



# Uttlesford District Council

Chief Executive: John Mitchell

## Local Plan Working Group

**Date:** Monday, 13 October 2014  
**Time:** 16:30  
**Venue:** Council Chamber  
**Address:** Council Offices, London Road, Saffron Walden, CB11 4ER

**Members:** Councillors S Barker, J Cheetham, K Eden, E Godwin, J Ketteridge, J Menell, E Oliver, V Ranger, H Rolfe, J Rose, D Watson, L Wells.

## AGENDA

- 1 **Apologies for absence and declarations of interest.**
- 2 **Minutes of the meeting held on 15 September 2015** 3 - 9
- 3 **Matters arising.**
- 4 **Local Plan Examination - Invitation to submit statements** 10 - 19
- 5 **Local Plan Examination - Council's response to the invitation to submit statements**  
Report to follow
- 6 **Great Dunmow Neighbourhood Plan - covering report** 20 - 21
- 7 **Great Dunmow Neighbourhood Plan - Response to consultation** 22 - 32

**For information about this meeting**

Democratic Services Officer – Maggie Cox

Telephone: 01799 510369 Email: [committee@uttlesford.gov.uk](mailto:committee@uttlesford.gov.uk)

**General Enquiries**

Council Offices, London Road, Saffron Walden, CB11 4ER

Telephone: 01799 510510

Fax: 01799 510550

Email: [uconnect@uttlesford.gov.uk](mailto:uconnect@uttlesford.gov.uk)

Website: [www.uttlesford.gov.uk](http://www.uttlesford.gov.uk)

**LOCAL PLAN WORKING GROUP held at COUNCIL OFFICES LONDON ROAD SAFFRON WALDEN at 9.30am on 15 SEPTEMBER 2014**

Present: Councillor H Rolfe – Chairman  
Councillors S Barker, J Cheetham, K Eden, E Godwin,  
J Ketteridge, J Menell, E Oliver, V Ranger and D Watson.

Also present: Councillors C Cant, A Dean, J Davey, E Hicks and D Morson.

Officers in attendance: M Cox (Democratic Services Officer), R Harborough (Director of Public Services), H Hayden (Planning Policy Officer), S Nicholas (Senior Planning Policy Officer) and A Taylor (Assistant Director Planning and Building Control).

**LP14 APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST**

Apologies for absence were received from Councillors Mackman and Rose.

Councillors Watson and Eden declared non – pecuniary interests as members of Saffron Walden Town Council.

Councillor Cheetham declared a non – pecuniary interest as a member of the Hatfield Forest Management Committee.

**LP15 MINUTES**

The minutes of the meeting held on 24 July 2014 were approved and signed as a correct record

**LP16 BUSINESS ARISING**

**i) Minute LP12 – Gypsy and traveller accommodation assessment and allocation process**

In answer to a question from Councillor Menell, it was reported that the consultant's report on the gypsy and traveller site allocation was expected next week. The consultants had assessed the capacity and suitability of potential sites, looking at existing pitches and those which had come forward during the call for the sites. The report would recommend how to fulfil the identified need. These recommendations would be considered by the working group followed by a public consultation on the proposed site allocations.

In answer to a question from Councillor Oliver, it was explained that the consultants had initially approached the landowners to establish which sites were available and deliverable as the situation would have changed over time. The next stage of consultation on the proposed allocations would seek the views of the wider public, including the parish councils.

LP17

## **LOCAL PLAN EXAMINATION INSPECTOR'S QUESTIONS**

The working group had received copies of the Inspector's initial questions and concerns in relation to forthcoming local plan inquiry. The questions had sought clarity on a number of areas and were mainly of a technical nature and had been circulated widely amongst internal and external colleagues who were involved with the plan process. The Council's response to the questions was required to be submitted by 17 September 2014.

LP18

## **COUNCIL'S RESPONSE TO THE INSPECTOR'S QUESTIONS**

A response to the Inspector's report had been prepared and had been circulated to all councillors. It set out in brief the Inspector's initial questions and concerns, the council's response and the next steps.

The council had been advised at this stage not to publish the response on the grounds that it was up to the Inspector to decide when this should be done. This had been queried with the Programme Officer.

Members were advised that this meeting was not an opportunity to revisit the plan, which had been approved for submission by Full Council. The response mainly required technical answers but members were able to seek clarity and ask questions regarding the proposed response.

The Assistant Director Planning and Building Control advised the group of information that had come to light since the report had been sent to members. The Government had issued a detailed consultation 'Housing Standard Review Technical Consultation'. This consultation was seeking views on the detail of proposals for implementation of the Housing Standards Review and in particular the technical standards that the Government was intending to put in place. The intention was to produce a standardised suite of policies across the country to be dealt with under building regulations.

This would have implications for various parts of the Council's response. Members were concerned that the policies currently included in the plan should not be lost. It was suggested that as the regulations were still in the consultation stage, the council should continue with the response as proposed but to include some reference to the possible implications of the new technical standards.

The working group then went through the document and discussed the council's response in the following areas.

### **1 Duty to Cooperate**

In answer to a query from the Inspector, the response included a letter from Harlow Council confirming that it was satisfied that Uttlesford had satisfied the duty to cooperate.

## **2 The NPPF 'justification' test and the sustainability appraisals of the local plan**

The Inspector had asked for evidence that the council had assessed sustainability at each stage of the plan process. This was evidenced in the response. Members were confident that the council had met this test.

## **3 The relevant housing area (HMA)**

The Inspector had questioned the housing market area assessed for the purpose of the local plan.

The response said that it was not appropriate to treat Uttlesford as a single HMA because of the dominant travel to work patterns focused on Cambridge and London, migration patterns and the fact that the district was substantially within the Harlow/M11 sub market area. These patterns were reflected in the council's local plan growth distribution strategy.

Councillor Dean said he did not agree with the statement made in the response. The locations of the new settlement did not appear to be justified by the analysis of local demand. Officers replied that the new developments were distributed in such a way that there would be provision in all the travel to work areas which look toward Harlow, Chelmsford and Cambridge.

It was also confirmed that the Strategic Housing Market Assessment (SHMA) was being reviewed and an update would be sent to the Inspector.

## **4 Objectively assessed housing need**

The Inspector had questioned whether account had been taken of the latest population projections.

The response confirmed that the phase 6 Greater Essex Demographic Forecasts had been included in the response and updated evidence from the previous phases of the project. This was covered in detail in the response and which stated that the council's figure was considered comparable with the SNP-2012 and the scaled SNPP-2010 figures taking the average between pre and post-recession household formation rates. It was also higher than the alternative trend figures published in the GEDF Phase 6. It was concluded that the UDC figure of 523 was consistent with the official projections.

