

**LOCAL PLAN WORKING GROUP held at COUNCIL OFFICES LONDON ROAD SAFFRON WALDEN at 2.00pm on 14 APRIL 2014**

Present: Councillor J Ketteridge – Chairman.  
Councillors S Barker, J Cheetham, K Eden, E Godwin, K Mackman, J Menell, V Ranger and J Rose.

Officers in attendance: M Cox (Democratic Services Officer), R Harborough (Director of Public Services) and S Nicholas (Senior Planning Policy Officer).

**LP44 APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST**

Apologies for absence were received from Councillors Oliver, Rolfe and Watson.

**LP45 MINUTES**

The minutes of the meeting held on 31 March 2014 were approved and signed as a correct record.

**LP46 BUSINESS ARISING**

**(i) Minute LP40 – Highway Assessment**

In relation to the Dunmow Bypass, Councillor Barker reported that temporary signs would be placed at strategic points before the permanent signs were installed in a few months' times. New road names and numbers had also been agreed for the new routes.

Members commented that the recent planning workshop with representatives from ECC Highways had been very useful. It was hoped that further meetings would be arranged to discuss the detailed plans for the larger scale developments.

Councillor Barker commented that the highway mitigation measures for Great Dunmow were mainly around the Hoblong junction so were relatively straight forward. Saffron Walden was more complicated with around 6/7 junctions affected. Members felt that in order to give confidence to residents that there was a structured plan in place it might be useful for the council to produce a leaflet highlighting the various stages that were planned to 2031.

**.LP47 COMMUNITY INFRASTRUCTURE LEVY**

The working group received a further report from the consultant's BNP Paribas on the viability of introducing the Community Infrastructure Levy (CIL) in Uttlesford. This had been prepared in the light of revised Government Guidance, which now required local planning authorities to cease to pool contributions from section 106 agreements from April 2015, a year later than

had been planned. However, local planning authorities could continue to secure section 106 contributions from up to 5 planning obligations to fund a single piece of infrastructure.

The report considered whether a decision not to adopt the CIL in the short term would adversely affect the Council's ability to deliver new infrastructure to support housing growth. It looked at the extent to which the council could deliver community infrastructure through S106 agreements and the extent of the CIL income that could be raised from sites where it was not possible to enter into a S106 agreement.

The report concluded that at present there was no compelling case for adopting a CIL in Uttlesford. The nature of the Council's housing trajectory lent itself to S106 agreements. It was also clear that implementing the CIL would impact on the council's resources and as this was still a relatively new provision it was likely that the guidance would be subject to change. There was no reason to do anything now as the CIL could still be adopted after the 2015 cut-off date.

Members of the working group agreed with the report's conclusion. They felt that this issue should be kept under review and suggested that a members' workshop could be arranged before April 2015.

The report was noted.

.LP48

## **RETAIL STUDY**

The working group received an additional retail capacity study to supplement the report that was published in 2010. It updated the existing report to take account of the proposed scale and location of the housing growth in the pre-submission consultation plan and looked to the end of the plan date in 2031.

The study looked at four area zones which included the main retail centres of Saffron Walden, Great Dunmow and Stansted. It concluded that provision would need to be made in the longer term for additional retail floor space.

Members commented that some of the information in the report was now out of date and it also did not take account of the changing trends in the retail arena. The Director of Public Services said that this was a limited update and much of what was contained in the 2010 study had remained unchanged. It had to make a number of assumptions but it was acknowledged that it was difficult to predict trends to 2031.

The report was noted

The working Group was informed that all the background studies would be summarised in a series of topic papers for the Inspector for use at the Local Plan public Inquiry.

The meeting ended at 2.45pm.

**Committee:** Local Plan Working Group

**Agenda Item**

**Date:** 26 June 2014

**3**

**Title:** Pre-submission Local Plan - Summary of main issues

**Author:** Andrew Taylor, Assistant Director Planning and Building Control

## Summary

1. The attached report sets out the main issues raised in the representations on the Pre-submission Local Plan consultation. The Council is required to send this information to the Secretary of State when the Plan is submitted for Examination by the Planning Inspectorate.

## Recommendations

2. For information

## Financial Implications

3. None

## Background Papers

4. The following papers were referred to by the author in the preparation of this report and are available for inspection from the author of the report.

None

## Impact

- 5.

Communication/Consultation	The document will be submitted to the Planning Inspectorate and made available on the website and at the Council Offices
Community Safety	N/A
Equalities	The consultation was subject to an equalities impact assessment.
Health and Safety	N/A
Human Rights/Legal Implications	N/A

Sustainability	N/A
Ward-specific impacts	All
Workforce/Workplace	N/A

## Situation

6. Representations were invited on the Uttlesford Local Plan – Pre-submission Consultation April 2014 between and Thursday 17th April and Monday 2<sup>nd</sup> June 2014. A total of 1230 people or organisations made a total 1824 representations. The representation from Elsenham Parish Council was supported by 973 signatories. The representation from the Joint Parish Councils of Henham, Ugley and Widdington was supported by 1261 signatories. The Representation from Save Newport Village was supported by 138 signatories.
7. The Council is required under regulations 22 of the Town and Country Planning (Local Planning)(England) Regulations 2012, to send to the Secretary of State a summary of the main issues raised by these representations. These are set out in the attached document in chapter order.
8. Other documents the Council is required to send include a copy of all the representations and a summary of the main issues raised in previous consultations and how they have been taken into account. The latter are set out in the Council's Report of Representations, Officer Comments and Recommendations and considered by Members at previous working group meetings.

## Risk Analysis

9.

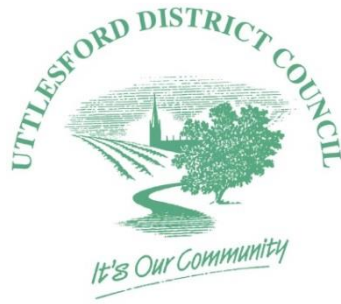
Risk	Likelihood	Impact	Mitigating actions
That the Council's prepares an unsound plan. This could either be when the plan is submitted and the Inspector advises the Council that the plan is likely to be found unsound; or that following the formal hearing the plan is found unsound.	1. The council is preparing a plan which is positively prepared; justified; effective and consistent with national policy.	3. That adoption of the Local Plan will be delayed whilst additional work is undertaken	That the Council ensures that the Plan meets the requirements of the NPPF and is justified by the evidence.

1 = Little or no risk or impact

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

3 = Significant risk or impact – action required

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



**Uttlesford Local Plan  
Pre-Submission Consultation 2014  
17 April to 2 June 2014**

**Summary of Main Issues**



## **Introduction**

This document sets out the key issues arising from representations made to the Uttlesford Pre-Submission Local Plan 2014. It is set out in plan order.

Representations were invited on The Uttlesford Local Plan – Pre-submission Consultation April 2014 between and Thursday 17th April and Monday 2<sup>nd</sup> June 2014. A total of 1230 people or organisations made a total 1824 representations. The representation from Elsenham Parish Council was supported by 973 signatories. The representation from the Joint Parish Councils of Henham, Ugley and Widdington was supported by 1261 signatories. The Representation from Save Newport Village was supported by 138 signatories.

Representations making reference to or directly responding to the Sustainability Appraisal are set out in the Sustainability Appraisal and Strategic Environmental Assessment Addendum June 2014.

<b>Chapter : Introduction - Paragraphs 3.1-3.6</b>											
<b>Total Representations: 33 (1 representation was supported by 973 people and another by 1261 people )</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	4	17	12		5	23	5		4	14	15
<b>Objections</b>	<ul style="list-style-type: none"> <li>• The plan does not take into account of development in Cambridge</li> <li>• The duty to co-operate has not been met</li> <li>• Flawed process</li> <li>• Inadequate infrastructure provision</li> <li>• Sites have not been tested against reasonable alternatives</li> <li>• Has not adhered to the Statement of community Involvement</li> <li>• Unsustainable sites allocated</li> <li>• Residents opinions have been ignored</li> <li>• <b>Home Builders Federation</b> states that the plan has not taken into account other local authority housing requirements</li> <li>• <b>Elsenham Parish Council</b> contrary to NPPF</li> <li>• <b>Ugley, Widdington and Henham Parish Council</b> housing numbers should be reduced and plan period is incorrect</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Chelmsford City Council</b> support the plan and feels the duty to co-operate has been met</li> <li>• <b>Great Canfield Parish Council</b> is in support</li> <li>• <b>South Cambridgeshire</b> feels the Council has met the duty to co-operate</li> </ul>										

<b>Chapter 5: The District Vision</b>											
<b>Total Representations: 15</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	5	3	7		5	9	1		4	5	6
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Unsustainable vision</li> <li>• The plan is contrary to the vision</li> <li>• Doesn't include infrastructure provision</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>English Heritage, Natural Environment, Little Easton Parish Council and Individuals</b> supports the vision</li> </ul>										

<b>Chapter 6: Objectives</b>											
<b>Total Representations: 9</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2		7		1	5	3		1	1	7

<b>Objections</b>	<ul style="list-style-type: none"> <li>• Unsustainable</li> <li>• Not SMART</li> <li>• <b>English Heritage</b> request minor changes to have reference to the natural and historic environment</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Natural England and Little Dunmow Parish Council</b> generally support the objectives</li> <li>• <b>Individual</b> support the objectives</li> </ul>

**Chapter 7: The Spatial Strategy and Key Diagram – paragraph 7.1 – 7.9**

**Total Representations: 1094 (1 representation was supported by 973 people and another by 1261 people )**

Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	8	1052	32		4	1062	23		6	1051	35
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Individuals, Great Dunmow Town Council, Saffron Walden Town Council, Birchanger, Takeley, Wedens Ambo, Elsenham, Henham, Widdington and Ugley Parish Council</b> object for the following reasons: <ul style="list-style-type: none"> <li>○ not positively prepared</li> <li>○ housing numbers too high</li> <li>○ failed to comply with the duty to co-operate</li> <li>○ consultation does not comply with the SCI</li> <li>○ representations not duly considered</li> <li>○ has not assessed the reasonable alternatives</li> <li>○ Sustainability Appraisal is flawed</li> <li>○ Evidence base does not justify the choice of sites</li> <li>○ Failed on the duty to co-operate</li> <li>○ Contrary to the NPPF</li> <li>○ Plan period too long</li> <li>○ Failure to assess and meet the infrastructure needs of the district</li> <li>○ Unsustainable housing strategy</li> <li>○ Undeliverable housing strategy</li> <li>○ Housing strategy not based on evidence</li> <li>○ Air pollution has not been properly considered</li> <li>○ Politically driven not based on evidence</li> <li>○ Question deliverability of the sites within the plan</li> <li>○ Environmental effects not properly assessed</li> <li>○ Inflexible sites</li> <li>○ Elsenham allocation contravenes the hierarchy</li> </ul> </li> <li>• <b>South Cambridgeshire District Council</b> disagrees that the northern part of the District lies within the Cambridge sub-market area</li> <li>• <b>Essex Bridleways Association</b> wants reference made to protecting or enhancing rights of way</li> <li>• <b>Landowner/developer</b> suggests Great Chesterford should have more allocations</li> <li>• <b>East Herts</b> are concerned with potential impact of development adjacent to Bishops Stortford</li> <li>• <b>Land owner/developer</b> High risk spatial strategy with large development at Elsenham, the housing strategy is not justified</li> <li>•</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>East Hertfordshire District Council</b> considers the plan complies with the duty to co-operate</li> <li>• <b>Natural England</b> supports paragraph 7.2</li> <li>• <b>Little Easton Parish Council</b> supports the hierarchy for their village</li> </ul>										



Chapter 7: The Spatial Strategy and Key Diagram – Key Diagram											
Total Representations: 2											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
					2				2		
<b>Objections</b>	<ul style="list-style-type: none"> <li>Landowner/developer suggests changes to the map</li> </ul>										

Chapter 7: The Spatial Strategy and Key Diagram - Paragraph 8.2											
Total Representations: 2											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
			2						2		
<b>Objections</b>	<ul style="list-style-type: none"> <li>Does not comply with Localism Act or NPPF and process should be more transparent</li> <li>The strategy is not sustainable and no green field should be built on as this can produce food, only brownfield sites should be developed for housing and employment.</li> </ul>										
<b>Support</b>											

Chapter 7: The Spatial Strategy and Key Diagram - Policy SP1											
Total Representations: 5											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		2					2		1		
<b>Objections</b>	<ul style="list-style-type: none"> <li>No demonstration that Brownfield sites have been considered</li> <li>If housing numbers fall below required level then housing should be approved irrespective of the spatial policies in the plan.</li> <li>Perfect Homes also want additional land allocated.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>Natural England supports the inclusion of Neighbourhood Plans in the policy.</li> <li>Chater Homes and Perfect Homes supports the policy as it complies with the NPPF.</li> </ul>										

Chapter 7: The Spatial Strategy and Key Diagram - Policy SP2 and Paragraph 8.3											
Total Representations: 7											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty	Yes	No	Not Specified

	3	2			2	3		to Co-operate	1	3	
<b>Objections</b>	<ul style="list-style-type: none"> <li>There should be a review of development limits boundaries particularly at Wendens Ambo</li> <li>Development should be allowed just outside development limits and there should not be just a blanket ban</li> <li>Development limits have not been fully justified</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>English Heritage</b> broadly welcomes the criteria within this policy, particularly (b) and (c) which refer to development needing to be compatible with the character of the settlement and/or its countryside setting as well protecting the setting of existing buildings and the character of the area.</li> </ul>										

<b>Chapter 8: General Development Principles - Policy DES1 and Supporting Text</b>											
<b>Total Representations: 12</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	4	2	6		2	9	1		3	2	7
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>Developers</b> object to the inclusion of a target for Lifetime Homes or Neighbourhoods, there has been no justification for the need or the level required, it does not meet an identified local need, lacks flexibility and affects viability which has not been tested or demonstrated</li> <li>Sustainable construction standards may conflict with new standards over the plan period</li> <li>These elements of the policy have not been tested for viability as set out in NPPF.</li> <li>Respecting Local Character is not clear and may contradict NPPF and other policies as well as the Essex Design Guide, it is also backward looking and will stifle modern innovative and high quality design</li> <li>There needs to be greater emphasis on physical activity which particularly encourages walking and cycling and stricter design standards to ensure that this happens and it should apply to all areas of development.</li> <li>Development in Dunmow is too dense and the roads too narrow</li> <li>Development on large sites in Dunmow do not comply with Lifetime design</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Natural England</b> welcome the inclusion of Green Infrastructure</li> <li><b>English Heritage</b> broadly welcomes this policy and its references to design issues such as historic character, setting, local context and materials.</li> </ul>										

<b>Chapter 9: Employment Strategy - Paragraph 9.1</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1					1				1
<b>Objections</b>	<ul style="list-style-type: none"> <li>Concern that employment land is being lost especially in Dunmow</li> </ul>										

Support	
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<b>Chapter 9: Employment Strategy - Paragraph 9.2</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
			2				2				2
<b>Objections</b>	<ul style="list-style-type: none"> <li></li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Stansted Airport</b> are pleased to note identification of Stansted Airport as a strategic growth location</li> </ul>										

<b>Chapter 9: Employment Strategy - Policy SP3 and Supporting Text</b>											
<b>Total Representations: 19</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	5	6			3	11			4	7	
<b>Objections</b>	<ul style="list-style-type: none"> <li>Particular sites are not viable to redevelop and retain in employment use</li> <li>Non airport related warehousing should be allowed at the airport to take advantage of the M11 junction</li> <li>Specific new sites are proposed including one in the Green Belt</li> <li><b>The Environment agency</b> object to an employment allocation at Gt Dunmow due to lack of foul water treatment capacity, concerns are also raised about the allocation at Elsenham</li> <li>The plan under estimates the employment generating impact of Stansted Airport</li> <li>The 4 Ha employment allocation at Elsenham is considered unjustified and unsound due to the unsustainable location and other sites being better and more sustainable</li> <li>The release of 18 Ha of employment land at Stansted for non-airport employment related employment is unsound</li> <li>Some site allocations are not justified</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>Support Policy SP3 Employment Strategy that includes enabling and supporting further development at Chesterford Research Park</li> <li>Support is expressed for a specific site in Wendens Ambo</li> </ul>										

<b>Chapter 9: Employment Strategy - Policy SP4 and Supporting Text</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified

		1				2		to Co-operate		1	
<b>Objections</b>	<ul style="list-style-type: none"> <li>It is unsound to release 18 Ha of Employment land north of Stansted airport and it should be reconsidered</li> <li>The employment policy on the airport is too restrictive in keeping it airport related</li> <li>The policy is not clearly drafted and may permit any sort of development</li> </ul>										
<b>Support</b>											

<b>Chapter 9: Employment Strategy - Policy EMP1 and Supporting Text</b>											
<b>Total Representations: 5</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1	1			1	3			2	1	
<b>Objections</b>	<ul style="list-style-type: none"> <li>The policy is negatively worded and does not allow the expansion of existing employment sites. It also stifles economic growth and ignores market signals contrary to the NPPF</li> <li>Any redevelopment should also allow for highway improvements where this is necessary</li> <li>The policy is too restrictive and does not allow enough clarity or flexibility for the redevelopment, particularly in relation to community use or what the local area is</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>The <b>County Council</b> support elements of the policy</li> <li>The policy is supported in principle, but it needs to be implemented and it should ensure that owners do not deliberately create vacancies to get consent for housing</li> </ul>										

<b>Chapter 9: Employment Strategy - Policy EMP2</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1				1					1
<b>Objections</b>	<ul style="list-style-type: none"> <li>There is support for the policy in principle but concern that it will not be implemented or applied</li> </ul>										
<b>Support</b>											

<b>Chapter 10: Retail Strategy - Paragraph 10.1</b>											
<b>Total Representations: 1</b>											

Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1				1						
<b>Objections</b>	<ul style="list-style-type: none"> <li>English Heritage consider that Thaxted and Stansted Mountfitchet should be referred to in this paragraph as well.</li> </ul>										
<b>Support</b>											

Chapter 10: Retail - Policy SP5											
Total Representations: 5											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2	1			1	3			2	1	
<b>Objections</b>	<ul style="list-style-type: none"> <li>Waitrose would like the threshold for a retail impact assessment to be reduced to 300 sq m</li> <li>There are questions about the policies which have been put forward from the evidence and whether the evidence supports them.</li> <li>Those allocations such as Land North East of Elsenham that include retail provision should be identified in Policy SP5.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>English Heritage welcome the statement within this policy that all development proposals will need to respect the historic and architectural character of the town and local centres and be of a high quality design. They also welcome the aim to prevent the loss of shops and other town centre uses in order to protect the vitality of the town and local centres.</li> </ul>										

Chapter 11: Housing Strategy District Housing Requirement Paragraphs 11.1 – 11.19 and Policy SP6											
Total Representations: 58 (1 representation was supported by 973 people and another by 1261 people )											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	12	14	32		1	46	11		8	17	33
<b>Objections</b>	<ul style="list-style-type: none"> <li>Plan does not clearly set out the assumed timescales of all the allocations so that Housing delivery can be properly examined and to ensure that infrastructure is delivered at the right time.</li> <li>The base date of the Local Plan cannot be 2011. It must be the current and be 2014. This is required to meet objectively assessed need for housing.</li> <li>The larger developments in Great Dunmow are too dense with non-compliant small gardens, insufficient parking and roads too narrow.</li> <li>UDC should build more social housing and not rely on developers</li> <li>The issue of affordable housing should not play a role in determining the overall housing requirement as affordable housing can be provided through other policies such as exception sites.</li> <li>Plan should show a detailed breakdown of the 11500 homes.</li> </ul>										

	<ul style="list-style-type: none"> <li>• The plan is based on a flawed assessment of the future housing need and the housing target for the District should be reduced.</li> <li>• The plan is based on a flawed assessment of the future housing need and does not meet the objectively assessed housing needs of the district and the housing target for the district should be increased.</li> <li>• The number of dwellings to be delivered through sites which do not have planning permission is questioned.</li> <li>• There is no evidence to support an allowance of 900 dwellings being delivered through windfall sites.</li> <li>• The overall housing number should reflect the pressures in the three sub-market housing areas. The Plan does not take into account the needs of other authorities.</li> <li>• Growth in Uttlesford needs to be re-appraised in the light of Interim Report on the Airports Commission (December 2013) and the unlikelihood of a second runway at Stansted by 2030.</li> <li>• The council’s policy in relation to Lifetime Homes is unclear.</li> <li>• This number of homes is not needed as there is no industry, there is to be no major development at Stansted Airport for 30 years or more, and the district historically has a very low unemployment rate. There are little or no brown-field sites in the district to be redeveloped, so building so many houses, on vitally important farmland or the Green Belt, for people who must commute to London or Cambridge for work is truly unsustainable</li> <li>• The strategy makes no provision for ‘self-build’ as encouraged by the Government. Nor does it make provision for low cost ‘mobile home’ space</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>South Cambs DC and Epping Forest DC</b> support Uttlesford is making provision for its objectively assessed need.</li> <li>• <b>A number of developer</b> considers that the housing target of 10,460 new homes between 2011 and 2031 is supported on the grounds that it is supported by the objectively assessed housing needs of the District as required by the NPPF</li> </ul>

<b>Chapter 11: Housing Strategy - Policy SP7</b>											
<b>Total Representations: 59 (1 representation was supported by 973 people and another by 1261 people )</b>											
<b>Legally compliant</b>	<b>yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Sound</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Complies with the Duty to Co-operate</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>
	15	8	36		6	29	24		14	8	37
<b>Objections</b>	<ul style="list-style-type: none"> <li>• No explanation or justification of the scale and distribution of housing.</li> <li>• Additional housing allocations should be made.</li> <li>• The suitability and delivery of proposed sites is questioned and therefore certain allocations should be deleted and alternative housing allocations should be made.</li> <li>• ‘Additional sites’ were selected on a different strategy to that which guided the selection of other sites. This mixture of approaches is unacceptable and reinforces the objection that only a comprehensive and universal methodology to assess all sites on the same basis would be ‘robust’.</li> <li>• Over reliance on a limited number of settlements to deliver the majority of the planned housing.</li> <li>• Many of the sites have already been granted planning permission and therefore the Plan does not plan for the longer term.</li> <li>• Amend policy to include additional safeguards with respect of the formal safeguarding of Aerodromes.</li> <li>• <b>Natural England</b> believes that local authorities should consider the provision of natural</li> </ul>										

