



**Public Participation on a Development Plan
Document
Consultation on Proposals for a Draft Local Plan
8 June 2012 – 23 July 2012**

**Report of Representations,
Officer Comments and Recommendations
on**

Employment
Strategic Policies
Site Allocations
Development Management Policies
Retail
Strategic Policy
Site Allocations
Development Management Policies

LDF Working Group 5 October 2012

EMPLOYMENT

Employment Strategic Policies

Policy SP2 – Employment Strategy

Summary of Representations

77 representations were made in relation to this policy. 9 were in support, the remainder raised objections.

Essex County Council raises a number of points and suggested changes. Whilst they support the alteration in the use of some employment land at Stansted Airport they recommend that further consultation be given to the justification for this alteration in the use of employment land. The council should determine whether there is appropriate evidence to suggest that widening the employment opportunities available on the land north of the airport will enable the airport to adapt to alternations in Stansted airports profile.

The Draft Local Plan para 10.2 talks about R&D being excluded from the calculation of land and floorspace requirements even though this use class forms a large part of the districts employment profile. It should therefore be included in land provision calculations alongside employment numbers.

They recognise that the ELR indicates a reduction in demand for industrial land, however, they note that recent evidence demonstrates there is a growth in small scale manufacturing. They recommend the local plan provides for small scale manufacturing and business space throughout the District.

They point out that in recent years there has been a growth in remote and home working, they recommend that further consideration is given to small local scale office, home and remote working.

They wish to see the local plan give consideration to how tourism is likely to provide business opportunities and recommend the plan provides appreciation of the economic opportunities that may be provided.

Agents are concerned there are inconsistencies with policy SP2 and EMP2. Paragraph 2 of the SP suggests that all existing employment land will be protected. Policy EMP2 sets out the criteria by which a change of use will be permitted. It is recommended these criteria should also be in SP2.

Broxted Parish Council and **We Are Residents** believe that Stansted Airport land should be restricted for airport related business only.

Two **local businesses** feel that their sites are suitable for a change of use to residential land and don't want their land to be protected for employment use.

Individuals are concerned that the policy does not deal with retaining existing businesses and attracting new ones. They question why Saffron Walden policy areas, which are existing employment land, are being turned into residential and

smaller parcels of land allocated elsewhere for employment use. Due to traffic issues in the town they suggest new housing should be within a few miles of the allocated employment sites and industrial and warehouse development should be sited near motorways i.e. Stansted and Great Chesterford. Another individual is concerned that releasing some land at the airport for non-airport related use will cause problems when the airport grows. Some express the wish to see an allocated employment site in Newport, with the suggestion of NEW9 as an ideal site. Some believe that the predicted job growth of 7820 is flawed and is inconsistent with the Edge Analytics report suggesting 4268 new jobs, therefore the assumptions are flawed and suggest that the aging population of the district has not been taken into account. A number of individuals point out that there are a number of empty employment units across the district and question the need for new sites. An individual stresses the need to permit development that is in keeping with its surroundings and character of the area. It is suggested that more encouragement is needed in the policy for small business start-ups across the whole of the district.

A **developer** is concerned that the policy makes no reference to the sustainable live-work concept and promoting B1 uses within a residential environment. Another wants assurance that policies are flexible to allow for change and suggest adding text regarding the AMR and how policies will be monitored.

Landowners believe that the economic potential of Stansted Airport has been ignored and its potential job growth there. They suggest the policy be amended to refer to a more realistic level of employment opportunities that takes into account the airport and make reference to its importance as an employment site. Another land owner is promoting their site for B1 and mix use development and disagree with the statement that there are no suitable sites for office use in Saffron Walden. paragraph 10.10 they feel the reference to railway stations is misleading as it implies Saffron Walden has a station and both the quoted locations are remote from the town and do not offer a sustainable location to support office development for Saffron Walden, that they may be best to serve small business development in the villages they are located in. they would like the policy to identify land suitable for office development within Saffron Walden.

Little Easton Parish Council disagrees with the assessment made regarding the current and future use of Stansted Airport. They are concerned that the change in policy would set a dangerous precedent.

An **agent** states that the employment strategy is unsound as it has been based solely on the ELR and not any previous employment studies. They point out that this does not comply with para 182 of the NPPF. They point out that the ELR suggests non airport related development on the 18ha site should be limited to 7 years to allow flexibility if and when the airport grows. They suggest deleting SP3 and allocate an existing site, parsonage Farm, for more employment development. They are concerned that there is no mention or encouragement to allow the growth of existing employment sites in the District. It questions how the council will seek to mitigate any adverse effects on businesses that are

displaced. They point out that the NPPF supports change of use and new development in rural areas for employment use and wish to see paragraph 6 of the policy removed and replaced with 'the sustainable growth and expansion of all types of business and enterprise will be supported, through expansion of existing employment sites, well designed new buildings and through conversion of existing buildings.'

East Hertfordshire District Council is concerned that the release of 18ha of land at the airport for non-airport related businesses will pose a threat to the economic vitality of Bishops Stortford.

Great Dunmow Town Council and **Great Dunmow Neighbourhood Plan Steering Group** feel that this policy conflicts with other strategic policies and site allocations. They express the wish to see the Smiths Farm site in Dunmow retained as employment. They express the need to encourage creative and high tech industries and feel higher standards of environment and sustainability performance should be set.

Sustainable Uttlesford recommends that policies to encourage the local procurement of products and services are developed to ensure that the economy benefits from proposed developments and their carbon impact is minimised.

Saffron Walden Town Council and **Friends of the Earth** point out that the existing employment sites in Saffron Walden are on the wrong side of town and are hard to access. They are concerned that the proposed allocated sites are also on the wrong side and access near the M11 would be best for employment sites. They feel the employment strategy fails to provide sufficient employment opportunity in the area for the proposed population increase. Friends of the Earth are concerned that the ELR proposes to abandon the Great Dunmow industrial site as there are a large number of houses planned for the area employment sites should be protected.

National Planning Policy Framework

Local authorities need to set out a clear economic vision and strategy which positively and proactively encourages sustainable growth; set criteria or identify strategic sites; support existing business sectors; plan positively for the location, promotion and expansion of knowledge/high tech industries; identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and facilitate flexible working practices.

Sustainability Appraisal June 2012

There will be positive impacts on promoting and encouraging sustainable methods of transport and accessibility through a geographical spread of new employment allocations throughout the district that respond to the key centres for growth as per the housing strategy, and also in regards to existing transport infrastructure and interchanges. There will be indirect positive impacts on this objective through an overall commitment in the employment strategy to locate a

large proportion of new employment development in the district on a previously developed site within the Stansted Airport boundary. Stansted Airport is a regional transport interchange hub supported by a Surface Access Strategy to support sustainable travel, as specified in Strategic Policy S16, with which cumulative impacts are positively strengthened.

There will be positive impacts on promoting the efficient use of natural resources and ensure the necessary infrastructure to support sustainable development through a geographical spread of new employment allocations throughout the district that respond to the key centres for growth as per the housing strategy, and also in regards to existing transport infrastructure and interchanges. There will also be positive impacts on this objective through an overall commitment in the employment strategy to locate a large proportion of new employment development in the district on a previously developed site within the Stansted Airport boundary. Stansted Airport is a regional transport interchange hub supported by a Surface Access Strategy to support sustainable travel, as specified in Strategic Policy S16, with which cumulative impacts are positively strengthened. There will also be positive impacts on this objective through a commitment in the policy that the council will continue to work with key stakeholders and providers to improve access to high speed and next generation information technology infrastructure across the district.

There will be positive impacts on improving the skills and education of the population through a commitment to work with education providers and business representatives with a view to the provision of educational and vocational training courses which match the skills required by new and emerging businesses. Impacts are limited at this point due to uncertainty of the successfulness and deliverability of this innovative approach, with impacts being significantly strengthened where successful.

There will be a significantly positive impact on supporting sustainable employment provision and economic growth as a result of this policy. The geographical spread of site allocations respond well to notions of accessibility and also in relation to the housing strategy. In addition to this, supporting development and innovations strongly adhere to this objective. Impacts for this policy are likely to be further strengthened in the long term where all these factors combine and are phased appropriately, as well as a result of the potential flexible policy direction as specified from monitoring the policy's successfulness and in response to the national situation. Despite this, there is perhaps scope for the policy to include another determining factor here regarding the flexible approach of Policy S7 regarding the phasing of housing where new housing and employment projects are linked.

Officer Comments

The decision to change the use of the 18ha site within the airport is based on the Employment Land Review, the way the nature of the airport is changing and the way in which the airport now operates

The Employment Land Review has concentrated on factories, warehouses and B1 offices. Any significant Research and Development (R&D) floorspace in the

District will be provided at Chesterford Park. The supporting text can be amended to include reference to the outstanding floorspace and the jobs this would create. Once created any R&D jobs will contribute to the District Supply. However, it is proposed to widen the uses which can be provided at Chesterford Park therefore the number of R&D jobs may decrease to be replaced by B1 office jobs which are included in the calculation.

The point regarding live/work units is noted and the policy text amended to reflect this.

The suggestion of repeating the criteria in policy EMP2 is not necessary as policies are not looked at in isolation and these two policies will be used together along with any others deemed appropriate.

It is recognised that Stansted Airport could grow in the future with the potential need to expand, however as the airport provides mainly short haul budget flights the amount of land and buildings needed by operators is less than originally envisaged.

Saffron Walden policy 1 includes an existing employment site and the proposal is not to develop residential over this part of the site but to extend it by adding retail and other business units. The Willis and Gambia site has been identified in the ELR as a site where the units are reaching the end of their useful life. The NPPF states that planning policies should avoid the long term protection of sites allocated for employment use where the site is not likely to be used for that purpose. It is realised that there are issues in Saffron Walden regarding road access and in the new Local Plan the provision of a link road has been included in policy area 1 to help relieve traffic through the town. Further highway studies are being carried out and will be reported on in due course.

An employment site has not been allocated in Newport as there were no suitable sites proposed and enough employment land has been allocated elsewhere.

All development that is proposed will be judged against the development management policies which deal with the design of development, ensuring that it is in keeping with the character of the area. It is not the role of a strategic policy to go into this detail.

The Local Plan will have a monitoring section in it which sets out how the policies in the plan will be monitored and reviewed.

The ELR has been used to help shape the strategic policies along with a number of other background studies which form part of the evidence base. The NPPF talks about forming the plan which is considered against reasonable alternatives. The Local Plan meets these criteria as a number of studies, covering a range of issues and topics have been used collectively to reach the strategy and write the policies. The points raised regarding the need to encourage existing businesses to grow and to allow development of live-work units is noted. Existing employment sites are protected under this policy and policy EMP1 and 2 and

applications for growth of existing businesses on these sites will be looked at positively so long as they comply with the policies criteria. The suitability of live-work units on a development will be looked at on a site by site basis, it is not considered necessary to include specific reference to them in this policy.

Policy SP8, SP11, EN2 and DES1 cover the issues of good design and environmental impact of development regarding climate change and sustainable development. It is therefore not necessary to include it again within this strategic policy.

It is recognised that Uttlesford has a large aging population and this has been taken into account in both the housing figures and job growth calculations.

The Council will help existing employment uses to locate elsewhere due to redevelopment, in accordance with the site allocations, by assisting them in finding new locations and supporting their relocation. This proactive work will be pursued through the Economic Development Strategy.

Officer Recommendations

Amend supporting text and policy as follows

The Council's employment strategy for delivering the economic objective is to:

- **Positively** Support the growth **and location** of firms in the district;
- Safeguard existing employment land;
- Allocate additional employment at key locations and in association with areas of housing growth.

10.2 The policies in this plan have had full regard to the Employment Land Review 2011 (ELR). The ELR considers the need for land and premises for employment uses falling with the categories of factories, warehousing and offices and this plan makes provision for these uses. Other types of employment (e.g. in health, education, retailing) will be provided in the District as part of the development which is planned but these are not specifically provided for in the policy below. Research and Development (R and D) falls within the remit of the ELR study but it is not office space, industry and warehousing so R and D is excluded from the calculation of land and floorspace requirements but jobs that are provided e.g. at the Chesterford Research Park will contribute to the total for the District. **The current Masterplan for Chesterford Research Park makes provision for a further 35,300 sq.m. (gross) of R & D floorspace. The current employment density is of the order of 38.5 sq. m. per worker. Hence the additional floorspace could therefore be expected to provide 900+ jobs.**

10.3 The nature of recent trends in employment space change indicate increases in the total amount of office and warehouse floorspace which is in contrast to a fall in the amount of industrial floorspace. This is a reflection of the picture both regionally and nationally. The ELR identifies the amount of employment land and floorspace needed during the plan period and makes recommendations as to

where it should be located. The ELR used the indicative job target for the District in the Regional Spatial Strategy (RSS) for 2011-2031 of 9,200 jobs which was based on the East of England Forecast Model. Reducing the plan period to 2028 gives a total of 7,820 jobs.

Table 2 Forecast Employment Change by Sector (2011 – 2028)

	2011	Net change (as at 2028)	Agency Staff	Gross Change (as at 2028)
Factories	3500	-1600	15	-1600
Warehousing	2700	1100	40	1150
Offices	4800	1600	65	1650

Source: *Employment Land Review. Uttlesford District Council (April 2012)*

10.4 Converting the anticipated change in the number and type of jobs in employment uses into floorspace and land requirements using employment densities and plot ratios gives the following total land requirements.

	No. of jobs (created/lost)	Employment densities(1) (sqm/worker)	Floorspace requirements (sqm gross)	Land requirements (ha) (2)
Factories	-1600	32	-51200	-12.8
Warehousing	1150	32	36800	9.2
Offices	1650	18	29700	7.4

(1) Employment Land Reviews: guidance manual, EERA, March 2008

(2) Plot ratio of 40% (ie 4000sqm of floorspace/ha) guidance manual, EERA, March 2008

Source: *Employment Land Review. Uttlesford District Council (April 2012)*

10.5 The net result of the forecast increase in the need for office and warehousing provision and the decrease in industrial land is for little, if any overall change in the amount of land required for these uses during the plan period. But different types of uses have different locational requirements and it is important that the provision being made meets the needs and aspirations of the business sector.

10.6 An assessment of the prevailing situation in the local commercial market has highlighted the following issues:

- There is a surplus of vacant new warehousing space available at Stansted Airport and little prospect of the un-used and under-used parts of the northern ancillary area at the airport being brought into beneficial use in the foreseeable future.
- There is an acute lack of modern office accommodation to meet the needs of Saffron Walden. Potential sites in and around the town are limited and rental values may mean development is not viable.

- There is a current surplus of industrial and particularly warehouse units in Saffron Walden, partly as a result of the recession and partly because of the difficulty of access to the M11.
- Most of the industrial estates in Great Dunmow appear to be thriving but there is a longstanding employment allocation which has not yet been brought forward.
- There is an aspiration for “strategic” warehouse and distribution depots in locations with ready access to Junction 8 of the M11.

Stansted Airport

10.8 The airport currently covers an area of around 950ha. Planning permission was granted in 2008 to increase the use of the existing runway at Stansted Airport to 35 million passengers per annum (mppa), current passenger throughput is around 17.8mppa. The planning permission may be implemented in the next 15 years. This plan needs to accommodate the development that will be needed to service this increase in passenger numbers and also any potential increase in the use of the airport for freight that may be anticipated if the increase in passenger numbers is not realised. By the time the airport serves 35mppa around 16,800 people are expected to work on the airport with a further 6,400 being employed off airport in either direct or indirectly related jobs. Only a limited proportion of these new jobs will be taken by Uttlesford residents because of the importance of airport-related jobs to the wider economy.

10.9 Land at Stansted Airport has previously been identified specifically for development directly related to or associated with the airport. The role and function of the airport, however, is now significantly different to that which was originally envisaged. It has developed into a hub for short-haul flights and “no frills” carrier airlines. These flights are now the mainstay of Stansted but planes spend little time on the ground and do not carry cargo. As a consequence of this few facilities are required for cargo storage pending trans-shipment or for catering or cleaning services and there is very little demand to take up the space reserved for airport related uses. Neither is there any mechanism to oblige companies which are airport-related to occupy premises on the airport rather than elsewhere. Much of the land to the north of the runway in the Northern Ancillary Area is unused or underused and new commercial units built on a speculative basis to the south of the runway have been empty since they were completed. This situation is contrary to National Planning Guidance to make effective use of land. **As a consequence the boundary of the airport is changed to exclude** some of the land north of the airport will now be made available for non-airport related uses in accordance with Policy SP2 below. Only airport related uses will be permitted on the remainder of the airport **site itself**.

