable):** Jones Lang Lasalle Ltd

Amendment(s) Sought: Consider whether the settlements listed within the policy could accommodate appropriate small scale extension to meet community needs. Where appropriate amend settlement boundaries to identify opportunities for small scale extensions to meet community needs. Include within the policy criteria which proposals for small scale extensions in addition to infilling will be permitted.

Reason(s) for Amendment(s) Sought: The boundaries of the settlements, including Stebbing for example are drawn in such a manner that it would be difficult to promote sites which are away from road frontage, as a small scale extensions to meet community needs. In context of objections to policy H1 consideration should be given to including within this policy criteria against which proposals for appropriate small scale extensions should be considered. This may also require review of the settlement boundaries.

Comments: *New green field allocations, even small ones, are not required to meet structure plan requirements.*

H2

Ref.No: 218 Rep.No: 30

Representor: Dale, Saffron Walden Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought: Delete "elsewhere the opportunities for development in a linear loose settlement sensitive to its character may be different to those in a village where historically buildings have been more clustered." Add to policy H2 "development would be compatible with other policies of the development plan, the character of the settlement" etc.

Reason(s) for Amendment(s) Sought:

Comments: *It is not clear why this would improve the plan.*

Recommendation:

Delete policy and substitute revised policy:

Policy H2 – New Housing within Settlement Boundaries
Infilling with new houses will be permitted on land in each of the settlements listed if the development would be compatible with the character of the settlement and, depending on the location of the site, its

countryside setting. This will be in addition to the sites specifically allocated as urban extensions and settlement expansions. Windfall sites will be permitted if they meet all the following criteria:

- a) The site comprises previously developed land;
- b) The site has reasonable accessibility to jobs, shops and services by modes other than the car, or there is potential for improving such accessibility;
- c) Existing infrastructure has the capacity to absorb further development, or there is potential for its capacity to be increased as necessary;
- d) Development would support local services and facilities; and
- e) The site is not a key employment site.

The list of settlements is:

Arkesden	High Roding
Ashdon	Leaden Roding
Barnston	Littlebury
Berden	Little Easton (Duck Street)
Birchanger	Little Hallingbury
Chrishall	Manuden
Clavering (incl. Hill Green)	Newport
Debden	Quendon & Rickling Green
Elmdon	Radwinter
Elsenham	Saffron Walden
Felsted	Sewards End
Great Chesterford	Start Hill
Great Dunmow	Stansted Mountfitchet
Great Easton	Stebbing
Great Hallingbury	Takeley
Great Sampford	Takeley Street
Hadstock	Thaxted
Hatfield Broad Oak	Wendens Ambo
Hatfield Heath	White Roding
Hempstead	Wicken Bonhunt
Henham	Widdington
High Easter	

Paragraph 6.4

6.4 The development of sites without a road frontage and the conversion of existing large residential properties, into smaller apartments for example, are also acceptable, again subject to safeguards.

Representation of Objection

Ref.No: 218 Rep.No: 31

Representor: Dale, Saffron Walden Friends of the Earth Agent (if applicable):

Amendment(s) Sought: Amend 6.4 to read "the development of sites without a road frontage and the conversion of existing large residential properties into smaller apartments for example may be an acceptable subject to safeguards such as ensuring the layout will deter crime as set out in the development plan.

Reason(s) for Amendment(s) Sought:

Comments:

Detering crime is the subject of GEN2.

Recommendation

No Change

POLICY H3 – BACKLAND DEVELOPMENT

Deposit Policy

Development of a parcel of land that does not have a road frontage will be permitted, if the following criteria are met:

- a) **There is significant under-use of land and development would make more effective use of it;**
- b) **There would be no material overlooking or overshadowing of nearby properties;**
- c) **Development would not have an overbearing effect on neighbouring properties;**
- d) **Access would not cause disturbance to nearby properties.**

REPRESENTATIONS RECEIVED

Representations of Support

Ref.No: 38 Rep.No: 7

Representor: , Gosling & Robson Trusts **Agent (if applicable):** Bidwells
Support policy which is practical and reasonable in relation to clients concerns as landowners

Ref.No: 183 Rep.No: 9

Representor: Canon, Sworders Agricultural **Agent (if applicable):**
It is considered that a policy encouraging backland development should be supported as it is in line with Government Planning Policy Guidance as set out in PPG7

Objections

H3

Ref.No: 55 Rep.No: 1

Representor: Sutton **Agent (if applicable):**

Amendment(s) Sought: Add further criterion to Policy H3 - (e) the sites lies wholly within the settlement boundary where applicable.

Reason(s) for Amendment(s) Sought: Policy H3 does not make it clear that backland development outside settlement boundaries will not be permitted.

Comments:

Any proposals outside settlement boundaries will be considered in the light of other policies such as S3 Settlement Boundaries and S7 The Countryside.

H3

Ref.No: 155 Rep.No: 1

Representor: Watson, High Easter Parish Council **Agent (if applicable):**

Amendment(s) Sought: A further criterion needs to be added. e) Development would be wholly within the boundary of the settlement, where applicable, as shown on the proposals map.

Reason(s) for Amendment(s) Sought: The policy does not make it clear that backland development outside settlement boundaries will not be permitted as it stands provided criteria a), b), c), and d) are met backland development outside settlement boundaries would be unacceptable.

Comments:

Any proposals outside settlement boundaries will be considered in the light of other policies such as S3 Settlement Boundaries and S7 The Countryside.

H3

Ref.No: 204 Rep.No: 6

Representor: Burchell, Essex County Council **Agent (if applicable):**

Amendment(s) Sought: Add sub section e) The existing public rights of way network is taken into account.

Reason(s) for Amendment(s) Sought: There is a need to take into account whether the access to any backland development sites would utilise existing public rights of way. If a public right of way is affected, the impact of the development on the public's use of this route must be considered

Comments:

This issue is addressed by Structure Plan policy LRT5 Public Rights of Way

H3

Ref.No: 213 Rep.No: 18

Representor: Herrman, CPREssex **Agent (if applicable):**

Amendment(s) Sought: We ask that additional criteria be included in one or other or both these policies to ensure that application should not be made for backland development on land which has previously been granted a change of use from agricultural land to garden land.

Reason(s) for Amendment(s) Sought: CPREssex wishes to draw the Council's attention to a potential conflict between policies H3 and ENV5. It seems to use that permission could be sought and very properly granted for a change of use of agricultural land to domestic garden lying behind one or more properties in a

settlement. Notwithstanding any removal of permitted development rights on that land, at a later date application could be made for backland development on it complying with all the criteria listed under H3 and therefore difficult to refuse. We therefore object to the absence of a criterion to deal with this possibility.

Comments:

Such sites beyond settlement boundaries would be subject Policy S7. Sites within Settlement Boundaries will be considered against Policy H3 and other relevant policies.

H3

Ref.No: 213 Rep.No: 19

Representor: Herrman, CPREssex **Agent (if applicable):**

Amendment(s) Sought: Criterion (d) to read "Access would not cause disturbance to nearby properties and would comply in all respects with Policy GEN1

Reason(s) for Amendment(s) Sought: CPREssex feels that in this instance there should be a cross-reference to the Council's Policy GEN1 in order to make it clear that the excellent requirements laid down in that policy will apply equally to access to backland development

Comments:

A statement will be made early on on the Plan that the GEN policies need to be considered in relation to all policies and there is therefore no need to cross reference each time.

H3

Ref.No: 213 Rep.No: 17

Representor: Herrman, CPREssex **Agent (if applicable):**

Amendment(s) Sought: If the omission is deliberate we ask that the word all be inserted after "if".

Reason(s) for Amendment(s) Sought: We note that unusually the opening sentence does not require that all the listed criteria are met. We hope this is just a typing error

Comments:

Wording change proposed as sought.

H3

Ref.No: 218 Rep.No: 32

Representor: Dale, Saffron Walden Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought: Development of a parcel of the land that does not have a road frontage will only be permitted if all the following criteria are met (a) the wildlife conservation interest of the site would not be compromised.c) add "and" to the end of the criteria.

Reason(s) for Amendment(s) Sought:

Comments:

This issue is covered by GEN7

H3

Ref.No: 219 Rep.No: 18

Representor: Fletcher, English Heritage **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: The rear elevations of some buildings, especially listed buildings are sometimes as important as their front facades and historic plot boundaries are part of settlement character. The openings created to gain access to backland often has a detrimental effect on streetscape in conservation areas. The policy is too open ended, and needs to include additional criteria on these matters.

Comments:

For development affecting Conservation Areas or Listed Buildings policies ENV1 and ENV2 will apply.

H3

Ref.No: 221 Rep.No: 5

Representor: Porter, Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Backland Development - It is very important that "access would not cause disturbance to nearby properties" e.g. on Thaxted Road.

Comments:

Issue is covered by criteria d) of policy.

Recommendation:

Insert "all" after "if".

POLICY H4 – SUBDIVISION OF DWELLINGS

Deposit Policy

The subdivision of dwellings into two or more units will be permitted if the character of the area would not adversely be affected.

REPRESENTATIONS RECEIVED

Representations of Support

Ref.No: 183 Rep.No: 8

Representor: Cannon, Sworders Agricultural **Agent (if applicable):**

In considering the development of new housing Government Planning Policy Guidance as set out in PPG7 encourages making use of existing housing to limit the need for new development and to sustain the character of rural villages,

Paragraph 6.5-6.6

6.5 Some settlements are not included in any boundary. These are settlements where there are no apparent opportunities for infilling, because there are no gaps left for development and, in some cases, the approaches to the village are too loose in character for development to be appropriate.

Infilling outside settlement boundaries

6.6 There is no specific policy on infilling outside settlement boundaries. This is because there are few gaps left in otherwise built up frontages small enough to be appropriate for development. Any infill proposals will be considered in the context of Policy S7.

Objections

Ref.No: 145 Rep.No: 2

Representor: Priors Hall Limited **Agent (if applicable):** PJ Rayner and Co

Amendment(s) Sought: Adopted policy H6. Infilling be retained to allow development of infill sites beyond settlement boundaries, change the wording of draft policy S7 and H2 and the development limits of other villages inset maps to allow for minor sites to be developed for housing, and retain the village inset map for villages removed in the draft deposit plan.

Reason(s) for Amendment(s) Sought: Infilling should be allowed to take place in villages to allow people to have greater choice.

Comment

Re-use of rural buildings and replacement dwellings can be considered against policies H5 and H6. Affordable housing on exception sites can be considered against Policy H10.

Ref.No: 213 Rep.No: 20

Representor: Herrman, CPREssex **Agent (if applicable):**

Amendment(s) Sought: We therefore suggest that para 6.5 be extended to explain more fully the Council's decision to omit certain settlement development boundaries to list those settlements by name and to give an indication be cross references to other policies of the protection they will continue to enjoy.