## **5 5yr Land supply: the Housing trajectory and 5 year land supply**

In order to aid efficiency of the examination and permit attention to be focused on sites that were not already committed, the Inspector had requested a table that listed the policies allocating residential development where all or part of the site was not subject to planning permission.

## **6 The spatial strategy – settlement classifications**

The Inspector had asked for clarity around the different classification of settlements during the local plan preparation.

The response explained that the adopted local plan had classified the settlements according to the allocation, whereas the emerging plan had classified them according to the services available. Members agreed that this approach was more logical and that larger development should be located in settlements with a higher order of services and facilities.

### **Development management policies**

The next part of the response was concerned with the development management policies. The response highlighted the amendments that had been made to some of the policies and supporting text in line with the Inspector's comments and in response to changes in legislation. The more significant issues were discussed as follows.

## **9 Housing Strategy**

Policy SP6 – The Inspector had asked about the provision being made by the council in relation to para 50 of the NPPF, to provide for a variety of needs including self-build homes. The response recommended that this should be included within the local plan in line with Government Policy and the practice of other local authorities.

It was suggested to amend policy SP6 – Meeting Housing Need – to include self-builders in the section 'to provide housing to meet other special housing needs' and an additional sentence in the housing allocations policies to meet the criteria to include at least 1% of serviced self build plots.

It was also suggested to amend para 11.35 to include self builders as people with longstanding links to the local community in terms of qualifying for an exception site.

Members agreed with the approach taken, although commented the high cost of land in the district could make self-build un-affordable.

## **11 Development in the Countryside**

The Inspector had questioned whether policy SP9, the Countryside Protection Zone (CPZ) was an unnecessary tier.

The response set out the case for its continued inclusion. Members cited the value of this policy in the past for preventing coalescence and were determined that it should be retained.

## 14 Access Strategy

In relation to transport modelling, the Inspector had asked whether the present state of evidence was sufficient to demonstrate that Uttlesford's allocations, taken together with those in nearby districts would be compatible with the capacity of the road network.

Councillor Dean raised the following points

- i) He asked for an explanation of the strategy behind the improvements to the M11 junction 8.
- ii) The report said that there was route capacity south of Elsenham but this was not the most direct and convenient route for residents so in reality it was unlikely to be used.
- iii) He asked about the current status of the western link road.
- iv) He questioned the modelling for more than 800 homes on the Elsenham site and the mitigation measures that would be required. He thought this information should be available at this stage and asked whether the inspector would be satisfied with the Council's response.

The report set out the evidence to support the strategy, in particular the Highways Impact Assessment to 2031, in relation to Elsenham and the strategic road network.

The response concluded that the allocations which would have a material impact on M11 J8 were those in Elsenham and the employment land allocation North East of Bury Lodge Lane, Stansted and in East Herts, the developments around Bishop's Stortford North. The allocations were sound because mitigation measures had been identified which would ensure that J8 continued to operate within capacity up to the mid-2020s with these developments.

The modelling would be progressed through the Duty to Cooperate, and developers when making planning applications would be required to demonstrate that adequate infrastructure could be provided on and off site, taking into account cumulative impacts. This approach had already demonstrated that there was sufficient capacity for an 800 homes development at Elsenham in combination with 548 homes on other sites in the settlement.

The delivery of more than 800 homes on the Fairfield site at Elsenham was profiled from 2024/25, which was considered adequate time for highway scheme development and the preparation of business cases underpinned by the required level of modelling to enable appropriate mitigation to be provided.

In answer to specific points raised, it was stated that the western link road would probably not be pursued as the cost for the junction 8 improvement short/medium term measures would be considerably less. It was not possible to have a detailed plan to the end of the plan period before detailed traffic

movements were identified but there was considered to be sufficient evidence for the first 10 years of the plan.

Councillor Barker said that the response didn't mention the additional traffic generated from the proposed allocations in Dunmow and its impact on junction 8. She was advised that the conclusion had been reached that impact from these developments would be too dispersed and limited to seek a developer contribution.

## **17 Elsenham**

The Inspector's questions had asked about the council's process for choosing the Elsenham site as a new settlement as part of its strategy for meeting its assessed housing need. He questioned the locations that had been identified and considered, and why Elsenham had been judged as the most appropriate site.

Council Dean said that the methodology for considering alternative sites had not been not considered at a public meeting. He disagreed with the report's statement that all potential sites had been considered, when he understood that Bidwell's had been refused a meeting with officers to discuss the site north of Great Chesterford.

The Council's response stated that the council had looked at all options since the start of the plan process in 2006. Once the strategy for development had been agreed, the council had considered the sites that had scored well in the SCHLAA and their comparative sustainability appraisals. When considering option 4, the six possible alternative sites had all come before the working group. The Elsenham site had been chosen after thorough assessment that showed the site to be the most sustainable.

With regards to the Bidwell's representation, it was clarified that at that time the Policy Team was not meeting anybody progressing alternative sites. The Council had offered pre-application discussions should Bidwell's wish to progress the scheme by way of a planning application but this had been declined.

Members of the group were satisfied that all alternatives had been considered. The 'methodology for selecting additional housing sites - October 2013' had been posted on the website with the documents for the meeting when the matter had been considered by the working group.

## **Conclusion**

The working group AGREED to note the response and for the document to be sent to the Inspector, including the typographical changes highlighted at the meeting.



Councillor Watson said that he considered the Local Plan to be flawed and asked that it be recorded that he did not wish to be associated with the response.

Councillor Rolfe thanked officers for the huge amount of work undertaken in preparing the detailed response in such a short period of time.

LP19

## **LONDON PLAN**

Further to the recent consultation on the proposed London Plan, 51 authorities had signed a letter expressing concern at the shortfall in proposed housing numbers, a significant gap of around 20,000 between the identified need and the likely supply of housing. Local authorities and developers were interested in the Inspector's conclusions but also wanted the Plan to be found sound in order to maintain the supply of houses. Members noted that this should be flagged as an issue at the next review of the London Plan due in 2019/20 as there had been no discussion about how this shortfall might be met.

The meeting ended at 11.45 am.

## **Examination of Uttlesford Local Plan (ULP)**

### **Inspector's invitation to participants to submit statements**

#### **Introduction**

My note on procedures (EX102) explained that the Council (UDC) and others who made representations to the plan would be invited to submit written views on matters and issues that would be identified after UDC's response to my initial soundness concerns and questions (EX101). UDC's response has now been received and is at EX104.

This note sets out the matters and issues upon which responses are now invited. Participants, including UDC, are invited to submit any responses by 17 October.