Tourism

Uttlesford has a high quality built heritage and rural environment with over 3,700 Listed Buildings and 36 Conservation Areas. The location of London Stansted within the district provides an international gateway for tourism

and it is important to support and develop the tourism business opportunities within the district.

Saffron Walden

As part of, and integral to the housing allocation to the east of the town additional employment land will be provided comprising industry, warehousing other similar uses and retail.

10.10 There is an identified need for offices to meet the needs of Saffron Walden but no potentially suitable sites available in or around the town. Whilst there are previously-developed sites available within the town boundary they are not considered appropriate for such uses because of access difficulties and the nature of adjoining uses. Given that and the need for such developments to be readily accessible to the workforce there is merit in locating it in close proximity to a railway station. Audley End is considered to offer significantly more scope for development in close proximity to the station than Newport and it is also potentially easier and quicker to access by train as only the slower trains stop at Newport.

10.11 Additional employment land will also be provided as part of the mixed use allocation to the east of the town.

Great Dunmow

10.12 A 9ha site on Chelmsford Road, Great Dunmow, is a long standing allocation as a Business Park for uses falling primarily within Class B1 but the development has never been implemented, despite ready access to the A120, the growth in passenger throughput at the airport and the relative lack of alternative sites locally. This suggests that either there is no pressing demand for additional B1 units in Great Dunmow or, as seems more likely that this site will not be released for these purposes. In line with National Guidance this long standing allocation has been reviewed and part of the site allocated for residential development. There is an identified need for commercial floorspace around Great Dunmow for which there are no other, readily available suitable sites so the southern part of the site will remain as an employment allocation but in order to make it as attractive as possible to prospective developers the permitted uses will be widened to accommodate industry and warehousing.

Start Hill

10.13 The existing site at Start Hill is close to and has good access to the M11 at junction 8. An extension is proposed on land to the east of the existing site.

Chesterford Research Park

10.14 The development of the Chesterford Research Park is progressing in accordance with the master plan approved by the District Council, albeit at a slower rate than originally anticipated. It provides research and development space and ancillary office accommodation. Current estimates are that completion will take 12-15 years. There is potential to **expand the site to** accommodate

future requirements for R and D floor space and **widen the permitted use to other similar high quality uses.**

Wendens Ambo

10.15 The Employment Land Review identified a need for office accommodation in the vicinity of Saffron Walden. Wendens Ambo represents a sustainable location for this provision because of the railway station and a site has been allocated to the north of the village.

Gaunts End Elsenham

10.16 Planning permission has recently been granted for a substantial B1 (a) office development next to the established industrial estate in this location. The allocation of this additional site reflects this permission **and allows for future growth.** The prestigious development planned in this location would have the potential to bring substantial economic benefits and would be likely to attract further investment. Additional land is allocated for further growth of the site in the future to provide additional high quality modern accommodation.

10.17 A small site is also allocated at the auction house to the north of Stansted Mountfitchet. This is not a strategic allocation but will provide additional accommodation for the Auction House or trades associated with it e.g. picture framers, furniture restoration.

10.18 As well as making this new provision the plan contains policies to protect existing identified employment uses and policies which allow the change of use of redundant agricultural buildings to employment uses in order to provide more employment in rural areas.

10.19 In addition to the locational requirements above the policy below seeks to address other needs in order to facilitate **and positively support** business growth and development within the District.

Training

10.20 The Sustainable Communities Strategy identified the fact that many businesses have difficulty recruiting people with certain skills as being an issue. Where these shortages relate to modern skills such as IT training then it should be possible to identify them and address the problem. This would serve to provide a local workforce better suited to the needs of modern businesses thereby making the District a more attractive location for them. It would also be likely to both facilitate higher income levels than might otherwise be achieved by the workforce locally and reduce the level of out-commuting.

Electronic Infrastructure

10.21 Modern day technology and business requirements are such that, in order to be able to function and compete in the business marketplace, businesses need ready access to the internet and to be able to access it speedily. This effectively means access to high speed broadband but Uttlesford is a very rural District and significant parts of it have either slow or traditional broadband

coverage. For those areas the only option is satellite broadband which tends to be slow and expensive and can be affected by poor atmospheric conditions.

10.22 The council is well aware of the potential importance of broadband to the local economy, particularly in rural areas and has therefore provided financial assistance to a company to deliver a radio broadband service for businesses and residents in the district by way of additional transmitters. With radio broadband only physical obstructions, such as tall buildings or tall trees could affect the signal.

10.23 Such infrastructure will also facilitate greater opportunities for people who work from home, which will both benefit the local economy whilst also enabling reduced out-commuting,

Sustainable work practices

10.24 Supporting alternative work practices which reduce the need to travel, including working from home.

Policy SP2 – Employment

To accommodate new employment opportunities **for 7,800 jobs** in the district during the period of the Local Plan. Of these, some 1,200 **jobs** will be in offices, factories and warehouses for which adequate and appropriate provision will be made.

This provision will entail:-

- **Supporting general** business, industrial and warehousing use (other than those which constitute 'strategic warehousing) on 18 hectares of land north of Stansted Airport;
- **Supporting and protecting** the provision of airport related commercial uses **within** the airport **boundary**;
- Identifying in the Site Allocations sites in Saffron Walden, Great Dunmow and Start Hill for appropriate combinations of industrial and warehousing uses (other than those which constitute 'strategic warehousing');
- Enabling and **supporting** the further development of the Chesterford Research Park
- Identifying in the Site Allocations a site of the order of 0.8 ha for B1(a) business development within a short walk of Audley End railway station at Wendens Ambo;
- Identifying in the Site Allocations a site of the order of 5.6ha for B1 business development in Gaunts End, Elsenham.
- **Identifying in the Site Allocations a site of 3ha at the Auction House, Alsa Street, Stansted for related businesses.**

Existing employment in offices, factories and warehousing will be **supported** by retaining the land and buildings in these or physically similar 'sui generis' uses unless there is justifiable planning reason for doing otherwise. Existing employment sites which are considered to be no longer suited to these uses, and

will therefore be made available for other purposes, will be identified in the Site Allocations. The Council will seek to mitigate any adverse effects upon any businesses displaced as a consequence. **The** planning reasons which may warrant the release of other land currently occupied by offices, factories or warehousing will be identified in the Development Management policies.

Where there are existing employment uses on sites with planning permission for redevelopment for non-employment use, in accordance with the Site Allocations, the Council will seek to accommodate those uses elsewhere in the district.

The manner in which proposals for locating non-employment uses on existing industrial estates will be **assessed through** Development Management Policies.

The re-use of redundant agricultural buildings for employment uses will be permitted subject to criteria to be specified in the Development Management policies.

The Council will work with the education providers and business representatives with a view to the provision of educational and vocational training courses which match the skills required by new and emerging businesses.

No specific provision is made for the creation of employment opportunities that are not in offices, factories and warehouses. These will be created as a consequence of the provision of services and facilities that meet identified local needs

The Council will continue to work with key stakeholders and providers to improve access to high speed and next generation information technology infrastructure across the district throughout the plan period by supporting, enabling and, where necessary and practicable, assisting its provision.

Monitoring will be undertaken, on not less than an annual basis, to ascertain the nature of the local employment situation and the effectiveness of the employment policies in the context of the prevailing situation nationally. This may warrant the adopted policies being revised if there is an identified need to change the amount, type and location of development that is taking place or the extent to which it is contributing to the achievement of the Council's economic vision for the District.

Policy SP3 – Land within the Airport

Summary of Representations

17 representations were received, 5 were in support, the others raised objections.

Friends of the Earth, Great Dunmow Town Council, Great Dunmow Neighbourhood Plan Steering Group and **individuals** object to the policy as they feel it is meaningless and question how judgements will be made as to whether or not something is permissible. They feel it is an unclear policy which will not achieve anything.

Takeley Parish Council objects to the policy.

A **local business** considers that objective 5 in the plan is not adequately supported and suggests that a separate policy is written which supports growth in employment at the airport.

A few **individuals** are concerned about the amount of land for non-airport related development and feel that land within the airport should be for airport related use only.

National Planning Policy Framework

Paragraph 33 requires plans to take account of the growth of airports and their role in serving business, leisure, training and emergency service needs.

Sustainability Appraisal June 2012

There will be positive impacts on this objective through environmental protection on site and the avoidance of unnecessarily prominent structures.

There are uncertain impacts on this objective overall. There would be positive impacts on this objective through commitments to use land efficiently within the airport boundary; however the majority of the supporting text for the policy is related to the 18ha site allocation within Policy S2, and it is stated that the remainder of land within the airport, presumably to which this policy applies, is safeguarded for airport related development only, with no conditions that airport related development must take place within this area. As such, the impacts on this objective are unknown in response to a potential precedent set by the change of use of the 18ha site and to a policy that relates to environmental protection and landscape issues. The policy needs to align more to the condition made in the supporting text as to what type of development is required/allowed within the airport boundary. In addition it is recommended that the policy and its supporting text clarify why the remainder of the site should remain airport related only in a separate paragraph, and not include it alongside details of the 18ha site allocation.

Officer Comments

This policy is a strategic one which means it is overarching and broad. More detail regarding employment allocation within the airport is set out in the Employment Allocations Stansted Airport Policies 1 and 2.

This policy is aimed at dealing with airport related development; it does not include the 18ha site allocated for non-airport related employment. It is recognised that this is unclear and the policy will be amended.

It is considered that this policy does meet objective 5 as it does not hinder employment development within the airport boundary it encourages it so long as its impact does not have negative effects on the environmental assets of the site and the structures are not too prominent.

The recommendations in the Sustainability Appraisal suggesting a clearer policy and adding supportive text have been taken into account and the policy will be amended to achieve this.

Officer Recommendation

Amend supporting text and policy

Supporting text

Stansted Airport

10.8 The airport currently covers an area of around 950ha. Planning permission was granted in 2008 to increase the use of the existing runway at Stansted Airport to 35 million passengers per annum (mppa), current passenger throughput is around 17.8mppa. The planning permission may be implemented in the next 15 years. This plan needs to accommodate the development that will be needed to service this increase in passenger numbers and also any potential increase in the use of the airport for freight that may be anticipated if the increase in passenger numbers is not realised. By the time the airport serves 35mppa around 16,800 people are expected to work on the airport with a further 6,400 being employed off airport in either direct or indirectly related jobs. Only a limited proportion of these new jobs will be taken by Uttlesford residents because of the importance of airport-related jobs to the wider economy.

10.9 Land at Stansted Airport has previously been identified specifically for development directly related to or associated with the airport. The role and function of the airport, however, is now significantly different to that which was originally envisaged. It has developed into a hub for short-haul flights and “no frills” carrier airlines. These flights are now the mainstay of Stansted but planes spend little time on the ground and do not carry cargo. As a consequence of this few facilities are required for cargo storage pending trans-shipment or for catering or cleaning services and there is very little demand to take up the space reserved for airport related uses. Neither is there any mechanism to oblige companies which are airport-related to occupy premises on the airport rather than elsewhere. Much of the land to the north of the runway in the Northern Ancillary Area is unused or underused and new commercial units built on a speculative basis to the south of the runway have been empty since they were completed. This situation is contrary to National Planning Guidance to make effective use of land and some of the land north of the airport will now be made available for non-airport related uses in accordance with Policy SP2 below.

Development on the remainder of the site will only be permitted for airport related uses. This ensures that airport businesses have space to expand and allows new airport related companies to locate at Stansted Airport. Policy SP3 ensures that only airport related development is built, ensuring appropriate design and protection of the environmental assets of the site.

Policy SP3 - Land within the Airport

Airport related development on land within the airport boundary **will be supported where the land is used efficiently**, whilst protecting the environmental assets of the site and avoiding unnecessarily prominent structures.

Employment Site Allocations

Employment Site Allocation - Chesterford Research Policy 1 – Chesterford Research Park, Little Chesterford

Summary of Representations

There were 4 representations received 2 of which were in support.

An **individual** feels Newport should have an employment allocation and suggests land around Chalk Pit Lane.

The **site owners** suggest that the policy sets a minimum of 75% floorspace for research and development with the remainder for other uses, stating that a wider mix will help maintain employment and make best use of the buildings. They also suggest a review of the development zone requesting land immediately adjacent to the estate road be extended to reflect existing uses and landscape setting.

Saffron Walden Museum Natural Science Curator does not want the boundary extended due to the impact it would have on the countryside and adjacent wildlife site, Emmanuel Wood.

Sustainability Appraisal June 2012

There will be positive impacts on sustainable employment provision and economic growth.

It is important that the development does not detrimentally impact on the nearby local wildlife site, Emanuel Wood.

There is uncertainty over pollution and flooding issues. It is suggested that the policy requires a Drainage Strategy which will ensure that any impacts on surface water movement and the source protection zone 3, for which the site is located, are mitigated. There is also uncertainty over the sites impact in traffic and emissions.

There will be uncertain impacts on infrastructure where the capacities of existing sewerage network and waste water treatment works are unknown. It is also not known if the site will require any other infrastructure improvements.

Officer Comments

This policy is site specific to Chesterford Research Park and does not cover any other employment allocations. Newport has not got an allocated employment as a suitable site did not come forward and enough employment land has been allocated elsewhere.

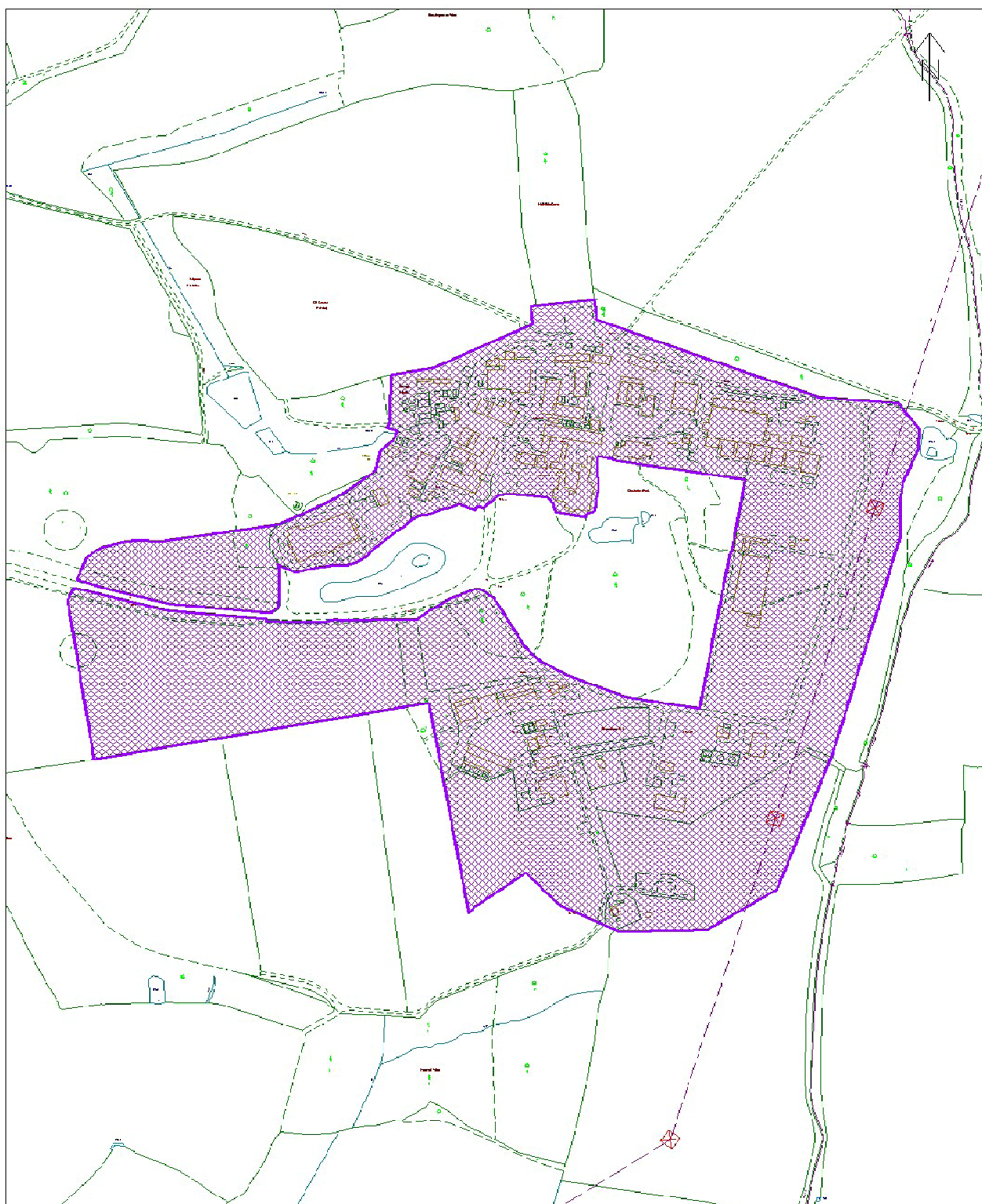
The suggested development zone revision is considered appropriate. The new boundary follows existing landscape boundaries and will not have a negative impact on the surrounding countryside or Local Wildlife Site.

