



Uttlesford District Council

Chief Executive: John Mitchell

Planning Policy Working Group

Date: Monday, 27 July 2015
Time: 19:00
Venue: Council Chamber
Address: Council Offices, London Road, Saffron Walden, CB11 4ER

Members: Councillors Susan Barker, Paul Davies, Alan Dean, Stephanie Harris, John Lodge, Janice Loughlin, Alan Mills, Edward Oliver, Joanna Parry, H Rolfe.

AGENDA

Open to Public and Press

- 1 Apologies for absence and declarations of interest.**
To receive apologies for absence and declarations of interest

- 2 Minutes of previous meeting** 5 - 14
To receive the minutes of the meeting held on 13 July 2015

- 3 Matters Arising**
To consider matters arising from the minutes

- 4 Presentation by the Planning Advisory Service**
Presentation from PAS about the role of District Councillors and the Local Plan process

- 5 Preparing a Justified Local Plan** 15 - 56
To consider the strategy for the initial development of the Local Plan

- 6 Sustainability Appraisal Scoping Report** 57 - 158
To consider the draft scoping report for consultation

- 7 Local Plan Transport Assessment** 159 - 176
To consider the approach to the Local Plan transport assessment
- 8 Neighbourhood Development Plans** 177 - 206
To consider an approach to assist parish councils with the preparation of neighbourhood plans
- 9 Date of next meeting**
To inform the group of dates for future meetings

MEETINGS AND THE PUBLIC

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PLANNING POLICY WORKING GROUP held at COUNCIL OFFICES LONDON ROAD SAFFRON WALDEN at 7.00pm on 13 JULY 2015

Present: Councillor H Rolfe - Chairman
Councillors S Barker, P Davies, A Dean, S Harris, J Lodge, J Loughlin and A Mills.

Also present: Councillors J Davey, R Freeman, J Gordon and D Jones,

Officers in attendance: R Harborough (Director of Public Services), M Cox (Democratic Services Officer), S Nicholas (Senior Planning Policy Officer), M Paine (Planning Policy Team Leader), A Taylor (Assistant Director Planning and Building Control), A Webb (Director of Finance and Corporate Services)

PP7 APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST

Apologies for absence were received from Councillors J Parry and E Oliver.

Councillor Barker declared a non-pecuniary interest in item 9, ECC Waste Consultation Response as a member of ECC.

PP8 MINUTES

The minutes of the meeting held on 8 June 2015 were received, approved and signed by the Chairman.

PP9 BUSINESS ARISING

i) Minute PP39(ii) – call for sites

Councillor Dean asked when the ECC criteria for the assessment of sites would be available to the working group. He was advised that some information was set out in the SHLAA report on tonight's agenda but the next meeting on the 27th July would consider the sustainability appraisal scoping report that would set out the criteria.

PP10 LOCAL PLAN WORK PLAN AND RISK ASSESSMENT

The Planning Policy Team Leader presented the report. He set out the background to the report and explained that the indicative work plan outlined the main activities to be undertaken for the council to achieve a sound local plan, following the report of the Planning Inspector on the previous submission and the withdrawal of the plan in January 2015. He said that after studying the Inspector's report, one of the problems identified was that the decisions taken had been

insufficiently justified and there was a lack of a full audit trail of the options that had been considered and rejected.

He said Uttlesford was not alone in facing difficulties in preparing a local plan, only 27% of planning authority's plans had been found sound by the Planning Inspectorate since the introduction of the NPPF in March 2012. Producing a new plan would be a huge challenge, but there would be transparent approach going forward and he would send regular email updates to district councillors and parish council clerks.

The work plan set out a time line of the 16 key tasks to be undertaken in the preparation of the plan. It also contained a risk assessment which addressed potential risks to both the timeline and the soundness of the plan. It was important to establish a process at an early stage but he warned that in order to achieve transparency and public scrutiny there would necessarily be a period of uncertainty.

Councillor Barker asked whether the recent budget announcements would have an effect on the process. The Planning Policy Team Leader said this would be considered but a more important issue was the productivity plan, the requirement to prepare a plan within a timeframe set out and published by the Government within the next few weeks. There could be implications for the council if this timeframe was not achieved.

Councillor Lodge asked about the timescale for preparing the new transport assessments as this had been an area of concern in the previous plan submission. He was advised that an initial scoping report would be prepared for the next meeting. It was important to first determine the existing transport models and whether there was data available to enable options to be considered. It was explained that the transport assessment was a long and involved process of modelling, mitigation and testing. As such there were no dates in the plan but 6 steps to be followed had been identified.

In answer to a further question from Councillor Lodge, it was confirmed that in terms of education and health provision, officers were in contact with the NHS and ECC concerning future provision to be included in the Infrastructure Delivery Plan. Councillor Barker said that plans for school expansion in Saffron Walden, Dunmow and Stansted had already been considered by the ECC Education Panel. In relation to the sustainability appraisal, the Planning Policy Team Leader said he was confident that the ECC Place Services had sufficient knowledge to undertake this work. Difficulties identified by the Local Plan Inspector were attributable to the Council's own protracted plan-making process.

Councillor Dean said he was reassured by the report which put in place a transparent process and set out a road map for developing a plan. He welcomed the strategic approach as he felt that previously the council had got to the specific sites too early. In relation to the highways assessment he felt that Essex Highways hadn't served the council as well as expected during the previous plan process he wanted assurance that there would be a deliverable plan.

He then highlighted the importance of the leadership role for members and the need to make difficult decisions. To facilitate this he felt there should be more dialogue between members and officers.

The Leader commended the report and said the work plan provided a good approach for the whole process and a set out a clear sequence of tasks.

AGREED that the work programme and risk assessment be supported, subject to future modifications as circumstances change.

PP11

TOWARDS A FRESH VISION OF THE DISTRICT IN 2013

The working group received a report setting out guidance for drafting a vision statement for the local plan. A clear vision was central to the commencement of the plan preparation process and set out a framework for future development.