The matters and issues are not here set out in any priority order but generally follow the order of ULP.

#### **Matters and issues**

##### ***Matter 1                   Duty to co-operate (DtC)***

My note EX101 (part1) indicates the nature of the DtC. UDC's compliance statement (L103) gives the Council's view that it has appropriately engaged with the relevant bodies on strategic matters. L103 has now been augmented by EX105, concerning co-operation with Harlow Council.

Matter 1, issue 1

Are there any specific reasons to suggest that UDC has not met the DtC in terms of the requirements of the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG)?

##### ***Matter 2                   Sustainability appraisal***

UDC addresses the questions posed in my initial concerns and questions at EX104 part 2 & appendix 2.

Matter 2, issue 1

Does the UDC report demonstrate adequate compliance with the requirement for sustainability appraisal?

##### ***Matter 3                   Settlement classifications (Local Plan paras 7.1-7.8)***

As explained in the Council's response (EX104), the emerging Local Plan takes a different approach to settlement classification from that in the present adopted plan, basing it more closely on the level of facilities present (see appendices 12 and 13 to EX104).

Matter 3, issue 1

Is this a sound, well-evidenced approach? Does the table below para 7.8 of the plan set out a sound settlement categorisation?

**Matter 4                    General Development Principles (Local Plan part 8)**

Matter 4, issue 1

Does policy DES 1 set out sound design principles?

Matter 4, issue 2    [also concerns policies HO4, EN8 and EN10, as well as DES1]

The consultation on the Government's review of Housing Standards, launched on 12 September 2014, makes clear that it proposes major rationalisation of the many present national/local approaches to policy on these matters. From early 2015 a new Government policy statement will set out how such standards should be applied in Local and Neighbourhood Plans.

At EX104 (7.1.1) In UDC's view it is beneficial for the standards contained in policies DES1 to be retained until the content of the Government statement is known. However, should a sound plan signal the coming change in national policy on these matters (which could occur before adoption) by inserting references at the policies identified above, identifying relevant parts likely to be overtaken by the new national approach in early 2015?

**Matter 5                    Employment Strategy (Local Plan part 9, including part 42 of the plan, in particular Stansted Mountfitchet policy 9: land north east of Bury Lane)**

Matter 5, issue1

Is the employment strategy founded on convincing evidence? Are the issues identified at para 9.9 the key ones and do the allocations (9.11 to 9.18 and policy SP3) make appropriate responses to those issues?

Note:

Matter 5, issue 2

Does the plan (paras 9.27 to 9.29 & policy SP4 and part 42 including policies Stansted Mountfitchet 9 and Stansted Airport 1-8) take a sound approach to Stansted Airport and its employment implications?

**Matter 6                    Retail strategy (Local Plan part 10)**

Matter 6, issue 1

Is the retail strategy founded on convincing evidence and are the relevant policies (SP5, RET1-RET3, and the retail-related parts of policies Saffron Walden 1, Great Dunmow 5 &12, Stansted Mountfitchet 1&7 and Elsenham 1)

appropriate responses to that evidence? Is the impact threshold appropriate for the circumstances of Uttlesford?

**Matter 7                      Housing strategy (Local Plan part 11)**

Matter 7A                      The relevant Housing Market Area (HMA)

My note EX101 asked (part3) 'what is the relevant HMA for the purposes of the plan?' UDC's response indicates the considerable complexity of HMA geography in the wider area including Uttlesford. It states (3.21) that the plan does not treat the District as a single HMA but that the complexity of travel to work areas and migration patterns, which do not fit neatly with an HMA structure based on local planning authority boundaries, is 'reflected in the Council's local plan growth distribution strategy', taking account of the economic development ambitions of the London Stansted Cambridge Consortium and the potential of the corridor's growth sectors.

However, it appears that the plan does (??) treat the District as a single 'housing market area' from the standpoint of adopting a housing need figure only for Uttlesford District derived from the Greater Essex Demographic Forecasts (GEDF), rather than one based upon any wider combination of whole/parts of Districts. Bearing in mind the complexity of factors involved and the number of adjoining authorities with very different linkages to their neighbours this is perhaps not surprising. The plan's approach then appears to be to distribute growth within that single-District quasi-HMA largely along the London-Stansted-Cambridge corridor and the linked A120 corridor (see the key diagram at p22 of ULP).

Matter 7A, issue 1

Does this approach raise any soundness issues?

Matter 7B                      Objectively-assessed housing need

The Council's statement EX104 gives details of the recent draft Phase 6 outputs of the Greater Essex Demographic Forecasts (GEDF) which can be compared with the housing provision made in the submitted plan (523pa).

As indicated at ULP's Para 4.6, the Phase 6 outputs for Uttlesford range from 508-549pa (ave 529pa) for the scenario based on the Sub-National Population Projections 2012. 529pa represents the average between the recession-based 2011-based household formation rates (508pa) and the higher pre-recession based 2008-based household formation rates (549pa).

*Matter 7B, issue 1 (for UDC and representors to address)*

Does the plan's provision of 523pa represent a sound objectively-assessed need for housing in Uttlesford? If not, what specific reasons are there to suggest that it does not?

*Matter 7B, issue 2 (for UDP to address)*

A number of representations make criticisms of the Council's calculation of need, some examples being Countryside Properties (1515), Crown Estate (1782), Icen Projects (1865), Perfect Properties (1870), K McDonald (275), Elsenham PC (601), Gladman (1889).

What specific reasons does the Council advance to indicate that representors' criticisms are unfounded and that other estimates of housing need are unsound in evidential terms?

*Matter 7C                    The housing strategy*

UDC accepts that table 5 and policy SP7 do not make it clear how housing growth would be distributed across the District between the various settlements. EX104 paras 9.1.3-4 propose changes to make the plan effective in terms of communicating its strategy.

Matter 7C, issue 1

Subject to the above changes proposed by UDC (and recognising that the amount of as yet uncommitted development has reduced since the base date of this revised table), does the plan provide a sound distribution of development over the period to 2030/31? Would the above changes make the plan effective in terms of communicating its strategy?

Matter 7C, issue 2

Is the proposed windfall allowance of 50 dwellings pa justified by sound evidence which is consistent with NPPF para 48?

*Matter 7D                    5-year land supply*

Document H108 (Housing Trajectory and a 5-year land supply, April 2014) suggests the existence of a 6.2 year supply of 'deliverable' housing sites. Does the evidence support this view?