Reason(s) for Amendment(s) Sought: "Some settlements are not included in any boundary." - though not entirely clear we assume this sentence refers to the Council's decision to remove settlement boundaries from 12 very small settlements and, for those that do not have conservation areas, to omit any reference to them either in the text of the deposit plan or on any map. CPREssex considers these omissions to be unfortunate and objects to their absence. Although we recognize that all settlements-without-boundaries will be covered by the Countryside policy (S7) and, we hope by an additional policy protecting the landscape for its own sake, we feel that the impression given to the user of the Plan will be that those settlements have ceased to exist.

Comments *Reference to all settlements without a boundary would serve little purpose as it would not add to the policy framework in the plan. There are many hamlets around greens as well as the smaller villages and comprehensive text would detract from the conciseness of the plan.*

6.5

Ref.No: 151 Rep.No: 1

Representor: Thomas, Little Dunmow Parish Council **Agent (if applicable):**

Amendment(s) Sought: Little Dunmow should be included on the list of settlements at H2 for which a settlement boundary is defined and that the settlement boundary be identical to the previous village development limit.

Reason(s) for Amendment(s) Sought: Little Dunmow has been omitted from the list of settlements for which a settlement boundary is defined, thus removing a visible limit on where infilling with new houses would be permitted. Any infilling proposals would be considered within the context of policy S7. The Parish Council believes that withdrawing the settlement boundary from Little Dunmow removes positive protection from the village. Even if that is not the case it is certainly how it would be perceived by village residents. Policy S7 seems commendable but control seems much less certain that within settlement boundaries.

Comments: *Policy S7 provides the protection from development sought by the parish council.*

Ref.No: 103 Rep.No: 3

Representor: Curtis **Agent (if applicable):** John Martin & Associates

Amendment(s) Sought: Delete para 6.6 and replace with new policy " HOUSING DEVELOPMENT BEYOND SETTLEMENT BOUNDARIES There will be a general presumption against housing development beyond settlement boundaries, unless for the purposes identified in Policy S7. However, within existing groups of buildings that include a minimum of 20 dwellings, infill development as defined in policy H2 will be permissible where no environmental or other harm would result." Alternatively acceptance of clients objections to Policies S3, H2 and the settlement boundary for Great Sampford/Moor End would overcome objection to para 6.6.

Reason(s) for Amendment(s) Sought: Paragraph is contradictory. On one hand it states that although few in number, there will be gaps beyond settlement boundaries that are appropriate for infill. At the same time it defers to Policy S7 which appears to set out an embargo on development. There can be no harm in permitting the erection of dwellings in those gaps beyond settlement boundaries still considered appropriate for development by the Council. PPG3 para 69 refers to infill or peripheral expansion. Local Plan entirely deletes the allowance for infill development in suitable locations beyond settlement boundaries.

Comments: *Wording changes are proposed to clarify the plan. Policy S7 is consistent with PPG7.*

6.6

Ref.No: 3 Rep.No: 7

Representor: Christian, Brian Christian Building Surveyor **Agent (if applicable):**

Amendment(s) Sought: Retain adopted infill policy outside settlement limits.

Reason(s) for Amendment(s) Sought: Infilling is appropriate in many areas outside settlement limits, the Adopted policy H6 has been successful since its introduction (in accordance with wider government policy) and contributed to many innocuous windfall sites with obvious benefits.

Comments: *The new plan needs to be consistent with PPG3 and PPG7, both of which have been revised since adoption of the current plan.*

6.6 & 6.7

Ref.No: 218 Rep.No: 33

Representor: Dale, Saffron Walden Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought: Infilling outside settlement boundaries and conversion of rural buildings to homes are not appropriate because locations are usually unsustainable and only to be considered to ensure retention of listed buildings.

Reason(s) for Amendment(s) Sought:

Comments:

Noted

Recommendation:

No change to paragraph 6.5.

Delete paragraph 6.6. and substitute:

“6.6. There is no specific policy on infilling outside settlement boundaries because any infill proposals will be considered in the context of Policy S7. This says that development will be strictly controlled. It means that isolated houses will need exceptional justification. However, if there are opportunities for sensitive infilling of small gaps in small groups of houses outside settlement boundaries but close to settlements these will be acceptable if development would be in character with the surroundings and have limited impact on the countryside in the context of existing development.”

POLICY H5 – CONVERSION OF RURAL BUILDINGS TO RESIDENTIAL USE

Deposit Policy

The conversion of rural buildings to dwellings will be permitted if all the following criteria apply:

- a) They are in sound structural condition;
 - b) Their historic, traditional or vernacular form enhances the character and appearance of the rural area;
 - c) The conversion works respect and conserve the characteristics of the building;
 - d) Private garden areas can be provided unobtrusively.
- Substantial building reconstructions or extensions will not be permitted. Conditions regulating land use or development rights associated with proposals may be necessary.

REPRESENTATIONS RECEIVED

Representations of Support

Ref.No: 10 Rep.No: 15

Representor: Turner, National Trust **Agent (if applicable):** Community and Regional Planning Services
The National Trust supports Policy H5

Ref.No: 38 Rep.No: 2

Representor: , Gosling & Robson Trusts **Agent (if applicable):** Bidwells
Policy is practical and reasonable in relation to our clients concerns as landowners

Ref.No: 76 Rep.No: 1

Representor: , **Agent (if applicable):** PJ Rayner and Co
The District Council policy over the last 23 years has been to support applications for residential conversions of rural buildings. Listed or otherwise, subject to strict criteria and has proved successful by providing sustainable development preservation and conservation of these buildings retained as part of the English countryside. The draft policy H5 conforms with the spirit of PPG7 and advice in PPG15. Do not consider that the third para of Structure Plan policy RE2 has any relevance to the Uttlesford District or Essex when referring to "isolated sites" located well away from existing settlements. The current district plan policy which allows conversion to residential or business use is admirable and works. In relation to residential conversions design is critical and important to ensure that the alterations involved to the buildings have minimal effect on elevational treatment. Strict control by specialist officers on vetting the design of the schemes for conversion is essential. +

Ref.No: 213 Rep.No: 21

Representor: Herrman, CPREssex **Agent (if applicable):**
CPREssex supports this positive policy, and is particularly pleased to see the inclusion of criterion (d)

Objections

Ref.No: 19 Rep.No: 1

Representor: , British Telecom **Agent (if applicable):** RPS Chapman Warren

Amendment(s) Sought: Criterion B should be deleted from the policy.

Reason(s) for Amendment(s) Sought: Criterion B goes beyond the requirement of any development within the rural area or Conservation Areas by inferring that such conversions will only be allowed where buildings enhance the character and appearance of the rural area. It also goes beyond the guidance in PPG7. The existing criterion a,c and d provide sufficient protection of the character and appearance of the rural area for any such proposals to be assessed.

Comment: *The guidance in PPG7 is primarily directed at re-use of rural buildings for commercial and industrial uses together with tourism, sport and recreation. The justification for residential re-use is that in the absence of such a use, the structure would fall into disrepair. This would not matter if the building did not enhance the rural area.*

Ref.No: 34 Rep.No: 5

Representor: Ovenden, (Officer) **Agent (if applicable):**

Amendment(s) Sought: policy should require applicants to have made clear efforts to see reuse of buildings for non residential uses prior to applying for conversion to residential uses and explain why it was not possible. Consideration should be given to requiring applicants to provide a specification of works with the application to identify what will be retained.

Reason(s) for Amendment(s) Sought: This ignores the stance in ESP and PPG which both promote business use in preference to residential conversion. Residential conversion very often destroys the character of the building which it is proposed to retain - due to the renewal of roofs,walls and structure to make it habitable and internal/external changes and alterations to the setting eg manicured gardens and garaging etc. Not clear whether presumption against extensions is limited to initial conversion or in perpetuity.

Comment: *It is accepted that the policy should generally conform the structure plan. However, the creation of local employment has a lower priority in Uttlesford than elsewhere in Essex, parts of which have RDA status. The local plan needs to reflect this. Future extensions can be considered against Policy H7.*

Ref.No: 71 Rep.No: 3

Representor: Walford, **Agent (if applicable):**

Amendment(s) Sought: Addition of new sub paragraph (e) as follows: They are genuinely not required for agricultural or other rural uses.

Reason(s) for Amendment(s) Sought: Object to this proposal because it needs to be strengthened. It permits too much conversion of rural buildings. Suggest a policy similar to that in West Sussex which requires than only genuinely redundant agricultural buildings may be the subject of conversion. This would prevent farmers becoming property developers, except where it is genuinely reasonable for such a development to take place.

Comment: *A redundancy test is not required in PPG7.*

Ref.No: 99 Rep.No: 1

Representor: Buckland **Agent (if applicable):** Mark Liell and Sons LLP

Amendment(s) Sought: The conversion of a barn used for employment/ business purposed to residential shall be permitted if: 1) There is reduced traffic movements, 2) The residential use would be consistent with the surrounding environment 3) the alterations to the external appearance would enhance or be no less in keeping than previously. 4) the need for the permitted business can be shown to have reduced or become uneconomic.

Reason(s) for Amendment(s) Sought: Failure to address the scope to convert barns used for employment/business purposes for residential where no significant physical alterations would take place and demand for continuing use as a business is no longer in existence/economic.

Comment: *If the building does not positively contribute to the character of the countryside, there is no justification for its residential use in the absence of a demand for commercial or recreational use.*

Ref.No: 183 Rep.No: 11

Representor: Cannon, Sworders Agricultural **Agent (if applicable):**

Amendment(s) Sought: The building does not need to be listed to be suitable for conversion to residential use. In addition there should be more flexibility given to the subdivision of large buildings

Reason(s) for Amendment(s) Sought: This policy should be supported, as it is in line with PPG3.

Comment: *The plan does not say that the building needs to be listed, only that it must be of environmental merit. It is difficult to retain a building's rural character if it is subdivided into too many homes.*

H5

Ref.No: 204 Rep.No: 7

Representor: Burchell, Essex County Council **Agent (if applicable):**

Amendment(s) Sought: Add extra criterion: e) The site is not an isolated location away from existing settlements.

Reason(s) for Amendment(s) Sought: H5 is a policy which contains conflict with Structure Plan Policy RE2 without explanatory cross reference. RE2 contains a presumption against isolated new houses in the countryside. This reflects advice in PPG7, and is increasingly important bearing in mind the need for sustainable provision of services and social inclusion.

Comment: *It is accepted that the policy should generally conform to the structure plan. However, the creation of local employment has a lower priority in Uttlesford than some Essex districts, parts of which have RDA status. The local plan needs to reflect this. PPG 7 implies that if local employment is not a priority locally and the building can be converted without extensive alteration, rebuilding or extension and the creation of a residential curtilage would not have a harmful effect of the countryside, strict control on developments even in the open countryside may not be warranted. However, changes to the policy are proposed.*

Ref.No: 208 Rep.No: 14

Representor: Muller, English Nature **Agent (if applicable):**

Amendment(s) Sought: Amend policy to include reference to protected species like bats.