The report gave some examples of vision statements produced for other authority's plans. Members noted the need for an updated vision statement, to agree a set of priorities as to how the district would look in 10 – 20 years.

AGREED that the working group support the guidance set out in the report relating to the production of the Vision for the District.

PP12

DEVELOPMENT STRATEGY: OPTIONS STAGE METHODOLOGY

The Planning Policy Team Leader presented the report on the Development Strategy for the Local Plan. The strategy was the mechanism by which the locally led vision for the district would be brought together with national requirements to produce a plan, which would be found sound by the Inspector. The report before members set out stage one of the process, which was the proposed methodology for the formulation of options and scenarios for consultation in the autumn.

Underpinning the methodology was the requirement in national policy to ensure that every effort is made to meet the district's development needs. The development strategy was at the heart of the plan and how the council should manage development in the District.

The report addressed the early stages in the formulation of the development strategy. There would be no detailed work on deliverability until the initial stages of evidence gathering and high-level assessment were complete. The options should not be narrowed too quickly until evidence had been assembled and thoroughly tested. The strategy would initially focus on the suitability of broad areas of search, to be identified with the assistance of 5 high level criteria, as set out in the report. There would be a matrix to apply the criteria in a consistent fashion, which would be represented on a map and form the core of the options consultation. The broad areas of search would be represented as elliptical shapes. The mapped areas of search and scenarios would be presented to the

next meeting, whilst the sustainability appraisal of the scenarios would be considered in the autumn.

In answer to a question from Councillor Dean about development in smaller villages, the Planning Policy Team Leader said that the Planning Policy Team would work with parish councils to identify the specific needs in their area and this would be fed into the plan process.

Councillor Lodge said he was happy with the strategic approach suggested in the report rather than being developer led. He asked whether the relevant landowners could be approached once the area of search had been identified. He was advised that this would need to be looked at but the usual procedure was for landowners to approach the council when the areas of search had been identified if they were interested in taking their sites forward.

Councillor Dean said it was important to bear in mind the balance between needing to protect the countryside and cramming too many houses into existing settlements and creating urban blight. The Planning Policy Team Leader said there was a need for a regular supply of houses throughout the plan period and in particular the first 5 years and the challenge was for the council to manage the cumulative impact.

Councillor Davies said he was heading a working group into community engagement that was looking to establish a community panel. He thought this would be a useful way to feed community views into the local plan process.

AGREED that the Local Plan Development Strategy: options stage methodology be supported.

PP13

STRATEGIC HOUSING LAND AVAILABILITY METHODOLOGY

The Senior Planning Policy Officer explained that a new SHLAA document was being prepared following the withdrawal of the Local Plan from the examination process and the need to identify more land for housing. The purpose of the SHLAA was to identify sites with potential for housing, but the document only provided evidence to support decision making, it did not make judgments about whether sites should be allocated, as they would be further tested through the plan making process. The report set out the draft methodology, which contained five stages culminating in the final evidence base showing the location of all sites and site appraisal information for each of the sites.

In answer to a question from Councillor Barker, the Senior Planning Policy Officer said that in terms of the transport assessment, ECC would be consulted on the larger sites, but smaller sites were assessed by officers using information required from the landowner. Councillor Barker was concerned that sites might be carried forward on this basis. She wanted this assessment to be robust as transport provision was one of the reasons for the failure of the previous plan submission.

The Planning Policy Team leader said that the SHLAA was just one small element of the assessment process underpinning the Local Plan. Councillor Lodge asked whether the council should go out to competitive tender for the transport assessment. He was advised that ECC was the statutory body and could not be bypassed and any independent consultant study would need to be signed off by the Highway Authority. It was important for the council to determine the capacity at ECC and the resource that might be available for Uttlesford.

AGREED that members agree to consult on the proposed methodology for a six week period.

PP14

GYPSY AND TRAVELLER CONSULTATION – FIVE ACRES AND PENINGTON LANE

The Assistant Director Planning and Building Control presented a report that considered the outstanding sites from the December 2014 Gypsy and Traveller Issues and Options consultation.

Further information had been required in relation to the site at Five Acres Arkesden/Wicken Bonhunt. The landowner had submitted a flood risk assessment which had been sent to the statutory consultees. In the light of the comments received the officers' conclusion was that the site should not proceed to the next stage of the plan making process. The detail was contained in the updated report of representations, officer comments and recommendation which was considered by the working group.

During the issues and options consultation two further sites had been proposed. Site assessments had been carried out on these sites and it was recommended that the site at Pennington Lane, Stansted should not proceed due to landscape impact and the detrimental effect on the conservation area and the open countryside.

In relation to the other site at Hill Top Yard, Henham, the Planning Committee at its meeting on 1 July 2015 had refused planning permission for 5 pitches. This did not however exclude the site going forward in the local plan as this was a different process and officers considered that it should proceed to the next stage of the process.

Public speaking

Steve Coltman, Joan Morgan, Alan Storah, John May and Robin Coady spoke in relation to the site at Five Acres. Copies of their statements are appended to these minutes.

Councillor Loughlin said she agreed with the points made by the public speakers, that the Five Acre site failed all of the sustainability tests. She was concerned about the wording in the papers that inferred that unfavourable sites might in time become favourable and be re-introduced into the plan process. This was unclear and left uncertainty for the residents. She said the working group should state

tonight whether the site was suitable or not, and if it was not suitable it should not be reconsidered.

Councillor Dean said he didn't think there was a devious attempt to bring back this site, but recognised that during the plan process there were changes in circumstances that meant certain elements came in and out. He thought it would be helpful to strengthen the recommendation to state the reasons why the site was considered unsuitable.

The public speakers had requested that the working group make a recommendation to Cabinet for the site to be excluded from the local plan process. Councillor Barker explained that this was a small part of the plan preparation process and it was not practical for the cabinet to consider individual sites at this stage. Councillor Dean agreed that this decision was wrapped up in the local plan process but would like the minutes to make clear the reason for the decision.