The possible flooding issues are noted; however, these are addressed by the Master Plan and development management policies.

Officer Recommendations

Change the allocation development boundary to that shown below.
Policy amended

Chesterford Research Policy 1 – Chesterford Research Park, Little Chesterford Research and development facilities and/or other similar **high quality/office based** uses will be permitted within the development zone at Chesterford Research Park, Little Chesterford provided that the proposals are in accordance with the approved Master Plan.



Chesterford Research Policy 1

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Employment Site Allocation – Start Hill, Great Hallingbury Policy 1 – Land south of the B1256.

Summary of Representations

5 representations were received, 1 in support the remainder raising objections.

Great Hallingbury Parish Council is concerned with the protection of nearby residents regarding noise and an increase in traffic. They point out that the area suffers with very low pressure water supply.

Saffron Walden Museum Natural Science Curator is concerned that the site is adjacent to the Flich Way, a local Wildlife Site. The need for good design is stressed so that the development does not have a negative impact on the wildlife site.

An **individual** questions why there is a need to allocate the site as there are still empty buildings. They raise concerns about the possible increase in traffic and road safety issues.

Sustainability Appraisal June 2012

There will be significant positive impact in supporting sustainable employment provision and economic growth where this site increases the amount of employment land within the district.

There is a grade II listed building in close proximity so it will be important that the development does not detrimentally impact it.

It is important to note that although the site will not include noise sensitive development it is likely to experience aircraft noise.

The requirement of a Drainage Strategy within the policy should ensure that any impacts on surface water movement are mitigated. An FRA would also positively deal with the issue at planning application stage.

There will be positive impacts on sustainable travel and accessibility, as the site is adjacent to an existing settlement boundary and near public transport.

There will be uncertain impacts on infrastructure where the capacities of existing sewerage network and waste water treatment works are unknown. It is also not known if the site will require any other infrastructure improvements.

The site will have a negative impact on biodiversity and landscape because the site is located on Greenfield land which is within the CPZ. This will result in a loss of countryside; however, the site is unlikely to significantly contribute to the coalescence of settlements. The site is not located on any nationally or locally designated sites of biodiversity and nature conservation, however, it is adjacent to Flich Way which is a designated local wildlife site. It is recommended that a criterion is added to the policy which requires a substantial strategic landscape buffer to the southern boundary with the Flich Way.

Officer Comments

The plan is based on an economic strategy and as the population grows over the plan period it is important to have land available for a variety employment use.

Design of development will take into account the Local Wildlife Sites (LoWS) and the development management policies will help ensure its protection.

Traffic issues will be addressed through the accompanying Transport Assessment. Noise pollution is addressed in the development management policies.

Officer Recommendations

No change to supporting text or policy.

Employment Site Allocation - Stansted Airport 1 – Airport Related Employment

Summary of representations

5 representations were received on this policy, 2 in support and 3 raising objections.

An **individual** feels that the definition must be tightened to make sure the policy achieves its stated aims. Another suggests that it may be appropriate to allow use of existing premises that are unused for non- airport purposes on a limited period to help boost the economy.

Airport Property Partnership feel the policy should be more flexible and consider any proposals for non-airport related employment within the entire Airport boundary on a case-by-case basis. Guidance which confirms the terms under which development or changes of use that are not airport related will be accepted should be adopted. Alternatively Policy SP2 should be expanded to allow for some flexibility to all for temporary relaxations of airport related restrictions outside the allocated area. It would also be useful if the text supporting the policy defined what constitutes –airport related uses

Sustainability Appraisal June 2012

There are a number of local wildlife sites in close proximity to the site so it will be important that development does not detrimentally impact them. There are two grade II listed buildings near the Northern Ancillary, a further three grade II listed buildings and a protected land near the northern end of the site which need to be protected. There is also extensive archaeology present.

It is important to acknowledge that although the site will not include noise sensitive development it will experience aircraft noise which may need to be

addressed. There is also uncertainty over the sites impact on traffic and emissions.

There will be an uncertain impact on flooding as a small part of the site is located within flood risk zones 2 and 3. The impact will depend on the type of development.

There are positive impacts on sustainable travel and accessibility as the site is well related to public transport.

There are uncertain impacts on infrastructure where the capacities of existing sewerage network are unknown. It is also not known if the site will require any other infrastructure improvements.

Officer Comments

The allocation of this site will stay for airport related employment only as an 18ha site has been allocated for non-airport employment. This site is needed to allow for any future growth of the airport.

What constitutes airport related development and other land uses permitted within the airport boundary will be set out in policies AIR1 – AIR7 which are being carried forward from the existing adopted local plan.

Officer Recommendations

No change to supporting text. Policy amended to make it clear it is within the airport boundary.

Stansted Airport Policy 1 - Airport Related Employment

This site is allocated for employment purposes **within the boundary of** Stansted Airport for uses which are directly airport-related and which could include any business and/or industrial and/or warehousing and/or similar 'sui generis' uses.

The development is designed to mitigate adverse effects upon existing residential and community interests and may be required, by legal agreement, to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact.

The application should be accompanied by a Transport Assessment and Drainage Strategy and other required document and any recommended improvements/remedial work will be controlled through the legal obligation.

Development will need to be implemented in accordance with other Development Management policies and regulated by legal obligation in association with the grant of planning permissions.

Employment Site Allocation - Stansted Airport Policy 2 – Non airport related employment uses

Summary of Representations

Stansted Airport Limited states that this land is considered unlikely to be required to support the development of the airport as it grows to its permitted level of 35 million passengers per year. Its development, therefore, for general employment purposes would make efficient use of previously developed land, without prejudicing the future needs and development of the airport.

A number of **individuals** made representations expressing concern that a precedent would be set and it may be hard to stop non airport related development in policy area 1. Some also point out that the draft local plan refers to the airport as an airport within the countryside and the plan discourages development in areas of high pollution. They feel that this allocation goes against those two statements. It is questioned how the airport will have room to grow when it reaches 35million passengers, and it limits scope for expansion of airport related activity. A number of them feel this policy would create an unfair market, whereby the airport operator could benefit from the low cost of land purchased for airport use. There is concern that it will create an out of town employment site which undermines sustainable communities where people can work, live, shop and obtain services. One individual questions why Newport has not been allocated an employment site when it is a key village with a lot of growth. A number of representations referred to the East of England Plan policy E7 stating that its aim was to restrict development at the airport to airport related employment only. There are concerns that this would encourage closure of existing commercial premises with a loss of local jobs and that it may reduce the viability of other employment sites and concentrate employment at the airport.

Moreton, Bobbingworth and the Lavers Parish Council (in Epping Forest District) feel there is no justified reason for this policy considering there is no shortage of space elsewhere within the district.

Birchanger Parish Council express the need for the council to investigate further the usage of existing B1 and B2 units as a number are, and have been empty for long periods of time.

Takeley Parish Council non airport related functions will have a negative impact on local businesses. Sufficient empty warehousing and office space in the local area. They have concerns regarding traffic and access through rural lanes. If permitted they suggest an option to reverse the policy should be in place in case the airport operation increases and requires the space/facilities.

Great Hallingbury Parish Council is concerned that this change in policy could lead to the rest of the site being thrown open for non- airport related uses which goes against it being an airport in the countryside.

Little Easton Parish Council objects to this policy

Elsenham Parish Council points out that paragraph 10.9 of the DLP states that 'neither is there any mechanism to oblige companies which are airport related to occupy premises on the airport rather than elsewhere.' They suggest that the current policy should not only be carried forward but also strengthened.

The **Airport Property Partnership** wishes to see flexible policy on the whole Stansted airport site to allow non-airport related uses across the whole of the airport site.

Stop Stansted Expansion and **Hatfield Heath Parish Council** state that the change in policy will mean Stansted Airport will cease being an airport in the countryside. They point out that there are a number of suitable sites and buildings which are currently empty which can be used instead of allocating this land. They feel that there is no need to change the existing policy and that each case should be looked at with supporting evidence for any planning applications contrary to the existing policy.

Henham Parish Council are concerned with the change in policy direction and allowing Stansted Airport to become a general provider of commercial and business premises. They wish to see the existing policy rolled forward.

A **developer** and a **business** feels that this proposal is not justified; either both sites are restricted to airport related development only or both sites are flexible to allow non-airport related development.

Sustainability Appraisal June 2012

There will be significant positive impacts on sustainable employment opportunities and economic growth where this site provides a significant amount of employment land within the district for business, industry and non-strategic warehousing.

There is a Local Wildlife Site (Stocking Wood) and two grade II listed buildings nearby so it will be important that the development does not detrimentally impact on them. There is also extensive archaeology present.

This site will have a positive impact on pollution where the site is outside groundwater source protection zones and away from the AQMA. However, it is important to acknowledge that although the site will not include noise sensitive development it will experience aircraft noise which may need to be addressed.

There is also uncertainty over the sites impact on traffic and emissions.

The site is outside flood risk zone 2 and 3 which positively impacts on SA flooding. The requirement of a Drainage Strategy within the policy should ensure that any impacts on surface water movement are mitigated. An FRA would also positively deal with this issue at planning application stage.

There will be positive impacts on SA objective 6 (sustainable travel) and SA accessibility where the site is well related to public transport.

There will be uncertain impacts on infrastructure where the capacities of existing sewerage network are unknown. It is also not known if the site will require any other infrastructure improvements.

Officer Comments

The changes in the way the airport operates means that businesses relating to the airport do not necessarily have to be located on the airport site. This area has been underused for a long period of time and better use could be made of the site by encouraging new businesses to locate there and bring with them employment opportunities. There is still sufficient room for the airport to grow on the rest of the site. Stansted Airport policy 1 and policy 2 are two distinct policies which clearly spell out what will be permitted in the allocated sites. Policies AIR1- AIR7 of the adopted local plan are proposed to be rolled forward into the new plan. The sites have clear boundaries which will also be shown on the policies map. The allocation of non-airport related employment is for the allocation in policy 2 only.

This site is suitable and sustainable for employment use with good road access onto the M11 and is well placed to make use of sustainable methods of transport. This policy deals specifically with land at Stansted Airport and no other employment allocation sites. Newport has not been allocated an employment site as no suitable site came forward and enough sites have been found elsewhere in the district.

The allocation of this site will help attract new businesses to the district as well as giving existing businesses the chance to expand. The plan is built on an employment led strategy and needs to provide enough employment land to meet the growth needs of the district over a long period of time. If existing local businesses relocate to this site it is envisaged that the premises they leave behind will encourage new businesses in.

Businesses associated with the airport cannot be forced to locate at the airport. The changing nature of the airport and new technology means these businesses can be located elsewhere. There is still plenty of land allocated for airport employment use to allow these businesses to locate at the airport if they wish.

Policy 1 allocation allows the airport to expand if and when it grows. To allow the whole site to be used for non-airport related employment would restrict the airports growth and also concentrate all the required employment land into one location, thus preventing growth in other parts of the district.

It is not felt needed to include reference to a Drainage Strategy as any issues regarding drainage will be sorted out at planning application stage. Flooding issues will also be addressed at this stage and there are sufficient development management polices to deal with any flooding issues arising due to development.

The airport will still be an airport in the countryside, the boundaries of the airport designation is not being extended from the existing. Development within the site will be subject to design criteria and its setting will be taken into account.

Policy E7 of the EEP protects land at the airport for airport related employment because it is in conformity with the White Paper which promoted growth of Stansted Airport and supported a second runway. This is now not the case, therefore this land is surplus to requirements by Stansted Airport and can be put to better use.

Officer Recommendation

Amend title of policy to

Stansted Mountfitchet Policy – Land north east of Bury Lodge Lane

No change to wording of supporting text or policy.

Amend boundary of the Airport to exclude site.

Employment Site Allocations - Wendens Ambo policy 1

Summary of Representations

A number of **individuals** made representations covering a number of issues. Traffic and road safety is a concern with the site being on a corner of a busy road. A number of people, including **Wendens Ambo Parish Council**, why a new site was needed when there are a large number of vacant office buildings in the district, including the Bearwalden Estate. It is suggested that money be put into revamping these sites making them more appealing.

There are concerns that the development will have a negative impact on the visual character of the village and it will involve the loss of quality agricultural land.

The reference in the text suggesting that this allocation is for Saffron Walden use then the proximity of the train station is irrelevant as car journeys will still be necessary,

One individual feels that this allocated site is contrary to type B settlements and another asks why there is an employment allocation when no housing development is planned in the village. The **Wendens Ambo Society** raised the question why wasn't Newport chosen to have an employment allocation instead as the ELR suggested.

A number of representations, including **Wendens Ambo Parish Council**, expressed the need for affordable housing in the village, suggesting that this site would be more suitable for this type of allocation.

Saffron Walden Museum Natural Science Curator is concerned that the development will have negative impacts on the local wildlife site - the roadside verge. It is rare chalk grassland habitat and is home to a nationally scarce plant. They suggest that if development does go ahead then mitigation for damage to

existing biodiversity will be required and should include financial provision for on-going management of existing hedgerow behind the verge and extra management for the LoWS. They request that the site access be changed as it presently goes through the verge.

Sustainability Appraisal June 2012

There will be significant positive impacts on supporting sustainable employment and economic growth where this site provides employment land within the district for B1(a) business use.

The site will have a significant impact on sustainable travel and accessibility where it is well related to public transport and an existing residential area. These outcomes are further supported by the policy criteria which require the development to minimise private car travel through the provision of safe pedestrian links between the bus stops and the railway station, and the provision of a new footpath and cycleway outside the site.

However, there is a grade II listed building in close proximity so it will be important that the development does not detrimentally impact it.

The site has a positive impact on pollution where it is away from the AQMA and unlikely to be affected by noise. The site is within source protection zone 1 which, according to the Environment Agency, requires careful consideration of SuDS to ensure that the site does not negatively impact groundwater. This should be sufficiently dealt with through a Drainage Strategy which is required by the policy. The site is outside flood risk zone 2 and 3 which positively impacts on flooding. The requirement of a Drainage Strategy within the policy should ensure that any impacts on surface water movement are mitigated. An FRA would also positively deal with this issue at planning application stage.

There will be positive impacts on infrastructure through the provision of highways improvements and greenspace created by landscaping. A significant positive is not given due to uncertainties regarding the existing sewerage network.

The site will have a negative impact on SA objective 1 (biodiversity and landscape) because the site is located on agricultural Greenfield land. The site is not located on any nationally or locally designated sites of biodiversity and nature conservation however there is a protected verge bordering the site. The impacts of the site on the landscape and the protected verge are minimised through the policy criteria which requires landscaping to the north and east of the site, for the design of the development to respond to its rural location and for access to the site to be designed so that its impact on the protected verge is reduced.

Officer Comments

The site is not located for the purpose of encouraging only workers from Saffron Walden, it is to help meet identified need of a variety of employment sites across the district. Therefore its location close to the train station is extremely relevant and important.