*Matter 7D, issue 1*

Do the sites forming part of the 5-year supply (see the schedule at the back of H108) meet the definition of deliverable sites in footnote 11 of para 47 of the NPPF? Are they suitable for development now, achievable in the sense that there is a realistic prospect that housing will be delivered on the site within 5 years, and are they viable? In the particular case of planning permissions, is there clear evidence that any will not be delivered within 5 years because of issues of viability, lack of demand for the type of units proposed or issues of long-term phasing?

*Matter 7E                    Policy HO1 (Housing density)*

Matter 7E, issue 1

UDC (EX104 para 9.2.3) suggests additional text to para 11.20 of the Local Plan. From the final sentence of 11.20 the ranges in policy HO1 are intended to be indicative. Is this policy consistent/inconsistent with the general thrust of NPPF part 7 (requiring good design)?

Matter 7F                      Policy HO2 (Housing mix)

Matter 7F, issue 1

UDC (EX104 para 9.3.1) suggests additional text to para 11.21 of the plan. Subject to such change, does the plan adopt a sound approach to housing mix?

Matter 7G                      Policy HO4 [see matter 4, issue 2 above]

Matter 7H                      Policy HO6 (Replacement dwellings in the countryside)

Matter 7H, issue 1

UDC (EX104, paras 9.5.1 to 9.5.3) proposes changes to para 11.25 and policy HO6 of ULP. Do these make the policy effective by explaining its purpose and clarifying (simplifying) its terms?

Matter 7I                      Encouragement to self-builders (NPPF para 50)

UDC (EX104, paras 9.6.1 to 9.6.3) suggests two approaches which could be followed in order to modify ULP to make it consistent with the requirement of the NPPF.

Matter 7I, issue 1

Would either of these suggestions, or some other approach, bring consistency with the NPPF?

**Matter 8                      Environmental Protection (Local Plan part 12)**

Matter 8A      Policy EN1

Matter 8A, issue 1

The Council suggests a change to policy EN1 to make its purpose clear (see EX104, para 10.1). Is this change appropriate?

Matter 8B      Policies EN8 and EN10 [see matter 4A, issue 2 above]

**Matter 9                      Development in the countryside (ULP part 13)**

Matter 9, issue 1

Does the evidence show that policy SP9 is sound and should be retained?  
[Note: ULP's response at EX104 part 11.1 explains the origin of the Countryside Protection Zone and the Council's view of its continuing purpose.]

Matter 9, issue 2

[To note: EX104 accepts that the recent changes to the General Permitted Development Order have overtaken this policy, so UDC proposes to delete it.]

**Matter 10                    *The historic environment (ULP part 14)***

Matter 10, issue 1

UDC suggests changes to policy HE3 (see EX104, para 12.3.1) concerning archaeological issues. These appear to more accurately reflect the gist of NPPF part 12, except that ULP para 14.16 would perhaps be more consistent if it stated: '.....need to take account of the contents of the English Heritage Register of Scheduled Monuments and the HER respectively and understand and assess any impacts of the development upon the heritage asset. ....'

**Matter 11                    *The natural environment (ULP part 15)***

UDC suggests changes to policies NE1 & NE2 (see EX104 paras 13.2.1 to 13.2.5) concerning the natural environment. These better reflect the NPPF in terms of seeking net gains in biodiversity and promoting coherent and resilient ecological networks of green infrastructure. They also reflect the importance of Hatfield Forest.

Matter 11, issue 1

Do these changes make for a sound UPL chapter on the natural environment?

**Matter 12                    *Access Strategy (ULP part 16)***

Note: Access issues concerning policy Elsenham 1 are raised at matter 15G.

On the wider transport impacts of the overall ULP proposals, particularly on the strategic network, the Highways Agency (HA) (1817) does not consider that sufficient investigation has been undertaken of the cumulative impact upon the strategic network of development in Uttlesford, East Herts, Harlow and Epping Forest; it is concerned that there is a risk that sites have been identified before it is clear that measures to manage impacts are deliverable.

The DtC statement (L103) para 5.15 indicates that in April 2014 Essex and Herts CCs and the HA signed off a predictive regional model for assessing traffic flows on strategic and local roads using housing and employment growth data up to 2036. According to EX104 (para 14.8) the model so far provides an indication that material impact could occur at a number of critical locations on the strategic network. The HA recommends further modelling 'as the plan progresses' to identify what mitigation measures may be required and is concerned at the risk that later more detailed evidence could determine that impacts are greater than

acceptable and/or that necessary infrastructure to manage the impacts is not deliverable. HA states that M11 (J8) is at/near capacity and up to 2000 additional dwellings may not be deliverable without yet to be identified improvements, albeit many are not proposed to come forward until the plan period, giving time to devise an appropriate mitigation strategy.

EX104 details possible necessary options for improvement of M11 (J8) which vary from levels considered unlikely to pose concerns to the deliverability of planned development, subject to developer contributions, to costs of a different order of magnitude potentially in the range £50-75m. EX104 details work by the South East and Greater Cambridge Local Economic Partnerships which would need to bear fruit to deliver Government/LEP investments on this scale.

Matter 12, issue 1

Is there a sound evidential basis for concluding that there is a realistic prospect that the transport impacts of ULP, combined with the development plans of neighbouring authorities, are sound?

**Matter 13                    Infrastructure (ULP part 17)**

Matter 13, issue 1

As submitted, policy SP14 appears to be inconsistent with national policy and the Community Infrastructure Levy Regulations in that it requires new development to 'take account of the needs of new and existing populations' with the apparent implication that the scope of contributions sought could go beyond the needs generated by the development itself. Is change required to the terms of SP14?

Matter 13, issue 2

Apart from SP14, this chapter is heavily focused on recreational issues. UDC accepts (see EX104 part 15.2) that INF2 & INF3 more appropriately fit within the countryside policies and can be merged into a single policy. Changes to that effect are set out in EX104. Subject to such changes, would the ULP be sound on these issues?

Matter 13, issue 3

The Council says (EX104 part 15.3) that policy INF4 is the culmination of over 2 years of effective joint working and liaison between itself and the NHS, yet representations have been made against its current terms by health bodies. This is an issue requiring resolution by the authorities concerned, including agreement about any changes to the plan that may be necessary.

**Matter 14                    Removal of references to Supplementary Planning  
Guidance (policies DES1, SP10, HE1, SP11, and NE1)**



To be noted: EX104 accepts that such references should be removed and proposes appropriate deletions from SP10, HE1, SP11, and NE1. Are there any other references to SPD in other policies of ULP?

**Matter 15 Strategic allocations**

EX104 lists (below para 5.1) the Site Allocations where all or part of the site is not subject to planning permission. This shows that the great majority of the 'allocations' are already covered by an extant planning permission or are the subject of a resolution to grant permission subject to the completion of an agreement. The issues identified below therefore necessarily focus on the soundness or otherwise of the much smaller number of Site Allocations which are not yet committed or wholly committed.