	<p>areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs.</p> <ul style="list-style-type: none"> <li>• Policy should include provision of multi user paths within the proposed improvements to the highway infrastructure. Currently there is no reference to use by horse riders.</li> <li>• The only acceptable form of development in Thaxted is infill. Further development would detract from the villages’ landscape setting, impact on tourism, capacity of schools, surgery, roads, water supply and lead to loss of agricultural land.</li> <li>• Scale of development will ruin countryside.</li> <li>• The road network is unable to accommodate the traffic generated by the scale of growth.</li> <li>• Development in Saffron Walden has inadequate access to employment centres meaning cars will need to cross town, impacting on the already poor air quality of the town.</li> <li>• Insufficient infrastructure.</li> <li>• <b>Hertfordshire County Council</b> suggests that further work is needed to identify impacts of development on Hertfordshire road network ; and that some of the housing developments are likely to have an impact upon HCC school places.</li> <li>• Single or small developments should be allowed on carefully selected areas of green belt around the many small villages.</li> <li>• Development should be dispersed more equally across the district.</li> <li>• <b>Highways Agency</b> considers that the assessment work undertaken to date does not yet fully determine the operation of the strategic road network following the implementation of all District Plan development. However, it does provide an indication that a material impact could occur at a number of critical locations on the Strategic Road Network. Further modelling work should be undertaken. The larger developments are not proposed to come forward until the end of the plan period and in that respect there is time to work out an appropriate mitigation strategy.</li> <li>• Allocation of all sites to meet requirement does not allow for flexibility. It is not clear where or how the 300 dwellings in other villages or the windfall allowance will be delivered.</li> <li>• There is a difference in inflexion to what is being demanded in policy SP7 and Policy EN10. Both policies are unclear.</li> <li>• <b>English Heritage</b> consider that the policy should require development to respect the district’s historic environment as a whole, including significance and setting of heritage assets and historic settlements.</li> </ul>
<p><b>Support</b></p>	<ul style="list-style-type: none"> <li>• A number of developers support the identification of certain proposal sites.</li> <li>• A resident of Great Chesterford supports the strategy on the basis that it conforms to the needs, facilities, resources and heritage considerations which affect the village.</li> <li>• <b>Essex CC</b> (Minerals and Waste) supports the policy reference to design and layout of housing developments including any infrastructure will incorporate the highest standards of low carbon development.</li> <li>• <b>Highways Agency</b> supports the emphasis on sustainable transport and travel.</li> <li>• <b>Little Dunmow PC</b> broadly supports the policy as it does not allow for other large developer led proposals in the area.</li> <li>• <b>Birchanger Parish Council</b> supports the protection of the Metropolitan Green Belt and Countryside Protection Zone.</li> </ul>

**Chapter 11: Housing Strategy - Policy HO1 and Paragraph 11.20**

**Total Representations: 4**

Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1	1			1	2			1	1	
<b>Objections</b>	<ul style="list-style-type: none"> <li>The larger developments in Dunmow are too dense with non-compliant small gardens insufficient parking and roads too narrow</li> <li>This policy may not be needed given the use of policy DES1 it is also too prescriptive</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>Support the density range of 30-50 units/hectare within Development Limits of all identified settlements other than Saffron Walden and Great Dunmow.</li> </ul>										

<b>Chapter 11: Housing Strategy - Policy HO3</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
							2				
<b>Objections</b>	<ul style="list-style-type: none"> <li>Concern is raised about the loss of small dwellings by combination of 2 smaller dwellings into one larger dwelling and this should not be permitted in order to safeguard the limited stock of smaller dwellings</li> <li>This subdivision policy offers no control or guidance over sustainable location for such additional dwellings to be created and in a rural area like Uttlesford this is unsound.</li> </ul>										
<b>Support</b>											

<b>Chapter 11: Housing Strategy - Policy HO5</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1						1				1
<b>Objections</b>	<ul style="list-style-type: none"> <li>Concern is expressed that the policy is more 'lax' than the policy for development within village which have limits.</li> <li>This infill policy offers no control or guidance over what constitutes 'infill' nor does it offer any sustainable location guidance for such additional dwellings to be created and in a rural area like Uttlesford this is unsound.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Lt Dunmow Parish Council</b> support Policy HO5 , in particular (a) and (e)</li> </ul>										

<b>Chapter 11: Housing Strategy - Policy HO6</b>											
<b>Total Representations: 3</b>											



Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1					2				1	
<b>Objections</b>	<ul style="list-style-type: none"> <li>The policy does not allow flexibility if all the criterion are not met.</li> <li>Sections c. and d. remove the financial incentive to redevelop and is in effect a ban on development</li> <li>The building of large new homes in the countryside will not be permitted.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

<b>Chapter 11: Housing Strategy - Paragraph 11.20</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
<b>Objections</b>	<ul style="list-style-type: none"> <li>The policy as presented is too 'flabby'. The council must ensure that developers deliver on the legal undertakings they enter into with regard to the delivery of social housing units. Too often in the past one finds instances of developers coming back with requests to 'renegotiate' because 'market conditions have changed', e.g. Wickfords. Drawing up these agreements entails tough talking, with no loopholes left.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

<b>Chapter 11: Housing Strategy - Paragraph 11.31</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
<b>Objections</b>	<ul style="list-style-type: none"> <li>The onus is on the Council to demonstrate that its targets for affordable housing, and other local plan policy expectations, are viable and achievable so that the plan objectives can be delivered with the minimum of delay. The developer should not be obliged to demonstrate viability with each application.</li> <li>Protracted negotiations over planning contributions will slow housing delivery</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

<b>Chapter 11: Housing Strategy - Policy H07</b>											
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Total Representations: 3											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
							1				
<b>Objections</b>	<ul style="list-style-type: none"> <li>The policy is unsound because the requirement for affordable housing at the rate proposed is unjustified</li> <li><b>The Fairfield Partnership</b> welcomes the additional wording recognising that viability will be taken into account in negotiating an appropriate provision. Large schemes such as Land North East of Elsenham that provide for a range of beneficial community infrastructure on site alongside new homes (such as schools), are exposed to development costs that are not borne by other purely residential allocations where contributions to off-site improvements might be more readily negotiated.</li> <li>40% Affordable Housing is not viable and not justified</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

Chapter 11: Housing Strategy - Policy HO8											
Total Representations: 2											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1							2		
<b>Objections</b>	<ul style="list-style-type: none"> <li>The district enjoys a long history of sound low cost rented options through 'charitable trusts' and also through private rented accommodation. Policy HO8 should be broadened in its scope to allow for 'charitable trusts' and private landlords to provide such affordable housing also and the control being set over rents levels by the fair rents officer under simple S.106 agreements. The narrowness of the Policy is unsound.</li> <li>There is one objection which suggests that the policy should be more open for criterion and worded as follows: a) "the development will meet a demonstrable local need <del>that cannot be met in any other way</del>"</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

Chapter 11: Housing Strategy - Policy HO11											
Total Representations: 2											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		2					2				

<b>Objections</b>	•
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>One developer</b> who say they can provide a site supports the policy.</li> <li>• <b>English Heritage</b> ‘welcome the first criteria in this policy which requires planning applications and site allocations to minimise impact on the historic environment.’</li> </ul>

<b>Chapter 12: Environmental Protection - Policy SP8 and paragraphs 12.1 to 12.6</b>											
<b>Total Representations: 4</b>											
<b>Legally compliant</b>	<b>yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Sound</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Complies with the Duty to Co-operate</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>
	<b>1</b>	<b>2</b>	<b>3</b>		<b>2</b>	<b>3</b>	<b>1</b>		<b>1</b>	<b>3</b>	<b>2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• SP 8 is supported as far as it goes but should take into account where development is located, development should be located where environmental impacts will be reduced</li> <li>• The plan does not minimise carbon emissions and the major allocations do the exact opposite</li> <li>• We are too dependent on imports for food as well as carbon producing energy to produce it. The plan should also say how we are going to find the additional land needed to meet the food needs of the increased population</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Natural England:</b> ‘The protection of the natural environment is welcomed’;</li> <li>• Paragraph 12.3 refers to ‘the built environment mitigates against and is resilient to the impacts of change, and identifies the provision of green infrastructure as one mechanism for achieving this’ this is also welcomed</li> <li>• <b>Essex CC</b> is pleased that UDC will support development which employs best practice in sustainable design and construction. The policy further promotes development which makes provision for waste recycling and which is located and designed to be energy efficient.</li> <li>• <b>English Heritage:</b> welcomes the fourth bullet point of this policy which requires development to retain and enhancing the character, appearance and setting of areas, settlements and buildings that are worthy of protection.</li> </ul>										

<b>Chapter 12: Environmental Protection - Policy EN 1 and Paragraphs 12.7 to 12.10</b>											
<b>Total Representations: 3</b>											
<b>Legally compliant</b>	<b>yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Sound</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Complies with the Duty to Co-operate</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>
		<b>2</b>	<b>1</b>				<b>2</b>		<b>1</b>		<b>2</b>
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Greater emphasis needs to be given to the reduction of traffic noise throughout the district, particularly in relation to major routes such as the M11 and the A120 and noise attenuation measures should be used more widely.</li> <li>• The policy should include: “should minimise pollution”.</li> </ul>										

<b>Support</b>	<ul style="list-style-type: none"> <li><b>Natural England</b> States: ‘effects to minimise effects of pollutants on the natural environment are to be encouraged.’</li> </ul>
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<b>Chapter 12: Environmental Protection - Policy EN 2 and Paragraphs 12.11 and 12.12</b>											
<b>Total Representations: 4</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		2					3				
<b>Objections</b>	<ul style="list-style-type: none"> <li>The cumulative effects of air pollution are not taken into account in the plan. The plan does not enable the delivery of sustainable development in accordance with the with the policies in the NPPF as a result.</li> <li>The plan does not comply with EU legislation on air pollution.</li> <li>The policy does not consider the effects of new development on existing users and residents outside the development</li> <li>There is no method for ascertaining what is "poor" air quality</li> <li>The policy should be redrafted in the style of the South Cambs policy on the subject</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

<b>Chapter 12: Environmental Protection - Paragraph 12.13</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1					1				
<b>Objections</b>	<ul style="list-style-type: none"> <li>The Plan is unsound because it is not consistent with National Planning Policy Framework and illegal because it does not have regard to UDC's 2008 Sustainable Community Strategy of ensuring new development is sustainable because the AQMA.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

<b>Chapter 12: Environmental Protection - Policy EN 4 and Paragraph 12.14</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1			1		1			1	
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>Gt Dunmow</b> recycling centre is in the wrong place as it is near a hotel and housing, a new location should be found in the district</li> </ul>										

<b>Support</b>	<ul style="list-style-type: none"> <li>Essex CC is supportive of the wording within the policy regarding ‘development will be supported where it makes appropriate provision for the recycling of waste and maximises the use of recycled building materials’.</li> </ul>

<b>Chapter 12: Environmental Protection - Policy EN 7</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1		2		1		2		1		2
<b>Objections</b>	<ul style="list-style-type: none"> <li>SUDs systems should be designed so as not to increase the bird hazard risk or the safe operation of Stansted Airport or the movement of aircraft; where appropriate the implementation of a bird hazard management plan will be secured by condition or planning obligation.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Natural England:</b> Provision of Sustainable Urban Drainage systems (SUDs) is welcomed as an example of green infrastructure through the use of permeable surfaces and soft landscaping. De-culverting of rivers and watercourses where feasible is also welcomed and encouraged.</li> <li>Surface Water Flooding, within the Local Plan is supported. <b>Thames Water</b> supports the use of properly maintained Sustainable Urban Drainage Systems (SUDs) in appropriate circumstances.</li> </ul>										

<b>Chapter 12: Environmental Protection - Policy EN8 and Paragraphs 12.23 to 12.27</b>											
<b>Total Representations: 8</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1	1	6		1	4	3		1	2	5
<b>Objections</b>	<ul style="list-style-type: none"> <li>Accordingly UDC’s policy for water conservation must take account of “virtual water” imports in clothing, food, drinks etc. Failure to do this exports shortages to other countries.</li> <li>UDC should do more than require new buildings “to meet Sustainable Homes Code Level 3.” It should require meters, and measures for recycling and rainwater collection for all new buildings</li> <li>Integration with building design is cheaper and more effective than retrofitting. The Plan has indications in this direction but is vague about best practice, design, and percentage of rainfall to be captured</li> <li>There should be a cross country water strategy</li> <li>The Local Plan cannot be considered sustainable without proper consideration and a realistic proposed solution that Uttlesford is capable of implementing prior to authorising the developments which gave rise to these concerns.</li> <li><b>Environment Agency</b> consider: ‘1, 2 and 3 at the end of Policy EN8 should be re-numbered</li> </ul>										

	<p>so that the following item is inserted between items 2 and 3. ☐ ‘that a risk assessment demonstrates an acceptable risk to groundwater; and’ The target of 105 l/h/d is in line with other developments across the area. Ideally we would have preferred to see targets for non-residential use based on the BREEAM standards. However the overall policy has been designed to minimise water use following agreed targets.’</p> <ul style="list-style-type: none"> <li>• ‘We propose to introduce a new, tighter level of water efficiency into the Building Regulations, to be set at 110 litres/person/day (lpd). This would be an optional higher level in addition to the current level of 125 lpd which could only be applied in areas with specific local needs (such as water stress).’</li> <li>• Waste water infrastructure may not be delivered at a fast enough rate to meet the plans requirements and so jeopardise delivery of the plan, because it can take up to 10 years to complete</li> <li>• It is unjustified because developers are already, by law, required to make financial contributions to the provision and maintenance of water services.</li> <li>• The policy will militate against the delivery of the plan, including the development objectives. Part of the policy is also unlawful.</li> <li>• The Council is making planning permission conditional upon developers providing evidence to satisfy assessment criteria that are in themselves vague and imprecise.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>•</li> </ul>

<b>Chapter 12: Environmental Protection - Policy EN 9</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1				1						
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Essex CC recommends that the ‘site requirements’ (the orange boxes) accompanying each site allocation from Section 20 onwards incorporates the requirement to consider the prior extraction of minerals as part of any development of that location, this could be done after the examination as a minor amendment</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>•</li> </ul>										

<b>Chapter 12: Environmental Protection - Policy EN 10</b>											
<b>Total Representations: 5</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1	4		1	4				1	1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• To remedy this objection our clients request that criterion (a) be deleted.</li> <li>• There is no need for the policy as much of the energy standards are being incorporated into</li> </ul>										

	<p>the building regulations</p> <ul style="list-style-type: none"> <li>• Parts of the policy are unclear</li> <li>• The policy should apply to fewer than 10 homes</li> <li>• Policy EN10 does not go nearly far enough, particularly given Uttlesford's huge and unsustainable carbon footprint. We understand from the UDC Energy Efficiency Officer that new builds can be built to Passivhaus standards at a cost which is not significantly more than using traditional new build techniques.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Essex CC</b> welcomes reference to development will be supported where it is designed to include decentralised, renewable and low carbon energy sources.</li> </ul>

<b>Section : Policy SP9 and Paragraph 13.1 to 13.5</b>											
<b>Total Representations: 8</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1	2	5			7	1		1	2	5
<b>Objections</b>	<ul style="list-style-type: none"> <li>• This policy should be deleted or should refer only to the Green Belt which is designated for particular purposes.</li> <li>• Section 11 of the NPPF does not advocate the protection of the countryside for its own sake, which is the stance of this policy. It therefore goes beyond the requirements set out in the NPPF and as such conflicts with national policy.</li> <li>• As stated in response to other policies relying on the 'development' limits they should be re drawn on the basis of evidence or redefined.</li> <li>• We would like to see the 2010 Consultation language reinstated the current policy is a watered down version.</li> <li>• <b>Little Easton Parish Council</b> asks that the District Council amends or adds to this policy to better suit its objectives: Set out that development will only be allowed if it does not result in the coalescence of settlements either visually or by an increase in activity which has an urbanising effect on the area between settlements.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• This policy is supported and <b>Natural England</b> is pleased to see reference to best and most versatile agricultural land, and its links to Policy C1.</li> <li>• We support the general thrust of draft policy SP9, but consider that where land is subject to an allocation, it should be clarified the provisions of SP9 should not apply.</li> </ul>										

<b>Chapter 13: Development in the Countryside - Policy C1 and Paragraphs 13.6 to 13.12</b>											
<b>Total Representations: 10</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	6	2	2			2	6		2	3	4

<b>Objections</b>	<ul style="list-style-type: none"> <li>The Countryside Protection Zone should be rigidly enforced and only infill or brown field developments allowed therein. The map of the Countryside Protection Zone that accompanied Policy S8 should be reintroduced and rigidly enforced.</li> <li>In order to make the plan sound, the first sentence of paragraph 13.9 should read: “Applications for development affecting a registered historic park and garden should show how the proposed development does not harm the significance of the park and garden, unless there are outweighing public benefits”</li> <li>Full details of the Flitch way link project should be shown and highlighted as a strategic project and all developments along the proposed route should be made to make provision for this project. ECC Rights of Way team are fully aware of these plans.</li> <li><b>Essex Bridleway Association</b> would like the policy to protect bridleways from development</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Natural England</b> broadly supports the policy</li> <li><b>English Heritage:</b> broadly welcome this policy and its various references to specific landscape and heritage characteristics of the district.</li> </ul>

<b>Chapter 13: Development in the Countryside - Policy C2</b>											
<b>Total Representations: 5</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1	1	3				3		2		1
<b>Objections</b>	<ul style="list-style-type: none"> <li>The types of potential future uses should not be prioritised as this does not comply with new permitted development rights it does not accord with the NPPF</li> <li>The wording of this policy is unclear with regards to the historic environment. As currently drafted, it allows for the re-use of rural buildings without mentioning the need to safeguard buildings of architectural and/or historic interest.</li> <li><b>English Heritage</b> suggest to make the plan sound another point should be added to criterion 1 – 4: “the development would conserve or enhance buildings of architectural and/or historic interest”</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Natural England:</b> broadly supports the policy, especially under sub section (3) which relates to the protection and enhancement of biodiversity of the site.</li> </ul>										

<b>Chapter 14: The Historic Environment - Policy SP10 and Paragraphs 14.1 to 14.4</b>											
<b>Total Representations: 6</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	3	1				1	4				1
<b>Objections</b>	<ul style="list-style-type: none"> <li>Non designated Heritage assets (such as Hatfield FOREST) are not given sufficient protection by the policy</li> </ul>										



	<ul style="list-style-type: none"> <li>The policy should also refer to Registered Parks and Gardens and their settings.</li> <li>Paragraph 157 of the NPPF requires that Local Plans should "contain a clear strategy for enhancing the natural, built and historic environment", The Local Plan does not.</li> <li>The third paragraph states that proposals to modify heritage assets to reduce carbon emissions, it is suggested that the weighting attached to this needs to be modified to accord with national guidance.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>

<b>Chapter 14: The Historic Environment - Policy HE1</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1		1		1		1				
<b>Objections</b>											
<b>Support</b>	<ul style="list-style-type: none"> <li><b>English Heritage</b> stated: We welcome this policy on conservation areas.</li> <li>We support Policy HE1 . Open spaces that materially contribute to the historic character and appearance of the area must be protected.</li> </ul>										

<b>Chapter 14: The Historic Environment - Policy HE2</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1				1						
<b>Objections</b>	<ul style="list-style-type: none"> <li></li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>English Heritage</b> welcome this policy on listed buildings.</li> </ul>										

<b>Chapter 14: The Historic Environment - Policy HE3</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty	Yes	No	Not Specified

	2				1	1		to Co-operate	1		1
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>English Heritage</b> state: In order to make the plan sound, clarity should be given regarding archaeological sites of less than national importance, and the renewable energy section should refer to more than just scheduled monuments.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

<b>Chapter 15: The Natural Environment - Policy SP11</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1	1				1		1		1
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>Residents Group</b> object to the specific wording of draft Policy SP11. The equivalent 2010 Consultation policy, DC10, had requirements that “New development should not result in a reduction of the biodiversity value of sites or the priority habitats defined in the BAP” and that “Development will be required to contribute to a network of biodiversity sites, green infrastructure and open spaces which link communities”. No explanation is given as to why these provisions have been removed, they should be reinstated.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Natural England</b> welcomes and supports this policy</li> </ul>										

<b>Chapter 15: The Natural Environment - Paragraph 15.5</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
			1						1		
<b>Objections</b>	<ul style="list-style-type: none"> <li></li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Natural England</b> welcomes and supports this policy. Under paragraph 15.5 there is reference to the Essex Biodiversity project website, providing advice on incorporating biodiversity in developments, this is to be welcomed and encouraged.</li> </ul>										

<b>Chapter 15: The Natural Environment - Policy NE1</b>											
<b>Total Representations: 4</b>											

Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1	1	2		1	1	2		1	1	2
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Natural England Suggest:</b> In respect of the reference to contribution to the network of biodiversity sites, the Council could make clearer references to lining sites together, improving access to, between and across sites as well as alleviating Areas of Deprivation for access as part of the benefits achievable from green infrastructure.</li> <li>• " No change has been made to what is now Policy NE1, and we believe that it should be amended to include a clear statement of the need to enhance the natural and local environment - this is currently completely ignored.</li> <li>• The following is suggested as a modification to the policy: Measures to enhance biodiversity should be designed so as not to increase the bird hazard risk or the safe operation of Stansted Airport or the movement of aircraft; where appropriate the implementation of a bird hazard management plan will be secured by condition or planning obligation.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Natural England</b> advises that the approach for the protection of the natural environment is avoid, mitigate and compensate, in that order. The inclusion of financial support from developers for the maintenance of sites after completion is welcomed and to be commended.</li> <li>• <b>Cambridgeshire County Council</b> welcomes the level of consideration given to the conservation of biodiversity within the Uttlesford District Council's draft Local Plan (pre-submission).</li> </ul>										

<b>Chapter 15: The Natural Environment - Policy NE 2</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
			1				1				
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Natural England</b> suggest: The Council may wish to suggest replacement or alternative open site provision under this policy, helping to avoid the potential for increasing areas of deficiency.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>•</li> </ul>										

<b>Chapter 16: Access Strategy - Policy SP12 and Paragraphs 16.1 to 16.5</b>											
<b>Total Representations: 7</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty	Yes	No	Not Specified

	2		4			3	3	to Co-operate	2		4
<b>Objections</b>	<ul style="list-style-type: none"> <li>No mention of the need to provide multi user routes through development, to make the plan sound we suggest that the wording is amended to read 'New development should be linked to existing services....and the countryside beyond by well designed, attractive and safe cycle, pedestrian and bridleway.</li> <li>Fitch Way should be accessible for horses at every access point</li> <li>The development West of Gt Dunmow is not compatible with the safeguarding of Fitch Way as an ecological and recreational resource</li> <li>To make the Plan sound it is suggested that the wording of the introductory paragraph is amended to read '...increase public transport use, cycling, walking and horse riding.' and in paragraph C 'new development should be located where it can be linked to safe and well designed footpath, cycle and bridleway networks.'</li> <li>Thresholds should be set out in the policy when Travel Plans and Transport/Statements will be needed, not just a general statement</li> <li>The Plan must be flawed and unsound without a major assessment of the real impact which Cambridge has over the district.</li> <li><b>The County Council</b> state that the policy should be amended to include reference to the 'provision of safe, secure cycle storage in all new developments where there is no provision'.</li> <li><b>The County Council</b> recommends that when developing more detailed site specific policies, master plans and/or pre applications discussions that sustainable transportation be promoted by considering the following – <ul style="list-style-type: none"> <li>- Car sharing;</li> <li>- Car club networks and mechanisms that may facilitate their sue and operation;</li> <li>- Real time travel information;</li> <li>- Welcome Packs within new developments highlighting sustainable transportation options;</li> <li>- Promote the use of sustainable transportation modes by ensuring adequate and appropriate cycle rack storage (secured and covered), parking spaces, space for motorcyclists and suitable bus stops and routes;</li> <li>- Provision of travel vouchers.</li> </ul> </li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

<b>Chapter 16: Access Strategy - Policy SP 13</b>											
<b>Total Representations: 3</b>											
<b>Legally compliant</b>	<b>yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Sound</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Complies with the Duty to Co-operate</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>
			3				3				
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>Braintree District Council</b> would support policy SP13 - Access to Stansted Airport and considers that all appropriate measures should be taken to ensure that access to the airport from a range of transport modes is possible from the east.</li> </ul>										