Newport was not allocated an employment site as no suitable sites came forward.

Affordable housing can still be provided in the village through an exception scheme, which is dealt with in development management policy HO7.

Any traffic issues will be identified and addressed by the Transport Assessment.

The plan is based on an economic strategy which identifies the amount of employment land that needs to be provided throughout the plan period; therefore new sites have to be allocated to meet future demand.

The policy stipulates that the design will have to take account of its rural setting and character of the landscape.

The developer will have to look at mitigation measures regarding the protected verge or propose another suitable access point. The retention and improvement of the verge will be taken into account.

Officer Recommendation

No change to policy.

Employment Site Allocations - Stansted Mountfitchet Policy 4 – Land at Alsa Street

Summary of Representations

5 representations were received, 4 in support and 1 raising a concern.

Essex County Council points out that this allocation is only 130 meters to the south boundary of site A27 'land at Ugley' which is a currently non-preferred site for future mineral extraction in the Minerals Development Document.

Stansted Parish Council support the allocation but wish to see it preferably used for small workshops and business uses related to the auction.

An **individual** stresses the need for good design so development is in keeping with its rural setting,

Sustainability Appraisal June 2012

There will be significant positive impacts on sustainable employment provision and economic growth where this site increases the amount of employment land within the district. The site is located away from the existing settlement however the site is accessible via public transport which promotes positive impacts for sustainable travel and accessibility.

There will be an uncertain impact on biodiversity, water environment and landscape character where it is unknown at this time whether the site is

Brownfield or Greenfield land and clarification is required. There is also no requirement in the policy for the development to be in accordance with approved design guidance which would assist in minimising the sites impact on the surrounding countryside. Further, the site is in close proximity to the Local Wildlife Site Alsa Lodge Pit so mitigation may be required to ensure that the development does not adversely affect it.

There is one grade II listed building in close proximity so it will be important that the development does not detrimentally impact it.

The site is outside flood risk zone 2 and 3, away from any AQMAs and unlikely to be affected by noise. However impacts on pollution and flooding are uncertain where there is no requirement in the policy for a Drainage Strategy which will ensure that any impacts on surface water movement and the source protection zone 2 for which the site is located, are mitigated.

There will also be uncertain impacts on infrastructure due to uncertainties regarding the existing sewerage network and waste water treatment works. It is also not known if the site will require any other infrastructure improvements.

The impact of this site on a number of SA objectives could be strengthened by providing more information and criteria within the policy, similar to other local policies for site allocations. It is recommended to include the following paragraphs:

The application should be accompanied by a Transport Assessment and Drainage Strategy and other required documents and any recommended improvements/remedial works will be controlled through the legal obligation. Development will need to be implemented in accordance with design guidance approved by the Council and other Development Management policies. Implementation of the proposals will be regulated by legal obligation in association with the grant of planning permissions.

Officer Comments

Essex County Council's point is noted.

The policy stipulates that development on the site is allocated for uses supporting and relating to the auction house.

It is recognised that design is an important issue and development management policies will ensure that the development does not have a detrimental effect on the surrounding area,

The findings and suggestions of the Sustainability Appraisal are taken on board and the policy has been amended.

Officer Recommendations

Amend Policy.

Stansted Mountfitchet Policy 4 – Land at Alsa Street

The Land at Alsa Street, Stansted Mountfitchet is allocated for an extension of and/or supporting and related businesses to the adjacent auction house.

The application should be accompanied by a Transport Assessment and Drainage Strategy and other required documents and any recommended improvements/remedial works will be controlled through the legal obligation.

Development will need to be implemented in accordance with design guidance approved by the Council and other Development Management policies. Implementation of the proposals will be regulated by legal obligation in association with the grant of planning permissions.

Employment Site Allocations - Elsenham Policy 4 – Land at Gaunts End

Summary of Representations

12 representations were received in response to this proposal.

The **developer of the site** points out that the employment allocation does not cover the whole site.

Essex County Council points out that this site is located directly opposite the access point to Elsenham quarry.

Individuals are concerned with the increase in traffic. Another individual states that the site is within the CPZ and therefore development should not happen as it is contrary to this policy. They are concerned that the LoWS and listed buildings will be affected by the development. They question the need for the site when there are plenty of vacant industrial buildings in more sustainable locations; the airport is suggested as a good site for development such as this. Concerns were raised regarding the impact of development on the residential properties. It is suggested that the development should provide pedestrian and cycle links from the village and the Airport to mitigate the need for car travel.

Takeley Parish Council are concerned about the access to the site and point out that heavy vehicles will have to travel through the village to access it. They wish to see traffic plans which include new access roads via M11/Stansted Airport through Takeley via Hall Road, Elsenham.

Sustainability Appraisal

There will be significant positive impacts on employment provision where this site increases the amount of employment land within the district with additional allocation for B1(a) business use. The site is away from existing settlements however this is mitigated through the requirement for the site to improve a bus service to the site.

There are five grade II listed buildings in close proximity so it will be important that the development does not detrimentally impact these and there is known archaeology already being excavated meaning that further work will be required on site.

The requirement of a Drainage Strategy within the policy should ensure that any impacts on surface water movement are mitigated. An FRA would also positively deal with this issue at planning application stage.

There will be positive impacts on infrastructure where the policy criteria require any appropriate highways improvements and improvements to public transport. A significant positive impact was not given to this SA objective due to uncertainties regarding the capacity at the Wastewater Treatment Works at Stansted Mountfitchet to accommodate any development within Elsenham. These infrastructure improvements will also promote positive impacts for sustainable travel and accessibility.

This site will have a positive impact on pollution where the site is outside the groundwater source protection zones, away from the AQMA and unlikely to be affected by contamination. A significant impact has not been given where its impact on traffic and emissions is unknown. It is unlikely that the site will significantly contribute to noise pollution but it is important to acknowledge that the site which is proposed for office use will experience aircraft noise related to Stansted Airport that must be addressed through design.

There will be a negative impact on biodiversity and landscape because the site is located on Greenfield land which will result in a loss of the countryside. The site is also within the Countryside Protection Zone. Policy criterion does seek to ensure that the impact on the landscape is acceptable. The location of the site does not impact on

Officer Comments

It is proposed to amend the site boundary.

The site already has benefit of planning permission for office development.

Any traffic issues will be identified in the Transport Assessment and measures will be taken to address any identified problems.

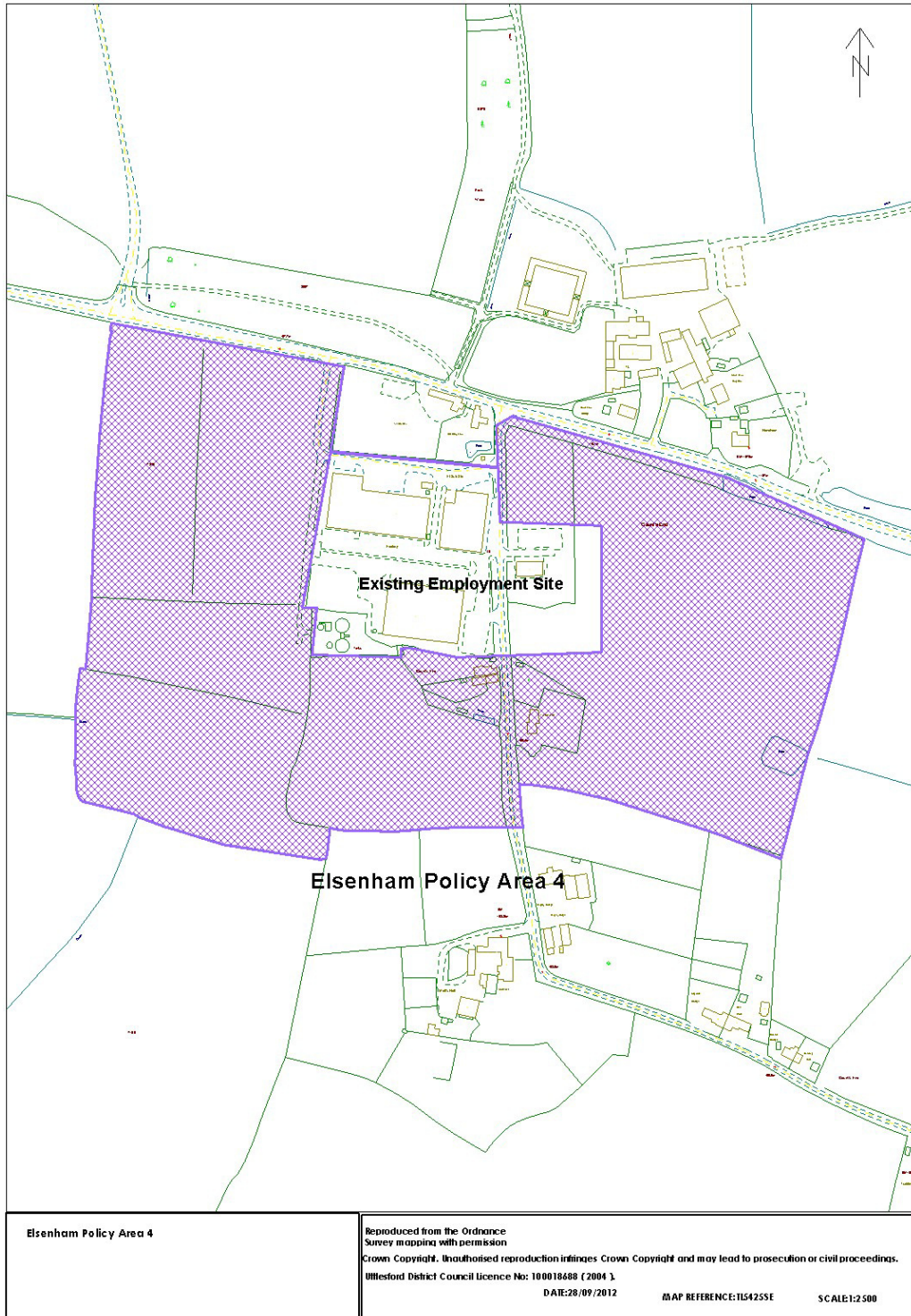
The impact on existing residential developments and the surrounding area will be mitigated through good design and the development is proposing large areas of landscaping.

This is not a suitable site to require cycle and pedestrian links to the village centre and the airport.

The plan is based on an economic strategy which identifies the amount of employment land that needs to be provided throughout the plan period; therefore new sites have to be allocated to meet future demand.

Officer Recommendation

No change to policy.
Amend proposal site as shown,



Great Dunmow Policy Area 3 - Land north west of the junction of the A120 with Chelmsford Road.

Summary of Representations

8 representations were received in response to this proposal.

Essex County Council asks the Council to note that permission for a waste transfer site was granted on this allocation. They feel that the provisions within the policy and the supporting text conform to the conditions set out in the planning permission.

Parsonage Down Conservation Group questions whether the waste transfer station will be able to cope with double the population.

The Environment Agency point out that the site is predominantly located within flood zone 1. However access onto Chelmsford Road would be through an area of Flood Zone 2 (medium probability risk). Your Authority should consider this aspect and be satisfied that the inclusion of this site is deliverable; this should be stated as part of your Sequential Test evidence.

Great Dunmow Neighbourhood Plan Steering Group and **Great Dunmow Town Council** state that it is necessary to justify both the needs and the choice of site, neither of which have been provided. They are concerned that a waste transfer station will add to the already inefficient arrangement, confused and visually depressing appearance as well as inevitably impacting on the adjacent land uses.

Individuals concerned with the impact a waste transfer station would have on the surrounding dwellings.

Sustainability Appraisal

This local policy does not relate to a site allocation that Uttlesford District Council are bringing forward therefore it cannot be appraised as such. The waste transfer station at Hoblongs Industrial Estate is currently a preferred site within the Waste Development Document Preferred Approach (November 2011), for which a full Sustainability Appraisal has been undertaken. On adoption the Waste Development Document will be key planning document for this site.

Officer Comments

The need has already been established and planning permission has been granted on the site.

The policy stipulates the need effective landscaping to protect the nearby housing and to take into account the surroundings.

Officer Recommendation

No change to policy.

Employment Development Management Policies

Policy EMP1 – Existing Employment Areas

Summary of Representations

14 representations were received for this policy. 12 comments were in support and 2 raised objections.

We Are Residents suggests there needs to be clear protection of employment sites to avoid landowners creating deliberate vacancies so as to obtain planning permission for change of use.

A **landowner** wishes to see changes so that policy EMP1 is compatible with SP2 – Employment Strategy. They feel that the statement regarding community benefit is difficult to understand/qualify. They suggest the following word changes to the policy. C: there are justifiable planning reasons for doing so.

Individuals support the policy but question why Newport has been identified for growth yet no employment allocations have been proposed.

Great Dunmow Town Council and Great Dunmow Neighbourhood Plan Steering Group question what a proposals map is and why the sites should be identified on it. They wish to see points A and B removed.

National Planning Policy Framework

This policy seeks to safeguard existing employment land to ensure that opportunities are available locally across Uttlesford. This accords generally with the NPPF in that a balance of land uses in an area is promoted so that people minimise journeys for employment purposes. In addition the policy states that other uses will be permitted if the employment use has been abandoned or the present use harms the character or amenities of the surrounding area. The areas should be reviewed at an appropriate time to ensure that the amount of land needed and the areas' suitability for employment purposes is justified. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. The Employment Land Review published in 2011 should be referred to.

Sustainability Appraisal June 2012

This policy will have positive impacts with regards to promoting sustainable travel through minimising transport distances to homes and jobs. It is flexible and ensures that employment sites are reviewed on a case by case basis and in response to housing and the community.

This policy will have positive impacts with regards to promoting accessibility through minimising transport distances to homes and jobs. It is flexible and ensures that employment sites are reviewed on a case by case basis and in response to housing and the community.

This policy is likely to have positive impacts on this SA objective through retaining existing employment based training opportunities. Flexibility as to where employment based training opportunities are located in regard to this need promotes a positive impact in the long term.

This policy is likely to have positive impacts on this SA objective through safeguarding existing employment land. It also ensure that employment land is flexible to respond to future conditions and potential new housing growth therefore a significant positive is applied to the long term impacts.

Officer Comments

Policy EMP1 is in conformity with SP2. SP2 discusses the broad objectives for employment land and specifies that criteria set out in the Development Management policies.

It is not possible to specify what constitutes an “essential community benefit” as this will depend upon the specific circumstances of individual cases. To add the suggested bullet point ‘c’ would not be necessary as any planning applications for change of use of these sites would be considered on all planning matters.

The proposals map shows the boundary of policy areas, such as allocated employment sites, as set out in the Development Plan Document. Identifying the sites on the map gives a clear spatial boundary and reinforces the policy.

The NPPF Compatibility Assessment recommends that the policy refers to the Employment Land Review, the supporting text will be amended to reflect this recommendation.

Officer Recommendations

Change supporting text to include reference to the Employment Land Review. Amend policy to ensure change of use only happens when the site/premises are no longer viable for business use.

Amend Appendix 2 to include reference to Policy EMP1.

Amend supporting text

The Employment Land Review 2011 considers the need for land and premises for employment purposes in Uttlesford and identifies employment land to be protected.

The policy identifies the existing employment areas which are to be retained in these uses. The policy also sets out the requirements that would have to be met in order to warrant making an exception to the policy of retention and permitting changes of use to non-employment uses.

Policy EMP1 – Existing Employment Areas

Existing employment areas identified as such on the proposals map will be retained for offices, warehouses, factories and physically similar ‘sui generis’

uses. Planning permission will **only be** granted for the change of use or redevelopment or extension of sites or premises in these areas for uses other than those identified above **in exceptional circumstances where all of the following criteria are met:**

- a. The proposed use provides an essential community benefit which demonstrably cannot be located elsewhere within the area it serves;
- b. The proposed use would not conflict with any existing or potential other employment uses in the employment area in terms of environmental, traffic generation or any other planning matters; and
- c. **Where the applicant is able to provide demonstrable proof that the employment use is no longer viable. The non-viability of employment uses would need to be proven either by marketing or an independent assessment in accordance with the requirements set out in Appendix 2.**

Question 3 - Safeguarding of exiting employment areas

Summary of Representations

24 representations were received in relation to this question.

