

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)	836 842 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	850 790 *unit
Land west of Chelmsford Road (Smiths Farm)	350 300 units 70 bed care home
Total	2,420 – 2316 units plus 70 bed care home

*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 1,400m² 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.