Councillor Loughlin asked if members could be reassured that the site would not go forward in the Local Plan. The Leader said it was clear that the working group supported the officers' recommendation not to take this site forward. Councillor Dean proposed the wording of the officer recommendation set out on page 112 of the papers but to exclude the words 'due to more suitable sites being promoted'

The decisions on the three sites were as follows

Five Acres Arkesden/Wicken Bonhunt

AGREED that due to the lack of an NPPF compliant Flood Risk Assessment, concerns about safe access and egress from the site through flood zone 3, harm to the protected lane and lack of acceptable detail regarding mitigation measures, the site should not be taken forward in the local plan process.

Pennington Lane – Stansted

AGREED that the site should not be taken forward in the Local Plan process for the reasons set out in the site assessment.

Hill Top Lane - Henham

AGREED to note the officer recommendation that the site be taken forward and the decision of the Planning Committee to refuse the site for 5 Gypsy and Traveller pitches.

PP15

REPLACEMENT WASTE LOCAL PLAN REVISED PREFERRED APPROACH

The Senior Planning Policy Officer presented the Replacement Waste Local Plan, which had been published by ECC on 18 June 2015 for a 6 week period of public consultation. The plan would guide the management of waste in Essex and

Southend until 2032. It identified 28 preferred sites including four in Uttlesford. The report set out the council's response to the consultation.

Jackie Cheetham spoke on behalf of Takeley Parish Council and expressed concern about the site at Little Bullocks Farm at Great Canfield which was proposed for stable non-reactive hazardous waste landfill. There was concern that the site would be accessed through residential areas and unsuitable small rural roads.

Councillor Barker clarified that the location of the waste sites was determined by the location of the mineral extraction sites. She understood that Little Bullocks Farm was the only site proposed for hazardous material in Essex. Members expressed concern at this proposal and felt that ECC should be asked to give this further consideration and look for a site that had good access to the strategic road network.

AGREED that the comments set out in the report, and the additional comments regarding Little Bullocks Farm are supported by the group, and sent to ECC as the Council's response to the Revised Approach of the Replacement Waste local Plan June 2015.

The meeting ended at 9.10 pm

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Public Statements

Steve Coltman

Good evening, before I begin I am sure that you know by now that I am the Clerk to Arkesden Parish Council and I would like to thank the members for the opportunity to speak tonight in what (has been)/(is likely to be) a long meeting. Your patience in listening is appreciated and I am sure you are well aware of the importance of this issue and the depth of feeling in the settled communities affected by this site

The Parish Council and residents welcome the officers' recommendation that Five Acres is **not** to be taken forward into the new Local Plan process. However, we are concerned that one reason given is the availability of "more suitable sites." Surely this cannot be a sound reason for determining site suitability. A site is either suitable or it is not, and Five Acres is most definitely UNSUITABLE and should be declared as such.

The evidence presented to the officers and the responses both from the public and the statutory bodies clearly indicate that there could hardly be a site LESS suitable than Five Acres and yet the planning officers seem reluctant to accept this. This site is UNSUITABLE not only for the reasons given by the officers but also for a host of other highly important issues, not least of which is the dangerous access road – particularly dangerous for pedestrians. No amount of mitigation measures will prevent the road from flooding or make the road less dangerous, both of which could endanger the lives of the Travelling Community.

Listening to the proposals tonight for the new Local Plan, I am encouraged that you will be making strategic decisions on where **you** want sites, including Travellers, rather than relying on sites coming forward. However, this working group has promised us a conclusion to the issue of Five Acres, irrespective of the new Local Plan process. We were promised that a recommendation would be made to Cabinet and yet tonight you are only being asked to “note” the report and to support the officers’ recommendations. This is not the “conclusion” that we had been expecting, or indeed deserve, following almost four years of consultations, letters, time, effort and money. You have promised clarity, community engagement and a determination to listen to your electorate and especially to your Parish Councils.

Now is the time to honour these promises and we respectfully request that having read the report, your comments **to the officers** should be to remove any reference to other “more suitable sites” from their report and to actually use the word UNSUITABLE with reference to Five Acres. We can then support you in recommending the report both now and later to Cabinet.

Furthermore, in the first part of the officers’ report presented to you, and duly noted by you, at the February meeting, when reporting on previously rejected sites the officers recommend that these sites are **not** taken forward “**unless** enough suitable sites are not found, when there may be a need to revisit and reassess the rejected sites.”

Failure to change this attitude on unsuitable sites whereby they are left “hanging” until you have nothing better on offer, will result in allocating sites on a “least worst” basis, which is not fair to the Travelling community and does not reflect the concerns of the settled community. You have duties and responsibilities to both of these groups and by not taking on these challenges you risk the whole of your Local Plan being found unsound yet again.

Joan Morgan, Chair of Wicken Bonhunt Parish.

I would like to address the Planning Policy Working Group with regard to the Agenda item No.8 Gypsy&Traveller Consultation, where members are asked to **CONSIDER** the officer’s recommendations on the outstanding Gypsy & Traveller sites.

Andrew Taylor states in his summary that the report presented tonight, concludes the Gypsy & Traveller Issues and Options consultation on outstanding sites – 5 Acres Arkesden (or Wicken Bonhunt as it was previously) being one of them. His report identifies the Agencies with whom he has consulted – namely Essex Highways, Essex Historic Environment Team, Essex Waste Management Team and the all-important Environment Agency.

The officer’s report has noted the concerns from Essex Historic Environment Team and concludes that increased pressure on the protected lane (Poore Street) should be resisted. **Agreed.**

He also is not able to confirm that the Waste Management constraints can be overcome. **Agreed.**

Finally, the Environment Agency states the Flood Risk Assessment does not meet the NPPF requirements – Well, there’s a surprise!

All in all, the final conclusion the officer recommends is that the 5 Acres site **DOES NOT** proceed to the next stage of the Plan Making Process. Hurray!

My own conclusion is that after 4 years of open discussion about 5 Acres, the local knowledge of my residents who have known for over 25 years that this site is **NOT SUITABLE**, has prevailed over consultants who sit behind computers and make judgements without even visiting the site.