An **individual** feels strongly that the Jubilee Works in Clavering should not be on the list for protected employment sites due to it being in a poor state of repair and the majority of the site is unused. They point out that the site was suggested for change of use in the Employment Land Review 2012, and the NPPF superficially discourages the long term protection of underused employment sites, and encourages a change of use for these sites. **Takeley Parish Council** and an individual however, support the identification of the Jubilee Works as a protected site.

Newport Parish Council objects on the grounds that there are no employment sites in Newport. An **individual** suggests that land around Chalk Pit Lane should be designated for office, retail and business development.

An **individual** wish to add Stansted Mountfitchet policy areas 1 and 2 to the list of protected sites.

Takeley Parish Council support the protection of Takeley Business Centre and Tool Hire.

A **landowner** wishes to explore the possibility of further employment sites in Takeley/Little Canfield reflecting its status as a key village.

A number of **individuals** made representations. One is concerned that additional business units on the Wendens Ambo site would ruin the views of the open

countryside, attract crime and increase traffic to an unacceptable level. Another expresses a wish to see the expansion of Warish Hall Farm to be allocated as an area suitable for light industrial use, and one stresses the importance to only protect those sites that are well used and are in prime locations. They are concerned that the protection of old sites may prevent new sites coming forward.

National Planning Policy Framework

Generally seeks to ensure that the existing and future supply of land available for economic development is sufficient and suitable. Supports existing business sectors, taking account of whether they are expanding or contracting. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. However, policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Policies should support economic growth in rural areas to help create jobs and prosperity.

Sustainability Appraisal 2011

This policy will have positive impacts with regards to promoting sustainable travel and accessibility through minimising transport distances to homes and jobs. It is flexible and ensures that employment sites are reviewed on a case by case basis and in response to housing and the community.

This policy is likely to have positive impacts on improving education and skills of the population through retaining existing employment based training opportunities. Flexibility as to where employment based training opportunities are located in regard to this need promotes a positive impact in the long term.

This policy is likely to have positive impacts on supporting sustainable employment provision and economic growth through safeguarding existing employment land. It also ensure that employment land is flexible to respond to future conditions and potential new housing growth therefore a significant positive is applied to the long term impacts.

There are no negative impacts

Officer Comments

The inclusion of the Jubilee Works in Clavering is to protect a local employment area and to encourage economic growth in rural areas, as encouraged in the NPPF. It is recognised that the NPPF discourages the protection of underused business sites. Since the publication of the Employment Land Review the Council has received evidence that more of the units are actively occupied and therefore make an important contribution to the rural economy.

The identified sites are existing employment sites. Subject to discussions on the representations objecting to Stansted Mountfitchet policy areas 1 and 2 the sites are being proposed as Development Opportunity sites as discussed in the Retail section of this report. An employment site has not been allocated in Newport as there were no suitable sites proposed and enough employment land has been allocated elsewhere.

Officer Recommendations

No additional changes to supporting text or policy to those shown above.

Policy EMP2 – Non Estate Employment Use

Summary of Representations

14 representations were received in relation to this policy. 10 of which are in support, the remainder raised some objections.

A **developer** states that the supporting text refers to B1, B2 and B8 uses and feels this should be clarified in the policy.

The Home Builders Federation feels that the policy is too rigid and needs to be more flexible. They suggest the policy wording should change from 'demonstrable proof' to 'justify'.

Great Dunmow Town Council and **Great Dunmow Neighbourhood Steering Group** feel that it is not clear how employment sites will be defined. The distinction between areas, which in most cases include many different enterprises, is not helpful. The application of criteria of non-viability to this class of sites whereas it will not be applied to 'identified sites' is unacceptable.

Sustainability Appraisal

This policy will have uncertain impacts on this objective in instances where employment sites become unviable and undergo a change of use, and new employment sites have to be allocated to meet any shortfall. This may see a reduction in Greenfield land.

This policy allows for sites of employment uses that have outlived their practicality, or do not relate well to housing provision in the district to be changed into more suitable uses providing justification is proven. This flexible approach could reduce travelling distances and associated pollution.

This policy allows for sites of employment uses that have outlived their practicality, or do not relate well to housing provision in the district to be changed into more suitable uses providing justification is proven. This flexible approach could reduce travelling distances.

This policy will have positive impacts on this objective where there is a flexible approach to the safeguarding of employment sites. Sites that become unsuitable may then become available for residential development, providing the change of use is in itself suitable.

This policy will have positive impacts on this objective. A flexible approach to the safeguarding of employment sites could allow for sites that become unsuitable

for employment to become available for educational facilities or residential development, providing the change of use is in itself suitable. This policy first seeks to ensure that employment sites are retained and secondly that they are located in areas that are suitable for their purpose. This promotes an ethos of sustainable employment provision.

National Planning Policy Framework

The NPPF supports sustainable economic growth, however, paragraph 22 in the Framework states that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

Officer Comments

Employment uses are defined as factories, warehousing and offices and this is set out in the text to the employment strategy. It is not considered necessary to specify this in the development management policy.

It is considered important that applications for a change of use are supported by evidence on the viability of continuing an employment use. The marketing exercise required by Appendix 2 allows the flexibility of either marketing the property for 12 months or undertaking an independent assessment.

There are numerous non-estate employment uses across the district within development limits and it is therefore impossible to ensure that all are identified on a map. It is proposed above to require sites covered by Policy EMP1 to undertake a marketing exercise.

Officer Recommendations

No change to policy or supporting text.

RETAIL

Retail Strategy

Question 2

Summary of Representations

There were 45 responses to this question.

Saffron Walden South and East Resident Corner suggest between Saffron Walden, Littlebury, Great Chesterford, mainly North West side of Saffron Walden. The eastern and southern side of Saffron Walden must be totally excluded from any further development.

Ridgeons considers that the mixed use of land to the north of Ashdon Road provides an opportunity to secure retail development, alongside employment and residential development.

Other sites suggested by **individuals** are:-

- Fire Station site
- Viceroy Coaches, Bridge Street (existing poor access for coaches)
- Rose and Crown car park – conflicts with pedestrian flow, need alternative site for parking
- Private car park behind Boots and Saffron Building Society.
- Radwinter Road - Former Willis and Gambier Site (opposite Tesco)
- Radwinter Road – adjacent Tesco – to allow direct competition with Tesco
- Away from the town eg Great Chesterford
- Post Office
- Police Station
- Thaxted Road (site proposed by Sainsbury's)
- Thaxted Road – between The Kilns and Recycling Centre
- West of Saffron Walden – to reduce congestion on Thaxted/Radwinter Road junction
- In Newport to meet growth planned and to ease trips from Newport to Tesco

The **Ickleton Society** suggests that retail space should only be located in town centre and not on the edge or outside of the town.

A number of **individuals** consider that developments outside the centre of the town are not desirable as concluded by the Inspector considering the Sainsbury appeal. Some individual consider that there is no need for additional shops whilst there are vacant units and the need to bring empty shops back into use should be priority. Some consider that the continual increase in online shopping reduces the need for more shops. Others consider that more town centre shops are needed to provide competition and choice and provide shops missing from the current range (e.g. hardware and greengrocers).

National Planning Policy Framework

Paragraph 23 requires local plans to allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites.

Sustainability Appraisal June 2012

Not applicable

Officer Comments

The Retail Capacity Study considered a number of sites in Saffron Walden which were also suggested in the representations. The Laundry and Fire Station site straddles the town centre and offers the opportunity of additional retail floorspace with the potential of incorporating a link to Waitrose and Jubilee Gardens as an amenity feature.

Emson Close and the Car park site lies within the town centre and already benefits from permission for retail development. If the site could be extended further this would offer the best opportunity to accommodate the larger shop units and greater potential to create links with the principle shopping frontages. In both cases schemes would need to be supported by high value residential element to ensure viability.

In respect to other sites suggested in the representations, the Viceroy coaches site has a constrained access, is not linked to the principle shopping frontages and any development would need to be sensitive to the listed buildings and conservation area. The suggested sites in Radwinter Road and Thaxted are considered more suitable for residential development but the proposed policies include the provision of convenience shops and retail warehousing. The Post Office Sorting office is similar to the laundry and fire station in that it does not need a town centre location. The site has very narrow street frontages on Abbey Lane and Park Lane making it difficult to development for town centre uses. The development of the Ridgeons site could include warehouse retailing but this is considered more appropriately located off Thaxted Road were planning permission has already been granted.

Officer Recommendation

Include the following site allocation policy

Saffron Walden Policy - Development Opportunity Sites

The Council will Support development and redevelopment opportunities for town centre uses in the following town centre locations.

- **The Fire Station/ Saffron Walden Laundry**

- **Emson Close/ Rose and Crown Walk and car parks to rear of Boots and Saffron Building Society**

Development should form part of a comprehensive development or not prevent the development of any other part of the site. Development will need to be implemented in accordance with design guidance approved by the Council and other Development Management policies. Implementation of the proposals will be regulated by legal obligation in association with the grant of planning permissions.

Policy SP4 – Retail Strategy

Summary of Representations

934 comments were received in relation to this strategic policy. Only about 4% of these comments objected to the policy. The remainder generally supported the policy.

Essex County Council consider that the strategic objection should be re-worded to appreciate the diverse role that the market towns perform i.e. as well as playing a fundamental role for the local living, working and visiting community the towns are also centres for entertainment, information, transportation connectivity, attractions in their own right and focus for culture and events.

English Heritage considers that the potential for a detrimental impact from additional retail outside the centre on the high quality shopping within the historic core should be a key consideration. Saffron Walden provides a rare example of a thriving town centre with a large representation of independent retailers. In the light of the Portas review of retailing we recommend that the Council should look very carefully at how retailing demand has, until now, been calculated and whether local circumstance, and changing shopping patterns, suggest a different approach. The character of historic places depends upon their continued vitality. The same issues may apply to retail development in the proposed urban extension at Great Dunmow.

Saffron Walden Town Council objects to the policy because it does not enhance the Town Centre, but tries to move retail capacity outside the town. The inquiry into the application for Sainsbury's showed that such a development would cause damage to Waitrose has the potential to damage the whole retail sector. There is no retailer demand for out of town shopping and as the Portas report clearly indicated vibrant shopping centres are an asset to all towns. The town council also question the plan statement regarding the claim that SW is underperforming in relation to convenience goods. If one reviews the 2005 Hephher Dixon study and the Savills Retail Capacity Study the conclusion is that the retention rate in Saffron Walden was high. No such evidence to the contrary was adduced during the Sainsbury's appeal process. **Great Dunmow Town Council** and **Great Dunmow Neighbourhood Plan Steering Group** consider the policy is too reactive and fails to offer a vision of sustainable retailing in Dunmow and fail to facilitate the review of the retail needs in Great Dunmow. The

problem of meeting modern retail expectations and protecting small shops is recognised. However, More options for enhancing the offer and broadening choice should have been explored and the policy should be more proactive in seeking to strengthen the attractiveness of Dunmow and increase its market share securing mixed use. The policy that out of centre applications will be judged against the NPPF is completely inadequate and should be revised to address local issues. **Takeley Parish Council** supports the growth of local businesses having due regard to residents rights to a peaceful life.

Save Walden Town Centre and Saffron Walden and District Friends of the Earth and We Are Residents and an individual largely support the strategy subject to a number of comments and the fact that they believe it does not comply with the NPPF. They object to the statement in the Plan that “it is reasonable to plan for an 80% retention rate because Saffron Walden is currently underperforming in relation to other centres and to reduce unnecessary travel.” There is no evidence to support the claim that the town is underperforming in relation to convenience goods and there is no evidence to show that a higher retention rate would lead to less travel. These statements should therefore be removed. The current retention rate reflects an increasing move to internet and other shopping and a very mobile population. Any increased convenience goods capacity would compete with existing stores and diversion to any less central site would be unsustainable. This aspect of the retail strategy should be changed and the plan based on the fact that retention rate will not change materially. The statement in the plan that additional floorspace capacity will need to be identified in the latter part of the plan period to 2028 is not true. It would be correct to say additional floorspace capacity may need to be identified but this is dependent on the unsustainable assumption that the retention rate will increase dramatically to 80%.

It is not clear what the identified comparison goods retail needs are or how they are planned to be met and on what basis the 10,200 m2 has been calculated. No appropriate sites have been identified. The plan does not set policies for the consideration of main town centre uses which cannot be accommodated in or adjacent to town centres. There appears to be a policy to expand SW's retail retention rates and future turnover but no potential sites identified and no policies for any such development. Both the Strategy and the retail policies needs to be rewritten to set out a clear strategy and then to include policies for implementation.

This policy does not comply with the NPPF. Nothing in the draft local plan reflects the requirement in the NPPF to promote competitive town centres that provide customer choice and a diverse retail offer. Given the plethora of cafes and chain coffee shops in SW we believe that the Local Plan should contain a restriction on change of use from A1 to any other class A uses. in an effort to retain SW's diverse retail offer and individuality. There is no consideration of how the NPPF para 24 requirements should be applied in practice. A policy for their application should be included. Para 26 envisages that a locally set threshold for impact assessments should be included or a default of 2,500 m2 will be applied. No such threshold is included in the Plan. Major retail developments which would be expected to have a significant impact on SW could fall well below the

2,500m² threshold and the impact assessment figure should be set at a much lower figure. We believe that impact assessment should be required for any retail development of 1,000 m² or more.

The Theatres Trust objects to the policy because it does not refer to the loss of town centre uses other than retail. The Title should reflect the policy and be amended to Town Centre Uses and Retail. In accordance with the NPPF (para 23) the need for retail, leisure, office and other main town centre uses should be met in full and a range of suitable sites allocated.

Waitrose consider that the policy should acknowledge the importance of Waitrose and the Town Centre convenience store and reference should be made to the extant planning permission for an extension to the Saffron Walden store. Tesco's should be referred to as an out of centre to be consistent with NPPF annex 2 definition. Supporting text paragraph 11.10 needs to make clear which type of food store the floor areas are referring to to avoid confusion. The reference to a discounter probably need an out of centre site should be deleted as any application regardless of type would need to be subject to sequential test. Waitrose has a requirement for a new store in Great Dunmow. It concerned that paragraph 11.11 states there is no requirement for additional convenience goods floorspace in the town whilst the Retail Study does identify a need. A new store would meet this need and provide choice and competition and accord with the NPPF and Council's evidence base. The policy should explicitly support the provisions of an additional foodstore in Great Dunmow.

Waitrose supports the identification of Saffron Walden and Great Dunmow as town centres in the retail hierarchy. However, clarity is required as to the scale of development appropriate in the town centres and what is meant by 'larger scale development'. The policy should set a threshold for the preparation of retail impact assessments as required by NPPF para 26. Given the limited need identified over the plan period it is recommended that the default threshold for undertaking an impact assessment should be 500m² gross. The final paragraph should acknowledge that for retail planning purposes the Town Centre comprises the defined Primary Shopping Area. The reference to National Planning Policy Guidance should be amended to National Planning Policy Framework.

About 900 **individuals** responded with the same comment that this policy is generally supported subject to the following: The policy does not say how existing village centre will be 'protected and enhanced to provide existing shops, services and community facilities' and should say that changes of use or redevelopment of such facilities will not be permitted unless there are exceptional circumstances. The policy should be amalgamated or cross referenced to Development Management Policy RET2.

Other Issues and comments raised by **individuals** are that developments outside the centre of the town are not desirable as concluded by the Inspector considering the Sainsbury appeal. Development limits should not be increased whilst Brownfield sites can be rejuvenated. Object to the assumption that the plan should provide for continued growth of out of centre retailing as this is

contrary to environmental and town centre policies. Insufficient consideration has been given to internet retailing and the recession on retailing. The assessment of Saffron Walden as a healthy town centre is over optimistic given the level of churn. The policy is loosely drafted and does not make clear the timescale for increases in retail floorspace to take place. Many people drive to other retail centres rather than shop in their community. Shops in Thaxted should be supported and protected from change of use to residential. The policy should encourage the delivery of a vision for the centre of Stansted Mountfitchet through a master plan process. Planning conditions limiting the scope of what an out of town shop can sell tends to send shoppers out of the district rather than to our town centres. Although access to Bishop's Stortford is listed as important to the strategy it does lead to road congestion. Dunmow needs 1-2 hour free parking or free parking on Saturdays to encourage shoppers away from Tesco and larger towns. Increasing the choice of retail outlets in the town centre rather than out of town will attract more shoppers.