	<ul style="list-style-type: none"> <li><b>Essex CC</b> recommends that this policy emphasises the importance of strategic access to Stansted airport to neighbouring authorities, Counties, and London reflecting the airports catchment area.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>Support Policy SP13 – Access to Stansted Airport. South Cambridgeshire welcomes the recognition given of the importance of the airport to the region.</li> </ul>

<b>Chapter 16: Access Strategy - Policy TA1 and Paragraph 16.7</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1				2					1
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>The HBF states:</b> The Local Plan needs to articulate what these parking standards are. Developers should not have to refer to another document such as the standards provided by Essex County Council. The Council will need to justify these standards in its new local plan. Essex County Council is not the local planning authority with regard to the provision of car-parking in developments.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

<b>Chapter 17: Infrastructure - Policy SP 14 and Paragraphs 17.1 and 17.2</b>											
<b>Total Representations: 14</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	3	2	3			2	6		3		3
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>The Mobile Operators Association</b> suggest that there is a specific policy on Telecoms masts: they set out what that policy might be.</li> <li><b>The National Trust suggest:</b> The Plan should make a commitment to working up a Green Infrastructure Strategy for the District. An example would be the Cambridgeshire Green Infrastructure Strategy.</li> <li>It was not until April 2014 that UDC published an "Infrastructure Delivery Plan" but this contains no more than the details of infrastructure that might be needed. There is no real plan as to how it might be delivered to support the housing proposed and it has not been costed.</li> <li>Policy SP14 should be made more robust by including a paragraph to protect other existing infrastructure.</li> <li>It is important to recognise that there may need to be cross boundary contributions to infrastructure, such as schools and youth service provision, in particular for Hertfordshire</li> </ul>										

	<ul style="list-style-type: none"> <li>• The wording of this policy is amended to read '...each development must address water supply...and make enough provision for children’s play space, open space, green infrastructure and new or enhanced social/community infrastructure including enhancement of multi user rights of way within new development. '</li> <li>• It is noted that infrastructure improvements will be funded through S106 Agreements and this is welcomed; however this policy does not include the consideration of the protection or enhancement of Rights of Way.</li> <li>• The Infrastructure delivery section, appendix 2 is wholly inadequate and should be completely re drafted.</li> <li>• The policy should be expanded to make clear that all obligations sought will accord with the tests set out in the Community Infrastructure Levy Regulations 2010 and that all obligations sought will be directly related to the development.</li> <li>• Educational health and transport needs are unlikely to be met by developers and the government are relying on private involvement which is unlikely to happen. land therefore will revert to the developer who will build more houses</li> <li>• <b>The HBF Recommend:</b> The policy is deleted, because the Council cannot insist that a developer must meet all these requirements unless it has conducted a viability assessment that demonstrates that it is feasible to do so in the majority of cases. The Council is obliged to consider its planning priorities and assess whether it is viable for development to provide all these things, while still providing a competitive return to a willing land owner and willing developer (paragraph 173 of the NPPF). Paragraph 175 advises that a CIL should be developed alongside the local plan to ensure that expectations around planning gain are realistic and will not hinder the delivery of the plan.</li> <li>• Policy SP14 should be amended to make clear that development will only be permitted where it makes proper contributions for infrastructure, both directly needed and for its pro rata share of indirect infrastructure needs.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Natural England:</b> Inclusion and support of open space provision and green infrastructure under this policy is welcomed and supported.</li> </ul>

<b>Chapter 17: Infrastructure - Policy INF 1 and Paragraphs 17.3 to 17.9</b>											
<b>Total Representations: 9</b>											
<b>Legally compliant</b>	<b>yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Sound</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Complies with the Duty to Co-operate</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>
	1	1			2	4			1	2	
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Sport England States:</b> Clarification that policy INF1 protects playing fields and sports facilities that are not in active use (as well as those that are) and proposals that would prejudice the use of such facilities is supported as this assists with the interpretation of the policy and would help address some of the issues that regularly arise when applying a policy of this nature.</li> <li>• <b>Sport England</b> requests that paragraph 17.6 be amended to add more safeguards for sports pitches.</li> </ul>										

	<ul style="list-style-type: none"> <li>'New development will be required to make appropriate on site provision..for publicly accessible green space or improvement to existing accessible green space, which will include the use by pedestrians, cyclists and horseriders where possible in accordance with the following standards..'</li> <li>Due to the density of modern development public amenity space is more important.</li> <li>It is also important to safeguard existing open space</li> <li>To comply with the policy, it appears that the <b>NHS</b> would need to seek approval from the Council for its own strategy and it is requested that the policy is amended to clarify that proposals for healthcare facilities would be exempt from the policy criteria.</li> <li></li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Sport England States:</b> Reference to the Council's evidence base on sport (the Uttlesford Open Space Sport Facility and Playing Pitch Strategy 2012) is supported as this provides the justification for the content of policy INF1.</li> <li><b>Natural England</b> broadly supports the policy.</li> </ul>

<b>Chapter 17: Infrastructure - Policy INF 3</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
						1					
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>Sport England</b> request that criterion (b) of policy INF3 be deleted and the policy be amended to provide clarity on what the policy approach is to new/replacement facilities on sites both within and outside development boundaries.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

<b>Chapter 17: Infrastructure - Policy INF 4 and Paragraphs 17.13 and 17.14</b>											
<b>Total Representations: 7</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	3					5			2	1	
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>Cambridgeshire CC</b> Comments: The Section on Health Impact Assessments 17.13-17.14 and Policy INF 4 is misleading in that the policy and associated guidance contained in section 17.13 and 17.14 refer to a both Health Needs Assessments and Health Impact Assessments and the two concepts are used interchangeably within both the policy and guidance. For clarification it would be better to split the policy into two policies one on Health Impact Assessment and one on Health Needs Assessments.</li> <li><b>NHS</b> requests that paragraph 17.14 is amended to read:</li> </ul>										

	<ul style="list-style-type: none"> <li>○ "the District Council will liaise with NHS England and West Essex Clinical Commissioning Group, or any successor body when assessing the scope and scale of likely impacts and the nature of mitigation required".</li> <li>● The policy should be rewritten as there are alternative means available to encourage or pursue the health evaluation of health impacts.</li> <li>● Policy INF4 in its current form is not effective. If the policy is retained it should be reworded to delete the mandatory requirement to submit a health impact assessment, and to instead introduce a requirement for the Director of Public Health to be consulted on any large applications.</li> <li>● Policy INF 4 is supported in general terms but there is little evidence that it is being supported or implemented at present.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>●</li> </ul>

<b>Chapter 18: Monitoring and Delivery : Policy SP15</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1					1				1
<b>Objections</b>	<ul style="list-style-type: none"> <li>● There is a need to achieve a step change in the reduction of car use and the plan does not set out to achieve that.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>●</li> </ul>										

<b>Chapter 20: Saffron Walden - Saffron Walden Policy 1 – Preamble, Site Allocation and Map</b>											
<b>Total Representations:</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	14	1	36			3	20		28		10
<b>Object</b>	<ul style="list-style-type: none"> <li>● <b>Individuals</b> object for the following reasons: <ul style="list-style-type: none"> <li>○ Harm to the historic character</li> <li>○ Inadequate infrastructure including roads, schools, health provision and sewerage provision</li> <li>○ Increase in emissions</li> <li>○ Questions over soundness and deliverability</li> <li>○ Unsustainable</li> <li>○ Suggested alternative sites need to be assessed, including Great Chesterford and sites west of Saffron Walden</li> </ul> </li> </ul>										



	<ul style="list-style-type: none"> <li>○ Questions how a comprehensive development can be achieved when the land is in multiple ownership</li> <li>○ questions regarding infrastructure delivery</li> <li>○ ignoring residents opinions</li> <li>○ Plan process is flawed</li> <li>○ Delivery of link road is questionable</li> <li>○ Previous applications on this site have been refused</li> <li>○ Piecemeal development</li> <li>○ Contrary to NPPF</li> <li>○ Air quality issues and increase in pollution</li> <li>○ Retail and employment provision will detract business from the town centre</li> <li>○ Questions deliverability of the site</li> <li>○ Site at odds with the evidence base</li> <li>○ The policy does not specify the necessary infrastructure requirements</li> <li>○ Site not located near train station or major highway network</li> <li>○ Highways assessment flawed</li> <li>○ Flooding issues</li> </ul> <ul style="list-style-type: none"> <li>● <b>Local retailer</b> wants the specified retail floorspace to be reduced and reference to discount foodstore removed</li> <li>● <b>Land owner/developers</b> suggests changes to map to reflect planning application UTT/13/3467</li> <li>● <b>Landowner</b> suggests minor changes to the policy to allow more flexibility</li> <li>● <b>Landowner/developer</b> Sustainability Appraisal and Strategic Environmental Assessment are flawed</li> <li>● <b>Landowner/developer</b> suggests alternative site at Chelmer Mead</li> <li>● <b>Essex Bridleways Association</b> wants the policy to mention the protection or enhancement of the current bridleway</li> <li>● <b>English Heritage</b> concerns of the impact on the historic town and lack of clarity regarding the link road and no mention of the important views of the church</li> <li>● <b>Sport England</b> consider formal open space being in just one area of the development and delete reference to rugby pitches and replace with playing pitches</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>● <b>Landowners/Developers</b> support the allocation of this site</li> <li>● <b>Essex County Council Environment, Sustainability and Highways</b> feel that the impact of this allocation is not severe</li> <li>● <b>Sport England</b> support the inclusion of playing pitches within the facilities</li> </ul>

<b>Chapter 20: Saffron Walden - Saffron Walden Policy 2 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 2</b>											
<b>Legally compliant</b>	<b>yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Sound</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>	<b>Complies with the Duty to Co-operate</b>	<b>Yes</b>	<b>No</b>	<b>Not Specified</b>
	1	1			1	1				1	1
<b>Objections</b>	<ul style="list-style-type: none"> <li>● <b>Individuals</b> object for the following reasons: <ul style="list-style-type: none"> <li>○ concerns regarding the deliverability and location of the cycle way,</li> <li>○ inadequate road infrastructure</li> <li>○ contrary to objective 6 and SP12</li> </ul> </li> </ul>										

<b>Support</b>	<ul style="list-style-type: none"> <li><b>English Heritage</b> are pleased that there is an opportunity to enhance the site and approach into Saffron Walden</li> </ul>
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<b>Chapter 20: Saffron Walden - Saffron Walden Policy 3 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2	1			2	1			1	1	?
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>Individuals</b> object for the following reasons: <ul style="list-style-type: none"> <li>concerns regarding the deliverability and location of the cycle way,</li> <li>Air Quality Issues</li> <li>contrary to objective 6 and SP12</li> </ul> </li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>English Heritage</b> are pleased that there is an opportunity to enhance the site and approach into Saffron Walden</li> </ul>										

<b>Chapter 20: Saffron Walden - Saffron Walden Policy 4 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2				2				1		?
<b>Objections</b>	<ul style="list-style-type: none"> <li></li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Sport England</b> welcome the allocation for playing pitches</li> </ul>										

<b>Chapter 20: Saffron Walden - Saffron Walden Policy 5 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1				1				1		

<b>Chapter 20: Saffron Walden - Saffron Walden Policy 6 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 8 (including 1 representation supported by 80 people)</b>											

Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	5	1	2		3	3	2		3	2	3
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Individuals</b> object for the following reasons: <ul style="list-style-type: none"> <li>○ Contrary to the NPPF</li> <li>○ Loss of open space</li> <li>○ Increase in traffic</li> <li>○ Lack of school capacity</li> <li>○ Lack of adequate infrastructure</li> </ul> </li> <li>• <b>Landowner/developer</b> suggest changes to the policy, to ensure that it allows some flexibility</li> <li>• <b>English Heritage</b> concerns regarding traffic movements, setting of the town and lack of clarity regarding views of the church</li> </ul>										

Chapter 20: Saffron Walden - Saffron Walden Policy 7 – Preamble, Site Allocation and Map											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2				2				1		1
<b>Objections</b>											

Chapter 20: Saffron Walden - Saffron Walden Policy 8 – Preamble, Site Allocation and Map											
<b>Total Representations: 4</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	4				4				3		1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>English Heritage</b> stress the importance of the historic environment</li> </ul>										

Map 47.1 Inset map: Saffron Walden											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1					1			1		
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Considerable questions remain over the Soundness and deliverability of Allocation SW 1.</li> </ul>										
<b>Support</b>											

Chapter 21: Great Dunmow - Great Dunmow Policy 1 – Preamble, Site Allocation and Map											
Total Representations: 12											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	6	2	4		2	5	5		3	2	7
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Individuals</b> object for the following reasons: <ul style="list-style-type: none"> <li>○ Allocation on agricultural land</li> <li>○ The Retail Assessment does not specify retail space is needed here</li> <li>○ Questions regarding deliverability</li> </ul> </li> <li>• <b>Essex Bridleway Association</b> wants specific reference to the protection of the current bridleway</li> <li>• <b>English Heritage</b> are concerned about urban sprawl and the historic character</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Essex County Council</b> do not considered the proposed growth severe</li> <li>• <b>Sport England</b> support reference to playing pitches</li> </ul>										

Chapter 21: Great Dunmow - Great Dunmow Policy 2 – Preamble, Site Allocation and Map											
Total Representations: 10											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	6		4		2	5	3		4	1	5
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Essex County Council</b> request word to the policy to ensure the site is viable</li> <li>• <b>Landowner/developer</b> suggests changes to the policy to allow more flexibility and set 400 dwellings as a minimum as well as other detailed changes</li> <li>• <b>Individuals</b> object due to public opinion being ignored, and the loss of agricultural land</li> <li>• <b>Land owner</b> is concerned that no allocations are made in Great Dunmow for A class uses and suggests allocation of a site west of Butleys lane</li> <li>• <b>West Essex CCG and NHS England, West Essex and NHS England</b> request changes to the policy to include reference to NHS Business Case approval</li> <li>• <b>Land owner/developer</b> is concerned with the impact on the countryside and deliverability and suggests Dunmow Park as an alternative site</li> <li>• <b>Landowner/developer</b> request the policy is more flexible regarding the number of dwellings</li> <li>• <b>Essex Bridleways Association</b> want the policy to specifically mention bridleway access onto the Flitch Way</li> <li>• <b>English Heritage</b> want clarity in the policy with regards to conserving and enhancing listed building at Folly Farm</li> <li>•</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Essex County Council Environment, Sustainability and Highways</b> do not consider the proposed growth severe</li> <li>• <b>Developer/Landowner</b> supports the allocation of this site</li> </ul>										

<b>Chapter 21: Great Dunmow - Great Dunmow Policy 3 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 9</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	5	2	2		1	6	2		3	3	3
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Individuals</b> object as the site is too close to the A120 and no evaluation/analysis has been carried out and alternative sites assessed</li> <li>• <b>Landowner/developer</b> suggests alternative site east of the town and suggests that the impact on heritage assessments need to be considered</li> <li>• <b>Sport England</b> wants the policy to specifically state that it is for school playing fields and replacement artificial grass pitch</li> <li>•</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Essex County Council Environment, Sustainability and Highways</b> do not consider the proposed growth severe</li> <li>• <b>Landowner/developer</b> support the allocation of this site</li> </ul>										

<b>Chapter 21: Great Dunmow - Great Dunmow Policy 4 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 12</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	5	1	6		1	9	2		4	3	5
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Essex County Council</b> suggest changes to the policy wording to include reference about offsetting the cost of additional primary school places</li> <li>• <b>Individual</b> objects as the proposal is unviable</li> <li>• <b>Landowner/developer</b> requests appraisal of alternative sites</li> <li>• <b>Essex County Council</b> request the site be viability tested</li> <li>• <b>Landowner/developer</b> suggests an alternative site at Dunmow Park</li> <li>• <b>The landowner/developer</b> requests the housing numbers are minimum and suggest policy word changes</li> <li>• <b>English Heritage</b> recommend that clarity is provided to conserve and enhance the conservation area</li> <li>• <b>Sport England</b> contrary to paragraph 74 of the NPPF – suggest policy text changes</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Helena Romanes School</b> support the allocation of this site</li> <li>• <b>Landowner/developer</b> support the allocation of this site</li> </ul>										

<b>Chapter 21: Great Dunmow - Great Dunmow Policy 5 – Preamble, Site Allocation and Map</b>											
<b>Total Representations:</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty	Yes	No	Not Specified

	2	1	2			4	1	to Co-operate	2	1	2
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Individual</b> should be allocated for employment</li> <li>• <b>Local retailer</b> suggests policy word changes to set out the retail floorspace more precisely</li> <li>• <b>Landowner/developer</b> suggests alternative site at Dunmow Park</li> <li>• <b>Essex Bridleway Association</b> requests the policy make reference to the Flich Way and bridle access</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Essex County Council Environment, Sustainability and Highways</b> do not consider the proposed growth severe</li> </ul>										

<b>Chapter 21: Great Dunmow - Great Dunmow Policy 6 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 5</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	5					5				3	2
<b>Objections</b>	<ul style="list-style-type: none"> <li>• A <b>landowner/developer</b> questions the sites deliverability over the plan period and suggests the allocation should be reduced and other sites found</li> <li>• <b>Essex Bridleways Association and an individual</b> want reference to a multi user track</li> </ul>										

<b>Chapter 21: Great Dunmow - Great Dunmow Policy 7 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 5</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2	2	1			1	3		1	2	2
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Individuals</b> questions the deliverability of this site in light of the high court decision</li> <li>• <b>Essex Bridleways Association</b> wants reference to a bridleway in the policy</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Essex County Council Environment, Sustainability and Highways</b> do not consider the proposed growth severe</li> <li>• <b>A developer/landowner</b> supports the allocation of this site</li> </ul>										

<b>Chapter 21: Great Dunmow - Great Dunmow Policy 8 – Preamble, Site Allocation and Map</b>											
<b>Total Representations:</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2	1	1				3		1	1	2

<b>Objections</b>	<ul style="list-style-type: none"> <li>• Unsustainable</li> <li>• Local opinion ignored</li> <li>• The site is ancient woodland</li> <li>• <b>Essex Bridleways Association</b> wants reference to a bridleway in the policy</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Essex County Council Environment, Sustainability and Highways</b> do not consider the proposed growth severe</li> </ul>

<b>Chapter 21: Great Dunmow - Great Dunmow Policy 9 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 3</b>											
<b>Legally compliant</b>	yes	No	Not Specified	<b>Sound</b>	Yes	No	Not Specified	<b>Complies with the Duty to Co-operate</b>	Yes	No	Not Specified
	2		1			2	1		1	1	1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Essex Bridleways Association</b> wants reference to multiuser access in the policy</li> <li>• Local opinion has been ignored</li> <li>• Sits outside current VDL</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Essex County Council Environment, Sustainability and Highways</b> do not consider the proposed growth severe</li> </ul>										

<b>Chapter 21: Great Dunmow - Great Dunmow Policy 10 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
<b>Legally compliant</b>	yes	No	Not Specified	<b>Sound</b>	Yes	No	Not Specified	<b>Complies with the Duty to Co-operate</b>	Yes	No	Not Specified
	1					1					
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>English Heritage</b> point out that development need to enhance and conserve the conservation area and heritage assets</li> </ul>										

<b>Chapter 21: Great Dunmow - Great Dunmow Policy 11 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 2</b>											
<b>Legally compliant</b>	yes	No	Not Specified	<b>Sound</b>	Yes	No	Not Specified	<b>Complies with the Duty to Co-operate</b>	Yes	No	Not Specified
		2					2				2
<b>Objections</b>	<ul style="list-style-type: none"> <li>• It is an Essex County Council project and has nothing to do with Uttlesford</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Essex County Council Environment, Sustainability and Highways</b> do not consider the proposed growth severe</li> </ul>										

<b>Chapter 21: Great Dunmow - Great Dunmow Policy 12 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2	1				1	2				1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Great Dunmow Town Council</b> wants the allocation to be a public car park</li> <li>• Minor amendment to the labelling of the site in the map</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>English Heritage</b> support the principle of development on this site</li> </ul>										

<b>Map 47.2 Inset map: Great Dunmow</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
			1						1		
<b>Objections</b>											
<b>Support</b>	<ul style="list-style-type: none"> <li>• The exclusion of a new settlement to the west of Great Dunmow is supported on the basis that a new settlement in that location is not considered to comply with the policies in the National Planning Policy Framework and would lead to a piecemeal and unacceptable extension of the built up area of Great Dunmow into the open countryside such that it would not provide a comprehensive approach to the future expansion of Great Dunmow and result in coalescence with Little Easton</li> </ul>										

<b>Chapter 22: Elsenham - Elsenham Policy 1 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 48 (1 representation was supported by 973 people and another by 1261 people )</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	10	14	24			5	34		9		11
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Individuals</b> object for the following reasons: <ul style="list-style-type: none"> <li>○ considerable questions remain over the soundness and deliverability of this allocation</li> <li>○ unsustainable area for such large growth</li> <li>○ allocation not justified when considered against reasonable alternatives</li> <li>○ allocation unbalances the Districts spatial strategy</li> <li>○ lack of duty to co-operate evidence with East Herts Dc</li> <li>○ Great Chesterford is a sustainable alternative location for development of this scale</li> </ul> </li> </ul>										