Reason(s) for Amendment(s) Sought: Rural buildings provide roost sites for protected species like bats. In addition both bats and barn owls may roost in traditional agricultural barns. These species benefit from strong legal protection which should be referred to in the plan.[see also 208.7 on GEN7 & 208.8 on E4]

Comment: *Paragraph 6.12 and GEN7 deal with the issue of protected species.*

Ref.No: 213 Rep.No: 22

Representor: Herrman, CPREssex **Agent (if applicable):**

Amendment(s) Sought: We suggest the addition of a final sentence reading: The residential conversion of listed farm buildings and the re-use of other farm buildings for residential use on isolated sites within the countryside located well away from existing settlements will not be permitted.

Reason(s) for Amendment(s) Sought: CPREssex considers this policy would be further strengthened by the addition of the last paragraph in the Essex Structure Plan policy RE2

Ref.No: 215 Rep.No: 3

Representor: Vose, Countryside Agency **Agent (if applicable):**

Amendment(s) Sought: We would like to see additional criteria added after b) to the effect c) where it can be demonstrated that there is no significant demand for employment generating uses within the locality or that the building could not be occupied for such a use by reason of Policy E4 and where either of these is the case that the building could not be occupied for such a use by reason of Policy E4 and where either of these is the case, that the building would not be suitable for community use of affordable housing by reason of a lack of local demand, location or design of form: d) as present c)

Reason(s) for Amendment(s) Sought: The Countryside Agency promotes the diversification of the rural economy and more sustainable rural communities. We would like to see planning authorities adopting a sequential approach to the conversion of rural buildings which firstly favour employment generating uses. In cases where employment generating uses are inappropriate or have been considered and properly discounted we next favour consideration of community uses or affordable housing. Only then should an open market residential option be considered.

Ref.No: 219 Rep.No: 19

Representor: Fletcher, English Heritage **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: The plan should give priority to employment use of historic barns. The potential of such structures for employment use has greatly increased as remote working has become possible. Paragraph 6.8 refers to employment as the optimum uses and this should be followed through in the policy. The conclusion from para 6.9 is that the most historic structures will be allowed to be converted for residential purposes despite this being the least compatible new use. We suggest further thought is given to this. The availability of European Funding, or funding from EEDA, may help make business use possible.

Comment: *It is accepted that the policy should generally conform to the structure plan. However, the creation of local employment has a lower priority in Uttlesford than some Essex districts, parts of which have RDA status. The local plan needs to reflect this. PPG 7 implies that if local employment is not a priority locally and the building can be converted without extensive alteration, rebuilding or extension and the creation of a residential curtilage would not have a harmful effect of the countryside, strict control on developments even in the open countryside may not be warranted. However, there may be extreme situations where it may not be appropriate to permit conversions, for example if the structure were particularly prominent in the landscape and isolated from existing habitation.. Changes to the policy are proposed.*

ENV5 and H5

Ref.No: 222 Rep.No: 8

Representor: Young, Go-East **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Policy ENV5 (and Policy H5) states that planning permission may be subject to conditions regulating development rights. Permitted development rights should only be removed in exceptional circumstances where there is a real and specific threat to an interest of acknowledged importance and DOE circular 11/95 advises that conditions withdrawing such rights should themselves only be imposed exceptionally. We consider that some clarification is needed as to the type of development that might warrant such restrictive action.

Comment: *Whether there is a threat can only be assessed in the context of a particular proposal and through the development control process, but if a large extension could be erected as permitted development and it would detract from the vernacular form of the building this might justify such a condition.*

Recommendations

Delete policy and substitute

The conversion of rural buildings to dwellings will be permitted if all the following criteria apply:

- a) **It can be demonstrated that there is no significant demand for business uses, small scale retail outlets, tourist accommodation or community uses;**
- b) **They are in sound structural condition;**
- c) **Their historic, traditional or vernacular form enhances the character and appearance of the rural area;**

- d) **The conversion works respect and conserve the characteristics of the building;**
- e) **Private garden areas can be provided unobtrusively.**

Substantial building reconstructions or extensive extensions will not be permitted. Conversion will not be permitted to residential uses on isolated sites in the open countryside located well away from existing settlements. Conditions regulating land use or development rights associated with proposals may be necessary.

POLICY H6 – REPLACEMENT DWELLINGS

Deposit Policy

A replacement dwelling will be permitted if it is in scale and character with neighbouring properties. In addition, outside settlement boundaries, a replacement dwelling will not be permitted unless, through its location, appearance and associated scheme of landscape enhancement it would protect or enhance the particular character of the countryside in which it is set.

REPRESENTATIONS RECEIVED

Objections

Ref.No: 3 Rep.No: 6

Representor: Christian, Brian Christian Building Surveyor **Agent (if applicable):**

Amendment(s) Sought: Retain current adopted policy unaltered or set size parameters

Reason(s) for Amendment(s) Sought: Wording is too subjective.

Comments: *Size parameters would inevitably be arbitrary.*

Ref.No: 34 Rep.No: 6

Representor: Ovenden, (Officer) **Agent (if applicable):**

Amendment(s) Sought: The first sentence should start with 'within settlement boundaries'. The second sentence should include reference to being on the same footprint and limiting the size of dwelling in order to avoid some of the deadful replacement dwellings permitted in the last 15 years. It should include tighter restrictions in the MGB/CPZ.

Reason(s) for Amendment(s) Sought: This loosens the already loose wording in the current policy. The proposed tests for schemes outside settlement boundaries are too vague. It doesn't make any reference to size or location of the existing dwelling. It says nothing about tighter restrictions in the MGB/CPZ.

Comments: *In the MGB the overriding policy is the national planning policy on development in the Green Belt. Size parameters would inevitably be arbitrary. No logical reason why the replacement should necessarily be tied to the same position in a site, especially if relocation would have countryside character benefits.*

Ref.No: 183 Rep.No: 12

Representor: Cannon, Sworders Agricultural **Agent (if applicable):**

Amendment(s) Sought: The replacement of dwellings should not be restricted outside of settlement boundaries.

Reason(s) for Amendment(s) Sought: This policy should be supported as it would reduce the need for new development, however, this should not be limited to within defined settlement boundaries. Derelict/substandard properties should not be required to be maintained where the site could be used for a suitable replacement dwelling. This is supported by Planning Policy Guidance Note 7 para 3.18.

Comments:

The policy does not preclude replacement dwellings beyond settlement boundaries but ensures that the amenity of the district is protected and enhanced.

Recommendation:

No change

POLICY H7 – HOUSE EXTENSIONS

Deposit Policy

Extensions will be permitted if all the following criteria apply:

- a) **Their scale, design and external materials respect those of the original building;**
- b) **There would be no material overlooking or overshadowing of nearby properties;**
- c) **Development would not have an overbearing effect on neighbouring properties;**
- d) **The property as extended has appropriate car parking space.**

REPRESENTATIONS RECEIVED

Objections

H7

Ref.No: 159 Rep.No: 5

Representor: Robson, Widdington Parish Council **Agent (if applicable):**

Amendment(s) Sought: This problem could be addressed by the planning department being empowered to maintain conditions put on applications when serial applications are made. Perhaps a percentage increase in the size of the original building as a max would be helpful

Reason(s) for Amendment(s) Sought: There is no guidance to protect areas from serial applications.

Comments: *The effects of each additional application can be considered against the policy tests and development refused if it fails one or more tests.*

Ref.No: 204 Rep.No: 8

Representor: Burchell, Essex County Council **Agent (if applicable):**

Amendment(s) Sought: Add sub section e) The existing public rights of way network is taken into account.

Reason(s) for Amendment(s) Sought: Before any extensions are made to properties it is important that homeowners refer to the definitive map of public rights of way to ensure that the extension would not affect an existing public right of way.

Comments: *This issue is addressed in structure plan policy LRT 5*

H7

Ref.No: 208 Rep.No: 15

Representor: Muller, English Nature **Agent (if applicable):**

Amendment(s) Sought: Bats benefit from strong legal protection which should be referred to in the plan.

Reason(s) for Amendment(s) Sought: Both modern and traditional homes can provide suitable habitat for bats to roost. Where extensions and/or loft conversions are proposed the potential presence of bats must be considered. If in doubt English Nature should be contacted for advice.[see also 208.7 on GEN7 & 208.8 on E4 & 208.14 on H5]

Comments:

Policy GEN7 deals with the issue of protected species

H7

Ref.No: 218 Rep.No: 34

Representor: Dale, Saffron Walden Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought: Delete criteria (d) from the policy

Reason(s) for Amendment(s) Sought:

Comments: *Agree, GEN9 applies*

Recommendation: **Delete criteria d) The property as extended has appropriate car parking space.**

- 6.16** There are, and will continue to be, many households or potential households in Uttlesford lacking their own housing or living in housing that is inadequate or unsuitable, who are unlikely to be able to meet their needs in the housing market without some assistance. This is the Government's definition of housing need. It is estimated that the scale of the requirements for affordable housing is nearly 300 homes a year for the period 2001 to 2006 taking into account the backlog of existing need, reducing to about 230 homes a year for the next five year period to 2011 once the backlog has been addressed. Much of the need is newly arising each year. The ten year requirement is accordingly 2,650. If the newly arising need in 2000-1 (the underlying rate of about 230 homes a year) is added to this, the total of 2,880 represents over 60% of the total housing provision in the plan for 2000-11.
- 6.17** Over 40% of the 4,620 homes proposed in total already had planning permission in April 2000. The supply of housing from these sites that would address the situation of those who are unlikely to be able to meet their needs in the housing market without some assistance is already determined. It is about 200 homes (11%). This means that the balance of the total requirement, 2,680, has to be compared with the balance of the housing provision without planning permission of 2,727. In practice the ratio will be even more unfavourable, because of planning permissions granted between 2000 and the date when the policies in this Plan are capable of being accorded sufficient weight to be implemented. The situation justifies affordable housing being sought on as many sites as is practicable, subject to national planning policy.
- 6.18** In Government policy advice, the term affordable housing includes low cost market housing, discounted market housing, as well as housing for social rent or shared ownership from social landlords. However, new build low cost market housing is unlikely to address housing need in Uttlesford. This is because new build housing is significantly more expensive than second hand properties, and those households who are on the margins of being able to meet their needs in the housing market will be purchasing second hand towards the bottom end of the price band.
- 6.19** For affordable housing to be relevant to those in housing need in Uttlesford it must meet the following tests:
- It results in weekly outgoings on housing costs that 20% of Uttlesford households in need can afford, excluding housing benefits.
 - Such housing should be available, both initially and for subsequent occupancy, only to those with a demonstrable housing need.
- 6.20** The percentage and type of affordable housing on any given site will be subject to negotiation at the time of a planning application, so as to allow for issues of viability and mix to be considered. On sites in settlements with a population of less than 3,000 the housing mix will have to reflect the particular needs of the village concerned and of registered social landlords. This Plan sets a target of 40% of dwellings to be affordable housing, meeting the weekly outgoings on housing costs and availability tests above. This represents a compromise between the proportion justified by the scale of need and what the housing industry can reasonably be expected to provide.