A **developer** considers that the plan should identify strategic growth at Elsenham to allow for new retail provision to be made on land north-east of Elsenham.

National Planning Policy Framework

Chapter 2 of the Framework deals with town centres and ensuring their vitality and viability.

Paragraph 23 states that local plans should pursue policies supporting viability and vitality of town centres; define a network and hierarchy of centres; define the extent of town centres and primary shopping areas; promote competitive town centres offering choice; retain and enhance existing markets; allocate a range of suitable sites; allocate appropriate edge of centre sites for main town centre uses if town centre sites are not available; set policies for consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres; encourage residential development on appropriate sites; plan positively for the town centres' future. The paragraph identifies town centre uses as retail, leisure, commercial, office, tourism, cultural, community and residential.

The NPPF has the following definitions

Town centre: Area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Edge of centre: For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

Out of centre: A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Out of town: A location out of centre that is outside the existing urban area.

Sustainability Appraisal June 2012

There will be positive impacts on maintaining and enhancing the district's cultural heritage, assets and their surroundings where all development will need to respect the historic and architectural character of the centres.

There will be positive impacts on promoting accessibility, social inclusion and improving the population's health where additional comparison floorspace requirements are focused in the main towns which are the district's most accessible settlements by all methods of transportation and with good sustainable transport links. Similarly, the safeguarding of village and shops, services and community facilities will reduce local level trips for convenience shopping and maximise the potential for sustainable transport for this means. There will be positive synergistic impacts on this object in line with Policy S15. There will be small positive impacts on providing housing to meet future and existing needs where mixed-use schemes including a residential element will be supported by the council.

There will be positive impacts on supporting sustainable employment provision and economic growth through focusing retail in the main towns and supporting village employment opportunities in local centres. Furthermore, the consideration of out-of-town centres for retail where there are capacity issues in town centres (pending the sequential test and possible impact assessment) may have an important employment element and keep job opportunities in the district.

There may be negative synergistic impacts through a commitment to deliver rural housing in Policy S5 and the impact of Policy S2 in regards to improving the telecommunications infrastructure. This may affect the retail function of town centres in regards to online shopping and decreased footfalls.

There are no negative impacts.

Officer Comments

To meet ECC comments Objective 3 could be amended to say 'retail and service centres'

The Retail Capacity Study carefully examines the retail zones, patterns of retail spending and retail trends, including internet shopping, in recommending floorspace requirements and the determining factor has been to encourage expenditure into the town and local centres. This will ensure that the centres remain competitive and offer choice to the shopper. In the case of main food provision this has meant the maximum provision within the centre capable of offering such facilities, and in respect of comparison shopping a judgement as to the extent to which Saffron Walden might attract an increased share of the market.

The vision for our towns is set out in Chapter 5 and the Objective in Chapter 6 of the June consultation. The policies set out how these will be achieved. The strategic policy sets out the broad policy approach and overall scale of development. Site allocation policies will identify specific sites for development.

The Retail Capacity Study considered a number of central sites which have the potential to provide additional retail and service floorspace in Saffron Walden, Great Dunmow and Stansted Mountfitchet. It is therefore recommended that Development Opportunity Areas are identified to encourage and enable retail development within each of the towns as described below and in response to Question 2 above.

The Retail Capacity Study concludes that there is a need for additional retail floorspace in the towns and centres of the District. The evidence includes inputs from marketing advisors who suggest that the socio-economic profile of the population would be attractive to operators.

The Retail Capacity Study identifies that 72% of the main food expenditure in Zone 1 (centred on Saffron Walden) is retained in the area. The size of this retention rate is influenced by the number, size and quality of the supermarkets serving the area. Therefore the Study concludes that additional facilities in the area will make it more attractive to shoppers and therefore increase the retention rate. This results in a greater concentration of main shopping trips locally with considerable sustainable planning benefits. Increasing the retention rate to 80% by 2028 would result in the need for an additional main food shop of 467m² or a discount food shop of 790m². Subject to discussions on the representations objecting to the residential allocations, this could form part of the development of Policy Area 1

The Retail Capacity Study finds Saffron Walden an important centre for comparison shopping and whilst it will never dislodge Cambridge as the focus for purchases requiring wide choice, it already attracts significant sales of lower order merchandise. There has been no growth in comparison floorspace over the decades which has detrimentally affected the town as a shopping destination. The study found that there is considerable interest by retailers to come to Saffron Walden and by customers for expanded and improved facilities. It is for these reasons that the Study considers that the retention rate for comparison spending in Saffron Walden town centre revealed by the household survey underplays the realistic potential of the centre and recommends a strategy that would increase the retention rate from 12% to 14%. Taking into account existing permitted schemes this would result in the need for an additional 10,200sqm by 2028. If the retention rate was maintained at 12% this requires a smaller addition of 6946sqm by 2028. Expansion of floorspace below this level would represent a further diminution of the influence of Saffron Walden as a comparison goods shopping centre. The study concludes that it is crucial that this comparison floorspace is accommodated in the central shopping area and an opportunity appears to exist on the Fire Station and Laundry site and the site comprising Emson Close through to the rear of Boots. These could provide comparison and service retail floorspace and potentially a top-up food store. These and other sites are considered in relation to Question 2 above.

In relation to Zone 2 (centred on Great Dunmow) the Retail Capacity Study finds that there is no current need for additional floorspace for main food shopping but

that later in the plan period there is likely to be a need for a discount supermarket or small main trader, especially if Tesco does not implement its planning permission to expand its current store. The Study considers that a different trader in Great Dunmow would offer the best prospect of attracting shoppers to the town. In relation to comparison shopping, the town was found to have a limited attraction and quite a significant step change in provision would be needed to draw trade back from Chelmsford and Bishop's Stortford. The Study look at the potential for the Council depot site and the adjacent Post Office sorting office to provide retail floorspace and concluded that although there are issues of ownership and poor configuration of the site it was still considered worthy of further examination. It is therefore considered that this site should be identified as a Development Opportunity Area to encourage and enable retail and service development within the town. In relation to main food shopping the study considers the south area of the town, complementing Tesco's location to the west to be a suitable area for a new store and therefore this could form part of the development of Policy Area 2. It is therefore considered that by identifying a development opportunity area and an additional food store this will broaden the choice of shopping in Great Dunmow, attracting more shoppers to remain in the town bringing sustainable planning benefits.

In relation to Zone 3 (centred on Stansted Mountfitchet) the study concluded that an additional medium sized supermarket or discount store would meet the retail needs of the immediate area and the objective of reducing travel. The study looked at the former Lotus garage site and considered it has sufficient development capacity. There are proposals for a mixed development of this site for medical centre, retail and residential and it is proposed that the plan allocate this site accordingly. Subject to discussions on the representations objecting to Stansted Mountfitchet Policies 1 and 2 for residential development, these sites could be allocated as Development Opportunity Sites to encourage and enable retail and service development within the town.

The Council will need to adhere to national advice and will follow the sequential test when considering applications.

In line with the NPPF it is proposed to identify primary and secondary shopping frontages to control the change of use between town centre uses providing greater protection to Class A1 shops within the core of the Town or Local Centre but more flexibility on the secondary street frontages.

It is accepted that the nationally set threshold of 2500m² is inappropriate for Uttlesford. The largest size single store recommended by the Retail Capacity Study is 1043sqm and it is therefore considered appropriate to require Impact Assessments on any application for retail, leisure and office developments contrary to the plan which is greater than 1000m².

It is considered appropriate to amend the loss of shops to include Town Centre Uses.

The supporting text mentions Waitrose as a town centre store. The location of the Saffron Walden Tesco's can be described as 'outside the centre of the town'. The period of the plan is 15 years and therefore specific reference to planning applications can become out of date. Just as it would be inappropriate to mention the Waitrose permission, the reference to the Sainsbury appeal should be removed as well.

The reference in the policy to focusing larger scale development in the town centres relates to development reflecting the settlement hierarchy. The policy can be reworded to make this clearer

Existing village centres will be protected and enhanced by the implementation of policy RET2 which prevents the loss of village services

Strategic growth at Elsenham is contrary to the development strategy, which reflects the existing hierarchy of settlements.

Officer Recommendation

Amend Objective 3 to read
'Function of Market Towns: To preserve and enhance the historic nature of the town centres of Saffron Walden and Great Dunmow and support their function as important retail **and service** centres within the District. New high quality and sustainable development will support **these roles** within the district.'

Amend supporting text and policy on Retail Strategy

Add Development Opportunity Policies as part of the Site Allocation Policies

11.1 Within the District the two main towns are Saffron Walden and Great Dunmow, both traditional market towns.

11.2 Saffron Walden is the largest town in the District with the widest range of shops and other facilities. It has a Waitrose supermarket in the town centre and a Tesco **outside the centre of the town**. There is also a Homebase store and Ridgeons, a builder's merchant on the edge of the town.

11.3 Great Dunmow is an important focus for residents who live in the southern part of the District. It has a smaller range of shops and services including a small Co-operative store in the town centre and a Tesco supermarket **outside the centre of the town**.

11.4 Stansted Mountfitchet is the third largest retail centre in the District. It has a much more limited range of shops, including a Tesco Express and a small Co-operative Store **in the local centre** but because it is so close to Bishops Stortford most residents from this part of the District will shop there for anything

other than basic day to day shopping. Thaxted offers a limited variety of retail uses. The centre's primary function is to provide a service to the local population as well as tourists. Weekly street markets are held in Saffron Walden, Great Dunmow and Thaxted.

11.5 Outside these centres retailing is limited. There is a range of fashion and other outlets landside at Stansted Airport but this is unlikely to represent a realistic shopping destination for most people.

11.6 Village services are important to local communities. Some villages have a village shop others also have specialist outlets like antique shops, garden nurseries etc. There have been losses of village services in recent years but the Council is generally unable to prevent such losses unless planning permission is required e.g. for a change of use. Where planning permission is required the Council will continue to resist a change of use where this would result in the loss of key **assets of community value** or rural service.

11.7 Around the District key regional centres like Cambridge, Chelmsford and Harlow and the smaller centres of Braintree, Haverhill and Bishops Stortford provide a much wider range of shops, services and recreational opportunities and there is a loss of expenditure to these nearby centres.

11.8 A retail capacity study has been prepared to support work on this local plan. It was published in January 2012. **The study found that Saffron Walden and Great Dunmow perform a main food-shopping role and Saffron Walden attracts a significant proportion of comparison expenditure whilst Great Dunmow has a limited role in comparison goods.** In relation to the main centres it has identified the following issues:

Saffron Walden

11.9 Vacancy rates in the town **generally remain** relatively low, which would suggest that Saffron Walden is a healthy town centre.

11.10 In Saffron Walden there is a case for providing some additional comparison (1) floorspace as there is interest from retailers to secure representation in the town and from customers for expanded and improved facilities. The need for additional comparison floorspace in the town is calculated at between 6,946m² and 10,200m² in 2028. **Two Development Opportunity Sites are proposed within the town centre to facilitate the development and redevelopment of town centre for retail and other town centre uses.**

In relation to convenience (2) floorspace **the strategy plans for an additional floorspace of 467-790 m² depending on whether it is a main trader or a discount trader respectively. This additional floorspace would provide increased choice and therefore increase the number of residents shopping locally and reduce unnecessary travel. This floorspace could be provided through extension of existing stores but an additional shop would increase choice.** Up to 2021 the priority will be to provide comparison floorspace to help regenerate the centre but additional convenience floorspace capacity will need to

be identified in the latter part of the plan period up to 2028. A small **top-up** supermarket could be provided within the town centre **within a Development Opportunity Site** but a discount store with associated parking would probably need an out of centre site which could be accommodated as part of a mixed development with residential and employment uses. In relation to retail warehouse requirements the floorspace requirement of 4,500m² could be accommodated on the site on Thaxted Road which already has retail warehouse consent for bulky goods.

Great Dunmow

11.11 The study suggests that it would be unreasonable to plan for any **significant** additional comparison floorspace in Great Dunmow. . **A Development Opportunity Site is proposed incorporating the post office sorting yard and the Council's depot off New Street and potentially the parking area to the rear of 48 High Street. It is recognised that the landownership is complex and the configuration of the site is poor, nonetheless as a fringe town centre site it is considered worthy of proposing as a Development Opportunity Site to encourage additional town centre uses.**

The study found that there is no requirement in the immediate future for a supermarket in Great Dunmow although the introduction of a new operator such as a discount supermarket or small main trader providing 1043m² or 616m² respectively later in the plan period (from 2016) would improve consumer choice and offers the best prospect of attracting shoppers back to Great Dunmow. The policy proposed includes a provision of 1,400m² to allow for a medium sized main trader. This could be accommodated as part of the development of Policy Area 2.

Stansted Mountfitchet

11.12 The study considers that a new small store in Stansted Mountfitchet would be justified by retail need in the area and the objective of reducing travel, particularly by car. **A Development Opportunity Site is proposed to the east of Cambridge Road incorporating Crafton Green to enable the provision of additional town centre uses.**

11.13 The retail strategy it is to maintain and improve the range of retail outlets available within the district to meet people's needs for convenience shopping locally without having to travel outside the district and to meet some of their comparison goods needs. Policies in this plan seek to protect the character of the towns and villages so that they continue to provide an attractive environment which encourages people to visit them

Footnote

- (1) clothes, shoes, furniture, electrical goods etc
- (2) food and drink, newspapers etc

Policy SP4: Retail Strategy

New retail, leisure and other town centre uses will be supported and focussed in the town and local centres as defined on the proposals map.

By 2020 appropriate proposal for new retail development will deliver (sales area)

–

- **10,600m²** of comparison floorspace
- **2,200m²** of convenience floorspace
- 4500 m² of retail warehousing

The scale of development will need to be consistent with the hierarchy below.

- Town Centres – Saffron Walden and Great Dunmow
- Local Centres – Stansted Mountfitchet and Thaxted

All development will need to respect the historic and architectural character of the centres and be of a high quality design. Mixed used developments including a residential element will be supported.

The loss of existing shops **and other town centre uses** will be resisted in order to protect the vitality of the local centres.

The village centres of Elsenham, Hatfield Heath, Great Chesterford, Newport and Takeley will be protected and enhanced to provide shops, services and community facilities for local residents **in accordance with Policy RET2**

Outside the defined centres, shops and other facilities will be safeguarded to provide the needs of local residents in accordance with Policy RET2.

Any proposals for retailing and other town centre uses outside the defined town centre or other allocated sites will be considered in relation to the sequential test in the National Planning Policy **Framework. A Retail Impact Assessment must accompany proposals that exceed 1000m².**

Retail Site Allocation Policies

Saffron Walden Policy - Development Opportunity Sites

The Council will support development and redevelopment opportunities for town centre uses in the following town centre locations.

- **The Fire Station/ Saffron Walden Laundry**
- **Emson Close/ Rose and Crown Walk and car parks to rear of Boots and Saffron Building Society**

Development should form part of a comprehensive development or not prevent the development of any other part of the site. Development will need to be implemented in accordance with design guidance approved by the Council and other Development Management policies. Implementation of the proposals will be regulated by legal obligation in association with the grant of planning permissions.

Great Dunmow Policy - Development Opportunity Sites

The Council will support development and redevelopment opportunities for town centre uses in the following town centre locations.

- **Council Depot, off New Street**
- **Post Office Yard**

Development should form part of a comprehensive development or not prevent the development of any other part of the site. Development will need to be implemented in accordance with design guidance approved by the Council and other Development Management policies. Implementation of the proposals will be regulated by legal obligation in association with the grant of planning permissions.

Stansted Mountfitchet Policy –Development Opportunity Site

The Council will support development and redevelopment opportunities for town centre uses in the following town centre locations.