**Matter 15A (Saffron Walden 1: land between Radwinter Road and Thaxted Road)**

This development has been the subject of many representations, but it appears that, of a total of 800 dwellings, some 200 dwellings plus a retirement village are subject to a resolution to approve while a further 300 are subject to an appeal which the Council has decided not to defend. Para 20.1 of the plan says that the aim is to secure a comprehensive development over the whole site including a link road from Thaxted Road to Radwinter Road and provision of formal open space south of the Leisure Centre and west of Thaxted Road.

Is the policy sound? Does it require an appropriate mix of development? Is there evidence that the relevant developers/landowners are working together to ensure a truly 'comprehensive' development? Is there a reasonable prospect that the development is viable and achievable and that all of its elements will be delivered within a known timeframe? Does the appendix to H108 set out a realistic delivery timetable for this site?

**Matter 15B (Saffron Walden 6: Ashdon Road Commercial Centre)**

It appears that the residential part of this site is subject to a resolution to approve with negotiations over an agreement at 'an advanced stage'. However, the policy lays stress on the 'linked employment allocation' which should come forward as part of a master plan. Is there a mechanism in place to ensure provision of the employment element of the allocation?

**Matter 15C (Great Dunmow 1: Land north of Stortford Road/west of Woodside Way)**

Most of the site is subject to a resolution to grant planning permission. Only a small part in separate ownership is not in that position. Does this policy provide a sound and viable mix of development and is there any reason to suggest that the part of the site without planning permission could not be developed in

accordance with the required master plan? Can the site be completed in accordance with the timeframe shown in H108 (2016/17 to 2029/30)?

**Matter 15D**                    **(Great Dunmow 2: West of Great Dunmow/south of Stortford Road)**

Is the policy sound and does it specify an appropriate mix of development? Is the land in single ownership? Is the requirement for a health centre deliverable and is it consistent with the (somewhat lukewarm?) support offered by the West Essex Clinical Commissioning Group (rep 1458 para 15)? Is it a reasonable expectation of H108 that delivery will occur from 2024 onwards?

**Matter 15E**                    **(Great Dunmow 3 & 4: land adj Buttleys Lane and land at Helena Romanes School)**

Are these linked policies sound? Is there firm evidence that part-funding from development at GD4 (not expected by H108 until 2029) will enable the completion of the new school at GD3?

**Matter 15F**                    **(Great Dunmow 5: land west of Chelmsford Road)**

Although residential development at this site is subject to a resolution to approve, the policy includes other elements including junction improvements, the construction of a primary school, recreational space, retail floorspace and an employment site. Is there assurance that provision of these elements is viable and that they will take place in accordance with the master plan? Is it likely that H108's timetable for the residential completions (2016-22) will be met?

**Matter 15G**                    **(Elsenham 1: land north east of Elsenham)**

Issue 15G/1                    Is the choice of Elsenham justified as the most appropriate location for new development, considered against the reasonable alternatives, if some form of new settlement is required to meet the District's needs? [EX104 part 17 summarises the factors behind the choice of this allocation over extensions to other towns or a new settlement at another location.]

Issue 15G/2                    Is the content of policy Elsenham 1, including all the elements within it (local centre, education provision, employment land, recreational provision and a set of transport improvements) sound and viable? What assurance is there that all these elements can be effectively secured in accordance with a master plan and completed to the timetable suggested in H108 (2019-31)? NPPF para 52 states 'The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities' Would the Elsenham development fit this description?

Issue 15G/3                    Concerning the access strategy for Elsenham 1, my questions at EX101 part 14 noted the statement of Essex CC in March 2014 that formal assessments of the cumulative transport impacts of Elsenham had not been undertaken. The CC considered that more detailed study was required, noting

that there were limited options to reduce impact, hinging on demand management, reducing demand for travel and providing high quality alternative means of doing so. Is there evidence providing the necessary degree of confidence that the various transport-related measures set out in policy Elsenham 1 (at bullet points 2 and 6-8) would deal adequately with the traffic impacts of the whole development of 2100 dwellings? Do these bullet points cover all the general categories of transport pre-conditions for a sound policy concerning the transport impacts of Elsenham 1, or are any omitted? Are they costed (and if so what are the costs?) and has it been shown that such costs are capable of being borne by the development? [Responses should deal with issues related to the whole of the local plan proposal for 2100 dwellings, not those raised only by the first 800 proposed dwellings].

**Matter 15H**            **(Newport 3: land west of London Road)**

Is this a sound allocation and is it deliverable (as stated in H108) by 2021/23?

**Matter 15I**            **(Henham 1: land at Blossom Hill Farm)**

Is this a sound allocation and is it deliverable (as stated in H108) by 2019/20?

**Matter 17**            **Monitoring**

Matter 17, issue 1

Objective 1 is inconsistent with the NPPF in referring to only allowing development in 'the most exceptional' circumstances – the test is 'very exceptional circumstances'.

**Committee:** Local Plan Working Group

**Agenda Item**

**Date:** 13 October 2014

**6**

**Title:** Great Dunmow Neighbourhood Plan  
Consultation response

**Author** Hannah Hayden Planning Officer

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### Summary

1. The attached documents are the Great Dunmow Pre-submission Neighbourhood Plan and the Councils response to the consultation which closes on the 20<sup>th</sup> October.

### Recommendations

2. Consider consultation response

### Financial Implications

3. None

### Background Papers

None

### Impact

- 4.

Communication/Consultation	The report has been available on the Housing Policy and Strategy page of the Council's website.
Community Safety	N/A
Equalities	N/A
Health and Safety	N/A
Human Rights/Legal Implications	N/A
Sustainability	N/A
Ward-specific impacts	Great Dunmow South and North
Workforce/Workplace	N/A

## Situation

5. This report is asking the LPWG to consider the Council's response to the public Pre-submission consultation on the Great Dunmow Neighbourhood Plan. The pre-submission document contains their preferred approach and all responses have to be received by the closing date of the 20 October.
6. A neighbourhood plan must:
  - a. Have appropriate regard to national policy and advice and guidance issued by the Secretary of State.
  - b. Be in general conformity with the strategic policies contained within the current adopted development plan,
  - c. Meet all EU and Human Rights obligations
7. It is important to remember that a neighbourhood plan is not tested against the policies in an emerging Local Plan although it should take them into consideration.
8. A number of changes have been suggested in our response, including the deletion of some policies which repeat Local Plan policies and/or National planning policies.
9. Once this stage of consultation is complete the Great Dunmow Neighbourhood Plan Group will read all the representations and make any changes they feel are needed. The Town Council will then submit the Plan to UDC for independent examination. At this stage UDC must satisfy itself that the Plan complies with all the relevant statutory requirements, if it does then UDC will publicise the Plan for six weeks and invite representations and send the Plan to independent examination.