6.21 It will be important to achieve mixed and balanced communities in two respects: within a larger site; and the village as a whole in the case of smaller settlements. All developments on a site of 3 or more homes must include an element of small 2 and 3 bed homes, which must represent a significant proportion of the total, for those households who are able to meet their needs in the market and would like to live in a new home. On those sites where an element of affordable housing for those who cannot meet their needs in the market is required, these small market priced homes will be an additional requirement.

6.22 Both requirements are summarised in the following table:

Settlement population	Site size	Housing mix
3,000 and above	0.5 hectares and above or 15 dwellings or more	Target of 40% dwellings to be affordable. In addition significant proportion to be 2 and 3 bed.
	0.1 hectares to 0.5 hectares or 3 to 15 dwellings	Significant proportion to be 2 and 3 bed
Less than 3,000	0.17 hectares and above or 5 or more dwellings	Target of 40% dwellings to be affordable. In addition significant proportion to be 2 and 3 bed.
	0.1 hectares to 0.17 hectares or 3 to 5 dwellings	Significant proportion to be 2 and 3 bed

Representations of Support

6.20 & 6.21

Ref.No: 213 Rep.No: 23

Representor: Herrman, CPREssex Agent (if applicable):

CPREssex strongly supports both the target of 40% for affordable dwellings and the commitment to achieving an appropriate proportion of 2 and 3 bed houses, especially in requiring the provision of these on small sites in villages. We are therefore wholly in favour of policies H8 and H9

Objections

Ref.No: 93 Rep.No: 18

**Representor: Hastoe Housing Association/Springboard HA Agent (if applicable):
Oldfield King Planning**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Plan omits reference to policy stating that cash in-lieu will only be accepted under exceptional circumstances.

Comments: *The Council always seeks an element of affordable housing within suitable developments.*

Ref.No: 93 Rep.No: 17

Representor: Hastoe Housing Association/Springboard HA **Agent (if applicable):** Oldfield King Planning

Amendment(s) Sought: Plan should provide consideration of producing Supplementary Planning Guidance on the implementation of affordable housing policies.

Reason(s) for Amendment(s) Sought: Plan omits reference to producing supplementary planning guidance on the implementation of affordable housing policies

6.16 onwards

Ref.No: 204 Rep.No: 9

Representor: Burchell, Essex County Council **Agent (if applicable):**

Amendment(s) Sought: Add explanation of Housing Needs Survey, with particular reference to Stansted Airport.

Reason(s) for Amendment(s) Sought: Insufficient explanation of Housing Needs Survey and particular needs in connection with Stansted Airport.

Comments: *Housing Needs Survey is available as a background information document. The effect of Stansted Airport on the labour market and housing demand is the subject of a current study.*

6.18-6.21

Ref.No: 164 Rep.No: 11

Representor: Bellway Homes **Agent (if applicable):** FPD Savills

Amendment(s) Sought: Council should consider contents of para. 6.18-6.21 to allow for the greatest scope possible in regard to the delivery of affordable housing.

Reason(s) for Amendment(s) Sought: The statement that low cost market housing is unlikely to address housing need in Uttlesford is a very narrow view. There are companies which are capable of providing genuine low cost housing in perpetuity through appropriately worded legal agreement. 6.19 puts forward an affordability test. It applies an onerous requirement which would stifle the delivery of affordable housing. Furthermore it seems to be skewed towards the most needy which in effect may penalise the delivery of housing for the greater majority identified within the Council's 40% requirement. Points raised in relation to 6.19 also apply to 6.20. The indication that housing mix will have to reflect the particular needs of registered social landlords places too much importance of the role of such organisations in the delivery of affordable housing. Other organisations can make significant contributions. Small market homes should be included in the affordable housing definition.

Comments: *The Housing Needs Survey and 2001 update conclude that as far as the majority of households in need are concerned social rented housing is the only form of affordable housing that will actually be affordable. There may be a limited role for shared equity.*

6.20

Ref.No: 142 Rep.No: 3

Representor: Wickford Development Co Ltd **Agent (if applicable):** Melville Dunbar Associates

Amendment(s) Sought: Re write para 6.20 to give more explicit reference to 6/98 in respect of the need to set individual targets for suitable sites having regard to the particular conditions which may apply.

Reason(s) for Amendment(s) Sought: Para 6.20 of the Deposit Draft fails to reflect the guidance in paras 9 and 10 in circular 6/98. Subject to proper justification being given there is no objection in principle to an appropriate upper limit and which would provide sufficient scope to allow the special circumstances of individual sites to be taken into account in determining the actual amount of affordable housing to be provided. Where there are other costs involved in site development e.g. contributions towards community facilities etc then a smaller percentage of affordable housing may be appropriate. The Plan should provide a degree of flexibility to allow for site specific considerations. The blanket figure of 40% is regarded as unsatisfactory because it does not follow Government guidance.

6.20

Ref.No: 149 Rep.No: 2

Representor: Wilson, Great Dunmow Town Council **Agent (if applicable):**

Amendment(s) Sought: Policy should state % of dwellings that should be affordable. Make provision for low cost affordable housing over and above that already allocated.

Reason(s) for Amendment(s) Sought: 6.20 states that the percentage and type of affordable housing will be subject to negotiation at the time of submission of a planning application. This does not go far enough. The policy should stipulate the exact percentage of affordable houses so that developers are aware of what they have to provide prior to any planning application being submitted. Furthermore there should be a policy which stipulates that low cost/affordable housing should not be grouped at one location but properly integrated into small pockets throughout a development as set out in National Advice. There is no provision in the plan for low cost affordable housing over and above that already allocated. This must be written into the plan and must be of low cost - high quality design and care must be taken to ensure that developers do not try to allocate low cost housing to sites outside development limits to protect their investment in other development sites.

6.20

Ref.No: 149 Rep.No: 2

Representor: Wilson, Great Dunmow Town Council **Agent (if applicable):**

Amendment(s) Sought: Policy should state % of dwellings that should be affordable. Make provision for low cost affordable housing over and above that already allocated.

Reason(s) for Amendment(s) Sought: 6.20 states that the percentage and type of affordable housing will be subject to negotiation at the time of submission of a planning application. This does not go far enough. The policy should stipulate the exact percentage of affordable houses so that developers are aware of what they have to provide prior to any planning application being submitted. Furthermore there should be a policy which stipulates that low cost/affordable housing should not be grouped at one location but properly intergrated into small pockets throughout a development as set out in National Advice. There is no provision in the plan for low cost affordable housing over and above that already allocated. This must be written into the plan and must be of low cost - high quality design and care must be taken to ensure that developers so not try to allocate low cost housing to sites outside development limits to protect their investment in other development sites.

6.20 - 6.22

Ref.No: 185 Rep.No: 7

Representor: McGowan, Hatfield Regis Grange Farm **Agent (if applicable):** FPD Savills

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: No objection is raised concerning the principle of affordable housing provision. The target of 40% of dwellings to be affordable is regarded as unrealistic and unachievable. It is not supported by any logical analysis and is certainly not regarded as "What the housing industry can reasonably be expected to provide" It is also completely unrealistic to require that all developments on sites of three or more dwellings must include an element of 2/3 bed homes. The advice on the provision of affordablehomes provides a site threshold much greater. The Council states that new build low cost housing is unlikely to address the housing need in Uttlesford - therefore the plan is contradictory. The summary table at 6.22 is unacceptable.

6.20 - 6.22

Ref.No: 137 Rep.No: 5

Representor: Coxeter **Agent (if applicable):** FPD Savills

Amendment(s) Sought: No changes are required the paragraph provided the interpretation in respect of High Roding as adduced in other objections can be accommodated.

Reason(s) for Amendment(s) Sought: No objection is raised concerning the principle of affordable housing provision. The target of 40% of dwellings to be affordable is regarded as unrealistic and unachievable. It is not supported by any logical analysis and is certainly not regarded as whatthe housing industry can reasonably be expected to provide. It is also completely unrealistic to require that all developments on sites of three or more dwellings must include an element of 2 and 3 bed homes. The advice on the provision of affordableprovides a site threshold size much greater than suggested in Para 6.21. The Council in its own words at 6.18 comments that "new build low cost market housing is unlikely to address housing need in Uttlesford. The Council is being contradictory in itsown plan and is ignoring

the realities of the way in which the construction industry works, especially in respect of small sites which are likely to be developed by small local companies. The summary table at 6.22 is unacceptable

6.20 & 6.22

Ref.No: 218 Rep.No: 35

Representor: Dale, Saffron Walden Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought: Para 6.20: add "on each residential development" after dwellings. Para 6.22: amend site size to 0.25 hectares to 5 dwellings. Delete "target of". Amend 3-15 dwellings to 3-5 . Amend site size 3,000 and above in or 5 dwellings in H8

Reason(s) for Amendment(s) Sought:

6.21

Ref.No: 120 Rep.No: 6

Representor: Laing Strategic Land Ltd **Agent (if applicable):** Sellwood Planning

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Para 6.21 states that a requirement for a significant proportion of smaller dwellings will be an additional requirement to affordable housing. Since Housing Departments often seek larger family sized affordable dwellings to meet assessed needs this can lead to a situation where the affordable dwellings escape the "small units" requirement of H9 but the market housing does not. This is inequitable and the plan should make it clear that the small units requirement applies to both affordable housing and market housing. Amend paragraph 6.21 to make it clear that the small dwelling policy applies to market and affordable housing not just market housing.

6.12

Ref.No: 142 Rep.No: 5

Representor: , Wickford Development Co Ltd **Agent (if applicable):** Melville Dunbar Associates

Amendment(s) Sought: The text should be amended to indicate that in order to secure "mixed and inclusive communities" a variety of dwellings should be built

Reason(s) for Amendment(s) Sought: This part of the Deposit Draft should make specific reference to Governments objectives indicated in para 2 of PPG3 which clearly express the need for a range of house types and living environments to be created. Para 6.21 is unduly biased towards the provision of small dwellings and gives insufficient emphasis to catering for the larger property for which there is a recognised demand in the Uttlesford Area.

6.22

Ref.No: 203 Rep.No: 5

Representor: , Croudace Ltd **Agent (if applicable):** Charles Planning Associates

Amendment(s) Sought: Delete paragraph 6.22 and replace with words referring to the use of the thresholds set out in Circular 6/98 at paragraph 10.

Reason(s) for Amendment(s) Sought: Paragraph 6.22 should include reference to the the thresholds in Circular 6/98 at Paragraph 10. The case for adopting lower thresholds is not properly made and is not accepted.