Uttlesford Planning Officers have finally reached the most sensible conclusion in their report so..

PLEASE – don't just NOTE this recommendation – make a POSITIVE decision to remove 5 Acres from the Local Plan tonight and put an end to this uncertainty.

Robin Coady

I would like to take you back to the end of last year when Uttlesford decided to start the G&T consultation process at the end of last year. This was after the Local Plan was found unsound. We asked for it to be halted. It was not.

On a number of occasions and as a result of this 'separate' process the residents of Wicken, Clavering and Arkesden were, at this meeting promised a decision on 5 Acres at this meeting before the new Local Plan process was resumed.

We have listened to the recordings of previous PPWG meetings and I would like to quote you Mr Rolfe, if I may.

"I can assure you that this committee will be making a recommendation to Cabinet and then full Council".

There were a number of other similar comments and this is what the public behind me heard.

Unless you tell us otherwise this statement and other similar promises were made in the context of bringing this consultation to a close and before embarking on a new round of consultation.

Officers have now conducted a very thorough process and we welcome their recommendation not to take 5 Acres forward in the Local Plan.

Indeed the need for a very thorough due process has been stressed to us on a number of occasions. We say that with regards to 5 Acres the process could not have been more detailed and certainly more so than any other site considered. This thorough process in our view could not be challenged and would certainly stand up to judicial review.

The evidence presented is unequivocal. Any new process is not going to change the facts that the site floods and that it would do harm to a protected lane. Something now acknowledged by the Statutory bodies and Officers.

Please don't be scared of making the right decision. We are simply asking the PPWG to do the right thing, deem the site 'unsuitable' and recommend this to Cabinet this evening.

Statement from John May to follow

Committee: Planning Policy Working Group

Agenda Item

Date: 27 July 2015

5

Title: Preparing a Justified Local Plan

Author: Martin Paine, Planning Policy Team Leader

Summary

1. The attached report explains that one of the main failings with the 2014 Submission Local Plan was the absence of a clear audit trail of decisions taken, and proper justification of why some options were rejected.
2. A number of maps are presented which show 'areas of search', or broad areas, all of which the Council proposes to investigate through the Local Plan process, so that there is a clear justification in terms of rejected areas as well as areas eventually taken forward. The process will follow the evolving strategy and the planning merits or demerits of the locations covered by the Areas of Search, rather than by sites submitted by landowners and developers.
3. The report also proposes eight Scenarios for public consultation later in the autumn, four at a lower level of development, three at a higher level of development, and one proposing no additional Local Plan development. These scenarios will form the basis of the first stage of Sustainability Appraisal, or consideration of alternatives, which will be presented for consultation alongside the scenarios and areas of search.

Recommendations

That the report be supported, and that any comments on the contents of the document be supplied to the Planning Policy Team prior to the next Working Group meeting and public consultation later in the autumn.

Financial Implications

4. The costs associated with the approach set out in the report, including the proposed consultation, can be met from existing budgets.

Background Papers

5. None

Impact

Communication/Consultation	Formal consultation as the Local Plan develops will be carried out in accordance with the Statement of Community Involvement.
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Community Safety	None
Equalities	The Local Plan impacts on all sectors of the community.
Health and Safety	None
Human Rights/Legal Implications	None
Sustainability	Appraisal of alternatives to the emerging plan will be undertaken.
Ward-specific impacts	All.
Workforce/Workplace	Planning Policy Team and other officers as appropriate.

Situation

5. This report follows on from early discussion of the Options stage methodology discussed by the Planning Policy Working Group on 13 July 2015. The methodology report stated the following:

“This report addresses the early stages in formulation of the development strategy, from initial preparatory work through to the Options consultation, the first of three public consultations to be undertaken on the emerging Local Plan.

In planning terms, the purpose of the Options consultation is to broaden the Council’s understanding of a range of relevant planning issues related to each of the options set out in the consultation documents. It is to be hoped that new evidence will be presented through the consultation which can then be used in more detailed assessments to follow as the Council works towards the Preferred Options stage. The options consultation may also highlight other options which were not included in the consultation documents.

At the Option stage no detailed work will be undertaken in respect of deliverability. Assessment of potential infrastructure provision will need to be undertaken as more evidence is gradually accumulated.”

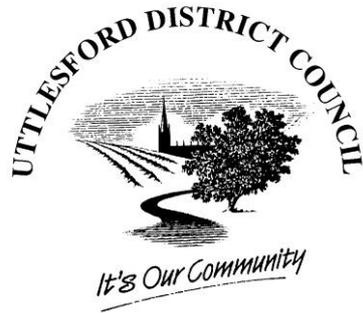
“The mapped areas will be represented as elliptical shapes to avoid misunderstandings as to the status, or attribution of any false precision to the exact locations or site boundaries. At this stage it is too early to draw conclusions about such detailed matters.

The scale of development proposed for testing at each of the areas of search is unknown at this stage. However, it is assumed that there will be a mix of large and small scale proposals carried forward for further testing. Indicatively, it is assumed that new settlement options could be up to 15,000 dwellings, that urban extensions will be much smaller and that villages will be smaller still.”

Risk Analysis

Risk	Likelihood	Impact	Mitigating actions
Without the proposed approach to areas of search and scenarios the Local Plan would become developer-led.	1. Can be addressed and managed through the Working Group discussion forum.	3. The Options stage helps to ensure that the Local Plan is justified when considered against the reasonable alternatives.	Discussion at the Working Group to ensure understanding of the methodology and propose refinements if necessary.

- 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.



Preparing a Justified Local Plan

27 July 2015

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Appendices (attached separately)

- A. District-Wide Areas of Search Map
- B. Areas of Search – Inset map for Saffron Walden
- C. Areas of Search – Inset map for Great Dunmow
- D. Areas of Search – Inset map for Bishop's Stortford

1. Introduction

- 1.1 Contained within national policy are four key requirements of every Local Plan. They should *be justified, effective, positively prepared, and consistent with national policy*. The far-reaching implications of national policy were discussed at the Planning Policy Working Group on 13 July 2015. Also discussed at the same meeting was a proposed methodology to ensure that the requirement for a *justified* plan can be met in full. This report follows on from the methodology as discussed at that meeting and shows how a properly justified plan can be prepared through to Options stage consultation.