## Risk Analysis

10.

Risk	Likelihood	Impact	Mitigating actions
The GDNP will not meet the basic conditions.	Low likelihood If UDC respond to this consultation.	High impact on planning policy as when adopted the GDNP will form part of the Local Plan.	Ensure that the consultation response is sent in by the closing date 20 October.

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**

**Response to Great Dunmow Neighbourhood Plan Pre-Submission  
Consultation**

**October 2014**

## **1. Introduction**

- 1.1. The District Council supports the desire of Great Dunmow Town Council to produce a Neighbourhood Plan for its area. The Council has worked closely with the Town Council and the Neighbourhood Plan steering group and commits to continuing to do so.
- 1.2. We hope that you find the Council's comments useful. These comments are designed to improve the robustness and effectiveness of the plan. If you wish to discuss any of these comments further please contact us.

## **2. General Comments**

- 2.1. The Council is pleased that the Neighbourhood Plan does not promote less development than is proposed in the adopted Local Plan 2005 and the emerging Local Plan, it is therefore in conformity with paragraph 184 of the National Planning Policy Framework (NPPF).
- 2.2. Whilst the GDNP recognises that it must be in conformity with the adopted 2005 Local Plan it is pleasing to see that reference and consideration is given to the emerging Local Plan.
- 2.3. The inclusion of photos, maps and tables within the Plan is welcomed, however, the source and date are missing on a number of these and it is important that this is rectified. Licence number and north arrow should be shown on all maps.
- 2.4. Many of the policies use the words "will be supported". These policies will be used by UDC in determining planning applications. It is therefore suggested 'supported' is replaced with 'permitted'.
- 2.5. There are a few occasions where the following sentence is used 'This policy does not contradict any emerging LP strategic policies or national planning policy'. By default the adopted GDNP should not contradict any Local Plan policies and must be in accordance with national policy, it is therefore suggested that these are removed.
- 2.6. A number of points are repeated throughout the document, which makes the supporting text to policies lengthy. A number of points and tables have been taken from evidence base documents which again make the document lengthy. It may be worth just referencing supporting documents and cutting some of the repetitions out so that the document is more succinct.
- 2.7. The area for the GDNP is the Parish boundary. However, the Plan concentrates on the town of Great Dunmow and does not always look at the wider parish area. Throughout the Plan there are a number of statistics for Great Dunmow, it is sometimes unclear whether these statistics relate to the town or the Parish.

- 2.8. It would be extremely helpful if paragraph numbers and section numbers can be added throughout the document.
- 2.9. The tables throughout the document which list the relevant Local Plan and NPPF paragraph/policies and conformity status could be taken out and made a supporting document. This would then reduce the size of the document and hold all the conformity information in one place making it easier to read.

### 3. Notes on Neighbourhood Planning

- 3.1. Paragraph 2: uses the phrase ‘emerging Uttlesford District Council Local Plan 2015’ At present we do not know what the final Plan will be called so it is suggested to replace with ‘emerging Uttlesford District Council Local Plan, which will hopefully be adopted in 2015’.
- 3.2. Paragraph 8: The figures used in paragraph 8 regarding sites with planning permission are incorrect and should be updated to reflect the table below. It should also clearly state that these figures are correct as of September 2014.

Brick Kilm Farm	65 units
Woodland Park (sectors 1-3)	<del>836</del> <b>842</b> units
Perkin's Garage	12 units
Barneston Court	10 units
South of Ongar Road	100 units
North of Ongar Road	73 units
Woodland's Park (sector 4)	124 units
Land west of Woodside Way	<del>850</del> <b>790</b> *unit
Land west of Chelmsford Road (Smiths Farm)	<del>350</del> <b>300</b> units <b>70 bed care home</b>
Total	<del>2,420</del> – <b>2316</b> units <b>plus 70 bed care home</b>

\*West of Woodside Way (GD Policy 1) is allocated for 850 dwellings in the emerging Local Plan, however, only part of the site has planning permission at present for 790 dwellings (UTT/13/2107/OP).

### 4. Section 2: The State of the Parish Today

- 4.1. Table of expected housing delivery rates: This table is incorrect and should be amended as below. The table should also clearly show the source and date, which is UDC Housing Trajectory and Statement of 5 Year Land Supply June 2014.



	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Land south of Stortford Road											50	50	100	100	100		
Helena Romanes School Site																50	50
Brick Kiln Farm			30	35													
Woodlands Park Sector 1-3	25	25	25	25	25	25	25	25	25	89	75	101	99	76	77	50	50
Perkins Garage				12													
Barneston Court			10														
South of Ongar Road		25	25	50													
North of Ongar Road			33	40													
Woodlands Park sector 4		25	50	49													
Land west of Woodside Way			50	50	50	60	60	60	60	60	60	60	60	60	60	40	
Land west of Chelmsford Road			50	50	50	50	50	50									
Land west of Chelmsford Road 70 bed care home					70												
Total	25	75	273	311	195	135	135	135	85	149	135	161	159	136	137	140	100

Source: UDC Housing Trajectory and Statement of 5 Year Land Supply June 2014

- 4.2. Fig 3 Major Existing Planning Permissions in Great Dunmow: The area marked 3 (Land west of Woodside Way) is incorrectly drawn. The site which has planning permission is smaller. Please see planning application UTT/13/2107/OP. A date should also be included with this figure so the reader knows when the information was gathered.
- 4.3. Paragraphs 29, 30 and 31: It is considered that these paragraphs would be best placed on page 16 under paragraph 21 so all the points relating to population can be read together before moving onto housing statistics.

## **5. Landscape, Setting and Character**

- 5.1. This section breaks down the character of the town in clear sections/areas. However, it would help the reader if fig 7 – Character Areas of the Built Environment, came before paragraph 46 or after 54. At the moment it sits in the middle of the character area description which stops the flow of this chapter.
- 5.2. There are a number of important trees within the town with tree preservation orders, it may be useful to mention this in this section.
- 5.3. Paragraph 47: reference is made to a moated site being listed with UDC as a Scheduled Monument, it is in fact registered by English Heritage.