POLICY H8 – AFFORDABLE HOUSING

Deposit Policy

The Council will negotiate to secure 40% of the dwellings to be affordable housing as indicated in the following table:

Settlement population	Site size	Proportion of dwellings to be affordable
3,000 and above	0.5 hectares and above or 15 dwellings or more	40% target
Less than 3,000	0.17 hectares and above or 5 or more dwellings	40% target

REPRESENTATIONS RECEIVED

Objections

H8

Ref.No: 16 Rep.No: 3

Representor: Stock, The Fairfield Partnership **Agent (if applicable):** Januarys Chartered Surveyors

Amendment(s) Sought: The thresholds and proportions detailed in Policy H8 be reconsidered.

Reason(s) for Amendment(s) Sought: Plan has not demonstrated exceptional local constraints to justify the minimum threshold considered appropriate by the Secretary of State (ie 0.5 ha and above or 15 dwgs or more). Likewise, in the case of settlements less than 3,000, the threshold at which affordable housing is required is excessively low (ie 0.17 ha and above or 5 or more dwellings) and has not been sufficiently justified by the Local Planning Authority.

H8

Ref.No: 19 Rep.No: 2

Representor: British Telecom **Agent (if applicable):** RPS Chapman Warren

Amendment(s) Sought: Reference to target of 40% should be deleted.

Reason(s) for Amendment(s) Sought: Guidance in circular 6/98 clearly states that policies for affordable housing should set "indicative" targets for specific sites. The target of 40% goes beyond national policy guidance and should be deleted. The target would not allow for flexibility. BT plc object to the Council's proposal to adopt the lower threshold. BT is of the view that no sound justification has been provided to set this low threshold.

H8

Ref.No: 20 Rep.No: 2

Representor: Wilson, Martin Grant Homes (UK) Ltd **Agent (if applicable):** RPS Chapman Warren

Amendment(s) Sought: The level of provision should be set at a lower ratio. Para 6.18 should be reworded to ensure that the contribution of low cost market housing to the provision of affordable accommodation is appropriately recognised with the context provided in 6/98. The target of 40% is too high and would not allow for flexibility and should be deleted.

Reason(s) for Amendment(s) Sought: Deposit Draft does not provide adequate information regarding the assessment of local need. The District Council have not put forward an acceptable explanation for their intention to secure such a high level of affordable housing. Circular 6/98 clearly includes the concept of low cost market housing within the definition of affordable accommodation. Object to the comment by the District Council that low cost market housing is unlikely to address the issue of affordability. Object to the Council's proposal to adopt the lower threshold set out in 16/98 - no justification has been provided to set this low threshold.

H8

Ref.No: 47 Rep.No: 2

Representor: Hamilton, PJ Hamilton and Associates **Agent (if applicable):**

Amendment(s) Sought: Delete the 40% requirement from the policy

Reason(s) for Amendment(s) Sought: The 40% target for affordable housing is indicated in the table is too prescriptive. Need will have to be established in each location and on each site and then a % if needed applied.

H8

Ref.No: 89 Rep.No: 4

Representor: Keith Clements Associates **Agent (if applicable):** Andrew Martin Associates

Amendment(s) Sought: Policy H8 should be amended to allow for flexibility.

Reason(s) for Amendment(s) Sought: The Council should set out a more flexible approach. A 40% target for affordable housing for all new residential development over the threshold set out in the policy is unreasonably high and likely to make more developments unviable. In turn this will impact on the release of windfall and allocated sites, strengthen the need to allocate further sites for residential development. In addition it is submitted that there should be rural exceptions to the policy to enable the authority to grant planning permission for small sites, within and adjoining existing villages that would not otherwise be released for housing.

H8

Ref.No: 90 Rep.No: 2

Representor: Drown **Agent (if applicable):** Andrew Martin Associates

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Council should set out a more flexible approach than has been set out in Policy H8. A 40% target for affordable housing for all new residential development over the threshold set out in the policy is unreasonably high and likely to make more developments unviable. In turn this will impact upon the release of windfall and allocated sites, strengthen the need to

allocate further sites for residential development. In addition it is submitted that there should be rural exceptions to the policy to enable the permission for small sites, within and adjoining existing villages that would not otherwise be released for housing.

H8

Ref.No: 91 Rep.No: 2

Representor: Ridley, TD Ridley and Sons Ltd **Agent (if applicable):** Andrew Martin Associates

Amendment(s) Sought: Policy H8 should be amended to allow for flexibility.

Reason(s) for Amendment(s) Sought: Council should set out a more flexible approach than has been set out in Policy H8. A 40% target for affordable housing for all new residential development over the threshold set out in the policy is unreasonably high and likely to make more developments unviable. In turn this will impact upon the release of windfall and allocated sites, strengthen the need to allocate further sites for residential development. In addition it is submitted that there should be rural exceptions to the policy to enable the authority to grant planning permission for small sites, within and adjoining existing villages that would otherwise be released for housing.

H8

Ref.No: 92 Rep.No: 10

Representor: Securities, Audley End Estates **Agent (if applicable):** Andrew Martin Associates

Amendment(s) Sought: Make policy more flexible

Reason(s) for Amendment(s) Sought: 40% target for all new residential developments is unjustified in terms of need, is unrealistic and unreasonably high and like to make most developments unviable. The policy requirement is not deliverable. This will in turn impact upon the release of windfall and allocated sites, further exacerbating the need to monitor and manage deliverance of housing within the District and strengthen the need to allocate reserve sites for new residential.

H8

Ref.No: 118 Rep.No: 9

Representor: Bryant Projects **Agent (if applicable):** DLP Consultants Ltd

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Do not object to the policy in principle however we consider that the target of 40% is unreasonable and reflects an untenable over-emphasis upon making up the shortfall of previous years from the relatively small number of houses yet to be committed. The issue of affordability and the shortfall in affordable housing provision arising from existing commitments is a factor of the limited overall strategic housing requirement. It is also reflective of the concentration of development on a limited number of larger housing allocations. The achievement of a high percentage of affordable dwellings is likely to be a significant deterrent on the realisation of urban and brownfield development opportunities and therefore future provision is likely to be concentrated principally on the four major urban extensions. Consequently the actual percentage needing to be achieved from these large schemes will be considerable in excess of 40%

Ref.No: 119 Rep.No: 37

Representor: Proto Limited **Agent (if applicable):** Littman and Robeson

Amendment(s) Sought: Delete policy pending an urgent review of housing needs on which an appropriate policy can be developed.

Reason(s) for Amendment(s) Sought: Whilst the discussion at paragraphs 6.16 to 6.20 seeks to suggest that the 40% target for affordable housing is appropriate an objection to this policy is being made pending a more detailed assessment of housing needs being available against which a more certain determination of levels of affordable housing can be made.

H8

Ref.No: 120 Rep.No: 4

Representor: Laing Strategic Land Ltd **Agent (if applicable):** Sellwood Planning

Amendment(s) Sought: The Council has a target of achieving 30% affordable housing on all housing sites of 15 dwellings (0.5h) or over in settlements of 3000 and above. In smaller settlements the threshold will be 5 dwellings (0.5h). The precise percentage achieved on any particular site will be determined through negotiation and in the context of the circumstances of that site.

Reason(s) for Amendment(s) Sought: The policy is too prescriptive in stating that all sites should provide 40% affordable housing. Circular 6/98 states that each site should be assessed in its own context. This should be reflected in the Policy. Additionally 40% is an unjustifiably high figure.

H8

Ref.No: 125 Rep.No: 5

Representor: Lipinski, Cala Homes (South) Ltd **Agent (if applicable):**

Amendment(s) Sought: It is suggested that policy H8 is amended by reducing the target figure to 30%. This target is more achievable and will result in more sites coming forward.

Reason(s) for Amendment(s) Sought: Cala Homes objects to policy H8 on the grounds that the target to provide 40% of all dwellings on a site as affordable is too high. It is noted that the Council states that it will negotiate with applicants to obtain this 40% target but this figure will become an absolute requirement rather than a goal to be achieved. Setting the affordable housing requirement so high will effect the viability of many schemes resulting in sites not being developed. This will have a knock on effect in terms of the overall housing provision.

H8

Ref.No: 137 Rep.No: 3

Representor: Coxeter **Agent (if applicable):** FPD Savills

Amendment(s) Sought: Amend policy H8 by the deletion of the line "less than 3000" and by the reduction of the 40% target to 25%

Reason(s) for Amendment(s) Sought: The Council's target of 40% affordable dwellings on the basis set out in this policy is unrealistic and unreasonable. The

proposed less than 3000 population settlement threshold is completely impractical and is not supported by any analysis of the facts.

H8

Ref.No: 138 Rep.No: 2

Representor: St John's College **Agent (if applicable):** Carter Jonas

Amendment(s) Sought: Council reverts to its original policy which is in line with Government guidance.

Reason(s) for Amendment(s) Sought: Threshold of 15 dwellings is unduly low and should be raised in accordance with government guidance. This guidance has a higher threshold and we consider that there are no sound planning reason to depart from that figure. There does not appear to be a Housing Needs study carried out or any overriding need for affordable housing in the District. In addition the percentage of affordable housing sought is unduly high. Appears to be no justification provided.

H8

Ref.No: 139 Rep.No: 3

Representor: CWS Pension Fund Trustees Ltd **Agent (if applicable):** Jones Lang Lasalle Ltd

Amendment(s) Sought: 1. Justify the target figure of 40% affordable housing with reference to a housing needs survey of other evidence. 2. Amend the first sentence of the policy to include the words 'a target of' after the word 'secure'. 3. Include within supporting text appropriate, information on whether commuted sums to provide affordable housing on an alternative site will be acceptable.

Reason(s) for Amendment(s) Sought: It is not clear whether the estimate of 40% arises from a housing needs survey, and if it does then reference should be included in the supporting text. If it does not then there should be an explanation as to how the level of need has been identified. There is an inconsistency between the first sentence of the policy and the right hand column of the table in the policy. The latter refers to a target of 40% but the first sentence of the policy is more definitive in stating the Council's intention to 'negotiate to secure 40% of the dwellings to be affordable housing'. The reference to the 'target' acknowledges that there may be circumstances where the achievement of the 40% figure is not realistic.

H8

Ref.No: 141 Rep.No: 4

Representor: Penn, Persimmon Homes (Essex) Ltd **Agent (if applicable):** RPS Chapman Warren

Amendment(s) Sought: The provision of affordable housing described in Policy H8 is unreasonable high. The level of provision should be set at a lower ratio. Para 6.18 of the Plan should be reworded in order to ensure that the contribution of low market housing to the provision of affordable accommodation is appropriately recognised within the context provided in C6/98.

Reason(s) for Amendment(s) Sought: Plan does not provide adequate information regarding the assessment of local housing needs and, accordingly, we would contend that the Council have not put forward an acceptable explanation for their intention to secure a high level of affordable housing as described at Policy H8. Plan

does not provide assessment of what is considered affordable in the area in terms of relationship between local incomes levels and house prices or rents for different types of households (para15 PPG3). Concernedthat Plan does not consider low cost market housing as having a role in affordable accommodation. C6/98 includes concept of low cost market housing within definition of affordable accommodation.