	<ul style="list-style-type: none"> <li>○ Inadequate infrastructure including roads, schools health facilities and water</li> <li>○ Urban sprawl – coalescence of Elsenham and Henham</li> <li>○ Poor access to major roads</li> <li>○ Uncertainties concerning the cost of infrastructure needed to support the development without breaching other policy aims</li> <li>○ Questions over site viability</li> <li>○ Lack of evidence around how the site will support local employment and services</li> <li>○ The housing should be dispersed around the district</li> <li>○ Views of local people have been ignored</li> <li>○ The site has been refused planning application in the past for fewer houses</li> <li>○ Flawed decision making process</li> <li>○ The plan has not objectively assessed all major infrastructure needs</li> <li>○ The proposed link road goes in the wrong direction and it will not be used</li> <li>○ A new access road is suggested going directly west to the B1383</li> <li>○ No local employment opportunities</li> <li>○ Contrary to the plans Objectives, Vision and NPPF</li> <li>○ Failed the Duty to Co-operate</li> <li>○ Impact on the CPZ has not been considered</li> <li>○ Impact on Birchanger Wood has not been considered</li> <li>○ No adequate traffic assessment</li> <li>○ Alternative sites not adequately assessed</li> <li>● <b>landowners/developers</b> object for the following reasons: <ul style="list-style-type: none"> <li>○ Impact on Henham conservation area</li> <li>○ Site may be constrained by the presence of archaeological deposits</li> <li>○ Potential aircraft noise would have a detrimental impact on residents</li> <li>○ Access by sustainable modes of transport is limited</li> <li>○ other sites are suggested including Chelmer Mead and Greater Priors Green</li> <li>○ more smaller sites should be allocated to ensure delivery over the first half of the plan period</li> <li>○ undeliverable in the plan period</li> <li>○ flooding issues</li> <li>○ more detailed Highway Assessment needs to be carried out</li> <li>○ inconsistent with the Plans Spatial Strategy</li> </ul> </li> <li>● <b>West Essex and NHS England, West Essex CCG and NHS England</b> suggest amendment to the policy to clarify that proposals for health care provision would be subject to NHS business Case approval procedure</li> <li>● <b>Essex County Council</b> make the following points: <ul style="list-style-type: none"> <li>○ Concerned about the inadequate access to strategic road network</li> <li>○ Development in this area and in neighbouring authorities will result in junction 8 exceeding capacity</li> <li>○ Impact on the primary road to Stansted Mountfitchet</li> <li>○ They recommend UDC indicates the precise nature of the phasing of future infrastructure to deliver growth in Elsenham</li> <li>○ The road hierarchy from Elsenham to the strategic road system should be defined and further detail is needed regarding connectivity to the strategic road network</li> </ul> </li> <li>● <b>Elsenham Parish Council</b> object for the following reasons: <ul style="list-style-type: none"> <li>○ Too many affordable homes in one area of the district</li> <li>○ The Retail Study did not take account of this site</li> <li>○ Land proposed for development is classified as best and most versatile agricultural land</li> <li>○ The principle for development on this site has been refused – planning application</li> </ul> </li> </ul>
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	<p>UTT/13/0808</p> <ul style="list-style-type: none"> <li>○ Contrary to Policy SP8 – Environmental protection</li> <li>○ Extensive public opposition for this allocation</li> <li>○ The Highway Impact Assessment proves that this allocation will have a serve adverse impact on surrounding highway network</li> <li>○ Flawed Sustainability Appraisal in relation to this allocation</li> <li>○ Unlikely that 2100 dwellings would be delivered within the plan period due to the infrastructure required</li> </ul> <ul style="list-style-type: none"> <li>● <b>Ugley, Widdington, Henham, Broxted and Stansted Mountfitchet Parish Councils</b> object for the following reasons: <ul style="list-style-type: none"> <li>○ it takes no account of the impact on Stansted Mountfitchet, in particular the road network</li> <li>○ unsustainable location</li> <li>○ inadequate infrastructure</li> <li>○ M11 junction 8 and 9 will have to be improved</li> <li>○ Impact on Forest Hall School has not been assessed</li> <li>○ Impact on health provision has not been assessed</li> <li>○ The policy should be excluded from the plan and alternative sites assessed closer to the strategic road network</li> <li>○ Coalescence of Elsenham and Henham</li> <li>○ Schools are at capacity</li> <li>○ Contrary to policy SP8</li> <li>○ Contrary to NPPF specifically in relation to highway issues</li> <li>○ Flawed sustainability assessment</li> <li>○ Affordable housing will not be spread around the district</li> <li>○ Destroy local landscape</li> <li>○ Local opinion has been ignored</li> </ul> </li> <li>● <b>The landowner/developer</b> suggests changes to the allocations map to reflect what they are proposing and including another site allocation for land under their control in Old Mead Lane for future growth either within the plan period or to meet longer term needs. Changes to the policy wording are also suggested</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>● <b>Individual and the landowner/developer</b> supports the allocation of this site</li> <li>● <b>Hertfordshire CC</b> support the inclusion of a primary school in the policy</li> <li>● <b>Sport England</b> welcomes the inclusion of provision for playing pitches</li> </ul>

<b>Chapter 22: Elsenham - Elsenham Policy 2 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 2</b>											
<b>Legally compliant</b>	yes	No	Not Specified	<b>Sound</b>	Yes	No	Not Specified	<b>Complies with the Duty to Co-operate</b>	Yes	No	Not Specified
	1		1		2		1		1		1
<b>Support</b>	<ul style="list-style-type: none"> <li>● <b>Hertfordshire County Council and the landowner/developer</b> supports the allocation of this site</li> </ul>										

<b>Chapter 22: Elsenham - Elsenham Policy 3 – Preamble, Site Allocation and Map</b>											
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<b>Total Representations: 4</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1	3			1	3				
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Individuals</b> wish the site name to be changed</li> <li>• <b>Landowner/developer</b> wants the 55 bed extra care unit provision removed from the policy</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Sport England</b> support the inclusion of providing additional open space within the policy</li> </ul>										

<b>Chapter 22: Elsenham - Elsenham Policy 5 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1					1				1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Individual</b> objects as the site is contrary to SP9 and C1</li> </ul>										

<b>Chapter 22: Elsenham - Elsenham Policy 6 – Preamble, Site Allocation</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1	2			1	1		1		1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Hertfordshire County Council</b> note that there is no reference to planning obligations and are concerned that the developments will have an impact on Hertfordshire schools</li> <li>• <b>Landowner/developer</b> suggests a new site west of policy area 3</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Landowner/developer</b> supports this policy</li> </ul>										

<b>Chapter 22: Elsenham - Elsenham Policy 7 – Preamble, Site Allocation and map</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1	1				2				1

<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Landowner/developer</b> suggests another site at Elsenham Nurseries / The Gables</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Landowner/developer</b> support the allocation</li> </ul>

<b>Map 44.1 Inset Map: Elsenham</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1	2				2		1		1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Developer of site</b> is concerned that the inset map does not show the extent of access provision required to support draft allocation Elsenham 1.</li> <li>• <b>Developer of the site</b> considers that the development of allocation Elsenham Policy 1 will not unnecessarily sterilise any minerals resource or conflict with the effective working of permitted minerals development.</li> <li>• Considerable questions remain over the soundness and deliverability of allocation ELS1. Inadequate accessibility, the inability to suitably mitigate for this and viability of such existing inadequate mitigation that is proposed are key matters that remain unaddressed as well as the fundamental questions of the need and sustainability of the scale of growth proposed in this location given the imbalance this will create to the Districts' spatial strategy.</li> <li>• Elsenham is identified for significant growth and yet it's access situation by car is very poor on any road into the village, north, east, west or south and therefore the growth proposed is unsound and unsustainable.</li> </ul>										
<b>Support</b>											

<b>Chapter 23: Great Chesterford - Great Chesterford Policy 1 – Preamble, Map and Site Allocation</b>											
<b>Total Representations: 4</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	4					4				4	
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Individuals</b> support the allocation of this site</li> </ul>										

<b>Chapter 23: Great Chesterford - Great Chesterford Policy 2 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty	Yes	No	Not Specified

	1				1			<b>to Co-operate</b>	1		
<b>Support</b>	<ul style="list-style-type: none"> <li>An <b>individual</b> supports the allocation of this site</li> </ul>										

<b>Map 44.3 Inset map: Great Chesterford</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1	2			2	1			1	2
<b>Objections</b>	<ul style="list-style-type: none"> <li>Great Chesterford is considered to be a sustainable location for residential development to meet the local and District's need. Land between Walden Road and Newmarket Road, potentially up to Stump Cross, Great Chesterford should be allocated for residential development</li> <li>The allocations already have permission and are likely to be developed before the Plan is approved. The housing strategy for the village makes no real provision for the employment growth at Chesterford Park. Additional sites should be allocated at land off Ickleton Road which is close to the railway station, the motorway and small retail park.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>The sites and number of houses planned for Great Chesterford are appropriate in terms of location and size.</li> </ul>										

<b>Chapter 24: Newport - Newport Policy 1 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 6</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	3	1	2			2	2		2		3
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>Essex Bridleway Association</b> wants reference made to the existing byway in the policy</li> <li><b>Newport PC</b> object to the site for the following reasons: <ul style="list-style-type: none"> <li>○ Unsustainable</li> <li>○ Outside current VDL</li> <li>○ The policy does not specify a maximum number of dwellings</li> <li>○ There is inadequate existing infrastructure</li> <li>○ too far from key amenities</li> <li>○ Concerns about increased traffic and emissions</li> <li>○ Primary school would have to expand</li> <li>○ Impact on conservation area</li> <li>○ Public safety – no pedestrian links to village facilities</li> </ul> </li> <li><b>An individual</b> wishes the policy to specify a dedicated bus stop for Newport Free Grammar be provided</li> <li><b>An individual</b> feels there is inadequate evidence to support the site and local views have not been considered.</li> <li><b>Individuals</b> are concerned about flooding issues</li> </ul>										

<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>An individual</b> supports the allocation of this site</li> </ul>
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<b>Chapter 24: Newport - Newport Policy 2 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 4</b>											
<b>Legally compliant</b>	yes	No	Not Specified	<b>Sound</b>	Yes	No	Not Specified	<b>Complies with the Duty to Co-operate</b>	Yes	No	Not Specified
	1	1	2		1	1	2		1	1	2
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>The landowner</b> requests the policy be changed from its current description to one for market housing</li> <li>• <b>Newport PC</b> object to the site for the following reasons: <ul style="list-style-type: none"> <li>○ Unsustainable</li> <li>○ Outside current VDL</li> <li>○ The policy does not specify a maximum number of dwellings</li> <li>○ There is inadequate existing infrastructure</li> <li>○ too far from key amenities</li> <li>○ Concerns about increased traffic and emissions</li> <li>○ Primary school would have to expand</li> <li>○ Impact on conservation area</li> <li>○ Public safety – no pedestrian links to village facilities</li> </ul> </li> <li>• an <b>individual</b> objects as the site is not viable as an economic enterprise</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>An individual</b> supports the allocation of this site</li> </ul>										

<b>Chapter 24: Newport - Newport Policy 3 – Preamble, Site Allocation and Map</b>											
<b>Total Representations: 3</b>											
<b>Legally compliant</b>	yes	No	Not Specified	<b>Sound</b>	Yes	No	Not Specified	<b>Complies with the Duty to Co-operate</b>	Yes	No	Not Specified
	1	1	1			2	1		1	1	1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• An <b>individual</b> objects to increase traffic and pollution levels</li> <li>• <b>Newport PC</b> object to the site for the following reasons: <ul style="list-style-type: none"> <li>○ Unsustainable</li> <li>○ Outside current VDL</li> <li>○ The policy does not specify a maximum number of dwellings</li> <li>○ Flood risk issues</li> <li>○ Sewage pipes at capacity</li> <li>○ Density of this site is inconsistent with policy HO1</li> <li>○ Increase in traffic will cause problems</li> <li>○ Whole assessment is flawed</li> </ul> </li> <li>• An <b>individual</b> requests that specific junction improvements take place as part of this development.</li> </ul>										

<b>Map 44.6 Inset map: Newport</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
					1					1	
<b>Objections</b>	<ul style="list-style-type: none"> <li>Allocate land to north of NEW1 for up to 15 houses to compensate for the reduced number of housing being allocated should the planning application relating to NEW2 for 35 houses be approved.</li> </ul>										
<b>Support</b>											

<b>Chapter 25: Stansted Mountfitchet - Stansted Mountfitchet Policy 1 - Site Allocation and Map</b>											
<b>Total Representations: 5</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		5					4		1		
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>Hertfordshire CC</b> Express some concern regarding impact of development on school places in Hertfordshire</li> <li><b>A Retail Firm</b> wants the policy to be specific about the amount of retail floorspace allowed</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Individuals and English Heritage</b> support the allocation</li> </ul>										

<b>Chapter 25: Stansted Mountfitchet - Stansted Mountfitchet Policy 3 - Site Allocation and Map</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		2			1		2		1		
<b>Objections</b>	<ul style="list-style-type: none"> <li>Lacking a path linking the site to High Land and Lower Street</li> <li><b>The Landowner</b> suggests amendments to the policy including to exclude requirements for 5% older persons dwellings</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li><b>The Landowner and an Individual</b> support the allocation of this site</li> </ul>										

<b>Chapter 25: Stansted Mountfitchet - Stansted Mountfitchet Policy 4 - Site Allocation and Map</b>											
<b>Total Representations: 4</b>											

Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	3	1				1	3				2
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Individual</b> concerned about flooding issues</li> <li>• <b>Essex Bridleway Association</b> wants assurance that rights away are protected or enhanced</li> <li>• <b>English Heritage</b> wants reference in the policy and supporting text to scheduled monument</li> <li>• <b>The Landowner</b> wants the policy changed to reflect the approved planning permission</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Individual</b> supports the allocation of this site</li> <li>• <b>The Landowner</b> supports the allocation of this site</li> </ul>										

Chapter 25: Stansted Mountfitchet - Stansted Mountfitchet Policy 5 - Site Allocation											
Total Representations: 1											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1						1				1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Essex Bridleways Association</b> wants assurance that rights of way are protected or enhanced</li> </ul>										

Chapter 25: Stansted Mountfitchet - Stansted Mountfitchet Policy 7 - Site Allocation and Map											
Total Representations: 2											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1						1				
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>English Heritage</b> hope that the historic environment issues are properly addressed</li> <li>• <b>An individual</b> questions how the site can be delivered with three different land owners</li> </ul>										

Chapter 25: Stansted Mountfitchet - Stansted Mountfitchet Policy 9 - Site Allocation and Map											
Total Representations: 1											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
					1					1	
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>An agent</b> wants the Council to assess district employment need and assess the most appropriate sites</li> </ul>										



Chapter 26: Takeley/Little Canfield - Takeley/Little Canfield Policy 1 – Preamble, Site Allocation and Map											
Total Representations: 2											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2						2				2
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Essex Bridleways Association</b> are concerned that no provision is made for bridleway access</li> <li>• <b>Hertfordshire CC</b> Express some concern regarding impact of development on school places in Hertfordshire</li> </ul>										

Chapter 26: Takeley/Little Canfield - Takeley/Little Canfield Policy 2 - Site Allocation and Map											
Total Representations: 1											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1						1				
<b>Objections</b>	<ul style="list-style-type: none"> <li>• An <b>Individual</b> is concerned that no provision is made for a bridleway</li> </ul>										

Chapter 26: Takeley/Little Canfield - Takeley/Little Canfield Policy 3 - Site Allocation and Map											
Total Representations: 1											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1						1				
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Essex Bridleways Association</b> are concerned that no provision is made for bridleway link</li> </ul>										

Chapter 26: Takeley/Little Canfield - Takeley/Little Canfield Policy 4 - Site Allocation and Map											
Total Representations: 1											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1						1				
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Essex Bridleways Association</b> are concerned that no provision is made for bridleway link</li> </ul>										

<b>Chapter 26: Takeley/Little Canfield - Takeley/Little Canfield Policy 5 - Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1						1				
<b>Objections</b>	<ul style="list-style-type: none"> <li>Essex Bridleways Association are concerned that no provision is made for bridleway link</li> </ul>										

<b>Map 44.9 Inset map: Takeley</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1	1					2				1
<b>Objections</b>	<ul style="list-style-type: none"> <li>A greater quantity of land should be allocated for residential development in Takeley to reflect its position as a key village and to meet the unmet need in neighbouring authorities.</li> </ul>										
<b>Support</b>											

<b>Map 44.10 Inset map: Takeley (Priors Green)</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
			1						1		
<b>Objections</b>	<ul style="list-style-type: none"> <li>There is uncertainty over the delivery from a number of proposed allocations and therefore there is a need to redistribute the housing allocations within the district and include further housing around Priors Green.</li> </ul>										
<b>Support</b>											

<b>Map 44.11 Inset map: Takeley Street</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2						2				
<b>Objections</b>	<ul style="list-style-type: none"> <li>A number of small sites at Takeley Street are considered appropriate for residential development.</li> </ul>										

Support	
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<b>Chapter 27: Thaxted - Thaxted Policy 1 - Site Allocation and Map</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2					2			1		1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Essex Bridleways Association</b> are concerned that no provision is made for bridleway access</li> <li>• <b>English Heritage</b> recommend clarity is provided in the policy with regards to development conserving and enhancing views of Thaxted church</li> </ul>										

<b>Chapter 27: Thaxted - Thaxted Policy 2 - Site Allocation and Map</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1		1			2			1		1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Thaxted Surgery</b> wishes the policy to include a new GP surgery</li> <li>• An <b>Individual</b> wants the policy changed to allow for some enabling development</li> </ul>										

<b>Map 44.12 Inset map: Thaxted</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1					1			1		
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>The landowner</b> questions the viability of retaining the Molecular Products site for employment and should therefore be allocated for residential development.</li> </ul>										
<b>Support</b>											

<b>Chapter 28: Clavering - Clavering Policy 1 - Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty	Yes	No	Not Specified

	1				1			<b>to Co-operate</b>	1		
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Hertfordshire CC</b> support the reference within the policy to the need for planning obligations</li> </ul>										

<b>Map 45.9 Inset map: Clavering Hill Green</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1					1					1
<b>Objections</b>	<ul style="list-style-type: none"> <li>The land to the west of The Cricketers represents a logical and sustainable location to contribute to the future growth of the District and help meet its objectively assessed needs.</li> </ul>										
<b>Support</b>											

<b>Chapter 29: Felsted - Felsted Policy 1 - Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1					1					
<b>Support</b>	<ul style="list-style-type: none"> <li><b>Landowner/Developer</b> supports the allocation but wishes to see greater flexibility on the quantum of housing to be delivered.</li> </ul>										

<b>Chapter 31: Great Hallingbury - Great Hallingbury Policy 1 - Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1					1					
<b>Support</b>	<ul style="list-style-type: none"> <li><b>The Landowner/Developer</b> supports this allocation</li> </ul>										

<b>Chapter 32: Henham - Henham Policy 1 - Site Allocation and Map</b>											
<b>Total Representations: 1</b>											

Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1					1			1		
<b>Objections</b>	<ul style="list-style-type: none"> <li>The Landowner/Developer wants the requirement for the LEAP to be removed from the policy as it is not justified by the Council's evidence base.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li>The Landowner/Developer supports the allocation</li> </ul>										

<b>Map 45.27 Inset map: Henham</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
			1						1		
<b>Objections</b>	<ul style="list-style-type: none"> <li>Village Development Limit should include Lodge Cottages and adjoining land to mirror eastward extent of development limit around HEN1.</li> </ul>										
<b>Support</b>											

<b>Chapter 35: Little Chesterford - Little Chesterford Policy 1 - Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	Yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
			1				1				
<b>Objections</b>	<ul style="list-style-type: none"> <li>The Landowner requests an amendment to the site boundary to increase it slightly to ensure the additional development plots are well suited to the requirements of the research business.</li> </ul>										

<b>Chapter 36: Little Dunmow - Little Dunmow Policy 1 - Site Allocation</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	2		1			2			1		1
<b>Support</b>	<ul style="list-style-type: none"> <li>English Heritage, Little Dunmow PC and the Landowner/Developer all support the allocation</li> </ul>										

<b>Chapter 37: Manuden - Manuden Policy 1 - Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1					1					1
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>Hertfordshire CC</b> Express some concern regarding impact of development on school places in Hertfordshire</li> </ul>										

<b>Map 45.37 Inset map: Manuden</b>											
<b>Total Representations: 2</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1				1				1	1	1
<b>Objections</b>	<ul style="list-style-type: none"> <li>Site at Cock Farm is suitable for additional housing along with a replacement for the Alms Houses which were recently sold on.</li> </ul>										
<b>Support</b>											

<b>Chapter 39: Radwinter - Radwinter Policy 1 - Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
					1				1		
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>The Landowner/developer</b> suggests the Policy needs to be amended to reflect the planning application for the site</li> <li><b>The Landowner/developer</b> wants the map Amended to ensure site boundaries reflect the planning permission UTT/13/3118/OP</li> </ul>										

<b>Chapter 40: Stebbing - Stebbing Policy 1 - Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1								1		1

<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>Landowner</b> suggests the site should include an extra 1.08 ha of land and development limits extended to include land south east of the allocation.</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>Landowner</b> in support for the allocation</li> </ul>

<b>Chapter 41: Wendens Ambo - Wendens Ambo Policy 1 - Site Allocation and Map</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1				1				1		
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>The Landowner</b> supports the Plan in its proposals to identify the land for development as a rural business centre.</li> </ul>										

<b>Chapter 42: Stansted Airport - Policy AIR 1</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1				1				1		
<b>Objections</b>											
<b>Support</b>	<ul style="list-style-type: none"> <li>• <b>English Heritage</b> support the policy in terms of new development at Stansted Airport needing to respect its countryside setting and landscape.</li> </ul>										

<b>Chapter 43: Monitoring:</b>											
<b>Total Representations: 3</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1		2			1	2		3		
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>English Heritage</b> request that <ul style="list-style-type: none"> <li>○ The Target and Performance Measure for Objective 1 should refer to all heritage assets at risk and not just buildings to reflect English Heritage’s national register and the fact that Policy SP10 refers to heritage assets at risk and not just buildings.</li> <li>○ There should be an additional indicator for keeping conservation area appraisals up to date (eg every five years)</li> </ul> </li> <li>• <b>Essex County Council</b> (Historic Environment Officer) request that <ul style="list-style-type: none"> <li>○ The relevant Policies listed under Objective 2 should include Policy HE3</li> </ul> </li> </ul>										

	<ul style="list-style-type: none"> <li>○ The relevant Policies listed under Objective 3 should include policies HE1, HE2, and HE3.</li> </ul>
<b>Support</b>	

<b>Map 45.6 Inset map: Birchanger and Parsonage Farm</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
			1			1					1
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Land adjacent to the Parsonage Farm employment site is suitable and available for development to allow expansion of the site.</li> </ul>										
<b>Support</b>											

<b>Map 45.16 Inset map: Flich Green</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1				1			1		
<b>Objections</b>	<ul style="list-style-type: none"> <li>• <b>The developer</b> states that the settlement limits are arbitrary by reference to a 2004 master plan. The previously approved master plan should not inhibit the potential for residential use of previously developed land which should be determined through the application process or, alternatively, with a more flexible boundary than currently envisaged.</li> </ul>										
<b>Support</b>											

<b>Map 45.36 Inset map: Littlebury</b>											
<b>Total Representations: 1</b>											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1					1			1		
<b>Objections</b>	<ul style="list-style-type: none"> <li>• Land east of Strehall Road (SHLAA ref LIT2) represents sustainable option for delivery of 40 dwellings and should be allocated on the inset map.</li> </ul>										
<b>Support</b>											

<b>Map 45.38 Inset map: Quendon and Rickling</b>											
--	--	--	--	--	--	--	--	--	--	--	--



Total Representations: 1											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1						1				1
<b>Objections</b>	<ul style="list-style-type: none"> <li>Land at Coney Acre, Rickling Green be included as a rural exception site to assist Uttlesford District Council in its delivery of affordable housing.</li> </ul>										
<b>Support</b>	<ul style="list-style-type: none"> <li></li> </ul>										

Map 48 Policies Map											
Total Representations: 4											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
	1		3				2		2		1
<b>Objections</b>	<ul style="list-style-type: none"> <li>Land should be allocated at Great Canfield Park for between 9 and 16 dwellings</li> <li>No minerals consultation areas are identified</li> <li>No existing rights of way of any designation are shown on Policies Map or inset maps</li> <li>Ensure that Historic Parks and Gardens are correctly mapped.</li> </ul>										
<b>Support</b>											

Appendix 2 Infrastructure Delivery:											
Total Representations: 7											
Legally compliant	yes	No	Not Specified	Sound	Yes	No	Not Specified	Complies with the Duty to Co-operate	Yes	No	Not Specified
		1	6				1		2	4	
<b>Objections</b>	<ul style="list-style-type: none"> <li><b>Anglian Water</b> request that the <ul style="list-style-type: none"> <li>Project Details for Saffron Walden Policy 1 is changed from ‘Strategic Sewer linking development site with wastewater treatment works’ to ‘Upgrades to foul network to accommodate development’; and Funding is amended to ‘Anglian Water Services and Developer Contributions.</li> <li>Project Details for Saffron Walden Policy 1 of ‘Increase capacity of wastewater treatment works’ is deleted as this is not needed as there is currently capacity to serve this development.</li> <li>Project Details for Great Dunmow Policy 1 and Great Dunmow Policy 5 is changed from ‘Strategic Sewer linking development site with wastewater treatment works’ to ‘Upgrades to foul network to accommodate development’.</li> </ul> </li> <li><b>Essex County Council</b> request changes to the phasing of elements of the infrastructure <ul style="list-style-type: none"> <li>The delivery of the Secondary School on land adjacent to Buttleys Lane would be required in Phase 2.</li> <li>Consideration should be given to the thresholds of development that will require</li> </ul> </li> </ul>										

	<p>specific mitigation and intervention to accommodate the delivery of Elsenham Policy 1.</p> <ul style="list-style-type: none"> <li>• <b>Highways Agency</b> will engage in the process of detailed consideration of the provision of infrastructure</li> <li>• The infrastructure proposed meets the needs of more than one if not all of the sites. It is unhelpful and misleading to structure the table in this way. There is no explanation of how the phasing will be implemented. There is no indication or reassurance that the critical works will be completed and hence no confidence in the 5-year land supply.</li> <li>• Failure to adequately consider the infrastructure requirements of the major development allocation at Elsenham Policy 1 and Saffron Walden Policy 1, and the links between the major infrastructure works necessary; and in particular failure to consider these as cross-boundary issues.</li> <li>• Overall lack of provision of infrastructure</li> </ul>
<b>Support</b>	<ul style="list-style-type: none"> <li>•</li> </ul>

**Committee:** Local Plan Working Group

**Agenda Item**

**Date:** 26 June 2014

**4**

**Title:** Proposed Minor Modifications

**Author** Andrew Taylor

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### Summary

1. Attached is the report of the Proposed Minor Modifications to the Pre-Submission Local Plan. The modifications have arisen from representations received, correcting typos and/or for clarification purposes.