## **6. Sports and Open Spaces**

- 6.1. Figure 12: The source and date needs to be attributed to the map

## **7. Proportion of units on primary and secondary retail (fig 13)**

- 7.1. Reference is made to primary and secondary shop frontages, however, these have not been defined. Are they taken from the adopted Local Plan? It may be a good idea to insert a map indicating where they run.

## **8. The Economy**

- 8.1. Paragraph 79: Where do these statistics come from? The 2011 census figures show a different result, 31%.
- 8.2. Paragraph 80: It is stated that at least 2,366 new homes are expected, and the population is expected to grow by 5,250. However, if you use the average household figure for Great Dunmow 2.27, as stated on page 13, the expected population growth would be 5,370, and if you use the average household figure of the district (2.5) the population growth would be 5915.
- 8.3. Paragraph 82: A date of 2014 is needed after 'Uttlesford District Council's Infrastructure Delivery Plan.'

## **9. Sustainability and Deliverability**

- 9.1. Policy SD1 Presumption in favour of Sustainable Development: This policy repeats national planning policy; it is therefore suggested this policy is not needed.
- 9.2. Position SD-A Community Infrastructure Levy: This position statement is supported.
- 9.3. Policy SD2 Funding Priorities: Whilst supported in principle it is felt that this is more of a position statement than a policy.
- 9.4. Policy SD3 Viability Assessments: This policy repeats National policy, paragraph 173: Ensuring Viability and deliverability, in the NPPF. It also repeats a number of policies which talk about viability considerations in the emerging Local Plan. It is therefore suggested that this policy and supporting text is not needed.
- 9.5. Policy SD4 Rate of Delivery: This policy is aspirational; however, there is no way of ensuring the delivery of housing in line with UDC targets. Developers will build at different delivery rates in line with market conditions and demand. In the past we have seen higher rates of delivery than expected as well as lower rates. It is therefore suggested that this policy and supporting text is not needed.

## **10. Development and Standards**

- 10.1. Town Development Area Fig 16: It is good to see the development area has been re-drawn to align with the majority of permitted developments, however, Ongar Road North and South both have outline planning permission and should therefore be included within the Development Area.
- 10.2. Policy DS1 Town Development Area: Community use of facilities is not a land use policy and it is therefore recommend that this paragraph be removed. The specific requirement for a swimming pool on 'site C' is not in conformity with the emerging Local Plan policy.
- 10.3. Paragraph 2 and 3 of this policy should be removed as it is contrary to the emerging Local Plan, if Helena Romanes decides not to move to this location than the land will remain for secondary educational use.
- 10.4. Policy DS2 Building for Life: This policy is supported. The Council is pleased that the GDNP is aiming to achieve good quality life time homes. However, please be aware of the Housing Standards review currently on consultation as this may impact on some aspects of BfL12.
- 10.5. Policy DS3 The Case for Space: Within the Policy it states that 'the minimum standards recommended by current best practice will be supported.' How will the planning officers and developers know what current best practice is that you support? This is a very general statement which will be hard to enforce.

- 10.6. The Case for Space (RIBA 2011) quoted in the text only refers to GLA standards and supports these standards in the absence of anything else however they are an update on the 60 year old Parker Morris and they do not consider them to be best practice.
- 10.7. Following the Housing Standards Review the Government have indicated that it intends to introduce a national space standard which would render this policy out of date.
- 10.8. Policy DS4 Hedgerows: This policy is supported.
- 10.9. Policy DS5: Eaves Height: The policy states '....should be favoured on the sensitive borders of Great Dunmow.' Where are the sensitive borders? The supporting text/map could list which areas specifically this policy applies to.
- 10.10. Policy DS6 Rendering and Pargetting: A local policy which is supported.
- 10.11. Policy DS7 Integration of Affordable Housing: This policy is generally supported.
- 10.12. Page 55: The two bullet points which are quoted from the emerging local plan are actually from the Adopted Local Plan 2005 paragraphs 6.28 and 6.29.
- 10.13. Fig 17 and Fig 18: These tables need to have details of the source and date.
- 10.14. Justification DS8 Local Housing Need: Within the text it is stated that UDC estimates that 14 new homes a month will be completed in Great Dunmow. Where has this figure come from, would it be more appropriate to calculate this figure in line with the 5 year land supply which at present is from 2014/15-2018/19, it may be best referenced as an annual development estimate rather than monthly.
- 10.15. Policy DS8 Local Housing Need: This policy needs to be reworded. At the moment it is requesting that 100% of dwellings are 3 bed or less. As it reads now this policy is contrary to the Strategic Housing Market Assessment.

## **11. Landscape, Setting and Character**

- 11.1. Policy LSC1 Landscape, Setting and Character: This policy is supported.
- 11.2. Policy LSC2 Important Views: This policy is supported. It may be worth mentioning the Great Dunmow Conservation Area Appraisal 2007 as this also lists important views across the town.
- 11.3. Policy LSC3 The Chelmer Valley: This policy is supported.
- 11.4. Fig 25: It is not clear that whether the Chelmer Valley includes all of Dunmow Park. The words 'Great Dunmow' go over any green notation.

- 11.5. Policy LSC4 Local Green Space: This policy is supported in general, however, it is suggested that the following text be removed 'Development will only be acceptable if it is desired by the current owner.' This implies that whatever development the owner wants on their land should be allowed, even if it is contrary to other GDNP policies and Local Plan policies.
- 11.6. Policy LSC5 Assets of Community Value: This is a local policy and is supported.
- 11.7. Position LSC-A The Flitch Trials: The Town Councils support of the flitch trails is commended, however the reference to developer funding needs to be removed as this is contrary to planning regulations.

## 12. The Natural Environment

- 12.1. Policy NE1 Identified Sites: As this policy duplicates national policy which protects SSSI's and Local Wildlife Sites, as well as Policy ENV7 – The Protection of the Natural Environment – Designated Sites of the adopted 2005 Local Plan, and Enhancing the Natural Environment in the emerging Plan it is suggested that this become a position statement which explains that the Town Council will work with landowners, Natural England and the Wildlife Trust to ensure proper management of sites.
- 12.2. Policy NE2 Wildlife Corridors: This policy is supported.
- 12.3. Policy NE3 Trees on Development Sites: The Council support the direction of this policy in seeking good design, however, there are some suggested changes. It is not clear what is meant by the principle and secondary streets in accordance with the development hierarchy, could this be made clearer? The reference to trees native to rural England could be removed as the most suitable trees are not always native to England. This will allow more flexibility to ensure that the best trees are planted on each development.
- 12.4. Page 81: The Prunus Subhirtilla variety of Cherry is not native to England.
- 12.5. Page 82: English Oak, Quercus Robar is misspelt, the 'a' in Robar should be replaced with a 'u'.
- 12.6. Policy NE4 Screening: This policy is supported, however, it is suggested that the reference to rural England is removed to allow greater flexibility for the most appropriate tree planting.