H8

Ref.No: 142 Rep.No: 4

Representor: Wickford Development Co Ltd **Agent (if applicable):** Melville Dunbar Associates

Amendment(s) Sought: Amend policy H8 as follows - The Council will negotiate to secure up to *% of the dwellings to be affordable having regard to any special circumstances that may apply to an individual site and in accordance with the following table. Settlement population 3000 and above 0.5 hectares and above or 15 dwellings or more *% / Less than 3000 0.17 hectares and above or 5 or more dwellings *% (* appropriate indicative target to be inserted in due course).

Reason(s) for Amendment(s) Sought: Para 6.20 of the Deposit Draft fails to reflect the guidance in paras 9 and 10 in circular 6/98. Subject to proper justification being given there is no objection in principle to an appropriate upper limit and which would provide sufficient scope to allowthe special circumstances of individual sites to be taken into account in determining the actual amount of affordable housing to be provided. Where there are other costs involved in site development e.g. contributions towards community facilities etcthen a smaller percentage of affordable housing may be appropriate. The Plan should provide a degree of flexibility to allow for site specific considerations.The blanket figure of 40% is regarded as unsatisfactory because it does not follow Government guidance.

H8

Ref.No: 144 Rep.No: 7

Representor: Bryant Homes Limited **Agent (if applicable):** Vincent and Gorbing

Amendment(s) Sought: The number and proportion of affordable housing units could be justified before the specific requirements are made. Unless this can be carried the policy should be amended to delete a specific proportion and be replaced with text to say that anappropriate level of provision will be sought. The thresholds should reflect the guidance ie 3000 dwellings and above 1.0ha and above or 25 dw or more. Less than 3,000 - 0.5ha and above or 15 dw or more

Reason(s) for Amendment(s) Sought: The plan states the number of afforable housing units that are required each year, but does not contain any information or eveidence to justify how this figure was arrived at. The 40% would be excessive. The thresholds are considerablylower that those suggested in Circular 6/98. The Circular suggests that the threshold for settlements over 3000 dwellings should be approx 25 dw or 0.1ha. It suggests that LPA's may adopt their own threshold for settlements of 3000 or less but indicatesthat the threshold for Inner London which is implied to be a high requirement area is 15 dw or 0.5 ha. No justification is given for the even lower thresholds.

H8

Ref.No: 164 Rep.No: 12

Representor: Bellway Homes **Agent (if applicable):** FPD Savills

Amendment(s) Sought: Amend policy H8 to reflect the Government advice as set out in 6/98

Reason(s) for Amendment(s) Sought: The site size reference within the policy to settlement populations of less than 3,000 is questioned. As written the policy will require 40% of affordable housing provision on the sites of 0.17 hectares and above or 5 or more dwellings. The particular reference to this threshold and its relevance to published affordable housing guidance is questioned and to that extent it is our view that the more appropriate threshold for provision of affordable housing in settlements of less than 3,000 is that contained in Circular 6/98

Ref.No: 159 Rep.No: 2

Representor: Robson, Widdington Parish Council **Agent (if applicable):**

Amendment(s) Sought: More attractive sheltered housing is needed also small bungalows within present communities. This would also release accommodation for larger families

Reason(s) for Amendment(s) Sought: This policy does not address the needs of the elderly for suitable accommodation

Comment: The type of accommodation provided reflects the requirements of households in need in terms of both location and property.

H8

Ref.No: 185 Rep.No: 2

Representor: McGowan, Hatfield Regis Grange Farm **Agent (if applicable):** FPD Savills

Amendment(s) Sought: Amend policy H8 by the deletion of the whole line "less than 3000 and by the reduction of the 40% target to 25% in the remaining line for 3000 and above settlements.

Reason(s) for Amendment(s) Sought: The Council's target of 40% affordable dwellings on the basis set out in this policy is unrealistic and unreasonable. The proposed less than 3000 population settlement threshold is completely impractical and is not supported by any analysis of the facts

H8

Ref.No: 186 Rep.No: 1

Representor: Siemens Pension Fund **Agent (if applicable):** Colliers CRE

Amendment(s) Sought: Policy H8 should be amended to reflect National Policy Guidance as set out in PPG3

Reason(s) for Amendment(s) Sought:

H8

Ref.No: 201 Rep.No: 5

Representor: Countryside Strategic Projects **Agent (if applicable):** Strategic Land and Planning

Amendment(s) Sought: Reduction in the overall percentage target to a figure which can be justified by a more rigorous and objective examination of the data available; incorporation of specific provision for a range of affordable housing tenure and redrafting to acknowledge the need for genuine negotiation and flexibility on all sides

Reason(s) for Amendment(s) Sought: There is inadequate evidence to justify the target of 40% it is not accepted that the Council's housing needs survey provides either a reliable or an intelligible picture of genuine local needs. Secondly the policy should acknowledge that there is a role for all types and tenures of affordable housing as set out in circular 6/98. The policy as drafted is too rigid. Government policy advises against an across the board percentage approach of this type. The policy should also acknowledge that affordable housing should be a matter for negotiation and agreement between the parties rather than imposition

H8

Ref.No: 202 Rep.No: 1

Representor: Duncan, Countryside Strategic Projects **Agent (if applicable):**

Amendment(s) Sought: H8 should read "On sites which are acceptable for housing in accordance with other policies of this plan and which are large enough to accommodate a reasonable mix of types, tenures and sizes of housing the Council will seek, by negotiation with developers to secure an element of affordable housing. In assessing the suitability of such sites for the provision of an element of affordable housing the Council will take into account (i) Site size, suitability and the economics of provision. (ii) the need to achieve a successful housing development (iii) The size, tenure and type of dwellings provided shall reflect the needs of those households requiring affordable housing.

Reason(s) for Amendment(s) Sought: The Council should set out a more flexible approach than has been set out in Policy H8. The Council must make balanced policy judgements and carry out housing needs assessment and consider all possible housing solutions to seek to meet the need. In accordance with circular 6/98 it is recognised that it can be more appropriate for a financial contribution to be made so that affordable housing can be provided off site. A target of 40% for affordable housing for all new residential development over the threshold set out in the policy is unreasonably high and likely to make more development unviable. In turn this will impact upon the release of windfall and allocated sites, strengthen the need to allocate further sites for residential development.

H8

Ref.No: 203 Rep.No: 4

Representor: Croudace Ltd **Agent (if applicable):** Charles Planning Associates

Amendment(s) Sought: Deletion of a % quota from H8 and replace it with words stating that the Local Planning Authority will seek to negotiate an appropriate element of Affordable Housing on a site by site basis. Delete the proposed 'thresholds' from the Policy and instead include a reference in the supporting text to the use of the 'thresholds' set out in Circular 6/98 at paragraph 10.

Reason(s) for Amendment(s) Sought: The case for a 40% quota, and for its inclusion in the policy wording is not acceptable. In addition the case for adopting

lower thresholds than those (normally) recommended in Circular 6/98 has not been properly justified and is not accepted.

H8

Ref.No: 205 Rep.No: 4

Representor: Enodis Property Developments **Agent (if applicable):** GL Hearn Planning

Amendment(s) Sought: Amend paragraph 6.22 and Policy H8 to refer to 'target of up to 40%'

Reason(s) for Amendment(s) Sought: The policy is ambiguous as to whether the 40% target will be the maximum sought and is not clear as to whether less than 40% provision may be acceptable. Given that the costs of developing sites can vary greatly, Policy H8 needs to give a clear indication of flexibility.

H8

Ref.No: 209 Rep.No: 4

Representor: Three Valleys Water Plc **Agent (if applicable):** Freeth Melhuish

Amendment(s) Sought: Para 6.22 amend site sizes to read 1 hectare and above or 25 dwellings or more and reflect this is policy H8
Para 6.22 amend housing mix to read 20% dwellings to be affordable. Reflect this in the policy
Para 6.20 amend 40% to read 20% of dwellings to be affordable

Reason(s) for Amendment(s) Sought: The proposed policy and supporting written statement should be amended to accord with guidance set out in Circular 6/98, namely the requirement for affordable housing on suitable sites should only apply to housing development 25 or more dwellings or residential developments of 1 hectare or more irrespective of the number of dwellings. The Council has not sought to demonstrate exceptional local need to justify Government advice being overturned. A target of 40% is too onerous and could serve to further reduce the number of good housing opportunities being promoted by landowners within the urban area. A target of 20% would be a far more equitable level of affordable housing on suitable sites taking into account material factors such as on-site subject to taking into account material factors such as on site development costs, sustainability, other planning benefits and marketability

H8

Ref.No: 217 Rep.No: 7

Representor: Pelham Homes Limited **Agent (if applicable):** Barton Willmore Planning Partnership

Amendment(s) Sought: Delete any reference to 40% in the policy and rely on a policy which seeks a reasonable proportion of affordable housing on sites which can contribute as follows.
H8 - The LPA will seek to negotiate a proportion of affordable housing on larger housing sites in accordance with the scale of the site, its economic characteristics, suitability and location.

Reason(s) for Amendment(s) Sought: The affordable housing policy is excessive and does not justify the high levels of affordable housing that it seeks. The plan makes no reference to and includes no analysis of a recent Housing Needs Survey. We object to the use of the word "target" in relation to percentages sought for

affordable housing. Circular 6/98 shows that any policies for aff housing must be based on a rigorous and realistic assessment of need. A high level of need does not in itself justify a high % figure in the policy. The LPA are seeking to impose an unfair burden on developers. By placing so much reliance on the residual housing supply in meeting affordable housing needs the LPA have unfairly prejudiced negotiations on the appropriate element of affordable housing. LPA have not accounted for the other elements of affordable housing provisions which are identified in their housing strategy statement. LPA's should ensure schemes are viable - by raising the target to 40% many schemes will not be viable.

H8

Ref.No: 218 Rep.No: 35

Representor: Dale, Saffron Walden Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought: Para 6.20: add "on each residential development" after dwellings. Para 6.22: amend site size to 0.25 hectares to 5 dwellings. Delete "target of". Amend 3-15 dwellings to 3-5 . Amend site size 3,000 and above in or 5 dwellings in H8

Reason(s) for Amendment(s) Sought:

H8

Ref.No: 231 Rep.No: 1

Representor: Dunn, Fairview New Homes Ltd **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: The grounds for objection are that the 40% target is outside the parameters established by circular 6/98 and no evidence has been put forward in terms of an up to date Housing Needs Survey to justify an exception to circular guidance. Furthermore the policy will act as a disincentive to house-builders, discouraging the development of housing sites and adding to the general problem of lack of housing in the District.

General Comment on Representations relating to Policy H8 and supporting text:

Uttlesford is an area where there are strong market housing pressures, a significant shortfall of affordable housing assessed in a Housing Needs Survey and 2001 update report, carried out in accordance with DTLR best practice guidance, and high development land values. The framework proposed in the plan is appropriate and consistent with circular 6/98.