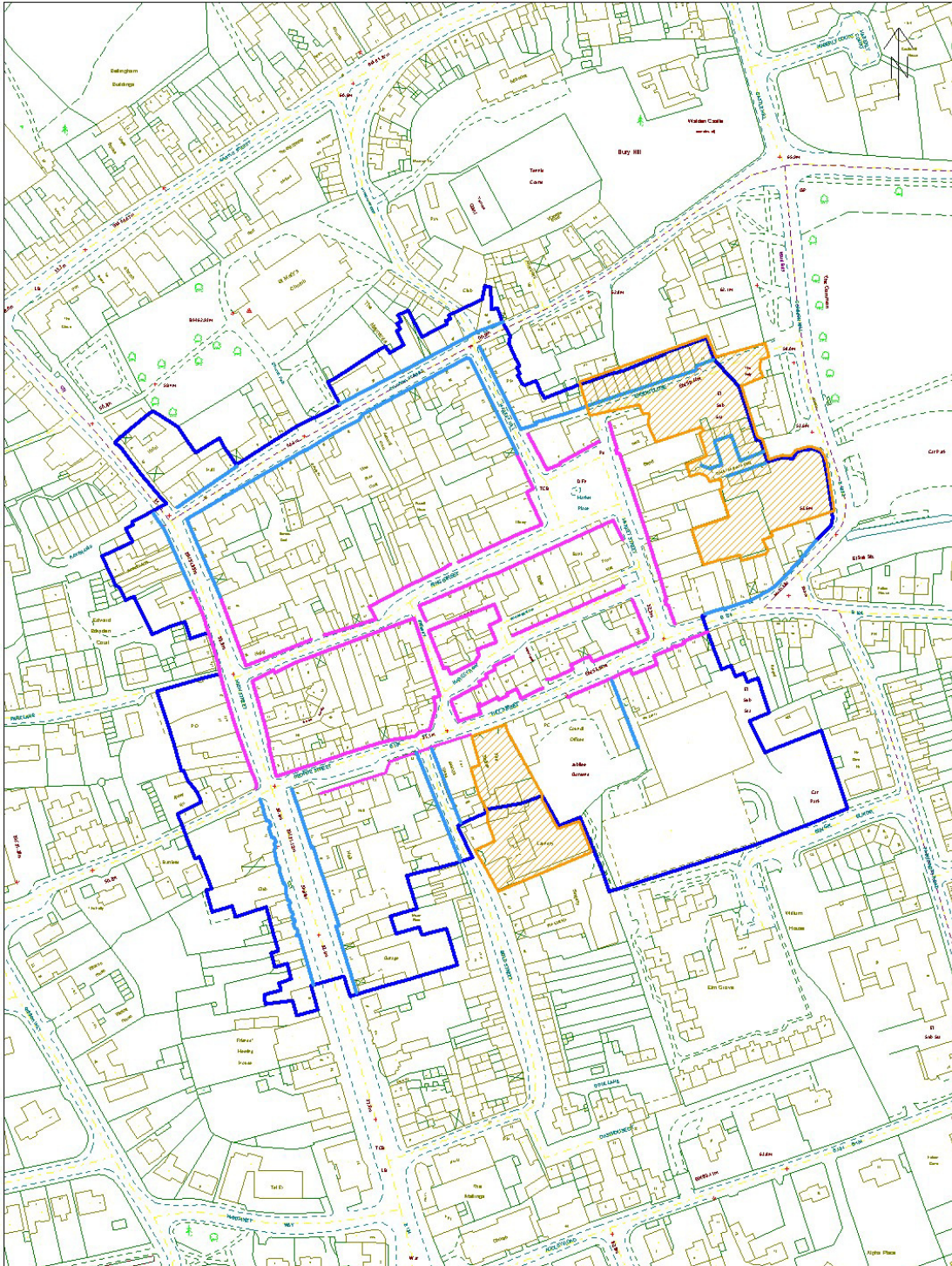
- **East of Cambridge Road/Crafton Green**

Development should form part of a comprehensive development or not prevent the development of any other part of the site. Development will need to be implemented in accordance with design guidance approved by the Council and other Development Management policies. Implementation of the proposals will be regulated by legal obligation in association with the grant of planning permissions.

Stansted Mountfitchet Policy – Lower Street

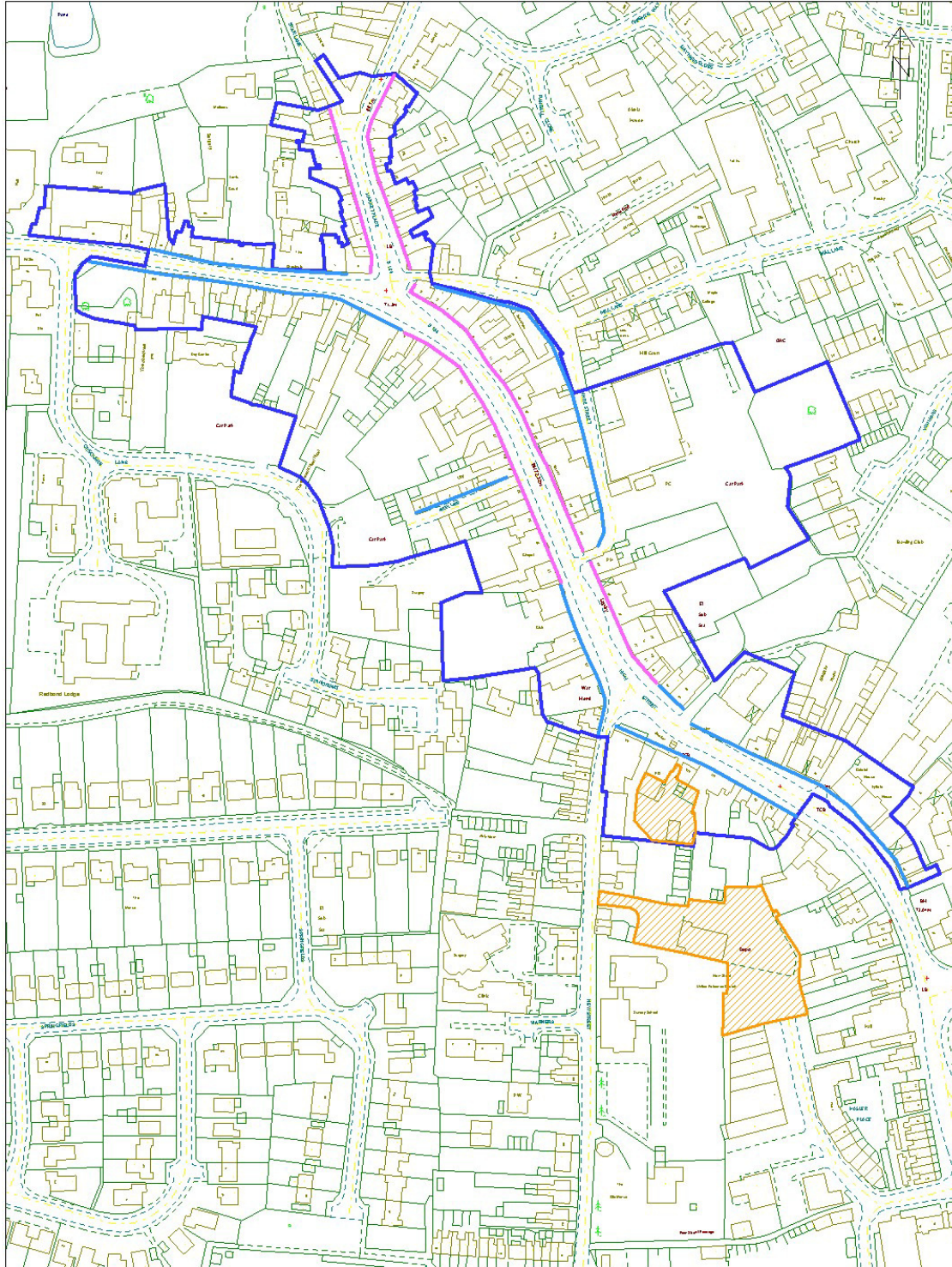
Land at 2 Lower Street is allocated for a development comprising retail, medical services and 14 residential units. Development will need to be implemented in accordance with design guidance approved by the Council and other Development Management policies. Implementation of the proposals will be regulated by legal obligation in association with the grant of planning permissions.

Saffron Walden Town Centre showing primary and secondary street frontages and Development Opportunity Sites



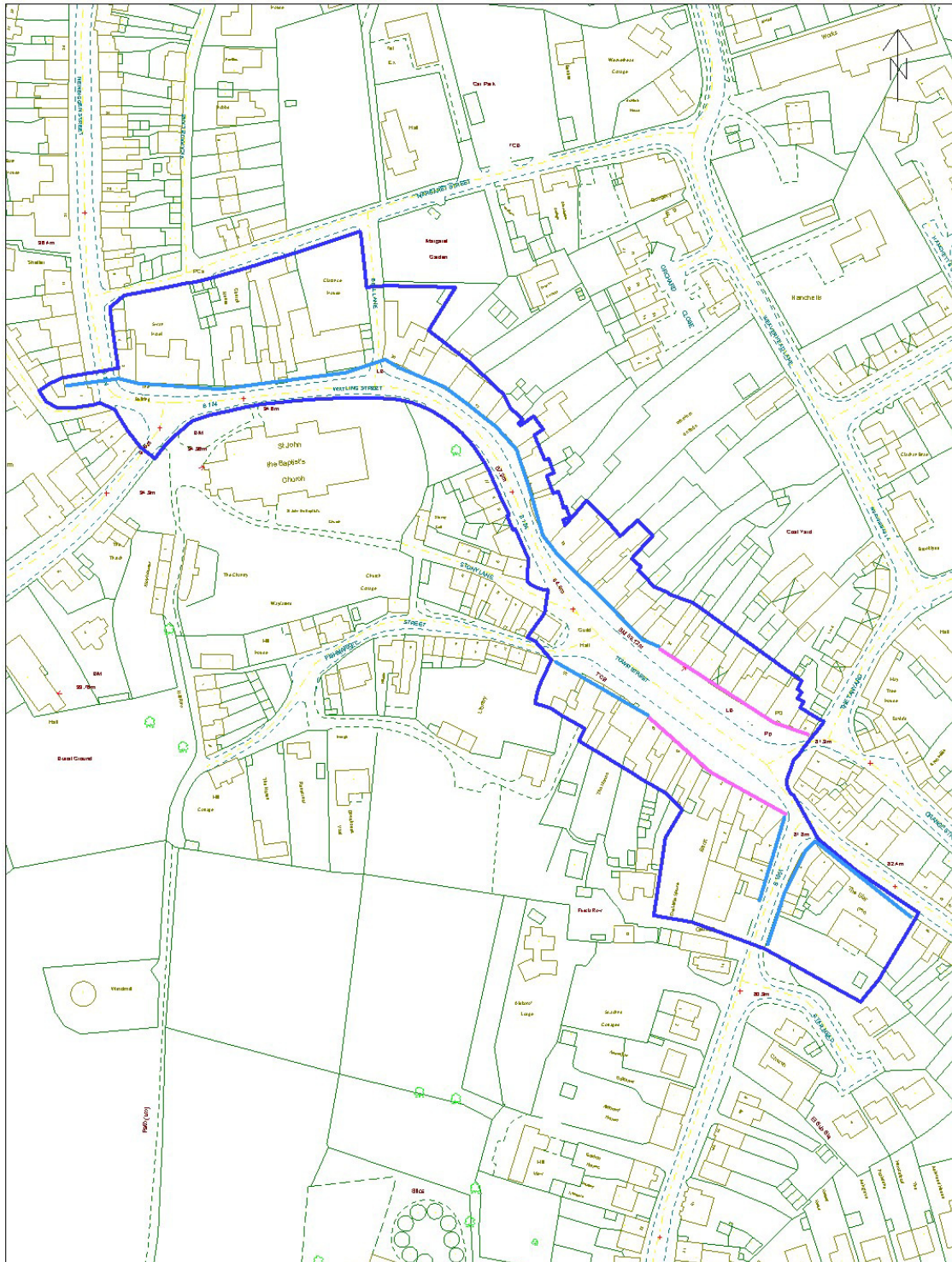
<p>Saffron Walden Primary and Secondary shop frontages, Town Centre Boundary and Development Opportunity Sites</p>	<p>Reproduced from the Ordnance Survey mapping with permission Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Uttlesford District Council Licence No: 100018688 (2004). DATE:28/09/2012 MAP REFERENCE:TL53385E SCALE:1:1600</p>
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Great Dunmow Town Centre showing primary and secondary street frontages and Development Opportunity Site



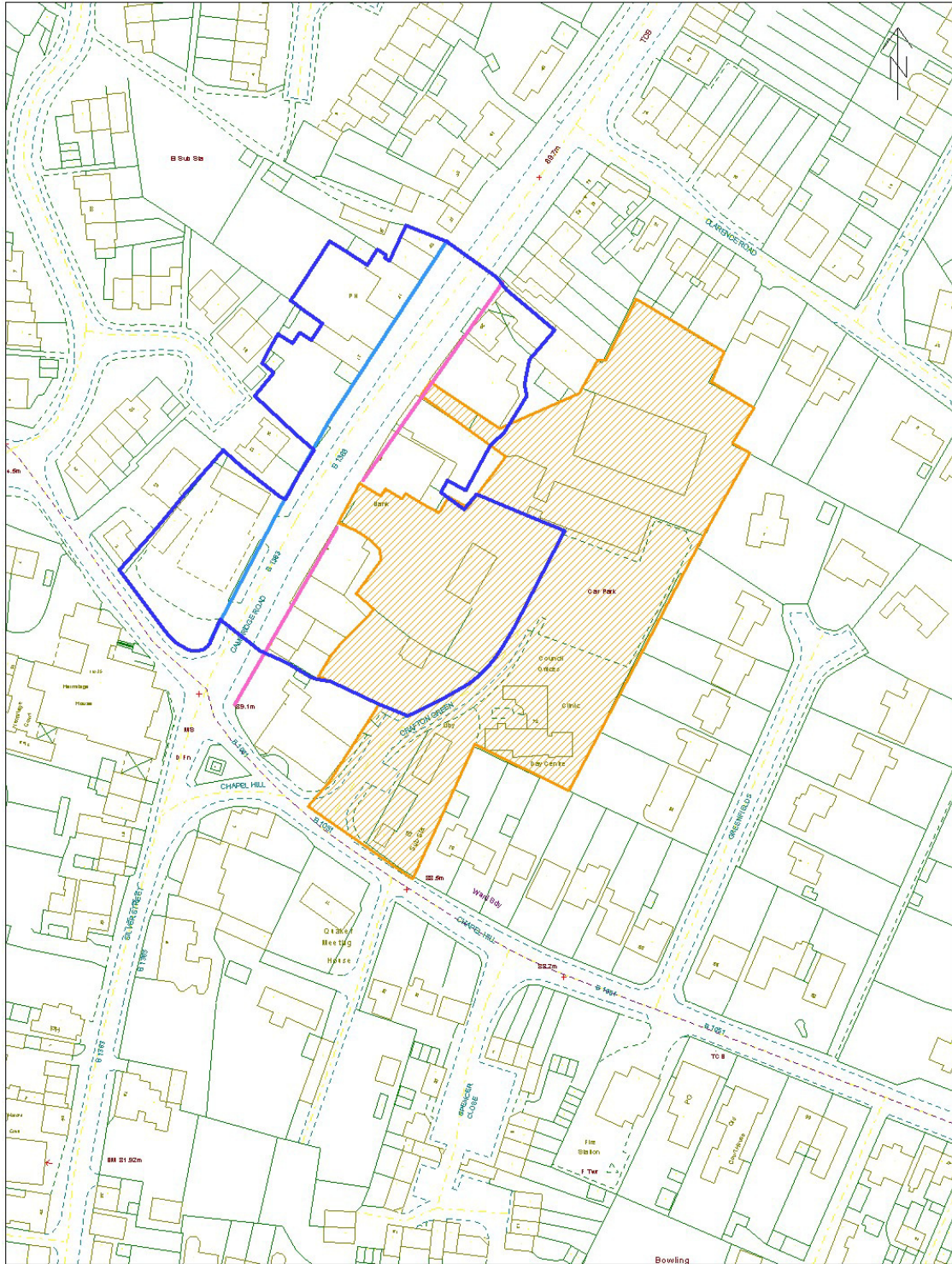
<p>Great Dunmow Primary and Secondary Shop Frontage, Town Centre Area and Development Opportunity Sites</p>	<p>Reproduced from the Ordnance Survey mapping with permission Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Billesford District Council Licence No: 100018488 (2004) DATE:28/09/2012 MAP REFERENCE:116221 NE SCALE:1:1550</p>
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Thaxted Local Centre showing primary and secondary street frontages