### Recommendations

2. For information

### Financial Implications

3. None

### Background Papers

4. The following papers were referred to by the author in the preparation of this report and are available for inspection from the author of the report.

None

### Impact

- 5.

Communication/Consultation	The document will be submitted to the Planning Inspectorate and made available on the website and at the Council Offices
Community Safety	N/A
Equalities	N/A
Health and Safety	N/A
Human Rights/Legal Implications	N/A
Sustainability	N/A
Ward-specific impacts	All

Workforce/Workplace	N/A
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## Situation

6. The Proposed Minor Modification are in chapter order and should be read in conjunction with the Pre-Submission Local Plan. The proposed modifications are non-material and reflect either minor errors included within the Pre-Submission version of the Plan, or reflect the need for minor non-material changes arising from the representations received on the Pre-Submission Local Plan.
7. As these are minor changes an additional Sustainability Appraisal and/or additional public consultation is not needed.

## Risk Analysis

8.

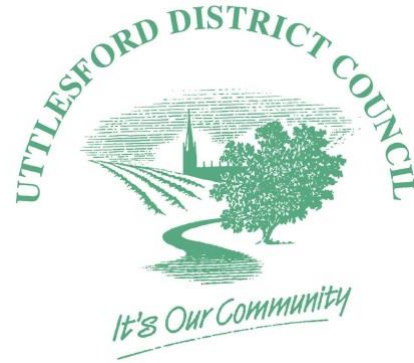
Risk	Likelihood	Impact	Mitigating actions
That the Council's prepares an unsound plan. This could either be when the plan is submitted and the Inspector advises the Council that the plan is likely to be found unsound; or that following the formal hearing the plan is found unsound.	1. The council is preparing a plan which is positively prepared; justified; effective and consistent with national policy.	3. That adoption of the Local Plan will be delayed whilst additional work is undertaken	That the Council ensures that the Plan meets the requirements of the NPPF and is justified by the evidence.

1 = Little or no risk or impact

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

3 = Significant risk or impact – action required

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



**Uttlesford District Council Pre-Submission Local Plan**



## Schedule of Proposed Minor Modifications to the Pre-Submission Local Plan

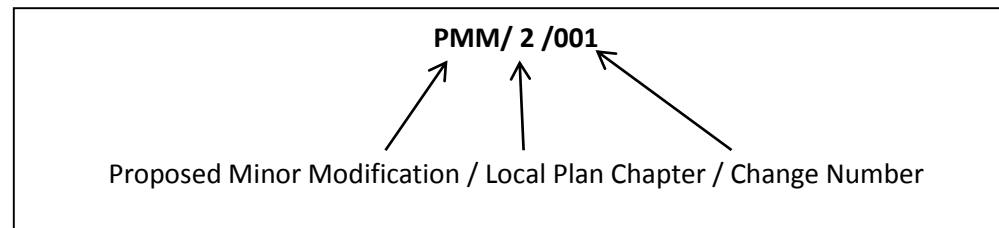
The schedule outlines the Council's proposed minor changes to the Pre-Submission Uttlesford District Council Local Plan. The suggested amendments seek to update the document, improve clarity and presentation. Minor changes are generally regarded as textual and grammar corrections; re-phrasing or limited new text to add clarity; or updates to figures and references which are necessary due to alterations which have been made elsewhere or for which new information has come to light.

In the Council's opinion they do not alter the overall impact of the Local Plan or change its direction, or affect the substance or soundness of the document. The Council has assessed the proposed minor modifications and concluded that further Sustainability Appraisal of the proposed changes is not required.

This document is intended to assist the Inspector in understanding the Council's position. The Schedule of Proposed Minor Modifications is part of the Council's evidence and will be available as a Core Document to the Examination. The document will be updated periodically, as necessary, and updates will be placed on the Council's website.

The schedule includes the following information:

**Change ID:** Change identification number for reference. The ID number is composed as so:



**Policy / Paragraph:** the specific policy or paragraph within the Pre-Submission Local Plan to which the change applies.

**Local Plan Page:** where the applicable policy or paragraph is located in the Pre-Submission Local Plan

**Proposed Minor Modifications:** details of the proposed change. Unless it states otherwise, where text is to be deleted it will have a strikethrough as so: ~~deleted text~~. Where additional text is proposed, it will be bold and underlined as so: **additional text**.

**Reason for change:** the reason why the minor change is proposed, for example, responding to representation, to correct a typo, update text or clarifying.

Ref No.	Policy/Paragraph	Local Plan Page	Proposed Minor Modification	Reason for change
<b>General</b>				
PMM/LP/01	Whole document	Whole document	Page layout – page numbers are lost in the ring-bound version. Relocated numbers to outside edge of the page	Formatting
<b>Chapter 4 – District Profile</b>				
PMM/4/02	4.5	11 and 12	Uttlesford lies <del>within</del> <b>on the border</b> of 3 sub-market areas, the majority of the District is within the Harlow/M11 sub-market area, the northern part of the <del>District lies within</del> <b>looking towards</b> the Cambridge sub-market and the southeastern edge of the District is <del>within</del> <b>towards</b> the Chelmsford sub-market area.	Responding to representation – clarification
<b>Chapter 6 – Objectives</b>				
PMM/6/03	Objectives	15	2. Protecting the Environment: To protect, conserve and enhance the natural <b>and historic</b> environment.....	Responding to representation – clarification
<b>Chapter 7 – The Spatial Strategy and the Key Diagram</b>				
PMM/7/04	Key Diagram	22	Key diagram shows Little Hallingbury sitting outside of the greenbelt. Amend to show Little Hallingbury surrounded by green belt.	Correction
PMM/7/05	Key Diagram	22	Move Elsenham housing symbol out of the countryside protection zone	Responding to representation
<b>Chapter 9 – Employment Strategy</b>				
PMM/9/06	9.11	29	‘.....Additional employment land will be provided as part of and integral to the housing allocation to the east of the town to include offices, industry, warehousing and other similar uses and retail. <b>Land to the north and south of Ashdon Road, including the commercial centre, will also provide employment land suitable for offices.</b>	Responding to representation
<b>Chapter 10 – Retail Strategy</b>				
PMM/10/07	10.3	36	....Waitrose supermarket in the town centre and a Tesco store <del>outside of the centre of town</del> <b>located out of centre.</b>	Responding to representation
PMM/10/08	10.4	36	....a small Co-operative store and a Tesco superstore <del>outside the centre of the town</del> <b>located out of centre.</b>	Responding to representation
PMM/10/09	10.13	37	...The policy proposes the provision of 1,400m2 <b>net</b> of additional	Responding to

Ref No.	Policy/Paragraph	Local Plan Page	Proposed Minor Modification	Reason for change
			floorspace .....	representation
<b>Chapter 11 - Housing Strategy</b>				
PMM/11/10	11.7	42	The distribution of housing needs to reflect the fact that Uttlesford lies <del>within</del> <b>on the border, and in one case substantially within</b> , three sub-market housing areas. The majority of Uttlesford lies within the Harlow/M11 sub-market area, with the northern part of the <del>District lying</del> <b>District lying within looking towards</b> the Cambridge sub-market and the southeastern edge of the District <del>is within</del> <b>towards</b> the Chelmsford sub-market area.	
PMM/11/11	Policy SP6 – Meeting Housing Need	45	Background colour for the policy text is blue, change to purple to match the other strategic policies	Formatting
PMM/11/12	Policy SP7 – Housing Strategy	46	Amend background policy colour to match the other strategic policies	Formatting
PMM/11/13	Policy SP7 – Housing Strategy	46	Add bullet point at the end of the policy : <b><u>Will be acceptable in terms of its effect on the safe operation of Stansted Airport</u></b>	Responding to representation
<b>Chapter 12 – Environmental Protection</b>				
PMM/12/14	12.20	61	Paragraph refers to <del>EN5</del> replace with <b>EN6</b>	Correction
PMM/12/15	EN7 – Surface Water Flooding	64	Add a paragraph at the end of the policy – <b><u>SUDs systems should be designed so as not to increase the bird hazard risk or the safe operation of Stansted Airport or the movement of aircraft; where appropriate the implementation of a bird hazard management plan will be secured by condition or planning obligation</u></b>	Responding to representation
<b>Chapter 15 – The Natural Environment</b>				
PMM/15/16	NE1 – Protecting and Enhancing the Natural Environment	82	Add a paragraph at the end of the policy – <b><u>Measures to enhance biodiversity should be designed so as not to increase the bird hazard risk or the safe operation of Stansted Airport or the movement of aircraft; where appropriate the implementation of a bird hazard management plan will be secured by condition or planning obligation</u></b>	Responding to representation
<b>Chapter 17 – Infrastructure</b>				
PMM/17/17	17.3	87	.....The needs of the District have been assessed in the Uttlesford Open Space; Sport Facility and Playing Pitch Strategy 2012 which has identified	Clarification

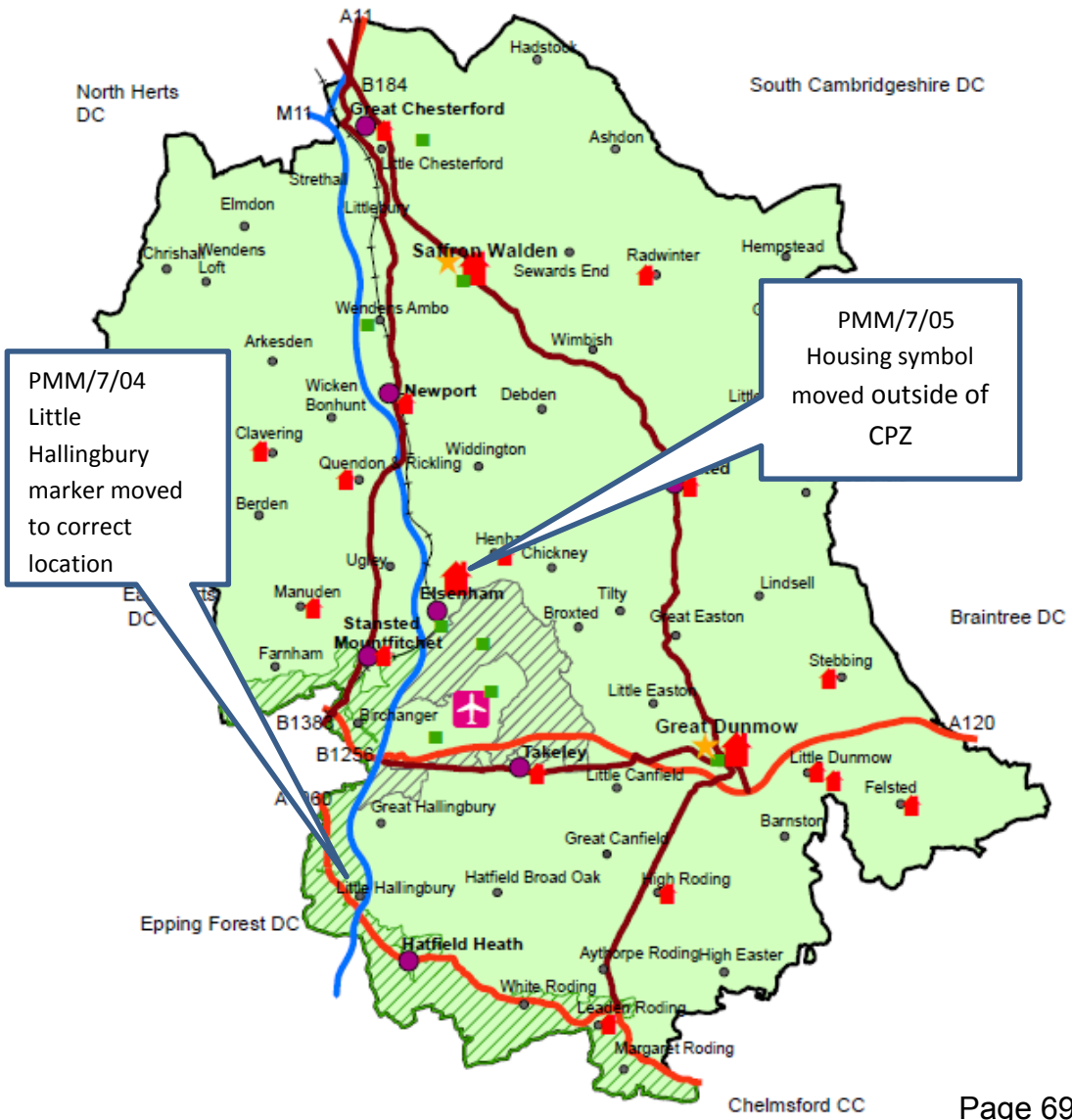


Ref No.	Policy/Paragraph	Local Plan Page	Proposed Minor Modification	Reason for change
			a deficiency in the amount of public open space and the number of playing pitches, sports facilities and allotments. <b><u>However, this shortfall together with additional need requirements will be met through delivering the Local Plan allocations.</u></b>	
PMM/17/18	17.14	91	The District Council will liaise with the <b>NHS England and</b> Essex Clinical Commissioning Group or any successor body when assessing the scope and scale of likely impacts and the nature of mitigation required.	Responding to representation
<b>Chapter 20 : Saffron Walden Site Allocations</b>				
PMM/20/19	Saffron Walden Policy 1	95	Amend the map to reflect planning application UTT/13/3467	Responding to representation
PMM/20/20	Saffron Walden Policy 1	96	It provides for <b>4 hectares of</b> employment land to be located generally to the rear of the Shire Hill Industrial Estate and <b>including</b> retail warehousing. on land fronting Radwinter Road.	Responding to representation
PMM/20/21	Saffron Walden Policy 1	96	The 7.8 hectares of land to the south of Lord Butler Leisure Centre and west of Thaxted Road shall provide for <del>rugby</del> <b>playing</b> pitches, a running track.....	Responding to representation
<b>Chapter 21: Great Dunmow Site Allocations</b>				
PMM/21/22	Great Dunmow Policy 2	108	This 17 hectare site to the west of Great Dunmow, <del>S</del> south of Stortford Road and north of the Flitch Way is a strategic allocation for an enabling residential development to support the provision of a medical centre within the site and a new secondary school with playing fields to the west of the site. <del>The provision of the new school site and buildings will be partially funded by the redevelopment of the existing Helena Romanes School site for residential use.</del> This site is on a key approach to Great Dunmow and improvements to this approach will be sought as part of the development.	Responding to representation – correction
PMM/21/23	Great Dunmow Policy 5	115	It provides for 1,400m2 <b>net</b> of retail floorspace.	Responding to representation
<b>Chapter 22: Elsenham Site Allocations</b>				
PMM/22/24	Elsenham Policy 1 Map	126	Amend annotation colour from residential to waste water treatment works	Responding to representation –

Ref No.	Policy/Paragraph	Local Plan Page	Proposed Minor Modification	Reason for change
				correction
PMM/22/25	Elsenham Policy 1 Map	126	Remove ELS6 (The old good yards) from the map	Correction
PMM/22/26	Elsenham Policy 7	135	Amend policy wording 'The land at Guants End, Elsenham is allocated for B1(a) business use <b><u>and ancillary supporting mixed uses.</u></b> '	Responding to representation - clarification
<b>Chapter 35: Little Chesterford</b>				
PMM/35/27	Little Chesterford Policy 1 - Chesterford Research Park Map	192	Amend site boundary to reflect ownership	Responding to representation
<b>Chapter 30 – Radwinter Site Allocation</b>				
PMM/39/28	Radwinter Policy 1 Map	199	Amend site boundary to reflect planning permission UTT/13/3118	Responding to representation
<b>Chapter 43: Monitoring</b>				
PMM/43/29	Objective 2 - Relevant Policies	210	<b><u>HE3 – Scheduled Monuments and Sites of Archaeological Importance</u></b>	Responding to representation
PMM/43/30	Objective 3 – Relevant Policies	211	<b><u>HE1 – Design of Development within Conservation Areas</u></b> <b><u>HE2 – Development affecting Listed Buildings</u></b> <b><u>HE3 – Scheduled Monuments and Sites of Archaeological Important</u></b>	Responding to representation
<b>Chapter 44: Key Villages Inset Maps</b>				
PMM/44/31	Stansted Mountfitchet Alsa Street Inset Map	227	Amend label from Picture 44.1' to ' <b><u>Map 44.9</u></b> '	Formatting
<b>Chapter 45: Rural Settlements Inset Map</b>				
PMM/45/32	Contents page	232	Amend text ' <del>Wedens</del> <b><u>Wendens</u></b> Ambo '	Correcting typo
PMM/45/33	Littlebury Inset	268	Delete site allocation polygon <del>L-BUR1</del>	Correction

Ref No.	Policy/Paragraph	Local Plan Page	Proposed Minor Modification	Reason for change
	Map			
<b>Chapter 46 – Other Inset Maps</b>				
PMM/46/34	Stansted Airport Inset Map	280	Amend policy notation <del>SM7</del> <b>SM9</b>	Correction
<b>Appendix 1</b>				
PMM/A1/35	Superseded Policies	283 - 291	<del>Superceded</del> <b>Superseded</b>	Correcting typo
<b>Appendix 2 – Infrastructure Delivery</b>				
PMM/A2/36	Infrastructure table - Saffron Walden Policy 1	293	<del>Strategic Sewer linking development site with waste water treatment works</del> <b>Upgrades to foul network to accommodate development.</b>  Funding: Anglian Water Services through sewerage charges <b>and Developer Contributions</b>  <del>Increase capacity of waste water treatment works</del>	Responding to representation
PMM/A2/37	Infrastructure Table – Great Dunmow Policy 1	295	<del>Strategic sewer linking development site with waste water treatment works</del> <b>Upgrades to foul network to accommodate development</b>	Responding to representation
PMM/A2/38	Infrastructure Table – Great Dunmow Policy 2	296	Delivery of secondary school change - <del>Phase 3</del> <b>Phase 2</b>	Responding to representation
PMM/A2/39	Infrastrcuture Table – Great Dunmow Policy 5	298	<del>Strategic sewer linking development site with waste water treatment works</del> <b>Upgrades to foul network to accommodate development</b>	Responding to representation
<b>Appendix 3</b>				
PMM/A3/40	Marketing	318	Amend text 'Policy <del>H09</del> <b>H10</b> '	Correcting typo
<b>Saffron Walden Policies Map</b>				

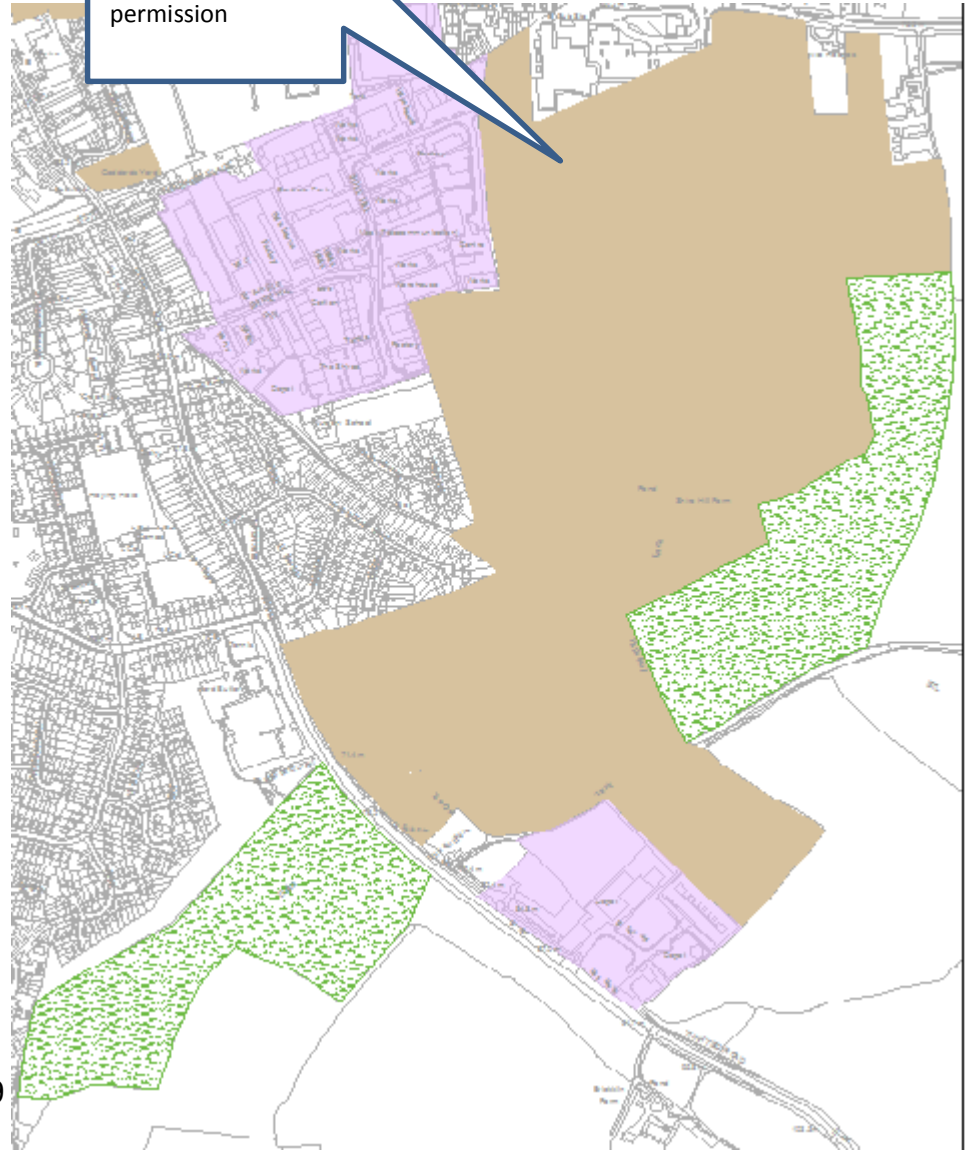
Ref No.	Policy/Paragraph	Local Plan Page	Proposed Minor Modification	Reason for change
PMM/SWPM/41	Saffron Walden Policies Map		Amend the boundary of Bridge End Gardens	Responding to representation – Correction
<b>Great Dunmow Policies Map</b>				
PMM/GDPM/42	Great Dunmow Policies Map		Amend annotation on development opportunity area GD <del>11</del> <b>12</b>	Correction
<b>Policies Map</b>				
PMM/UDCPM/43	Uttlesford Local Plan Pre-Submission Policies Map		Locate 'East Hertfordshire' label to the correct location and insert <b><u>Epping Forest District Council</u></b>	Correction