Lessons from the 2014 Submission Local Plan

- 1.2 Poor justification of the 2014 Submission Local Plan was one of the main reasons for the negative conclusions of the Planning Inspector's report. This was evident in relation to his criticisms of the Sustainability Appraisal, one of the main tools available to Local Planning Authorities to document the audit trail of decisions behind the emerging plan, and where assessment of alternatives should take place.

Local Plan Inspector's Report, Paragraph 3.6 (extracts)

"All in all it may be questionable whether the various successive SAs together provide a really transparent audit trail of the endorsement/rejection of the claims of the very many other smaller 'reasonable' candidate locations for growth..."

"Future SAs need to ensure that the requirements of the Regulations and the principles established by case law are built into the process from the outset."

- 1.3 The Inspector's report refers to "the difficulty in following the reasoning behind the adoption/rejection of some specific candidate 'reasonable' options sites". Furthermore, the Inspector was very clear that he would not comment upon the comparative merits of various options, including new settlements:

Local Plan Inspector's Report, Paragraph 4.4 and 4.5

There appeared to me to be fairly widespread recognition that some form of 'new settlement(s)' may form an appropriate means for catering for the future long-term growth of the District and, if so, that this should be on a scale bold enough to achieve maximum possible sustainable critical mass and a long term solution, especially if there are judged to be limits as to how far relatively small towns with the characters of Saffron Walden and Great

Dunmow can grow sustainably, attractively, and in an integrated way through successive phases of peripheral expansion. However, I do not consider it for me to comment further upon this matter.

Nor is it necessary or appropriate for me to comment on the comparative claims of any of the very many potential alternative development sites, large and small, promoted in representations to the submitted plan or indeed at the other stages during the 8 years which it took for the plan to evolve against changing background circumstances.

- 1.4 From this it is clear that the Council should take great care not to jump to conclusions about where development should go. Instead, it is essential that the Council should adhere to an agreed and transparent process, carefully considering in the merits of all the options. This process needs to be set out in a clear and accessible manner, in an audit trail that can be followed by those not involved in the evolution of the plan.
- 1.5 This report sets out proposals for addressing these shortcomings with the previous Local Plan, for discussion by Members and reflection over the summer prior to a public consultation in the autumn.

Plan-Making and Sustainability Appraisal

- 1.6 The Sustainability Appraisal Scoping Report sets out the legal requirements and the regulations. The Council has commissioned the Planning Advisory Service to prepare a 'critical friend' review of the Sustainability Appraisal of the previous Local Plan, which will be reported to the Scrutiny Committee in October. The Planning Advisory Service has advised the Council not to delay work on the Local Plan pending receipt of this report.
- 1.7 Plan-making and sustainability appraisal exist in a reciprocal relationship of testing through an iterative process. Sustainability Appraisal provides a way in which plans may be improved. It also enables 'equal appraisal' of options, ensuring that the legal requirements can be met.
- 1.8 In order to commence the first iteration of the plan and to begin the plan-making process, it is necessary for the plan-makers to draw together some initial concepts for appraisal. The appraisal conclusions can then be used to help inform the next stage of plan-making as ideas are tested and gradually refined.

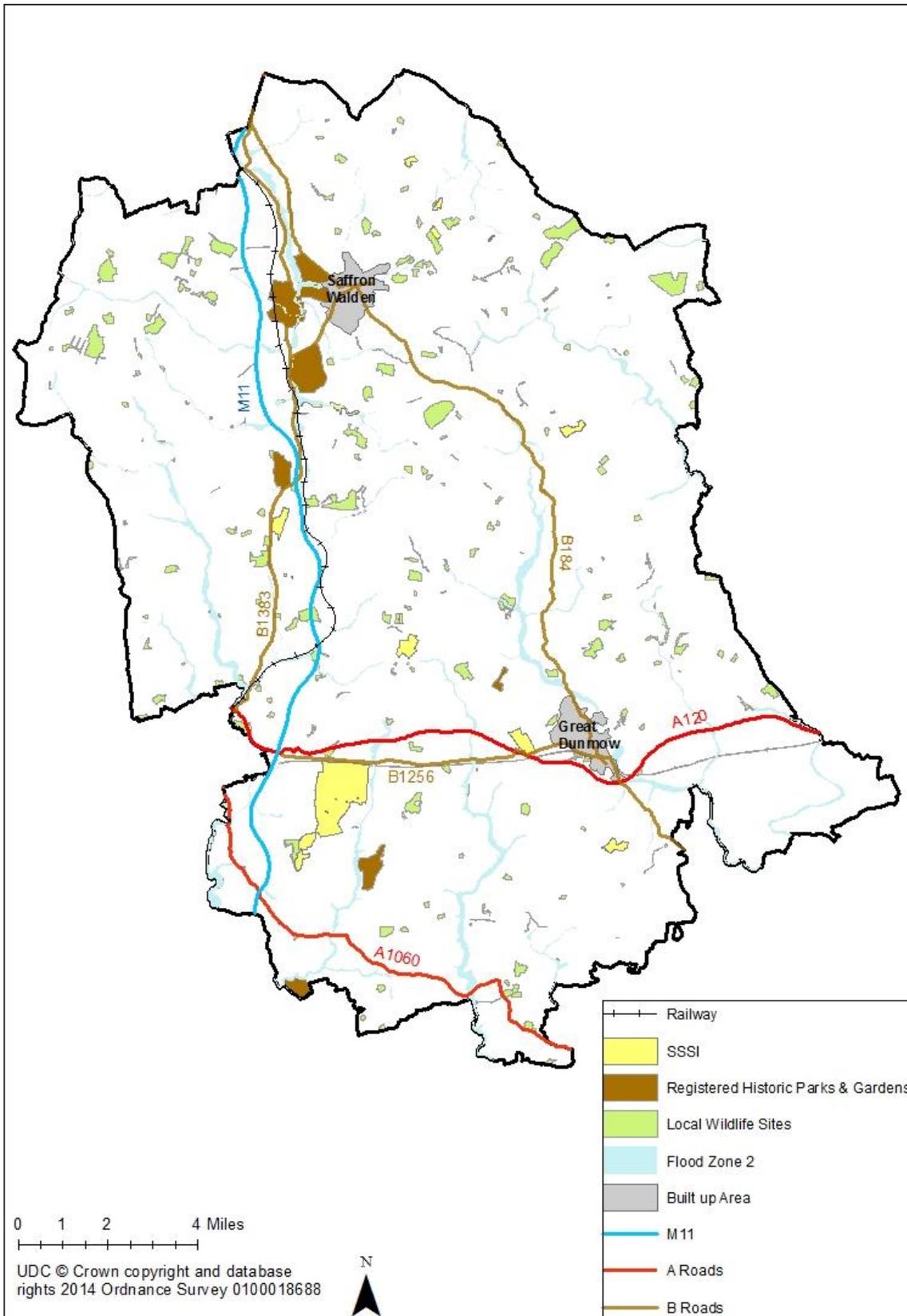
Starting to Plan: Chicken or egg?