Recommendation:

No change

POLICY H9 – HOUSING MIX

Deposit Policy

All developments on sites of 0.1 hectares and above or of 3 or more dwellings will be required to include significant proportion of market housing comprising small properties. This will be in addition to the affordable housing, where this is required.

REPRESENTATIONS RECEIVED

Representations of Support

Ref.No: 93 Rep.No: 10

Representor: , Hastoe Housing Association/Springboard HA **Agent (if applicable):**
Oldfield King Planning
Support

Objections

H9

Ref.No: 20 Rep.No: 3

Representor: Wilson, Martin Grant Homes (UK) Ltd **Agent (if applicable):** RPS
Chapman Warren

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Object to the imprecise wording in Policy H9. Accept there is a need to ensure a balanced mix of housing within each development. The housing mix can only be judged within the context of the settlement in which the site is situated. It is inappropriate, in policy terms, to seek a vague notion of what a "significant proportion of market housing comprising small properties"

H9

Ref.No: 47 Rep.No: 1

Representor: Hamilton, PJ Hamilton and Associates **Agent (if applicable):**

Amendment(s) Sought: The mix of development to be decided on a site specific basis applying tests like character and style of the surrounding properties and design

Reason(s) for Amendment(s) Sought: Policy is too prescriptive - some sites are not suited to small properties. The character of the surrounding area and design must be taken into account.

H9

Ref.No: 119 Rep.No: 38

Representor: Proto Limited **Agent (if applicable):** Littman and Robeson

Amendment(s) Sought: Delete policy pending an urgent review of housing needs on which an appropriate policy can be developed.

Reason(s) for Amendment(s) Sought: Objection due to lack of detailed housing needs assessment to back up policy. There is also a concern about the uncertainty of the word significant in qualifying the proportion of market housing (small properties) sought.

H9

Ref.No: 120 Rep.No: 5

Representor: Laing Strategic Land Ltd **Agent (if applicable):** Sellwood Planning

Amendment(s) Sought: Policy H9 should be amended to acknowledge that this policy should be applied flexibly to reflect site and market conditions

Reason(s) for Amendment(s) Sought: The policy is unacceptably inflexible and prescriptive. Whilst the policy objective of more, smaller dwellings is acceptable the precise mix on any particular sites should also reflect site constraints and characteristics as well as market demand. The policy should acknowledge this

H9

Ref.No: 137 Rep.No: 4

Representor: Coxeter **Agent (if applicable):** FPD Savills

Amendment(s) Sought: Delete policy H9 completely.

Reason(s) for Amendment(s) Sought: This policy is wholly unworkable because of the very low threshold set for applicability. It will have serious effects on small site developers and is an attempt to interfere with the normal operation of a housing market on very small sites without adequate justification.

H9

Ref.No: 139 Rep.No: 4

Representor: , CWS Pension Fund Trustees Ltd **Agent (if applicable):** Jones Lang Lasalle Ltd

Amendment(s) Sought: Delete policy H9

Reason(s) for Amendment(s) Sought: Supporting text provides no information as to what constitutes a 'significant proportion', nor does it clarify whether there may be circumstances where such provision is inappropriate. The plan refers to small market priced homes being additional affordable housing. Central government guidance in C6/98 and PPg3 makes it clear that the term affordable housing includes a low cost market housing. Given the level of affordable housing being sought under Policy H8 the requirement for an additional significant proportion of small properties is considered unreasonable. The provision can be met under the terms of Policy H8

H9

Ref.No: 141 Rep.No: 5

Representor: Penn, Persimmon Homes (Essex) Ltd **Agent (if applicable):** RPS Chapman Warren

Amendment(s) Sought: The policy should be reworded in order to make the intentions clearer. If it is considered difficult to identify an appropriate wording for the policy itself, para 6.21 of the Plan should provide guidance with regard to the terminology employed in H9.

Reason(s) for Amendment(s) Sought: Object to imprecise wording. There is no definition which provides developers with an indication of the scale envisaged by the

term 'significant proportion'. Accept that there is a need to ensure a balanced mix of houses. However housing mix can only be properly judged on the basis of each development proposal within the context of the settlement in which the site is located. It is inappropriate in policy terms to seek to secure a vague notion of a 'significant proportion of market housing comprising small properties

H9

Ref.No: 142 Rep.No: 6

Representor: , Wickford Development Co Ltd **Agent (if applicable):** Melville Dunbar Associates

Amendment(s) Sought: Amend H9 as follows "On larger sites, provision should be made for a range of size and type of dwellings to meet all sections of the housing market and to secure mixed and inclusive communities.

Reason(s) for Amendment(s) Sought: H9 is wholly devoted to the provision of small market sector housing. This is unacceptable given the Government's aims set out in PPG 3 and acknowledged local shortfall of larger dwellings. The policy, should therefore seek to achieve an appropriate mix of dwellings within residential developments.

H9

Ref.No: 144 Rep.No: 8

Representor: Bryant Homes Limited **Agent (if applicable):** Vincent and Goring

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: The policy is too restrictive. It should be amended to take account of other factors in determining the housing mix.

H9

Ref.No: 164 Rep.No: 14

Representor: , Bellway Homes **Agent (if applicable):** FPD Savills

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: We believe the requirement to include a significant proportion of market housing comprising small properties is a far too detailed approach taken in the circumstances where a housing mix is appropriate. We would point out that there is no definition of significant nor is there any definition of small properties which clearly makes a proper assessment and application of this policy to a particular development, very difficult. Reference to an adequate mix of housing over and above any provision of affordable housing is sufficient description for any local plan policy which in any case will be driven by the developers to provide a range of styles in order to sell the scheme. Para 6.23 which supports H9 refers to the need to retain mixed and balanced communities. The imposition upon the developer to provide small properties cannot be taken carte blanche as an appropriate measure since every settlement is different

H9

Ref.No: 185 Rep.No: 4

Representor: McGowan, Hatfield Regis Grange Farm **Agent (if applicable):** FPD Savills

Amendment(s) Sought: Delete Policy H9 completely

Reason(s) for Amendment(s) Sought: The policy is wholly unworkable because of the very low threshold set for applicability. It will have serious effects on small site developers and is an attempt to interfere with the normal operation of a housing market on very small sites without adequate justification.

H9

Ref.No: 186 Rep.No: 6

Representor: Siemens Pension Fund **Agent (if applicable):** Colliers CRE

Amendment(s) Sought: H9 should be amended to reflect National Policy Guidance as set out in PPG3

Reason(s) for Amendment(s) Sought:

H9

Ref.No: 201 Rep.No: 6

Representor: Countryside Properties PLC **Agent (if applicable):** Strategic Land and Planning

Amendment(s) Sought: Policy should be deleted

Reason(s) for Amendment(s) Sought: The type and size of accommodation to be provided should be first and foremost a matter for the developer and his prospective customers, subject to general compliance with other relevant policies including those in PPG3 with regard to densities and making the best use of urban land and the creation of balanced communities. The policy is also imprecise as to give no meaningful guidance and will simply generate even lengthier negotiations over planning applications for no clear cut benefit.

H9

Ref.No: 209 Rep.No: 5

Representor: Three Valleys Water Plc **Agent (if applicable):** Freeth Melhuish

Amendment(s) Sought: Delete policy H9

Reason(s) for Amendment(s) Sought: Addition requirement of small houses on sites of 0.1 hectares and above or 3 or more dwellings is too onerous on top of affordable housing requirement. It does not accord with government advice as set out in circular 6/98. The application of over zealous affordable housing and low cost market housing standards would serve to significantly reduce the number of suitable housing opportunities from coming forward within the urban area. This would have the regrettable effect of putting further pressure on large green field sites to deliver the district's housing needs.

H9

Ref.No: 217 Rep.No: 3

Representor: , Pelham Homes Limited **Agent (if applicable):** Barton Willmore Planning Partnership

Amendment(s) Sought: Delete policy H9

Reason(s) for Amendment(s) Sought: We object to the policy on the grounds that it is not adequately supported by survey material which would demonstrate the need for such a policy. In addition we believe the policy restricts housing opportunities by placing an additional burden on the developer. If the policy is retained we object to the imprecise nature of the wording "significant proportion" We prefer reference to a % as long as it is justified. We believe that the only reason for requesting all schemes over 0.1ha to provide a significant proportion of 2/3 beds in in para 6.21 to achieve mixed and balanced communities. However this justification is not adequately supported by survey material which justifies the need for such a policy. The LPA are in a position to define mix in respect of affordable housing because mix can be defined by the outcomes of the needs survey. H9 places an additional burden on the developer as a significant proportion of this housing is constrained to 2/3 bed dwellings which restricts choice.

H9

Ref.No: 218 Rep.No: 36

Representor: Dale, Saffron Walden Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Define small properties as 1-3 bedroomed

H8 & H9 Affordable Housing

Ref.No: 73 Rep.No: 2

Representor: Phillips, HBF **Agent (if applicable):**

Amendment(s) Sought: The policies and text should be amended to comply with current government guidance.

Reason(s) for Amendment(s) Sought: The Council's proposals for affordable housing provision are contrary to government advice in circular 6/98 and PPG3. No explanation is provided of the justification for these policies i.e. a robust housing needs assessment. The definition of affordable housing excludes low cost market housing and is defined by reference to specific weekly housing costs. The target is expressed as a District wide percentage rather than numerically or as site specific targets taking full account of site specific considerations. The proposed threshold of 15 dwellings is below that recommended by the circular and had not been justified by exceptional local circumstances. The requirement for a "significant proportion of small market housing in addition to affordable housing is unjustified.

H8 & H9 Affordable Housing and Housing Mix

Ref.No: 98 Rep.No: 1

Representor: Hatfield Development Ltd **Agent (if applicable):** Mark Liell and Sons LLP

Amendment(s) Sought: Removal of affordable housing requirement on all sites under 1.5 acres and reduction of quantum % to 20% on those above, subject to locational characteristics. Removal of any insistence on mixed unit size composition

Reason(s) for Amendment(s) Sought: 40% is too high a % to adopt as a target for affordable housing units as a % of the whole scheme. Should be dependent upon location and environment. Minimum site threshold should be increased. Housing mix should be dependent on site environment and surroundings. Should not be a blanket requirement for high density/smaller property elements in all schemes

H8 & H9 Affordable Housing

Ref.No: 143 Rep.No: 4

Representor: Kennedy, David Wilson Estates **Agent (if applicable):**

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Affordable housing policy not in line with Government Advice in terms of tenure and viability issues. Housing mix policy is unnecessary in light of PPG3.

General Comment on Representations about Policy H9 and Supporting Text:

Uttlesford is an area of high housing market pressure and it is essential that the profile of new build housing reflects the need profile for market housing rather than just the strength of demand for large 3, 4 and 5 bedroom homes. Forecasts suggest that a large proportion of newly formed households anticipated in the plan period will comprise one or two persons. It is not accepted that some sites are unsuitable for an element of smaller homes. Successful designs for mixed schemes can readily be achieved without compromising the character of the development or its integration into the locality. .