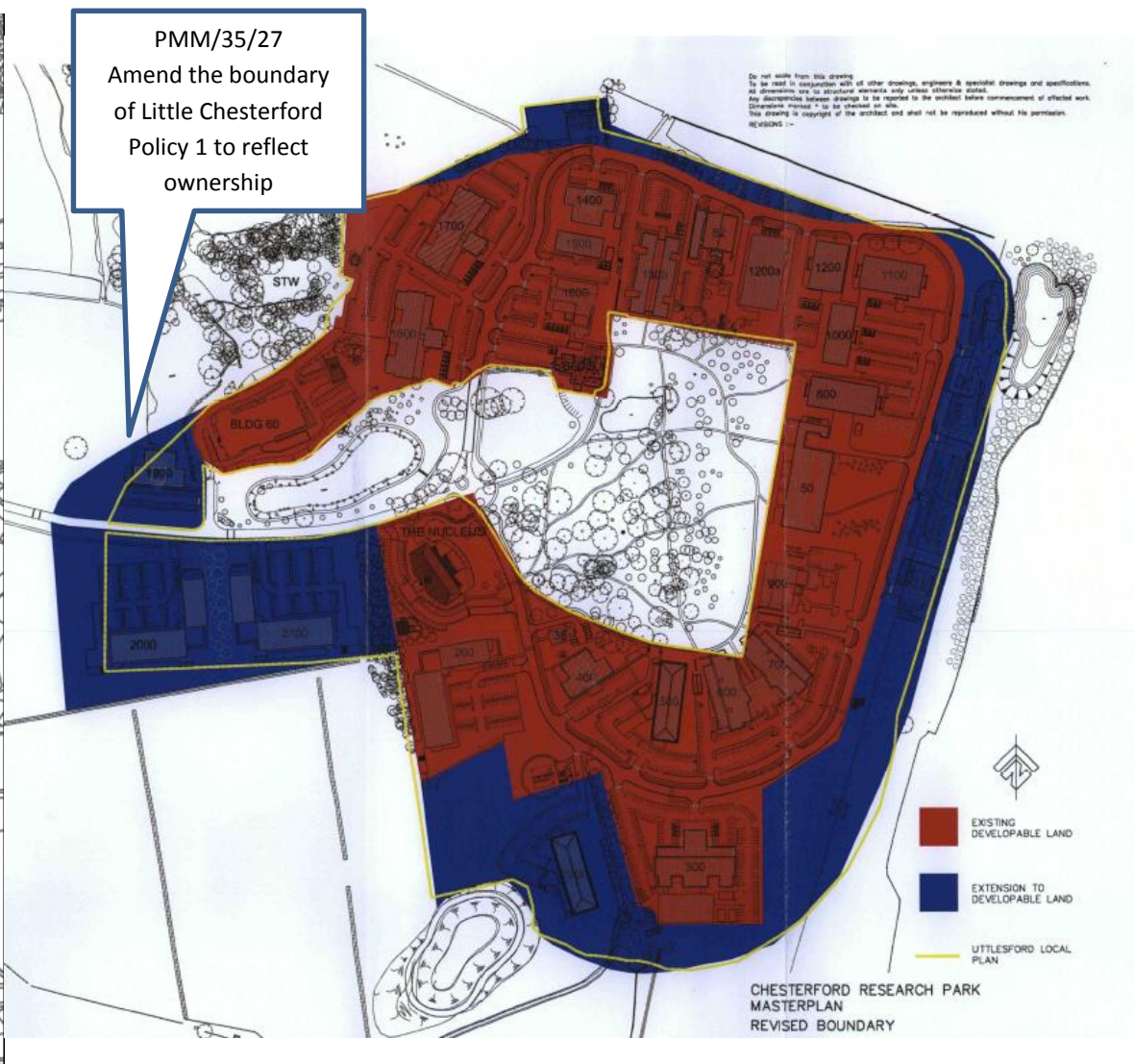
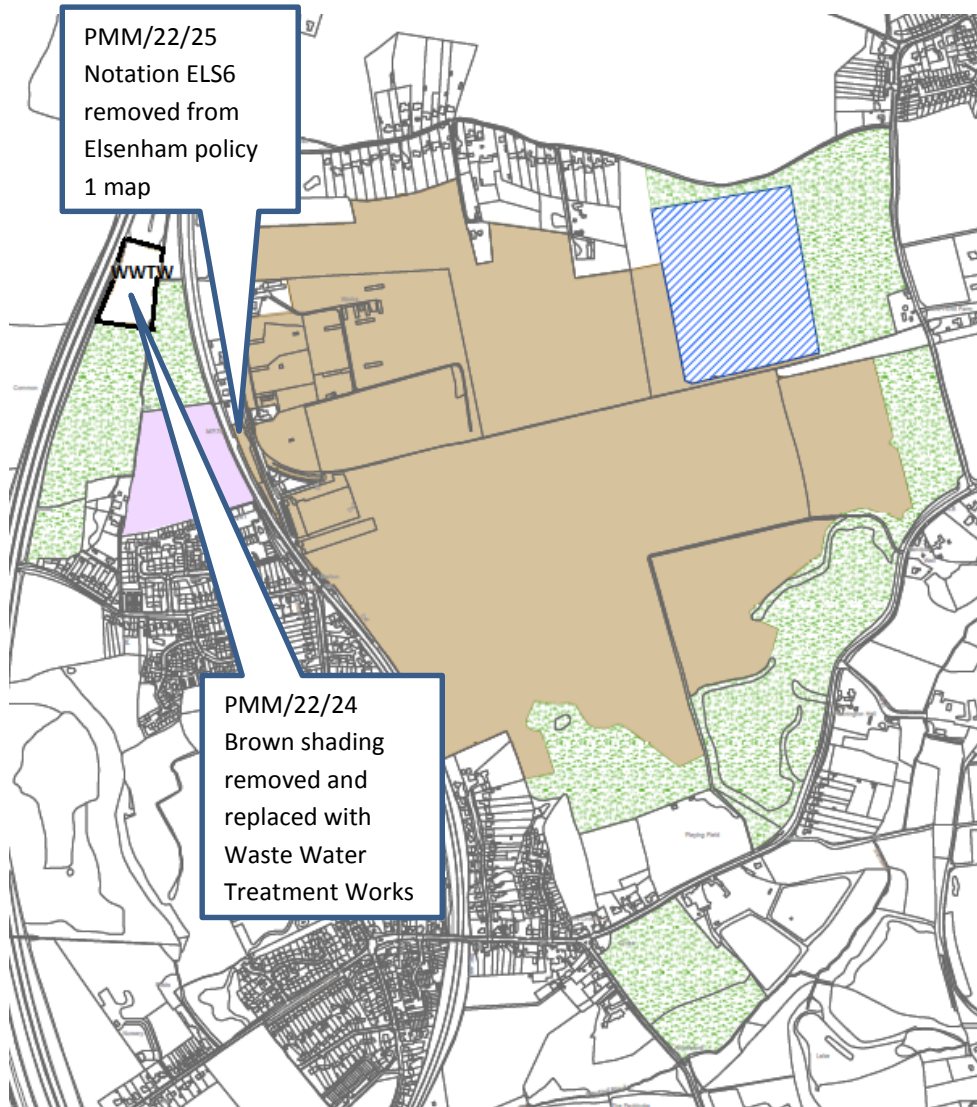


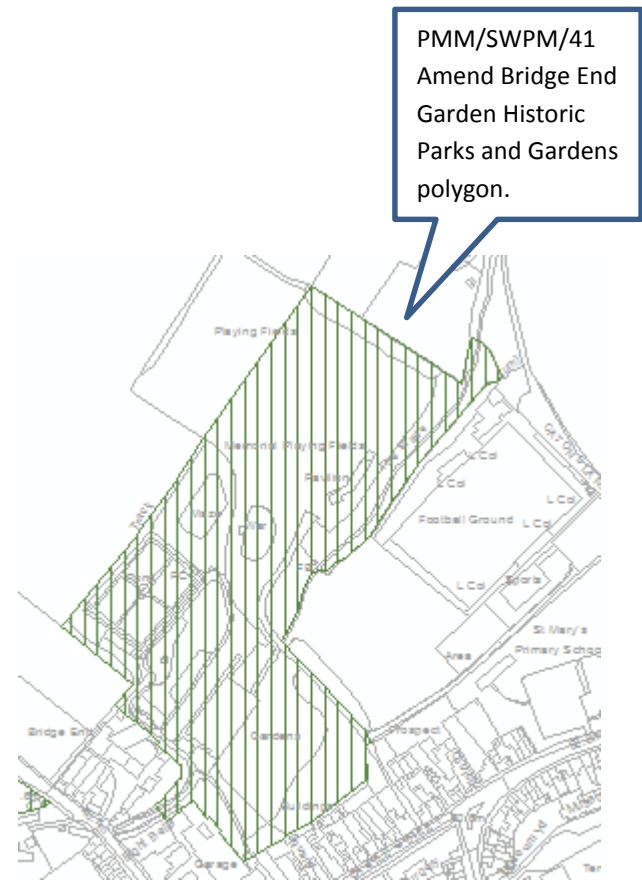
PMM/7/04  
Little Hallingbury marker moved to correct location

PMM/7/05  
Housing symbol moved outside of CPZ

PMM/20/19  
Saffron Walden 1 policy area amended to reflect planning permission







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**5**

**Date:** 26 June 2014

**Title:** Housing Supply

**Author:** Sarah Nicholas, Senior Planning Officer,  
01799 510454

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### Summary

1. This report presents 3 papers on housing supply which will be presented as evidence supporting the Local Plan and can be used as evidence when determining planning applications.
2. The papers are  
Appendix 1 - Housing Trajectory and 5-Year Land Supply 1 April 2014  
Appendix 2 - Housing Supply Statement 2014  
Appendix 3 - Consideration of a Windfall Allowance June 2014

### Recommendations

3. For information

### Financial Implications

4. None

### Background Papers

5. The following papers were referred to by the author in the preparation of this report and are available for inspection from the author of the report.

Residential Land Availability data

### Impact

- 6.

Communication/Consultation	The papers are part of the background papers to the Local Plan and are available on the website and from officers.
Community Safety	N/A
Equalities	N/A
Health and Safety	N/A



Human Rights/Legal Implications	N/A
Sustainability	N/A
Ward-specific impacts	ALL
Workforce/Workplace	N/A

## Situation

7. The Housing Trajectory and 5-year land supply shows past and future housing performance. The Council's overall target over the next 5 year period is 2885 dwellings which includes making up the shortfall of 133 dwellings from an under delivery in 2013/14, and the frontloading of 5%. The Council estimates that 3592 dwellings will be provided over the next 5 years which provides the District with 6.2 years of supply.
8. The Housing Supply Statement sets out which sites of 6 or more dwellings have been built over 2013/14 and which sites have outstanding planning permission. During 2013/14 390 additional dwellings were built. As at 31 March 2014 2900 dwellings had planning permission; and 5800 dwellings are proposed on sites without planning permission, although some of the sites have been resolved permission subject to signing of a S106 Agreement.
9. A consideration of windfall developments concludes that with an annual average completion rate of 46 dwellings on windfall sites and 80 dwellings on all small sites, a windfall allowance of 50 dwellings based on rounding the windfall completion rate is considered conservative but realistic.

## Risk Analysis

10.

Risk	Likelihood	Impact	Mitigating actions
That the conclusions of the papers are found unsound	Little risk if the conclusions are supported by evidence	That the Local Plan would be found unsound or the Council's calculation of 5-year land supply is questioned at appeal	Annual assessments and monitoring of planning permissions.

1 = Little or no risk or impact

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

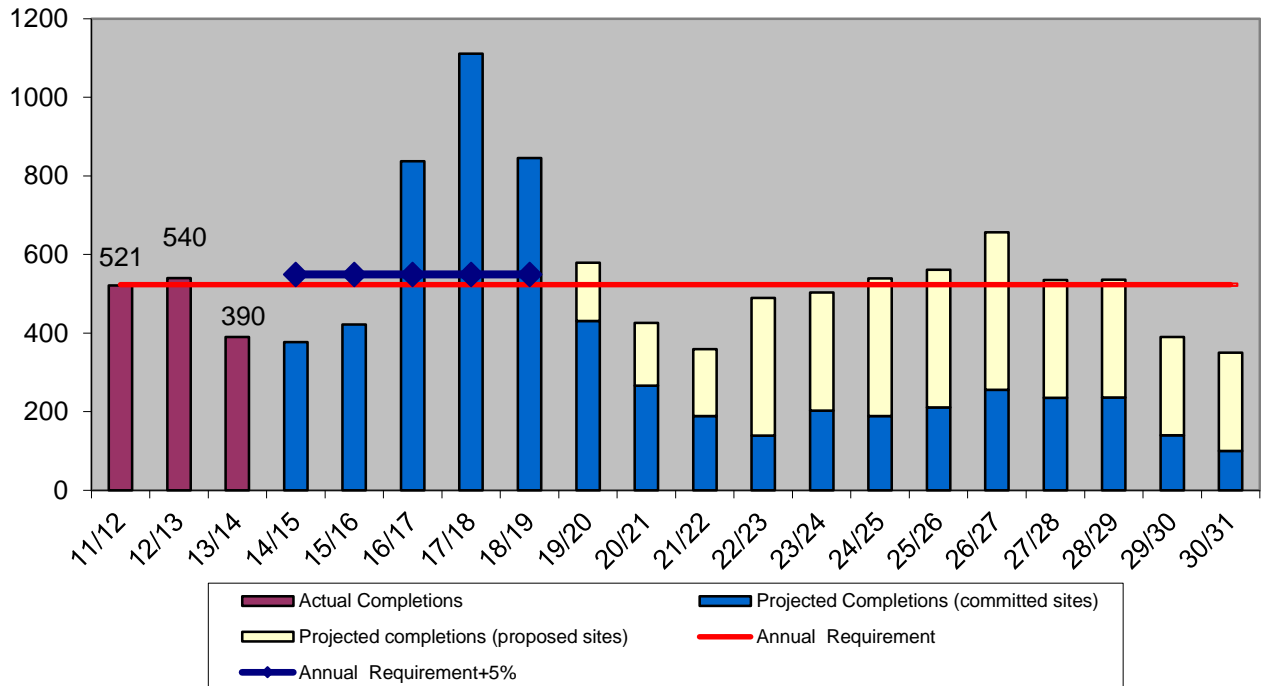
3 = Significant risk or impact – action required

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

**APPENDIX 1**

**UTTLESFORD DISTRICT COUNCIL**  
**HOUSING TRAJECTORY AND 5-YEAR LAND SUPPLY**  
**1 April 2014**

**Diagram 1: - HOUSING COMPLETIONS AND TRAJECTORY 2011 TO 2031**



**Housing Trajectory**

1. Planning Policy Guidance requires Local Authorities to undertake housing and economic land available assessment. Planning Practice Guidance (PPG) paragraph ID3-006-20140306 sets out the overall methodology. This paper considers the deliverability (5 year supply) and developability of housing i.e. Stage 5.
2. The Council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) which is updated annually; an assessment of its windfall allowance, and as assessment of its objectively assessed need.
3. The council's adopted Local Plan 2005 pre-dates the National Planning Policy Framework (NPPF) and a new Local Plan reflecting the NPPF is being prepared and is programed to be submitted in July 2014 and adopted in 2015. As the adopted Local Plan does not provide an adequate basis for the identification of the objectively assessed need the Council needs to refer to the advice of the PPG and its own demographic work.
4. PPG paragraph ID 2a-015-20140306 recommends that household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.

5. For Uttlesford, the 2008-based household projections forecast an increase in 8000 households between 2008 and 2028 which equates to 400 household per annum, which equates to the need to provide 415 dwellings per annum.
6. The interim-2011-based household projections indicate that over the 10 year period the number of households is projected to grow by 4774 which equates to 5005 dwellings 2011 to 2021 or an average of 500 dwellings a year.
7. Uttlesford District Council has worked with Essex and other adjoining authorities in commissioning demographic forecasts. Edge Analytics has undertaken the work through five separate phases and delivered the analysis using the POPGROUP suite of demographic forecasting models. The Council has examined a range of scenarios presented in this work. The scenario based on the 2010-based sub-national population projections (SNPP) forecasts a high housing and jobs growth; the economic scenario which constrains population growth, and the approved (but now revoked) Regional Plan forecast a mid-range housing and jobs figure; and growth based on the Annual Monitoring Report and nil net migration forecast a low growth scenario. The most recent work produced by Edge Analytics took into account the 2011 census statistics, revisions to mid-year population estimates, the new 2011-based household projections and the 2012 mid-year estimates.
8. The Council has prepared its Plan on the most robust official projections available at the time and considers that its objectively assessed need is that identified by the SNPP-2010 which estimates a need for 523 dwellings a year over the plan period. This exceeds both the official 2008 and 2011 household projections mentioned above. The Plan is based on projections from when the economy was strong. It recognises that if conditions in the housing market and the economy more generally improve there may be a return towards these trends. To base a plan on a projection influenced by the economic downturn, with the knowledge that the housing market in Uttlesford is relatively strong, is not considered sound. This 5-year land supply statement will consider the supply of housing against this target.
9. The Housing Trajectory is a way of showing past and future housing performance by identifying the predicted provision of housing over a period of time.
  - The housing trajectory is illustrated in Diagram 1.
  - The predicted annual completion rate is shown in Table 1.
  - The calculation of the 5 year housing supply is shown in Table 2.
  - The number of completions since 2001 is shown in Table 3.
  - Detailed site information is provided in Appendix 1.
10. All the sites in the trajectory are considered developable; they are in suitable locations for housing development, are available for development, and are viable at the point envisaged. The Council undertakes an annual assessment of the sites, to identify as at 31 March 2014 the number of dwellings built during 2013/14, the outstanding number of dwellings with planning permission and whether the site is under construction or not started. It also identifies those sites without planning permission which are considered deliverable including sites proposed in the draft Local Plan. The status of each site is shown in Appendix 1.
11. In accordance with PPG paragraph ID 3-037-20140306 the trajectory includes housing provided for older people, including residential institutions in Use Class C2.
12. The number of dwellings required to be provided by the Regional Strategy for the East of England (revoked January 2013) from 2001 to 2013 was 4620. The trajectory shows

that the number of dwelling provided within this period is 4901. There has therefore been an oversupply of 281 dwellings.

13. The trajectory shows how the completion rate in the reporting year of 2013/14 is lower than in previous year and falls short of the Council's target of 523 dwellings per annum. This undersupply is planned to be met within the following 5 years.
14. It is predicted that completion rates for the next two years will remain relatively low reflecting the fact that the sites identified in the Adopted Local Plan have been completed, and there will be a delay before there are completions on new sites granted permission while detailed planning applications are negotiated and determined.

### **Statement of 5-year Land Supply in Uttlesford 2014/15 – 2018/19**

15. Paragraph 47 of the National Planning Policy Framework requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.
16. The trajectory illustrates a pattern of alternating years of high and low delivery which is not considered to be a record of persistent under delivery. Therefore the 5-year land supply includes a 5% buffer. This approach was supported by an Inspector in his decision letter dated 7 August 2013 relating to an appeal inquiry in May 2013 reference APP/C1570/A/12/2181608 and APP/C1570/A/12/2181612 relating to land at Oakwood Park, Felsted UTT/0365/09/OP and UTT/0190/09/FUL.
17. The 5 year period covers the period 2014/15 to 2018/19.
18. The 5-year land supply data is wholly retrospective, using a base date of 31 March 2014 and only uses known data i.e. actual completions and actual planning permissions.
19. Appendix 1 lists, in order by Parish, all the sites which are considered to provide housing during the period up to 2031. It includes an allowance for windfall sites of 50 dwellings per year based on historic rates of completions on windfall sites and the policy context in which they are likely to continue to be provided at this rate. All sites for 6 or more dwellings are individually listed. There are 9 categories of site
  1. under construction
  2. with planning permission (full or reserved matters covering whole site)
  3. with outline permission with part(s) covered by reserved matters
  4. with outline only
  5. where full, outline or reserved matters at post committee resolution subject to S106 negotiations
  6. with application submitted
  7. with pre-application discussions occurring
  8. allocation only
  9. draft allocation

Table 1 below sets out the actual and estimated completions for each year during the plan period. As set out in Table 2 the Council's overall target over the next 5 year period is 2885 dwellings which includes making up the shortfall of 133 dwellings and the frontloading of 5%. The Council estimates that 3592 dwellings will be provided over the next 5 years which provides the District with 6.2 years of supply.

<b>Table 1</b> Actual and estimated completion rates 2011 - 2031								
Year	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19
				Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
completions	521	540	390					
estimated completions years 1-5 (sites with permission or resolution to approve)				377	422	837	1111	845

Year	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31
	6	7	8	9	10	11	12	13	14	15	16	17
(1) Estimated completions	431	266	189	139	203	189	211	256	235	236	140	100
(1) sites with permission, resolution to approve, expired permissions												
(2) Estimated completions	579	426	359	489	503	539	561	656	535	536	390	350
(2) sites with permission, resolution to approve, expired permissions and sites allocated in draft Local Plan which do not have permission or resolution to approve.												