- 1.8 It is commonly observed that plan-making starts with a ‘chicken and egg’ problem: there is a huge amount of evidence available, but the testing process can’t start until some areas have been identified for testing.
- 1.9 A constraints-led approach does not assist at the start of the process. Although there are some areas of the District which are constrained, very little land is absolutely constrained, as shown in Figure 1 overleaf. For example, the impact of a development on a historic or ecological asset is highly context and site specific. A precious view of a church spire may be preserved by the pattern of the street layout within a new development, or a sensitively designed network of ‘Green Infrastructure’ within and around a development can mitigate the impacts on wildlife sites within the site or nearby.
- 1.10 Discounting areas on the basis of superficial consideration would inevitably lead to strong challenges from developers armed with extensive evidence submitted by experts in specialist fields. For plan-makers, assessment of potential constraints is necessary, but it is not the starting point in setting up a spatial assessment framework.
- 1.11 In order to ensure that the Council can demonstrate that it has made every effort to meet objectively assessed development needs, it is inadvisable to jump to conclusions on the basis of apparent ‘constraints’, or because a potential site ‘could’ negatively affect precious assets. This applies also to Green Belt, which although it should only be released in exceptional circumstances through a Local Plan review, is not an absolute constraint. Similarly, although consideration of planning appeal decisions should inform the process, care must also be taken not to jump to conclusions regarding the applicability of individual appeal decisions to wider strategic considerations.
- 1.12 To start the process, it is standard practice to begin with high-level but nevertheless reasonable assumptions, in order to ensure that options are not arbitrarily discounted without due consideration. This is addressed in Section 2 below.

Uncertainty during the preparation of Local Plans

- 1.13 One consequence of an open and transparent approach to plan-making will be an extended period of uncertainty which may be a cause of some concern to local residents. Such concerns, whilst understandable, should be balanced against the need to ensure that the process of formulation of the plan is subject to public scrutiny, and so that the many challenges facing the Council can be understood. The Council will do everything it can to expedite progress on the Local Plan, subject to ensuring that it has complied with the requirements of soundness set out in national policy.

Figure 1: Uttlesford District, showing the main constraints (excluding Green Belt and the Stansted Airport Countryside Protection Zone)



2. Initial Assumptions

- 2.1 As explained above, the initial stage in preparation of the development strategy is to establish a reasonable set of high level assumptions which can then be refined as more evidence is gradually accumulated through the strategy selection process.
- 2.2 At the previous Planning Policy Working Group on 13 July 2015, Members discussed five potential high-level criteria which could inform the development of 'areas of search' or broad spatial areas for further consideration and testing. These five assumptions were as follows:
- Potential to contribute to effective cross-boundary strategic planning priorities.
 - Potential to minimise the need to travel by car, for example by locating residential development near to jobs, shops, leisure opportunities, and other facilities.
 - Potential access to the strategic highways and rail network.
 - Exclusion of areas with special protection, for example Registered Parks and Gardens and Sites of Special Scientific Interest.
 - Focus on key villages and "villages with a primary school and with some local services: e.g. village hall/pub/shop suitable for a scale of development that would reinforce its role as a local service centre" (known as Type A rural settlements in the 2014 submission Local Plan).
- 2.3 This section takes these five assumptions as a starting point for consideration, and applies them to the geography of Uttlesford.
- 2.4 The purpose of the exercise is to identify whether there are any locations which the Council can be confident should be screened out from further consideration. The purpose of the exercise is not to identify the best locations for development. Therefore no scoring or rating system has been used because this would be misleading in terms of how suitable a given location could be for development.

Potential to contribute to effective cross-boundary strategic planning priorities

- 2.5 The National Planning Policy Framework (NPPF, Paragraph 182) states that this is a key part of an effective plan, and this is an important aspect of the Duty to Co-Operate. The brief review below illustrates how issues could affect the development of the plan.
- 2.6 The town of **Braintree** lies approximately 3 miles east of the edge of Uttlesford District along the A120. Although for the purposes of the Strategic

Housing Market Assessment (SHMA) Braintree lies within a separate Housing Market Area (HMA) covering Chelmsford, it nevertheless has strong linkages with parts of Uttlesford and has good access to Stansted Airport along the A120. It is understood that Braintree Council is currently testing options for a new settlement adjacent to the boundary with Uttlesford, and that landownerships stretch across the District boundaries.