## 13. Sport and Open Spaces

- 13.1. Page 84 and 89: Reference to the deficit/surplus of children's play space is repeated twice in this section, pages 84 and 89 as well as page 29. It may be worth removing some of this duplication.

- 13.2. Policy SOS1: Identified Facilities: This policy is supported.
- 13.3. Policy SOS2 Sporting Infrastructure Requirements: There is no evidence to support the inclusion of this policy. It is not enough to say there is a deficit and it is a priority area. Where has the 30 unit threshold come from? Ensuring sporting provision is open for community use is not a land use planning issue, so this cannot be enforced. It is therefore suggested that this policy is made into a position statement, excluding the 30 unit threshold.
- 13.4. Policy SOS3: Children's Play Space: The stance of this policy is supported. However, it duplicates Policy INF1 – Protection and Provision of Open Space, Sports Facilities and Playing Pitches in the emerging Local Plan. To make this policy more local to Great Dunmow it could possibly become a protection/safeguarding policy with a list of the play spaces to be protected.
- 13.5. Policy SOS4 Cemetery Space: This policy is fully supported. It is a local policy which aims to meet the needs of the local community.

#### **14. Getting Around**

- 14.1. Policy GA1: Core Footpath and Bridleway Network: The last two paragraphs are not needed. If CIL was ever implemented then it is automatically up to the town council what that money would be spent on, however, this could become a position statement. When the GDNP is adopted then the Policies within it would automatically be used in the determination of planning applications. It is therefore suggested that these two paragraphs are removed from the policy.
- 14.2. Policy GA2 Integrating Developments (Paths and Ways): This policy is supported.
- 14.3. Position GA-A: Public Transport: This is supported.

#### **15. The High Street and Town Centre**

- 15.1. Position HSTC: High Street Retail Character: This is supported.
- 15.2. Policy HSTC1: Uses and Variety: This policy cannot be enforced. There is a new permitted development right allowing any building within use classes A1, A2, A3 A4 (Drinking establishments), A5 (Hot food takeaways), to change to a flexible use falling within either use class A1, A2, A3 or B1. It is therefore recommended that this policy is removed.
- 15.3. Position HSTCB, C, D and E – These Position Statements are supported.

#### **16. The Economy**

- 16.1. Objective Economic Development: This objective is supported generally, however, it is suggested that the text regarding reducing the towns export of people be reworded to "...will increase its job base with the aim of reducing its export of people".
- 16.2. Policy E1 Employment Land: The supporting text for this policy states that the emerging Local Plan has no employment allocations in Great Dunmow, this is incorrect. Policy GD5 – Land west of Chelmsford Road allocates 2.1 hectares of land for employment and 1,400m<sup>2</sup> retail floorspace and Development Opportunity Sites are allocated for mixed uses.
- 16.3. The policy specifies developments of over 50 units having to provide land and premises for employment, what evidence is used to come up with the figure of 50 units? Has viability testing been carried out? The policy also states that developers can work together to provide this employment land, planning obligations only allow pooling contributions from different developments if it is directly related to those developments. The policy, is also too vague to implement, there is no indication of the quantity of land that needs to be provided for employment use. It is suggested that this policy be removed.
- 16.4. The emerging Local Plan evidence base shows that there is a need for 9,200 jobs in the district over the plan period. The emerging plan allocates new employment land and protects existing employment land to meet this need. What evidence does the GDNP have that shows there is a need for more employment land over and above this?
- 16.5. Currently, this policy can only be applied to those sites without PP ie GD2 and GD4, both of which have other commitments and GD4 is probably unsuitable. Otherwise the policy would apply to large windfall sites or allocations in next plan. While appreciating the desire for additional employment land it is questioned whether this policy is the best way of achieving it.
- 16.6. Position E A Economic Growth: This is supported.
- 16.7. Policy E2 Loss of Employment Land: This cannot be implemented as the number of jobs provided on site or off-site is not a land use policy. The basic stance of this policy is enforced by national policy and policies SP3 – Employment strategy, Policy EMP1 – Existing and Proposed Employment Areas and Policy EMP2 – Non-Estate Employment Uses of the emerging Local Plan and policy ES – Safeguarding Employment Land in the 2005 adopted Local Plan It is therefore suggested that all but the final sentence is removed.

## **17. Healthcare, Education and Infrastructure**

- 17.1. Policy HE11: Medical Facilities: The council understands the issues behind the policy aims however the criteria for new medical centres rests with NHS England. The council would apply the County car parking standards. The NP would need to

provide evidence to show why a different standard would apply. The accessibility of medical facilities is covered by GEN1 and emerging policy SP12.

- 17.2. Objective: Education: The reference to school catchment areas should be deleted as this is in the full control of Essex County Council Education Department or academy schools. It is also contradictory of the objective to state that it is encouraging pupils from outside of catchment to the local schools when on page 113 and 114 it is recognised that the local secondary school and primary schools will need to expand to meet the demand over the Plan period for local children.
- 17.3. Policy HE12 Secondary School Provision and Policy HE13 Primary School Provision: The council understands the issues behind the policy aims however the criteria for new schools rests with Essex County Council. The council would apply the County car parking standards. The NP would need to provide evidence to show why a different standard would apply.
- 17.4. Policy HE13 Primary School Provision: This policy is supported, however it is suggested that the word 'adjacent' be removed from point 6.
- 17.5. Policy HE14: Conversion to Educational Use: Promoting satellites to existing schools seems to go against the aims of the policies. A satellite school will encourage travel between two sites therefore increasing journeys; it may be very difficult to also supply green space on both the main school site and the satellite site. Points 1,2 and 5 of this policy are covered by 'sustainable development' policies in National policy. Point 4 repeats the criteria in the adopted Local Plan policy GEN2 – Design and Policy DES1 – Design of the emerging Local Plan. Point 3 demands adequate car parking spaces; however, it does not specifically set out how planning officers will calculate what adequate space is. Point 7 would not easily apply to satellite sites as they will not be located on the existing school site and therefore the existing footprint of the school could not be integrated. It is suggested that this policy is amended to be a local policy supporting the conversion of buildings to educational uses.
- 17.6. Policy HE15: Infrastructure: There is no evidence to support the infrastructure requirements set out in this policy. Uttlesford District Council has a large body of evidence which lists what infrastructure requirements are needed over the plan period. Infrastructure will be provided through the allocated sites in the emerging plan through planning obligations. It is recommended that this policy and supporting text are deleted.