<b>Table 2</b> Calculation of 5 year housing supply		
Annual Target	AT	523
Target years 1 - 5	AT x 5	2615
Shortfall	AT - 390	133
Target plus shortfall		2748
5% of target plus shortfall		137
<b>Overall target</b>	<b>T+</b>	<b>2885</b>
<b>Supply</b>	<b>S</b>	<b>3592</b>
% of target available on deliverable sites	(S/T+)x100	124
Supply in years	S/(T+ /5)	6.2
<b>Deficit/Surplus</b>	<b>S-(T+)</b>	<b>707</b>

Year	Net
01/02	182
02/03	396
03/04	241
04/05	344
05/06	542
06/07	326
07/08	543
08/09	441
09/10	523
10/11	302
11/12	521
12/13	540
<b>Total 2001 - 2013</b>	<b>4901</b>

Appendix 1 Trajectory Data 2011 - 20131

KEY TO STATUS	
1.	under Construction
2.	with planning permission (full or reserved matters covering whole site)
3.	Outline with some reserved matters determined
4.	with outline only
5.	where full, outline or reserved matters at post committee resolution to Subject S106 negotiations
6.	with application submitted
7.	with pre-application discussions occurring
8.	allocations only

YEAR								Yr1	Yr2	Yr3	Yr4	Yr5	6	7	8	9	10	11	12	13	14	15	16	17		
Policy No.	Site	UTT Reference	Date of Permission	Capacity	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	PDL/G	Status
	Small sites(< 6 Units)				26	40	49																		G	
	Small sites (< 6 units)				59	22	19																		PDL	
	Windfall Allowance			850				50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50		
	Birchanger 300 Birchanger Lane	UTT/1527/09/DFO		0	9																				PDL	Built
CLA1	Clavering: Land rear of the Shop and Oxleys Close	13/0327/OP	13-Jan-14	13					13																G	3
CLA1	Clavering: Land to the rear of the shop and Oxleys Close	UTT/2251/11/FUL	22-Nov-13	14					14																G	2
CLA2	Clavering: Jubilee works	UTT/2149/11/OP	29 November 2012.	24						12	12														PDL	3
ELS1	Elsenham: Land to the north east			2100									100	100	100	200	200	200	200	200	200	200	200	200		8
ELS3	Elsenham: Land west of Station Road	UTT/0142/12/OP	09-May-13	154					24	30	50	50													G	3
ELS3	Elsenham: Land west of Station Road Care Home	UTT/0142/12/OP	09-May-13	55								55													G	3
ELS4	Elsenham: Land west of Hall Road	UTT/13/0177/OP	19-Dec-13	130					40	45	45														G	3
ELS5	Elsenham: Land south Stansted Road	UTT/13/1790/OP	23-Dec-13	165						55	55	55													G	3
ELS6	Elsenham: Former Goods Yard, Old Mead Lane	UTT/12/6116/FUL	07-Feb-14	10						10															PDL	2
ELS6	Elsenham: Hailes Wood	UTT/13/2917/FUL	Resolution to approve 12/1/14.	31							31														G	5
ELS6	Elsenham: Land at Alsa Leys	UTT/13/2836/FUL	12-Mar-14	6						6															G	2
ELS6	Elsenham: The Orchard	UTT/1500/09/OP UTT/2166/11/DFO	OP = 25/11/2010 DFO = 10 August 2012	7			44	7																	G	1
F-GRE1	Felsted/Little Dunmow: Oakwood Park	See Housing Supply Statement		154					9												47	49	49			2/6
	Felsted: Lyndfields Bannister Green	UTT/0799/08		0		6																			PDL	Built
FEL1	Felsted: Hartford End Brewery	UTT/2310/10/FUL	21-Feb-12	43									43												PDL	2

YEAR					11/12	12/13	13/14	Yr1	Yr2	Yr3	Yr4	Yr5	6	7	8	9	10	11	12	13	14	15	16	17	PDL/G	Status
Policy No.	Site	UTT Reference	Date of Permission	Capacity																						
FEL2	Felsted: Watchhouse Green Felsted	UTT/13/0989/OP	11-Jul-13	25				12	13																G	3
GreatCHE1	Great Chesterford 1: New World Timber and Great Chesterford Nursery, London Road	UTT/14/0174/FUL	Resolution to approve 9 April 2014	42							21	21													G/PDL	5
GreatCHE2	Great Chesterford: Land south of Stanley Road	UTT/12/5513/OP UTT/13/3444/DFO	12 July 2013; 13 February 2014	50					20	30															G	2
GreatCHE2	Great Chesterford: Land south of Stanley Road			10									10													8
	Great Dunmow 37-75 High St	UTT/1185/02/FUL		0	7																				PDL	Built
	Great Dunmow 39 Causeway and land r/o 37& 41-49 The Causeway	UTT/0601/08/Ful		0	7																				G	Built
	Great Dunmow Chequers Inn	UTT/1200/02/FUL		0	8																				PDL	
	Great Dunmow rosemary lane infants school	UTT/1006/10		0	31																				PDL	Built
	Great Dunmow Waldgrooms	UTT/0644/09/FUL		0	6																				PDL	Built
	Great Dunmow: Springfields	UTT/1412/09		0		25																			G	Built
GD1	Great Dunmow: west of Woodside way	UTT/13/2107/OP	Resolution to approve 12/2/14	790						50	50	50	60	60	60	60	60	60	60	60	60	60	40		G	5
GD1	Great Dunmow Policy Area 1 West of Woodside Way (part) x 60			0																						8
GD2	Great Dunmow: Land south of Stortford Road			400														50	50	100	100	100				8
GD4	Great Dunmow: Helena Romanes School Site			100																			50	50		8
GD5	Great Dunmow: Land west of Chelmsford Road	UTT/13/1684/OP	Resolution to approve 23/10/13	300						50	50	50	50	50	50	0									G	5
GD5	Great Dunmow: Land west of Chelmsford Road x 70 bed care home	UTT/13/1684/OP	Resolution to approve 23/10/13	70								70													G	5
GD6	Great Dunmow: Woodlands Park Sector 1-3	See Housing Supply Statement		842	24	23	22	25	25	25	25	25	25	25	25	25	89	75	101	99	76	77	50	50		1
GD6	Great Dunmow: Woodlands Park Sector 4	UTT/2507/11/OP. UTT/13/1663/DFO	2 August 2012; 31 October 2013	124					25	50	49														G	2
GD7	Great Dunmow: South of Ongar Road	UTT/1255/11/OP	12 July 2012;	100					25	25	50														G	3



YEAR					11/12	12/13	13/14	Yr1	Yr2	Yr3	Yr4	Yr5	6	7	8	9	10	11	12	13	14	15	16	17	PDL/G	Status	
Policy No.	Site	UTT Reference	Date of Permission	Capacity																							
GD8	Great Dunmow: North of Ongar Road	UTT/1147/12/OP	23-Aug-12	73						33	40														G	3	
GD9	Great Dunmow: Brick Kiln Farm	UTT/13/0847/OP UTT/14/0265/DFO	11/07/2013; 4 June 2014	65						30	35														G	3	
GD10	Great Dunmow: Perkins Garage	UTT/12/5270/FUL	08-Oct-13	12							12														PDL	2	
GD10	Great Dunmow: Barnet ton Court	UTT/1519/12/FUL	19-Apr-13	10						10															PDL	1	
GD10	Great Dunmow: Former Council Offices, 46 High Street	UTT/2116/10		0		8	2																		PDL	Built	
GD10	Great Dunmow: Land Adj Harmans Yard	UTT/0912/10/FUL	12-Jul-13	0			6																		PDL	Built	
	Great Easton: The Moat House Dunmow Road Care home	UTT/0874/11	29/07/2011	26				26																	PDL	1	
	Hatfield Heath: Broomfield	UTT/12/5349/FUL	Oct-13	14				14																	G	1	
	Hatfield Heath: The Stag Inn,	UTT/13/2499/FUL	Nov-13	6				6																	PDL	1	
HEN1	Henham Policy Area Blossom Hill			25									25														8
HEN2	Henham: land north of Chickney Road and west of Lodge Cottages	UTT/13/0909/OP. UTT/14/0065/FUL	resolution to approve 12/3/14	16							16														G	5	
H-ROD1	High Roding: Meadow House Nursery	UTT/13/1767/FUL	07-Jan-14	30							15	15													PDL	2	
L-ROD1	Leaden Roding: Holloway Crescent	UTT/1357/11		0		-18	8																		PDL	Built	
Lt-DUN1	Little Dunmow: Dunmow Skips Site	UTT/13/2340/OP	Resolution to approve 12/3/14	38							19	19													PDL	5	
	Littlebury: Peggys Walk	UTT/1984/10		0	2	12																			PDL	Built	
MAN1	Manuden: Site off the Street	UTT/0692/12/FUL	12-Feb-13	5			9	5																	G	1	
	Newport: The Maltings Station Rd	UTT/1405/09		0		11																			PDL	Built	
NEW1	Newport: Bury Water Lane/Whiteditch Lane	UTT/13/1769/OP	29-Nov-13	84							42	42													G	3	
NEW2	Newport : Hillside and land to rear, Bury Water Lane Retirement village (40 retirement units; 120 extra care; 5 market houses) [5 respite care bungalows <b>not</b> included] Loss of 2 units	UTT/13/1817/OP	30-Oct-13	163								43	60	60											G	3	

YEAR					11/12	12/13	13/14	Yr1	Yr2	Yr3	Yr4	Yr5	6	7	8	9	10	11	12	13	14	15	16	17	PDL/G	Status
Policy No.	Site	UTT Reference	Date of Permission	Capacity																						
NEW3	Newport: Land west of London Road by Primary School			70											20	50										8
NEW4	Newport: Carnation Nurseries	UTT/12/5198/OP	10-Oct-13	22							11	11													G/PDL	3
QUE1	Quendon: land r/o Foxley House	UTT/1359/12/OP & UTT/13/0027/OP	30-Aug-13	19							19														G	3
RAD1	Radwinter: Land north of Walden Road	UTT/13/3118/OP	28-Feb-14	35							15	20													G	3
	Saffron Walden Bell College Peaslands Road	UTT/0503/10		0	86																				PDL	Built
	Saffron Walden: Bell College South Road	UTT/0828/09		0	25	37																			PDL	Built
	Saffron Walden: Bell College South road (retirement flats)	UTT/1981/10		0		27																			PDL	Built
SAF1	Saffron Walden 1: Land between Radwinter Road and Thaxted Road and land to the south of the Lord Butler Leisure Centre and west of Thaxted Road			600										50	50	100	100	100	100	100						8
SAF1	Saffron Walden 1: Land south of Radwinter Road	UTT/13/3467/OP	Resolution to grant 30 April 2014	200						50	50	50	50												G	5
SAF1	Saffron Walden: Land south of Radwinter Road for retirement village (60 bed care home; 12 extra care bungalows; 30 extra care apartments)	UTT/13/3467/OP	Resolution to grant 30 April 2014	102							60	12	30												PDL	5
SAF3	Saffron Walden: Former Willis and Gambier Site, Radwinter Road	UTT/13/3406/FUL	Resolution to approve 12/2/14	52						26	26														PDL	5
SAF3	Saffron Walden: Former Willis and Gambier Site, Radwinter Road Extra Care Home	UTT/13/1981/OP	resolution to approve 20 November 2013	60						60															PDL	5
SAF4	Saffron Walden: Lt Walden Road	UTT/1576/12/DFO	15-Nov-12	0			15																		G	Built
SAF6	Saffron Walden: Land at Ashdon Road Commercial Centre	UTT/13/2423/OP	Resolution to approve 30 April 2014	167							50	50	50	17											PDL	5
SAF7	Saffron Walden: 8-10 King Street	UTT/0280/12/REN of UTT/1733/08/FUL	21-Jun-12	8							8														PDL	2

YEAR					11/12	12/13	13/14	Yr1	Yr2	Yr3	Yr4	Yr5	6	7	8	9	10	11	12	13	14	15	16	17	PDL/G	Status		
Policy No.	Site	UTT Reference	Date of Permission	Capacity																								
SAF7	Saffron Walden: Ashdon Road	UTT/1572/12/DFO	21-Nov-12	108			22	68	40																	G	1	
SAF7	Saffron Walden: Former Gas Works Thaxted Rd	UTT/0123/09	24-Mar-09	0		4	5																			PDL	Built	
SAF7	Saffron Walden: Friends School	UTT/0188/10	31-Mar-11	7		30	37	7																		PDL	1	
SAF7	Saffron Walden: Goddards Yard	UTT/13/0669/FUL	21-Jun-13	14					14																	PDL	1	
SAF7	Saffron Walden: Land to the West of Debden Road (Tudor Works)	UTT/1252/12/OP UTT/14/0356/DFO pending	21-Nov-12	24						24																PDL	3	
SAF7	Saffron Walden: Lodge Farm, Radwinter Rd (Pt of Jossaumes)	UTT/12/5226/FUL	04-Jan-13	31				31																		PDL	1	
SAF7	Saffron Walden: Thaxted Rd (Kiln Court)	UTT/13/1937/OP	11-Oct-13	52							26	26														PDL	3	
SAF7	Saffron Walden: The Sun Inn Gold Street	UTT/0681/12	07-Jul-12	0			6																			PDL	Built	
SAF7	Saffron Walden: Emson Close	UTT/0609/11/REN of UTT/0536/07/FUL	14-Jul-11	9									9													PDL	2	
SM3	Stansted : Land at Walpole Farm	UTT/13/1618/OP	1 April 2014	160						50	50	60														G	3	
	Stansted: Braefield Engineering High Lane : Care home	UTT/0310/12/FUL	28-Jun-12	60				60																		PDL	1	
SM1	Stansted: lotus garage 2 Lower Street	UTT/1522/12/FUL	07-Jan-13	14						14																PDL	2	
SM2	Stansted: Rochford Nurseries	See Housing Supply Statement		35	84	148	64	35																		G	1	
SM4	Stansted: Land at Elms Farm	UTT/13/1959/OP	17-Jan-14	51							25	26														G	3	
SM5	Stansted: 68-70 Bentfield Road	UTT/2479/11/FUL	07-Feb-12	0		3	6																			PDL	Built	
SM5	Stansted: Mead Court Redevelopment of 27 units with 29 units therefore net gain of 2	UTT/13/0749/FUL	06-Jun-13	2				2																		PDL	2	
STE1	Stebbing: Land to east of Parkside and Garden Fields			10										10														8
	Takeley: Priors Green, Takeley Nurseries	UTT/0515/10		0	35																					G	Built	



YEAR					11/12	12/13	13/14	Yr1	Yr2	Yr3	Yr4	Yr5	6	7	8	9	10	11	12	13	14	15	16	17	PDL/G	Status
Policy No.	Site	UTT Reference	Date of Permission	Capacity																						
TAK1	Takeley: Land South of Dunmow Road and east of The Pastures/Orchard Fields	UTT/1335/12/FUL	24-Sep-13	41						13	14	14													G	2
TAK2	Takeley 3: North View and 3 The Warren	UTT/13/1779/FUL	03-Oct-13	45							22	23													PDL	2
TAK3	Takeley: Land adj Olivias, Dunmow Rd	UTT/12/5142/FUL	14-Dec-12	6						6															G	1
TAK3	Takeley: Land to the south of the B1256 between Olivias and New Cambridge House			13									13													8
TAK4	Takeley: Priors Green	See Housing Supply Statement		64	98	162	76	14	6	6	6	8	4	4	4	4	4	4								1
TAK5	Takeley: Brewers End Takeley	UTT/13/1393/OP	23-Aug-13	100					25	37	38														G	3
TAK6	Takeley: Chadhurst Takeley	UTT/13/1518/FUL	12-Sep-13	12					12																G	2
TAK6	Takeley: Priors Green Stansted Motel & 2 Hamilton Rd	UTT/0240/12/OP	03-Sep-12	13					13																PDL	3
THA1	Thaxted: Sampford Road	UTT/12/5754/FUL	08-Feb-13	60					20	20	20														G	1
THA3	Thaxted: Land East of Barnards Fields Thaxted	UTT/13/0108/OP	07-Jun-13	8					8																G	3
THA3	Thaxted: Wedow Road	UTT/1562/11/OP UTT/12/5970/DFO; UTT/13/1153/DFO ; UTT/13/3420 x 4	9 December 2011; 18 February 2013; 3 July 2013 : Feb 2014	59				15	20	20	4														G	1
	Wendens Ambo: Mill House Royston Road	UTT/13/3474/P3JPA	24 February 2014	6					6																PDL	Prior Notification accepted
	rural exception site completions			0	14																				G	
<b>ANNUAL TOTALS</b>					<b>521</b>	<b>540</b>	<b>390</b>	<b>377</b>	<b>422</b>	<b>837</b>	<b>1111</b>	<b>845</b>	<b>579</b>	<b>426</b>	<b>359</b>	<b>489</b>	<b>503</b>	<b>539</b>	<b>561</b>	<b>656</b>	<b>535</b>	<b>536</b>	<b>390</b>	<b>350</b>		



APPENDIX 2

HOUSING SUPPLY STATEMENT 2014

This paper sets out the housing supply situation as at 31 March 2014

The Council's housing supply is made up of dwelling completions; committed sites which are those sites with planning permission and those sites without planning permission but are considered to be deliverable during the plan period; including new sites to be identified in the emerging Local Plan; and a windfall allowance based on historic rates and current planning policy. This is set out in the table below.

**2011/12 – 2030/31**

**Supply**

Built since April 2011	1451
Sites of 6+ units with PP @ April 2014	2903
Sites without PP @ April 2014	282
Proposal sites without PP @ April 2014	5232
Windfall allowance 50dpa for 17 years	<u>850</u>
TOTAL	<u>10718</u>

Table 1 provides detailed information on the progress for each site with planning permission for 6 or more dwellings as at 31 March 2014.

Table 2 lists any Rural Exception Sites completed 2013/14 and any outstanding Rural Exception Sites granted permission under Policy H11.

Table 3a and 3b lists sites without planning permission which are considered to contribute to the supply of housing during the plan period.

Table 4 lists annual completion rates since 2000.

<b>Table 1. Dwellings with Planning Permission on Large Sites (6+ units) @ 31 March 2014</b>							
<b>UTT Reference</b>		<b>Site Address</b>		<b>Site Capacity (gross)</b>	<b>Built 2013-2014 (net)</b>	<b>Total Units complete (net)</b>	<b>Total Units Outstanding (net)</b>
<b>Woodlands Park, Great Dunmow</b>							
UTT/0458/93		Sector 1		93	0	93	0
UTT/1006/04		Emblems		105	0	0	99
0510/92		Sector 2 Woodlands Park	Market	0	0	0	0
1047/93				24	0	24	0
0753/96				1	0	1	0
0720/94				220	0	161	0
0817/98				70	0	70	0
1328/01				126	3	126	0
1809/02				130	6	111	17
0147/03				Affordable		156	0
0409/04		Pt of Sector 2 phase 1 (pt s/s 720/04)		36	0	36	0
0395/05				51	0	0	44
0496/05				253	13	13	240
0386/05		Sector 3		100	0	0	100
0392/05			Market	246	0	0	243
			Affordable	54	0	0	20
0246/07	s/s 395/05x7 392/05x3	Sectors 2&3		20	0	0	20
13/1663		Sector 4 Lt Easton	Market	75 (minus potential loss of 1)	0	0	74
			Affordable	50	0	0	50
13/1600	s/s 1809/02	Plot 540 & 541 Elm Rd		2	0	0	2
<b>TOTAL</b>					<b>22</b>	<b>791</b>	<b>909</b>
Total market						635	839
Total affordable						156	70

Expired sites – see table 6						
1910/07	s/s 1006/04	Sector 1 Emblems	6			
399/08			17			
0406/08	s/s 392/05	Affordable	34			

<b>UTT Reference</b>	<b>Site Address</b>	<b>Site Capacity (gross)</b>	<b>Built 2013-14 (net)</b>	<b>Total Units complete</b>	<b>Total Units Outstanding (net)</b>
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				(net)			
<b>Oakwood Park Little Dunmow</b>							
0302/96/OP				650	-	-	-
1135/99/DFO	Part s/s of 302/96			80	0	80	0
0632/00/DFO				47	0	47	0
1073/01/DFO				133	0	133	0
0770/01/DFO				38	0	38	0
1821/02/DFO Phase 3				120	0	120	0
1829/03/DFO Phase 4				120	0	120	0
0023/03/OP	56 (s/s 302/96) & 160 increase		216	-	-	-	
0090/05/DFO Phase 5 & 5A	Part s/s 23/03		97	0	69	0	
1225/06/DFO Area 5B	s/s remainder of 23/03 (49 units) increasing capacity by 19		68	0	68	0	
1539/06/DFO Area 5D	s/s 28 units of 90/05		53	0	0	0	
1342/07 Area 5D The Poppies	Whole s/s of 1539/06 (capacity decrease of 12)	Market	25	0	25	0	
		Affordable	16	0	16	0	
1123/13 Land at Webb Rd & Hallet Rd	Erection 9 Residential units & 1 no. retail unit (A1)		9	0	0	9	
<b>TOTAL</b>				<b>0</b>	<b>716</b>	<b>9</b>	

Expired site – see table 6						
0537/05/OP Phase 6	70 (s/s 23/03) & 28 increase Part s/s by 1123/13	Market	68			59
		Affordable	30			30
0302/96/OP	Village centre		56			56

UTT Reference		Site Address	Site Capacity (gross)	Built 2013-14 (net)	Total Units complete (net)	Total Units Outstanding (net)
<b>Rochford Nurseries/Forest Hall Park, Birchanger and Stansted Mountfitchet</b>						
<b>0204/05</b>		Market	236	0	129	0
		Affordable	79	0	59	0
1685/06	Part s/s of 204/05	Area P3 Rochford Nurseries	35	0	20	0
1607/09	Part s/s of 1685/06	Phases E & F Stansted	14	0	14	0
0312/09	Part s/s of 204/05	Plot 80	1	0	1	0
0992/09		NW corner of Phase 2	16	0	16	0
0012/10		Phases C & D Stansted	24	0	24	0
0014/10		Phase B	9	0	9	0
<b>1123/01</b>			285	0	0	0
2265/07	Part s/s of 1123/01	Market	131	56	106	25
		Affordable	91	4	67	10
0557/06		Market	72	0	70	0
		Affordable	5	0	5	0
0076/10	Wholly s/s 2264/07 Part s/s 2265/07 Affordable	Market	49	0	49	0
		Affordable	14	0	14	0
1229/09	Part s/s of 0557/06		2	0	2	0
0432/11	Part s/s 0204/05	Market	23	0	23	0
		Affordable	16	0	16	0
1032/11	Part s/s 0204/05		2	0	2	0
1960/11	Phase H Part s/s 204/05		4	4	4	0
<b>TOTAL</b>				<b>64</b>	<b>630</b>	<b>35</b>
Total market					469	25
Total affordable					161	10
2264/07 s/s by 0076/10	Replacement dwellings	3&4 Cottages Rochford Nurseries	2	0	0	0



UTT Reference		Site Address	Site Capacity (gross)	Built 2013-14 (net)	Total Units complete (net)	Total Units Outstanding (net)
<b>Priors Green, Takeley</b>						
UTT/0816/00		Land north of Dunmow Rd Takeley	650	0	0	0
UTT/1197/06		Phase 3B	38	0	38	0
UTT/1066/05		Phase 3A	54	0	54	0
UTT/1067/05		Phase 2	90	0	90	0
0664/06	Affordable	Phase 4A	25	0	25	0
0665/06	Affordable	Phase 4B	25	0	25	0
0519/07	Pt s/s of 632/07	Pt of Phase 7 Lot 1	13	0	13	0
0632/07		Phase 7&8 Lot 1	58	0	45	0
0841/07		Phase 10	49	0	49	0
1057/05		Phase 3c	18	0	18	0
1124/08	Market	Phase 9	8	0	8	0
	Affordable		30	0	30	0
0174/09	Market	Land north of Jacks Lane	262	0	0	0
	Affordable		65	0	0	0
1136/10 Partial s/s of 714/09	Market	Phase A	70	8	70	0
	Affordable		17	0	17	0
1642/10 Partial s/s of 714/09	Market	Phase B	36	19	36	0
	Affordable		10	0	10	0
1110/10 Partial s/s of 714/09	Market	Area C	78	27	78	0
	Affordable		20	0	20	0
1675/10 Partial s/s of 714/09	Market	Phase D	71	22	70	1
	Affordable		18	0	18	0
1398/11 Partial s/s of 174/09		Land adj Warwick Road	7	0	0	7
<b>TOTAL</b>				<b>76</b>	<b>714</b>	<b>8</b>
Total market				76	569	8
Total affordable				0	145	