Recommendation:

No Change

Paragraph 6.24

..... It is essential that a registered social landlord is involved to achieve control over future occupancy of the homes provided on such sites

Representations of Objection

Ref.No: 110 Rep.No: 2

Representor: Cory-Wright **Agent (if applicable):** AS Planning

Amendment(s) Sought: Amend last sentence of 6.24 to read "it is essential that a registered landlord is involved to achieve control over future occupancy. The exception to this will be in cases where the nature of the occupation provided is such that it will provide a continuing supply of affordable housing. Such circumstances will occur for instance with accommodation provided at mobile home park where the dwellings provided will always have a value well below the normal conventional housing "Suggested changes to Policy S10 Sections a) - d) See letter.

Reason(s) for Amendment(s) Sought: The policy as worded fails to recognise that there is potential to provide affordable housing in other limited circumstances. Mobile Home Parks are a suitable way of providing open market affordable housing.

Comments:

The issue of mobile homes providing affordable housing is not a district wide issue. It is acknowledged that the Takeley Park site meets a need. This is addressed under the relevant policy heading (Takeley Local Policy 4)

Recommendation:

No change

Paragraph 6.25

6.25 Schemes are likely to be more appropriate in larger communities providing a basic range of services including a primary school, public transport and adequate infrastructure for sewage disposal. Sewage disposal should be considered at an early stage so that any implications for the viability of a scheme can be taken into account. Various schemes are currently being considered and it is expected that a number will be built during the Plan period. It is intended that in most villages such housing developments will be the only new development sites. In Green Belt villages the need will have to represent special circumstances to justify an exception to Policy S6.

6.25

Ref.No: 218 Rep.No: 37

Representor: Dale, Saffron Walden Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought: Add "affordable housing schemes to the beginning of 6.25 and delete "larger" in front of communities.

Reason(s) for Amendment(s) Sought:

Comments: *As a general statement it is appropriate to encourage schemes in larger villages, which will have a better range of facilities.*

Recommendation:

No change

POLICY H10 – AFFORDABLE HOUSING ON EXCEPTION SITES

Deposit Policy

Development of affordable housing will be permitted outside settlements on a site where housing would not normally be permitted, if it would meet all the following criteria:

- a) 100% of the dwellings are to be affordable and provided through a Registered Social Landlord;**
- b) The development will meet a particular local need that cannot be met in any other way;**

- c) **The development is of a scale appropriate to the size, facilities and character of the settlement; and**
- d) **The site adjoins the settlement.**

REPRESENTATIONS RECEIVED

Representations of Support

Ref.No: 93 Rep.No: 11

Representor: , Hastoe Housing Association/Springboard HA **Agent (if applicable):**
Oldfield King Planning
The policy is supported

Ref.No: 157 Rep.No: 1

Representor: Townsend, Great Hallingbury Parish Council **Agent (if applicable):**
While we support the criteria given an addition should be made to state that sewage disposal must be a priority when considering housing development in rural villages with no main sewerage connection

Comments:

Issue covered by GEN

Objections

H10

Ref.No: 164 Rep.No: 13

Representor: Bellway Homes **Agent (if applicable):** FPD Savills

Amendment(s) Sought: The final para of 6.24 should be deleted in addition to the last part of Criteria (a) under policy H10

Reason(s) for Amendment(s) Sought: In our view it is not essential that a registered social landlord is involved in providing low cost housing. The Council should accept that as the housing need in their area is so great creative alternative options should be considered. Companies exist which are not registered yet nevertheless provide affordable houses to the public in perpetuity through legal agreements which are appropriately worded to the satisfaction of the local authority. This is, in effect the same as the operations undertaken by a registered social landlord but without the need for any public subsidy to be used in the scheme.

Comments:

Without the involvement of a RSL the housing will not be accessible by people in affordable housing need.

H10

Ref.No: 218 Rep.No: 38

Representor: Dale, Saffron Walden Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought: Amend criteria (d) to read "The site adjoins the settlement and is within easy walking distance of transport links and public transport in available to link the development with schools."

Reason(s) for Amendment(s) Sought:

Comments:

It needs to be recognised that many of the district's villages are not well served by public transport and that the proposed amendment would unduly restrict the opportunities for the provision of affordable housing. Public transport is mentioned in the supporting text.

Recommendation:

No change

**Agricultural Workers Dwellings
Paragraph 6.28**

Ref.No: 218 Rep.No: 39

Representor: Dale, Saffron Walden Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought: Amend 1st two sentences to read "such dwellings may be exceptionally permitted in open countryside only because of the needs of the enterprise. In these cases dwellings will normally be modest in size etc.

Reason(s) for Amendment(s) Sought:

Comments:

Agree

Recommendation:

Amend text as suggested

POLICY H11 – AGRICULTURAL WORKERS DWELLINGS

Deposit Policy

New dwellings or the conversion of existing buildings for agricultural workers may be permitted if both the following criteria are met:

- a) **It can be demonstrated that there is an essential need for someone to live permanently on site to provide essential care to animals or processes or property at short notice.**
- b) **The scale of the proposed dwelling(s) relates to the needs of the agricultural enterprise.**

In these exceptional circumstances, residential occupancy conditions will be imposed.

REPRESENTATIONS RECEIVED

Representations of Support

Ref.No: 183 Rep.No: 6

Representor: Sworders Agricultural **Agent (if applicable):**
Policy reflects PPG7

Ref.No: 206 Rep.No: 17 1

Representor: Uttlesford LA21 Group2 **Agent (if applicable):**
The policy is supported

POLICY H12 – REMOVAL OF AGRICULTURAL OCCUPANCY CONDITIONS

Deposit Policy

The removal of agricultural occupancy conditions will not be permitted unless both the following criteria are met:

- a) **The dwelling is genuinely surplus to the current and foreseen future agricultural needs of the holding, neighbouring locality and local farmers.**
- b) **The dwelling has been widely advertised for at least six months on terms reflecting its occupancy condition.**

REPRESENTATIONS RECEIVED

Representations of Support

Ref.No: 183 Rep.No: 5

Representor: Sworders Agricultural **Agent (if applicable):**

The policy reflects PPG7

Ref.No: 206 Rep.No: 18

Representor: Uttlesford LA21 Group2 **Agent (if applicable):**

None - the policy is supported

Objections

Ref.No: 218 Rep.No: 40

Representor: Saffron Walden Friends of the Earth **Agent (if applicable):**

Amendment(s) Sought: Amend the timescale in criterion (b) from 6 to 12 months

Reason(s) for Amendment(s) Sought:

Comments:

No reason is given to assess this objection

Recommendation:

No Change

New Policy - New Houses in the Countryside

Ref.No: 183 Rep.No: 2

Representor: Cannon, Sworders Agricultural **Agent (if applicable):**

Amendment(s) Sought: A Policy " New Houses in the Countryside" must be included within the Local Plan. This policy should fully reflect National Policy.

Reason(s) for Amendment(s) Sought: A new policy regarding new houses in the countryside should be inserted. Consideration should be given to the reference in PPG7 (March 2001) paragraph 3.21.

Comments: *PPG7 sees these proposals as very much the exception. There is no need to duplicate national policy.*

Recommendation:

No change

Special Housing Needs

Ref.No: 93 Rep.No: 16

Representor: , Hastoe Housing Association/Springboard HA **Agent (if applicable):**
Oldfield King Planning

Amendment(s) Sought: Plan should provide assessment on the needs of those requiring supported or special needs housing and a positive policy to meet those needs.

Reason(s) for Amendment(s) Sought: Plan omits reference to Special Housing needs

Comments: *This issue is explored in the Housing Needs Survey and addressed through the Council's corporate Housing Strategy.*

Recommendation:

No change

Key Workers

Ref.No: 93 Rep.No: 15

Representor: , Hastoe Housing Association/Springboard HA **Agent (if applicable):**
Oldfield King Planning

Amendment(s) Sought: Plan should provide assessment on the needs of key workers and a policy aimed to meet those needs

Reason(s) for Amendment(s) Sought: Plan omits reference to Key Workers

Comments: *The issues of key workers is being explored in a new Housing Needs Survey being conducted in summer 2002.*

Recommendation:

No change

Housing

Ref.No: 227 Rep.No: 4

Representor: Barrell, Environment Agency **Agent (if applicable):**

Amendment(s) Sought: New policy "To enable the reduction, re-use and recycling of household waste, housing developments, should be designed with space for

intensive bring systems; provide space for composting at individual households; provide space for composting at individual households; provide space for storage of recyclables." The provision of collection points for recycling household materials should also be encouraged for existing householders (eg increase the density of bring banks). Could either be a general planning policy or as part of the Housing Chapter.

Reason(s) for Amendment(s) Sought: The plan should include a policy relating to development being designed to include ease of collection of recyclables, to assist the District in reaching its targets outlined in its Best Value Indicators.

Comments: *This issue can be addressed through Supplementary Planning Guidance encouraging housing design to facilitate collection of recyclables*

Recommendation:

Supplementary Planning Guidance on design to include encouragement of housing specifications facilitating the collection of recyclables.

New Policy – Lifetime Homes

Ref.No: 212 Rep.No: 8

Representor: Locke, Uttlesford Area Access Group **Agent (if applicable):**

Amendment(s) Sought: Add new policy H13 - Lifetime Homes "The Council will seek to ensure that in new residential developments all dwellings are constructed to "Lifetime Homes" standards such that structurally they are capable of adaptation without undue difficulty for continued occupation by residents who develop or acquire a physical or sensory impairment. B) The District Council will seek to negotiate in all new housing schemes an element, based on the established current needs of the community, of housing designed to full mobility standards. Such dwellings should be spread evenly throughout the development. In each case the site location and topography will be taken into consideration.

Reason(s) for Amendment(s) Sought: There is no specific inclusion for "Lifetime homes"

Comments: *Lifetime homes can be encouraged through the supplementary planning guidance proposed on design issues. Market housing designed with the needs with physical or sensory impairment in mind would no doubt be of value to house purchasers of retirement age and others who may be looking to accommodation which continues to be suitable as they become increasingly frail. Many people with special needs also require affordable housing and this issue is addressed through the Council's corporate Housing Strategy.*

Recommendation:

Supplementary Planning Guidance on design to include encouragement of Lifetime Homes.

Chapter 10-19 Housing

Ref.No: 93 Rep.No: 13

Representor: Hastoe Housing Association/Springboard HA Agent (if applicable):

Amendment(s) Sought:

Reason(s) for Amendment(s) Sought: Argued for the identification & targetting of more sites for affordable housing & these should be included within these chapters. In relation to the sites identified & the related policies in Chapter 10-19, targets for affordable housing should be added.

Comments: *The plan already seeks to maximise the provision of affordable housing through the planning system utilising all opportunities consistent with the national framework set out in circular 6/98. The target for the sites identified in local policies is 40% affordable housing although the extent to which this target is achieved will depend on negotiations on a site by site basis taking into account any exceptional factors.*

Recommendation: *No change*