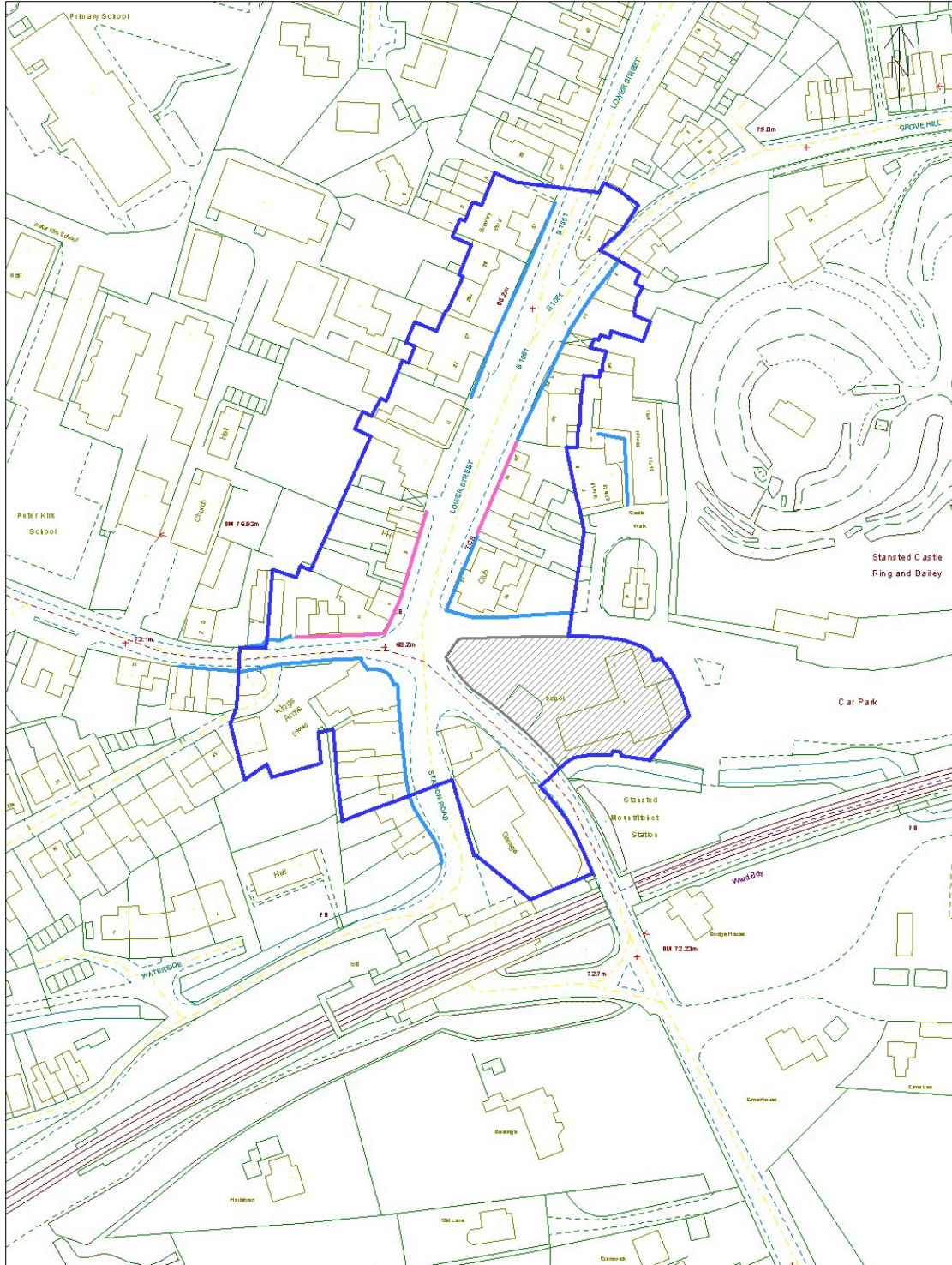
<p>Thaxted Primary and Secondary Frontage and Town Centre Area</p>	<p>Reproduced from the Ordnance Survey mapping with permission Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Ullensford District Council licence No: 100018688 (2004) DATE:28/09/2012 MAP REFERENCE:116130NW SCALE:1:250</p>
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Stansted Mountfitchet Local Centre (Cambridge Road) showing primary and secondary street frontages Development Opportunity Area.



<p>Stansted Mountfitchet Cambridge Rd Primary and Secondary Shop Frontage, Town Centre Boundary and Development Opportunity Site</p>	<p>Reproduced from the Ordnance Survey mapping with permission Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Uttlesford District Council Licence No: 100018688 (2004). DATE:28/09/2012 MAP REFERENCE:TL51255W SCALE:1:1000</p>
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Stansted Mountfitchet Local Centre (Lower Street) showing primary and secondary street frontages and Lower Street Policy Area



<p>Stansted Mountfitchet - Lower Street Primary and Secondary Shop Frontage, Town Centre Boundary and new policy area.</p>	<p>Reproduced from the Ordnance Survey mapping with permission Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Uttlesford District Council licence No: 100018688 (2004). DATE:28/09/2012 MAP REFERENCE:T15124NW SCALE:1:1000</p>
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Retail Development Management Policies

Policy RET 1 – shops and other Town Centre Uses

Summary of Representations

There were 10 response to this policy of which 8 were in support.

Friends of the Earth (Saffron Walden and District), Save Walden Town Centre, We Are Residents and an **individual** support the policy subject to the policy prohibiting change of use from Class A1 to other Class A uses to preserve retail space for the identified need for comparison goods. It is suggested that there is a need for additional retail policies dealing with applications for out of centre retail development and those necessary to implement the NPPF requirements as suggested in response to the Retail Strategy Policy 4.

Great Dunmow Town Council and **Great Dunmow Neighbourhood Plan Steering Group** consider that as the policy appears to apply to locations and uses other than shops in town centres the title of the policy should be clarified. The policy is considered too reactive and should be strengthened to create the conditions for the increase in vitality and viability of the town centres. It is not clear how this policy will meet the objective of enhancing the function of market towns. The policy should be restructured to reflect that there are only two main town centres and being historic market towns and worth of specific attention. The policy must make provision for the planned growth in the towns and villages. Retail change should be contingent on master plans for the centres. The Town Design Statement for Dunmow gives examples of how this might be pursued. The conversion of upper floors is supported in principle but the issues of associated car parking and of space standards and access arrangements must be included as criteria, similar to HO2. It is not clear how the 'tourism function' might be defined.

National Planning Policy Framework

Paragraph 22 of the framework states that planning policies should avoid the long-term protection of sites allocated for employment use.

Chapter 2 of the Framework deals with town centres and ensuring their vitality and viability. Paragraph 23 recognises the importance of residential development in town centres and states the need for planning policies to encourage residential development on appropriate sites.

Sustainability Appraisal June 2012

This policy will have positive impacts on the maintenance of the district's historic centres through protecting retail uses. Many of the district's conservation areas correspond to town centres.

There will be positive impacts on promoting and encouraging sustainable methods of travel because town and local centres respond to those places with existing established transport interchanges for the wider area. By seeking to retain current retail uses within these centres it will maximise the potential for people to access goods and services through sustainable transport choices instead of by private vehicles.

There will be positive impacts on promoting accessibility because town and local centres respond to those places with existing established transport interchanges for the wider area. By seeking to retain current retail uses within these centres people will have greater access to the goods and services on offer.

This policy seeks to safeguard retail employment opportunities in the district as far as possible and therefore positively impacts on this SA objective. Protecting shops and other town centre uses would also promote the vitality of these centres.

There are no negative impacts

Officer Comments

In line with the NPPF it is proposed to identify primary and secondary shopping frontages to control the change of use between town centre uses providing greater protection to Class A1 shops within the core of the Town or Local Centre but more flexibility on the secondary street frontages.

The policy relates to Town and Local Centres and the policy title should reflect this.

The retail hierarchy is set out in the strategic retail policy. The identification of Development Opportunity Sites will enable the provision of new retail floorspace thus strengthening the vitality and viability of the town and local centres. The supporting text describes the tourism function.

Parking and access standards are covered by other Development Management Policies

Officer Recommendation

Amend policy to incorporate primary and secondary street frontages

Amend title to Town and Local Centres

Amend Appendix 2 to refer to Class A1 uses.

Amend paragraph 33.1 of supporting text and policy as follows

The town centres of Saffron Walden and Great Dunmow and the local centres of Thaxted and Stansted are identified on the proposals map. Retail uses in Stansted are split between two locations – Cambridge Road and Lower Street and policy RET1 will apply to both. **For the purposes of this policy, town centre uses are defined as retail, leisure, commercial, office, tourism, cultural, community and residential development needed in towns. The Town and Local Centres are comprised of Primary and Secondary Shopping Frontages. The primary shopping frontages are the main shopping streets which attract the most shoppers and therefore the Council wish to retain Class A1 shops along these streets. The secondary shopping frontages extend from the primary shopping frontages to the**

edge of the town or local centre and provide a mix of town centre uses. The Council will expect details of the marketing to be submitted with any application for the change of use of ground floor units along primary shopping frontages to non A1 class uses. The requirements for marketing are set out in Appendix 2.

Policy RET1 – Town and Local Centres

The Town and Local Centres are identified on the proposal maps.

Along Primary Shopping Frontages as identified on the proposals maps change of use of the ground floor to non A1 uses will only be permitted if the applicant is able to demonstrate that the unit is not viable **as an A1 use (shop)**. As part of the marketing to establish viability, the property should be widely advertised for at least twelve months on terms reflecting an **A1 use** in accordance with Appendix 2.

Along Secondary Shopping Frontages as identified on the proposal maps change of use to town centre uses of retail, leisure, office and other main town centre uses will be permitted.

Along both Primary and secondary shopping frontages change of use to residential will be allowed on upper floors. Mixed use schemes with a residential element will be appropriate within the town and local centres.

Policy RET 2 – Loss of Village Shops and Other Facilities

Summary of Representations

There were 10 responses to this policy of which 7 supported and 3 raised objections.

Friends of the Earth (Saffron Walden and District), Save Walden Town Centre, We Are Residents and **individuals** support the policy.

NHS North Essex wishes to clarify whether healthcare facilities are to be included in the Council's Assets of Community Value list. If they are to be included it would be inappropriate to require the level of justification required by the policy. To comply with the current policy, it appears that NHSNE would need to seek approval from the Council for its own strategy and programmes before planning permission would be granted for the change of use or redevelopment of facilities which is considered inappropriate. Therefore, it is requested that clarification is provided as to whether healthcare facilities are included as Assets of Community Value. If they are included, it is requested that the policy is amended to exclude healthcare facilities.

The **Bridgefoot/Walden Road Gospel Trust** welcomes the protection given to places of worship. However Appendix 2 appears to be unduly prescriptive and onerous. Marketing should be reduced to 3 months; the requirement for leasing to be included; the policy doesn't specify the uses within the terms of the policy. Criterion (d) is considered weak and unhelpful with the potential for conflict over what is meant by the term 'nearby'.

A **developer** objects to the policy as it is not clear what the list of Assets of Community Value contains or where it might be found.

National Planning Policy Framework

Chapter 3 of the framework deals with supporting a prosperous rural economy and promotes the retention and development of local services and community facilities including local shops.

Sustainability Appraisal June 2012

There will be positive impacts resulting from this policy which seeks to only approve a change of use where it would not result in the loss of facilities and services. This maximises the potential for rural communities to walk and cycle to certain facilities and services.

There will be significant positive impacts resulting from this policy which seeks to only approve a change of use where it would not result in the loss of facilities and services. This allows accessibility for rural communities to certain facilities and services.

There will be positive impacts resulting from this policy which seeks to only approve a change of use where it would not result in the loss of facilities and services. This maximises accessibility for rural communities to certain facilities and services, including health care facilities and pharmacies. It is not a privilege of urban communities to have access to such important facilities, and the option adheres to notions of social inclusion across the district.

There will be positive impacts on supporting sustainable employment provision and economic growth because the policy seeks to only approve a change of use where it would not result in the loss of facilities and services. This maximises accessibility for rural communities to certain facilities and services, and also the employment opportunities these provide..

There are no negative impacts.

Officer Comments

It is considered appropriate that this policy should cover healthcare facilities. It is not considered that the council would need to approve the strategy and programmes of NHSNE but the NHSNE could use these documents to demonstrate the criteria required in the policy.

If sites are only marketed for three months the results could be influenced by the time of year that it was undertaken. The general criteria includes the option for leasehold. Different facilities will have different catchment areas and this will need to be taken into account when applying criteria (d).

The Council will compile the List of Assets of Community Value when the relevant Government Regulations are published. The list will specify buildings and Land which have a community value. It is likely that lists will be available from the District Council and made available on the website and also from individual town and parish council's.

Officer Recommendation

Amend supporting text to Include medical facilities as a village service

*".... Village services like village shops, public houses, places of worship, village halls and **doctors surgeries** are important to local communities and* "

Policy RET 3 – New Shops in Rural Areas

Summary of Representations

10 representations were received on this policy. 6 support the policy whilst the others raise comments

Friends of the Earth (Saffron Walden and District), Save Walden Town Centre, and **individuals** support the policy.

Great Dunmow Town Council and **Great Dunmow Neighbourhood Plan Steering Group** suggest that the policy is refined so as to make it clear it does not apply to the market towns as the distinction is not adequately apparent. **Takeley Parish Council** advocate two additional criteria 1.Providing there are no suitable alternatives within development limits and 2.Providing there will be no adverse effect on surrounding properties and road network.

A **landowner** would support the policy subject to amending it so c) referred to the site being well related to the village as opposed to adjoining it. This would build in clarity and flexibility and reflect the approach taken in Policy INF2 relating to community facilities.

National Planning Policy Framework

Chapter 3 of the framework deals with supporting a prosperous rural economy and promotes the retention and development of local services and community facilities including local shops. Paragraph 28 supports the conversion of existing rural building and the development of well designed new ones to encourage growth of businesses and enterprises.

Sustainability Appraisal June 2012

This policy makes provision for the possibility of new shops in rural areas specifying that the site needs to adjoin the village which has the potential to reduce the need to travel by car.

There will be significant positive impacts on this SA objective from this policy as it contains criterion that requires new shops in rural areas to adjoin the village. This will maximise accessibility to them by the local community

This policy will have significant positive impacts where planning permission is granted for new shops in close proximity to villages. A criterion exists in the policy that proposals will not have an adverse impact on existing shops within the catchment area; safeguarding existing local employment opportunities and enhancing further opportunities.

There are no negative impacts

Officer Comments

The policy refers to rural areas beyond development limits with the intention of applying to smaller villages. It is therefore proposed to amend the policy to make it clear that it does not apply to Town or Local Centres

It is considered appropriate and consistent with other policies to have an additional criterion that there are no suitable alternatives within development limits. Impact on surrounding properties and road network are covered by other Development Management Policies

It is considered appropriate and consistent with other policies for criteria c) to use the term 'well related to the village' instead of 'adjoins'.

Officer Recommendation

Amend policy and supporting text.

Add to end of supporting text.

This policy does not relate to settlements which have a Town or Local Centre as identified on the proposals map.

Policy RET3 – New Shops in Rural Areas

For settlements where a Town or Local Centre is not identified, planning permission will be granted for new shops/post offices on sites beyond development limits where the following criteria are met:

- a) the retail function is restricted to convenience goods/food;*
- b) the proposal is of a size compatible with the catchment area it is intended to serve;*
- c) the site **is well related to** the village and has the potential to reduce the need for travel by car; and*
- d) there would be no adverse impact on existing shops within the catchment area;*
- e) **There are no suitable alternative sites within development limits.***