UTT Reference		Site Address	Site Capacity (gross)	Built 2013-14 (net)	Total Units complete (net)	Total Units Outstanding (net)
<b>Other sites within Priors Green Policy Area</b>						
1809/06	Market	Land at the Laurels	33	0	33	0
	Affordable		11	0	11	0
0515/10	Market	Takeley Nurseries	26	0	19	0
0423/09	Affordable		9	0	9	0
0337/11	Pt s/s 515/10		2	0	2	0
0338/11	Pt s/s 515/10		5	0	5	0
0240/12		Stansted Motel and 2 Hamilton Road	13	0	0	13
<b>TOTAL</b>				<b>0</b>	<b>79</b>	<b>13</b>
Total market				0	59	13
Total affordable				0	20	0
<b>Other sites within Priors Green Policy Area ("island sites")</b>						
2070/06		1 Hamilton Road	2	0	2	0
0338/08 (x7 gross)		8 Hamilton Rd	6	0	6	0
1467/08		Adj Homestead, Dunmow Rd	1	0	1	0
1976/10		1 & 2 Broadfield Villas	7	0	7	0
0169/09		The Rest	1	0	1	0
1174/09		Land at The Rest	9	0	9	0
1736/09		Morgan House, Dunmow Road	4	0	0	4
1226/10		Willow Tree Cottage	10 (minus potential loss of 2)	0	0	8
13/1953		Ld Btwn 3 & 5 Hamilton Rd, Little Canfield	5	0	0	5
13/3429		S of Willow Tree Cottage, Broadfield Road	1	0	0	1
13/2905		The Laurels Dunmow Road	4 (potential loss of 1)	0	0	3
0410/12		Lyric Cottage, Dunmow Road	1	0	0	1
12/5305		Rear of 4 Hamilton Road	2	0	0	2
13/0768		Ld R/o 1 – 4 Cotts, Dunmow Rd	1	0	0	1

UTT Reference	Site Address	Site Capacity (gross)	Built 2013-14 (net)	Total Units complete (net)	Total Units Outstanding (net)
13/0692	Land north of 4 Hamilton Road	7	0	0	7
<b>TOTAL</b>			<b>0</b>	<b>26</b>	<b>32</b>

UTT Reference	Site Address	Site Capacity (gross)	Built 2013-14 (net)	Total Units complete (net)	Total Units Outstanding (net)	
<b>Clavering</b>						
2251/11	r/o Oxleys Close	14	0	0	14	
13/0327	Land south of Oxleys Close	Market	7	0	0	7
		Affordable	6	0	0	6
2149/11	Jubilee Works	Market	14	0	0	14
		Affordable	10	0		10
			<b>0</b>	<b>0</b>	<b>51</b>	
<b>Elsenham</b>						
2166/11	The Orchard, Station Rd,	Market	32 (minus loss of 2)	23	23	7
		Affordable	21	21	21	0
13/2836	Land at Alsa Leys	6	0	0	6	
0142/12	Land at Stansted Road	Market	109 (minus potential loss of 1)	0	0	108
		Affordable	46	0	0	46
		Extra Care flats	55	0	0	55
13/0177	Land west of Hall Rd	Market	78	0	0	52
		Affordable	52	0	0	78
13/1709	Land south of Stansted Road	Market	99	0	0	99
		Affordable	66	0	0	66
12/6116	The Old Goods Yard	10	0	0	10	
			<b>44</b>	<b>44</b>	<b>527</b>	
<b>Felsted</b>						
2310/10	Hartford End Brewery, Mill Lane	43	0	0	43	
13/0989	Land east of Braintree Road	Market	15	0	0	15
		Affordable	10	0	0	10
			<b>0</b>	<b>0</b>	<b>68</b>	
<b>Great Chesterford</b>						
13/3444	Land south of Stanley Road and Four Acres	Market	30	0	0	20
		Affordable	20	0	0	30
					<b>50</b>	

UTT Reference	Site Address		Site Capacity (gross)	Built 2013-14 (net)	Total Units complete (net)	Total Units Outstanding (net)
<b>Great Dunmow</b>						
13/0847	Brick Kiln Farm, St Edmunds Lane	Market	42 (minus potential loss of 3)	0	0	39
		Affordable	26	0	0	26
2116/10	Former Council Offices, 46 High Street		10	2	10	0
12/5270	Perkins Garage, 12 Stortford Rd		12	0	0	12
0912/10	Land adj Harmans Yard, New Street		6	6	6	0
1255/11	Land south of Ongar Road	Market	60	0	0	60
		Affordable	40	0	0	40
1147/12	Land north of Ongar Road	Market	44	0	0	44
		Affordable	29	0	0	29
1519/12	Barnetson court Braintree Road		10	0	0	10
				<b>8</b>	<b>16</b>	<b>260</b>
<b>Great Easton</b>						
0874/11	Moat House Dunmow road		26	0	0	26
<b>Hatfield Heath</b>						
13/2499	The Stag Inn The Heath		6	0	0	6
<b>Henham</b>						
13/0909	Land at Chickney Road		14	0	0	14
<b>High Roding</b>						
13/1767	Land at Meadow House	Market	19 (lossx1)	0	0	18
		Affordable	12	0	0	12
<b>Leaden Roding</b>						
1357/11	21-33 & 23a-33a & 35-43 Holloway Crescent		8 (minus loss of 18)	8	8 gross	0
<b>Manuden</b>						
0692/12	Land at The Street		10	5	5	5
<b>Newport</b>						
12/5198	Carnation Nurseries	Market	14(lossx1)	0	0	13
		Affordable	9	0	0	9
13/1769	Land at Bury Water Lane	Market	50	0	0	50
		Affordable	34	0	0	34
13/1817	Hillside & land r/o Bury Water lane		45(minus potential loss of 2)	0	0	43
				<b>0</b>	<b>0</b>	<b>149</b>

UTT Reference	Site Address		Site Capacity (gross)	Built 2013-14 (net)	Total Units complete (net)	Total Units Outstanding (net)
<b>Quendon and Rickling</b>						
1359/12	Land at Foxley House		14	0	0	14
13/0027	Land at Foxley House	Affordable	5	0	0	5
				<b>0</b>	<b>0</b>	<b>19</b>
<b>Radwinter</b>						
13/3118	Land off East View Close and Walden Road		35	0	0	35
<b>Saffron Walden</b>						
13/1937	r/o Old Cement Works/ Kiln Court	Market	32	0	0	32
		Affordable	20	0	0	20
13/0669	Goddard's Yard, Thaxted Rd		14	0	0	14
0280/12	r/o 8-10 King Street		8	0	0	8
0123/09	Former Gas Works site, Radwinter Road		9	5	9	0
0188/10	Friends School, Mount Pleasant Rd	Market	45	37	38	7
		Affordable	31	0	19	0
2154/11	Pt s/s 188/10	Market	12	0	12	0
0609/11	Land at Emson Close		9	0	0	9
0681/12	The Sun Inn, Gold Street		7 (minus potential loss of 1)	6	6	0
1252/12	Tudor Works, Debden Road		24	0	0	24
1572/12	Ashdon Road	Market	93	10	10	83
		Affordable	37	12	12	25
1576/12	Land at Little Walden Rd	Affordable	15	15	15	0
12/5226	Lodge Farm, Radwinter Road (retirement flats)		31	0	0	31
				<b>85</b>	<b>121</b>	<b>253</b>
<b>Stansted Mountfitchet</b>						
2479/11	At 68-70 Bentfield Road		9	6	9	0

UTT Reference	Site Address		Site Capacity (gross)	Built 2013-14 (net)	Total Units complete (net)	Total Units Outstanding (net)
1552/12	2 Lower Street		14	0	0	14
13/0749	Nos. 30 – 56 Mead Court, Cannons Mead		29 (minus potential loss of 27)	0	0	2
13/1959	Elms Farm Church road	Market	32 (minus potential loss of 2)	0	0	30
		Affordable	21	0	0	21
				<b>6</b>	<b>9</b>	<b>67</b>
<b>Takeley/Little Canfield</b>						
12/5142	Land adj Olivias Dunmow Road		6	0	0	6
13/1393	Land south of Dunmow road Brewers End	Market	60	0	0	60
		Affordable	40	0	0	40
13/1518	Chadhurst, Dunmow Road		13 (potential loss of 1)	0	0	12
13/1779	Land at North View and 3 the Warren	Market	28 (minus potential loss of 1)	0	0	27
		Affordable	18	0	0	18
1335/12	Land at Brewers End Dunmow Rd	Market	25	0	0	25
		Affordable	16	0	0	16
				<b>0</b>	<b>0</b>	<b>204</b>
<b>Thaxted</b>						
12/5970	Land off Wedow Road	Market	33	0	0	33
		Affordable	22	0	0	22
13/3420	Land adj 39 Wedow Road		4	0	0	4
12/5754	South of Sampford Road	Market	37	0	0	37
		Affordable	23	0	0	23
13/0108	Land east of Barnards Field		8	0	0	8
				<b>0</b>	<b>0</b>	<b>127</b>
<b>Wendens Ambo</b>						
13/3473 (prior notification)	Mill House Royston Road		6	0	0	6

UTT Reference	Site Address	Site Capacity	Total Units completed	Total Units Outstanding
2427/11	Site adjacent Crathie, Hampit Road, Arkesden	4	0	4
12/5349	Broomfield Hatfield Heath	14	0	14
0692/12	Land at The Street Manuden	4	4	0

Sites without Planning Permission

Table 3a lists sites without planning permission which are considered to contribute to the District's housing supply. The sites are either allocated in the Adopted Local Plan; have had planning permission which has expired or have been granted planning permission subject to signing of S106 Agreement. Table 3b list sites proposed in the Pre-submission Local Plan April 2014. All the sites have been considered as part of the Strategic Housing Land Availability Assessment (SHLAA).

	Net Capacity	SHLAA ref no.
Woodlands Park, Great Dunmow (expired permissions 1910/07x6 dwlgs; 0339/08x17 dwlgs; 0496/08x34 dwlgs)	57	GtDUN06 & 07
Land off Riverside Great Dunmow	8	GtDUN25
Council Depot New Street Great Dunmow	10	GtDUN30
Phase 6 Oakwood Park Flitch Green (Expired permissions 0537/05)	89	LtDUN2
Flitch Green (village centre)	56	LtDUN2
8 Station Street Saffron Walden	10	SAF17
Jossaumes Depot Thaxted Rd Saffron Walden	13	SAF18
Almont House High Lane Stansted	7	STA03
Land west of 8 Water Lane Stansted	8	STA05
Priors Green, East of Takeley ("Island Sites")	24	TAK01 (part)
	<b>282</b>	

**Table 3b: Sites without planning permission @ 31 March 2014 identified in Pre-Submission Local Plan**

Draft Policy	Site	Total Capacity	Outstanding Capacity	SHLAA reference	Comments
Saffron Walden Policy 1	Land between Radwinter Road and Thaxted Road	800	800	SAF05	
Saffron Walden Policy 3	Former Willis & Gambier Site, 119-121 Radwinter Road	52	52	SAF03	
Saffron Walden Policy 6	Ashdon Road Commercial Centre	167	167	SAF13	
Great Dunmow Policy 1	Land west of Woodside Way	850	850	GtDUN13	
Great Dunmow	Land west of Great Dunmow and south of	400	400	GtDUN02 GtDUN13	

Policy 2	Stortford Road				
Great Dunmow Policy 4	Land at Helena Romanes School	100	100	GtDUN39	
Great Dunmow Policy 5	land west of Chelmsford Road	370	370	GtDUN14	
Elsenham Policy 1	Land north east of Elsenham	2100	2100	ELS8	
Elsenahm Policy 6	Land adjacent Hailes Wood	32	32	ELS3	
Great Chesterford Policy 1	New World Timber and Great Chesterford Nursery, London Road	35	35	GtCHE1 GtCHE8	
Great Chesterford Policy 2	Land south of Stanley Road	60	10	GtCHE3	Part s/s by UTT/12/5513/OP x 50
Newport Policy 3	Land west of London road by the primary school	70	70	NEW02	
Stansted Policy 3	Land north of Stansted at Walpole Farm	160	160	STA14	
Takeley/Lt Canfield Policy 3	Land between Olivias and New Cambridge House	20	13	TAK15	part s/s by 12/5142/FUL x 6 & 1286/11 x 1
Henham Policy 1	Land at Blossom Hill Farm, south of Chickney Road, Henham	25	25	HEN9	
Little Dunmow policy 1	Land at Station Road	38	38	LtDUN03	
Stebbing Policy 1	Loand to the east of Parkside and Garden Fields, Stebbing	10	10	STE11	
		5289	5232		

**Table 4**

Total Dwelling completions (includes rural exception sites)

	Gross	Net
00/01	265	224
01/02	209	182
02/03	411	396
03/04	263	241
04/05	380	344
05/06	576	541
06/07	363	326
07/08	574	538
08/09	465	437
09/10	542	522
10/11	316	298
<b>Total</b>	<b>4364</b>	<b>4049</b>

11/12	543	521
12/13	582	540
13/14	428	390
<b>Total 2011 - 2014</b>	<b>1553</b>	<b>1451</b>



## Appendix 3

### Consideration of a Windfall Allowance for Uttlesford – June 2014

#### Summary

1. This is an update of the report originally presented to Members of the LDF Working Group on 14 June 2013, taking into account windfall completions in 2012/13 and 2013/14.
2. The purpose of this report is to consider whether it is realistic to include an allowance for windfall sites in the housing supply and calculation of 5-year land supply. The number of windfall dwellings consented and built has been recorded since 2001 and therefore it is possible to look at the historic rates of windfall development over a whole plan period. Analysis of future trends is more difficult but consideration can be given to the positive approach of local and national policies.
3. The report concludes that there is evidence to justify including a windfall allowance of 50 dwellings per annum in the housing trajectory and 5-year supply, and the overall housing supply.

#### National Planning Policy Framework

4. Paragraph 48 of the Framework states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.

#### Definition

5. Residential windfall sites are those housing sites which have not been specifically identified as being available through the operation of the local plan-making process. They comprise sites that have unexpectedly become available over time, and which were not anticipated by the planning authority when local plans were in preparation. Windfall sites have been granted planning permission by the local planning authority and are in accordance with adopted local plan policies or national guidance. These could include for example, large sites such as might arise from a factory closure or very small changes to the built environment, such as a residential conversion, change of use of a small office to a new home, or a new flat over a shop.
6. Windfalls have been recorded as they occur as from the 1st April 2001 on a "this day forward basis". From that base-date, all such sites have been recorded irrespective of their dwelling capacity (i.e., from 1 dwelling unit upwards). No historic analysis of such sites before this base-date has been possible within the resources available.

7. Windfall sites do **not** include any of the following,
- DCLG/Planning Inspectorate appeal decisions.
  - New local plan allocations made by a local plan review in site-specific terms as a proposal on the Local Plan Proposals Map.
  - New planning permissions on an already identified housing site which has an existing planning permission (such as where the dwelling capacity is being increased from 12 to 20 units). Any permissions which supersede others on an existing housing site do not count.
  - New planning permissions involving an existing building which already has an existing planning permission for new housing. Any permissions which supersede others do not count.
  - An expired planning permission which time-lapses and is then added into the list of sites without planning permission

**Historic Windfall delivery rates**

8. Information on the delivery of windfall sites has been collected since 2001. Windfall sites have consistently made a contribution to the delivery of housing in Utlesford. The National Planning Policy Framework specifically excludes any development in residential gardens from being counted in any windfall allowance. The following table therefore excludes the erection of new dwellings within gardens. A breakdown of the figures is set out in appendix 1.

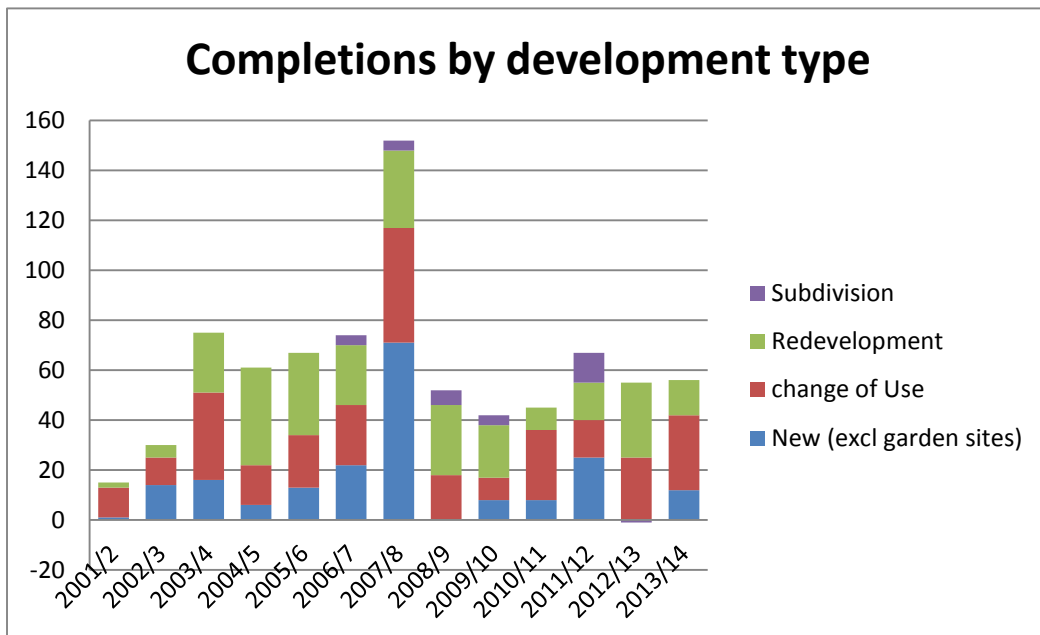
Year	No. of dwellings permitted on windfall sites (net) & excluding garden sites	No. of dwellings built on windfall sites (net) & excluding garden sites
2001/2	114	8
2002/3	134	20
2003/4	60	62
2004/5	152	32
2005/6	77	50
2006/7	170	43
2007/8	48	128
2008/9	59	37
2009/10	75	30
2010/11	93	32
2011/12	68	54
2012/13	290	53
2013/14	70	49
TOTAL	1410	598
Annual average		46
Percentage of windfall dwellings permitted which are built		42%

9. The above table shows that since 2001 the number of dwellings permitted and built can vary considerably from year to year. This is inevitable by the very nature of windfall sites as larger sites unexpectedly become available for development. However, the average number of windfall dwellings completed annually is 46. Over the 13 years 42% of windfall sites permitted have been developed.
10. The figure for 2002/03 excludes 23 units at Carver Barracks, Debden when former service personnel accommodation was sold on the open market.
11. The unusually high completions in 2007/8 reflects the completion of a number of large windfall sites -28 at Kiln Court, Thaxted Road, Saffron Walden; 20 at Vicarage Mead, Thaxted; 19 at Bowker Close, Newport; and 10 at Counting House Lane, Great Dunmow.

### Types of Windfall Sites

12. Uttlesford is a large rural district with two market towns and about 60 villages enabling significant potential for windfall development through the conversion of rural buildings and the redevelopment of previously developed sites.
13. The following table and chart show that most windfall sites arise from changes of use and redevelopment. Very little development arises from the subdivision of properties. Gross figures have been used as the loss does not always occur in the year of completion. New dwellings in gardens have been excluded from the figures.

TYPE OF DEVELOPMENT COMPLETED (gross figures)				
Year	New (excludes garden sites)	Change of Use	Redevelopment	Subdivision
2001/2	1	12	2	0
2002/3	14	11	5	0
2003/4	16	35	24	0
2004/5	6	16	39	0
2005/6	13	21	33	0
2006/7	22	24	24	4
2007/8	71	46	31	4
2008/9	0	18	28	6
2009/10	8	9	21	4
2010/11	8	28	9	0
2011/12	25	15	15	12
2012/13	0	25	30	-1
2013/14	12	30	14	0
<b>TOTAL</b>	<b>196</b>	<b>290</b>	<b>275</b>	<b>29</b>



### Completion Rates

14. The following table shows that the majority of completions take place in the second and third year following consent. The figures are gross figures and have not been adjusted to take account of dwellings built in gardens.

Consent Date	Year of completion (gross figures)												
	2001/2	2002/3	2003/4	2004/5	2005/6	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12	2012/13	2013/14
2001/2	15	25	12										
2002/3		8	60	24	6	2	3						
2003/4			8	31	16	8	30	1	0				
2004/5				10	47	35	25	5	0	1			
2005/6					2	31	41	5	1	5		1	
2006/7						9	68	28	13	3	1	0	
2007/8							1	26	26	5	0	0	
2008/9								10	22	8	14	5	
2009/10									1	22	21	8	7
2010/11										4	36	19	10
2011/12											13	34	28
2012/13												8	28
2013/14													4

### Completion Rates of Windfall and non-Windfall Small Sites

15. The Council's housing trajectory and 5-year supply specifically identifies sites of 6 or more dwellings. Anticipating the number of dwellings being provided on small sites of 5 or less dwellings can be covered by a windfall allowance.
16. The definition of windfall sites excludes certain types of development, such as those allowed on appeal, those superseded by other applications and dwellings in gardens, as explained above. However some of these developments will be built and contribute towards the overall housing stock.

17. The council has recorded the number of completions on sites of 5 or less dwellings since 2005/6 as set out below, which demonstrates that over the last 9 years an average of 80 dwelling are built on small sites.

Year	Completions
2005/6	84
2006/7	88
2007/8	111
2008/9	100
2009/10	56
2010/11	64
2011/12	85
2012/13	62
2013/14	68
Average	80

### **National and Local Policy Context**

18. The Council is proposing a number of policies which positively encourage windfall development. Subject to meeting certain criteria:-

- Policy HO3 allows for the subdivision of dwellings;
- Policy HO5 allows for small scale development on sites in settlements without development limits;
- Policy HO8 allows for the provision of affordable housing on exception sites which can include market housing to ensure the viability of the development;
- Policy HO9 allows the provision of rural workers dwellings;
- Policy C2 allows for the reuse of rural buildings for residential if other types of use are demonstrably non-viable;
- Policy HE2 allows alternative uses of listed buildings as a way of preserving the building; and
- Policy EMP2 allows for the redevelopment/change of use of employment uses if it can be demonstrated that the employment use is no longer viable.

19. The Government has introduced permitted development rights to enable change of use from commercial to residential properties. There are a number of office buildings across the district in settlements and rural locations which could be viable to convert to residential and which would contribute to the windfall supply.

### **Conclusions**

20. Historical evidence shows that windfall sites make a contribution to the number of annual completions. It is also considered that in the light of available sites and planning policy windfall and other small sites will continue to be permitted and built in the future.

21. With an annual average completion rate of 46 dwellings on windfall sites and 80 dwellings on all small sites, a windfall allowance of 50 dwellings based on rounding the windfall completion rate is considered conservative but realistic.

Appendix 1

	Permitted (gross)	losses	Permitted net	dwellings permitted in gardens	Total permitted excluding garden sites
2001/2	150	27	123	9	114
2002/3	180	32	148	14	134
2003/4	97	20	77	17	60
2004/5	199	26	173	21	152
2005/6	134	29	105	28	77
2006/7	245	37	208	38	170
2007/8	96	19	77	29	48
2008/9	101	15	86	27	59
2009/10	116	24	92	17	75
2010/11	138	26	112	19	93
2011/12	106	23	83	15	68
2012/13	337	24	313	23	290
2013/14	112	2	110	40	70
	2011			297	1410

	Built (gross)	actual losses on windfall sites	net built	dwellings built in gardens	Total built excluding garden sites
2001/2	15	7	8	0	8
2002/3	33	10	23	3	20
2003/4	80	13	67	5	62
2004/5	65	29	36	4	32
2005/6	71	17	54	4	50
2006/7	85	31	54	11	43
2007/8	168	24	144	16	128
2008/9	75	15	60	23	37
2009/10	63	12	51	21	30
2010/11	48	13	35	3	32
2011/12	85	13	72	18	54
2012/13	75	12	63	10	53
2013/14	77	10	67	18	49
	940		734	136	598