- 2.7 The town of **Bishop's Stortford** lies immediately adjacent to the western side of Uttlesford District, and is accessible from Great Dunmow (7 miles along the A120) and with Saffron Walden (11 miles along the B1383). Bishop's Stortford shares a Housing Market Area with Uttlesford District, both of which are influenced by the M11 and the West Anglia Main Line. Bishop's Stortford is the nearest town to Stansted Airport, which exerts a significant influence on the town in terms of employment opportunities.
- 2.8 The city of **Cambridge** lies approximately 6 miles north of the administrative boundary of Uttlesford District. It may be accessed from Saffron Walden via the A1301 or by train from all stations on the West Anglia Main Line. Cambridge City Council and South Cambs District Council (which adjoins Uttlesford District) have a strong functional relationship and together form part of the Cambridge Housing Market Area. This exerts an influence on the northern part of Uttlesford District.
- 2.9 The town of **Harlow** lies approximately 4 miles south-west of the administrative boundary but lies within the same Housing Market Area, with good access through Uttlesford to Cambridge by train and also on the M11. Harlow Council has aspirations for development to achieve critical mass in order to transform the economic fortunes of the town. The focus of these aspirations is on urban extensions to the town, and work is ongoing to assess options for growth to the north in East Hertfordshire District, and to the west and south in Epping Forest District.
- 2.10 The city of **Chelmsford** lies approximately 6 miles from the south-eastern edge of Uttlesford District. Chelmsford has strong connections with Colchester and Braintree. Although the A1060 between Chelmsford and Bishop's Stortford passes through the southern edge of Uttlesford District it provides ready access to neither of Uttlesford's two towns and the influence of Chelmsford over travel to work patterns and the Housing Market Area is weak. It is therefore considered that Chelmsford is unlikely to have a strong influence on patterns of development within Uttlesford District.
- 2.11 The town of **Haverhill** lies approximately 4 miles north-east of the administrative boundary within St. Edmundsbury Borough. St. Edmundsbury Borough does not directly adjoin Uttlesford but is separated from it by South Cambs District. Haverhill lies within a separate Housing Market Area and has

strong connections with other settlements outside Uttlesford District, including Cambridge and Bury St. Edmunds. It is considered that in functional terms the relationship between Haverhill and settlements within Uttlesford is weak and should not have a significant impact on the development strategy for Uttlesford's Local Plan.

- 2.12 London** is a significant influence on travel to work patterns in Uttlesford, as indeed it is for much of the east and south-east of England. Significant numbers of Uttlesford residents commute to work in central London via the West Anglia Main Line which provides fast access to Liverpool Street Station.
- 2.13 The above review suggests that the main locations for consideration in terms of potential influences on the spatial distribution of future growth are Braintree and Bishop's Stortford.

Potential to minimise the need to travel by car, for example by locating residential development near to jobs, shops, leisure opportunities, and other facilities

- 2.14 Accessibility is an important consideration for plan-making. Uttlesford District possesses only two towns with significant jobs and facilities and it is therefore proposed that with the exception of areas excluded under criterion 4 below, all the areas around these towns will be considered further through the testing process. Bishop's Stortford also lies on the edge of the district and contains a significant range of jobs and facilities.
- 2.15 Application of this criterion suggests that large areas of Uttlesford District, which are rural areas remote from settlements with a range of facilities, and also remote from transport corridors, should be excluded from further consideration.
- 2.16 New settlements should also meet this criterion to some extent, although it is generally only the largest new settlements which would be capable of providing a significant number of job opportunities.

Potential access to the strategic highways and rail network

- 2.17 The M11 is the main strategic road which runs north-south through the District. There are only two motorway junctions in the District, at Junction 8 between Bishop's Stortford and Stansted Airport, and Junction 9 near Great Chesterford. There does however appear to be space either side of Junction 9. The feasibility of junction improvements for access to both sides of the motorway would need to be investigated.
- 2.18 M11 Junction 8 is closely related to Stansted Airport and the A120. The area to the south-east of the junction could be considered a suitable area for a

potential new settlement related to the airport. Stanstead Airport station is relatively nearby.

- 2.19 The A120 is the other strategic highway in the District, running east-west across the District. The entire length of the section through the District is dual carriageway. Locations to north and south of the A120 with direct access onto existing junctions may be considered worthy of further consideration and testing in the context of a possible freestanding new settlement.
- 2.20 There are six railway stations in the District, at Stansted Airport, Stansted Mountfitchet, Elsenham, Newport, Audley End, and Great Chesterford.

Exclusion of areas with special protection, for example Registered Parks and Gardens and Sites of Special Scientific Interest.

- 2.21 There are many designations and protections currently in place across the District. The NPPF requires that a hierarchy of designations should be put in place, with the most protections afforded to those at the top of the hierarchy. As part of the Local Plan process all designations will be considered. Discussions with ecology and heritage bodies suggest that there are also a large number of undesignated assets which should be considered as part of the Local Plan process.
- 2.22 The initial criterion relates to exclusionary factors i.e. designations which can be used to rule out areas of search. From a review of the mapped data, options which can be ruled out at this early stage despite performing favourably against other criteria are: Audley Park Registered Historic Park to the west of Saffron Walden, and Hatfield Forest SSSI to the south of the A120. Although there are other designated sites in close proximity to (and indeed within) areas which could be considered further, the specific impacts of development would need to be considered on a site-by-site basis taking account of the local context and impact pathways. It is therefore considered premature to exclude such areas on these grounds. This approach has been discussed with heritage and ecology specialists at the relevant bodies.

Focus on Key Villages and Type A villages

- 2.23 The Planning Inspector took a pragmatic approach in his report on the settlement hierarchy proposed by the 2014 Submission Local Plan.

Local Plan Inspector's Report, 19 December 2015

"3.24 The settlement classifications in table 2 of ULP are based broadly on the level of services available at each settlement. This is a more appropriate evidential base than the system underlying the classification of settlements in the present local plan. There will always be scope for debate about how much

weight to apply to one factor or another and the appropriate categorisation for individual towns or villages where their services are at the margin between different classifications. However, the content of table 2 (and the resulting roles of the particular settlements) is generally soundly set out.

“3.25 Having said this, where it can be justified by relevant economic, social and environmental factors a case can sometimes be made to direct a greater or lesser amount of development to a settlement than would reflect its strict place in the settlement hierarchy. Some of the factors discussed during the hearing (eg locally identified demographic and other needs, local constraints and opportunities, patterns of bus services, and inter-relationships between particular settlements) can be relevant to such decisions and can be considered in taking the plan forward.”

- 2.23 It is not proposed to re-assess the settlement hierarchy, as this would be likely to result in protracted and subjective discussions about the different weightings attributed to various facilities in each village. More importantly, it will be necessary to undertake discussions with Parish Councils to understand the local context and any areas which could have potential for further consideration, to help inform the consideration of any sites assessed through the SHLAA process.

Conclusion: Defining Areas of Search

- 2.24 The above review suggests 9 broad areas of search to be carried forward for assessment, and two areas discounted from further consideration, as set out in Table 1 below.

Table 1: Summary of potential areas considered

No.	Area of Search	Cross-boundary strategic planning	Minimise need to travel	Access to the transport network	Key designations	Villages with local services	Carry forward for assessment?
1	M11 (J9a) - east	Transport	New settlement	M11, A11 Great Chesterford rail station	Various – none exclusionary	n/a	Yes
2	M11 (J9) - west	Transport	New settlement	M11	Various – none exclusionary	n/a	Yes
3	Elsenham	n/a	New settlement	Poor roads Elsenham station		n/a	Yes
4	M11 (J8) – north-west	Transport, economic development	New settlement	M11, A120 west	Various – none exclusionary	n/a	Yes
5	M11 (J8) – south-east	Transport, economic development	New settlement	M11, A120 east	Hatfield Forest SSSI to east	n/a	Yes
6	South of A120, North of Hatfield Forest	Transport, economic development	New settlement	A120 Stansted Airport station	Hatfield Forest SSSI to south	n/a	Yes
7	North of A120, west of Great Dunmow	n/a	New settlement	Access to A120 Stansted Airport station	SSSI and a Registered Historic Park in the area	n/a	Yes
8	South of A120	n/a	New settlement	Access to A120 No station	SSSI adjacent to the area	n/a	Yes
9	West of Braintree	Cross-boundary housing	New settlement	Access to A120 No station	County wildlife sites	n/a	Yes
10	Saffron Walden	n/a	Range of existing facilities	Limited access to strategic roads.	Audley Park to the west	n/a	Yes

No.	Area of Search	Cross-boundary strategic planning	Minimise need to travel	Access to the transport network	Key designations	Villages with local services	Carry forward for assessment?
			in town	Audley End station			
11	Edge of Bishop's Stortford	Housing and economic development	Range of existing facilities in town	Access to M11 Bishop's Stortford Station	Green Belt Birchanger Wood County Wildlife Site	n/a	Yes
12	Great Dunmow	n/a	Range of existing facilities in town	Access to A120 No station	SSSI to the west	n/a	Yes
13	Key Villages	n/a	Limited range of existing facilities	Stations at Great Chesterford, Newport, Stansted Mountfitchet, Elsenham	Various – none exclusionary	Good level of local services and facilities	Yes
14	Type 'A' Villages	n/a	Limited range of existing facilities	Majority of Type A villages are remote from the strategic transport network	Various – none exclusionary	Medium level of local services and facilities.	Yes
n/a	Rural area	Few/no cross-boundary issues	Few/no facilities	Large parts of the rural area are remote from strategic transport network	Green Belt to south and west fringe.	Very limited/none	No
n/a	Existing built-up areas	n/a	Range of existing facilities in town	As per areas 5 and 7 above.	Various	n/a	To be addressed by the SHLAA.

3. Areas of Search – Brief Review of Key Features

- 3.1 Having completed an initial screening of potential areas of search, this chapter provides a brief overview of the nine areas of search identified above. This information is presented as a first attempt to identify some of the key features and issues in relation to each area of search. It is not intended to be an assessment of the potential for development in each area, but simply a factual statement. Assessment will follow later in the Local Plan process. Members are invited to comment on any text which is considered wrong or misleading.
- 3.2 This review has been also been used to assist in mapping the areas of search. A District-wide map showing all areas of search is shown at **Appendix A**. To assist with clarity inset maps showing Saffron Walden, Great Dunmow, and the edge of Bishop's Stortford are provided at **Appendices B, C, and D** respectively. Inset maps are not considered necessary for other areas, where the areas shown are approximate. The maps are intentionally shown as ellipses in order to avoid any misapprehensions that the areas are 'sites'. To assist with clarity, new settlement Areas of Search are shown in blue, town extension Areas of Search in pink, Key Villages in yellow, and Type A Villages in green.
- 3.3 Maps of submitted sites are currently being prepared and the information submitted typed up. These will then be assessed as part of the standard methodology set out in the Strategic Housing Land Availability Assessment (SHLAA). It should be noted that the Areas of Search exercise has not been led by consideration of whether or not sites are available. Further SHLAA sites may be submitted at any time throughout the process.

Area of Search 1: M11 Junction 9a – east (new settlement options)

- 3.4 This area is located to the east of the junction of the M11, A11, and A1301, near junction 9. On a number of maps this junction is labelled 9a and is located a couple of miles north-east of the junction on the main section of the M11 referenced in related to Area of Search 2 below. Immediately after the junction the M11 becomes the A11 towards Newmarket.

Area of Search 2: M11 Junction 9 – west (new settlement options)

- 3.5 This area is located west of the M11, near junction 9. Junction 9 is not a full junction but provides access to the A11 towards Newmarket. It does not provide access onto the M11 southbound or the M11 northbound towards Cambridge.

- 3.6 In relation to Areas of Search 1 and 2, discussions with South Cambridgeshire District Council will be needed, as both lie on the boundary of the two districts. Early discussions will be needed with Highways England, Essex County Highways, and also Cambridgeshire County Highways.

Area of Search 3: Elsenham area (new settlement options)

- 3.7 This area of search mainly includes land to the north and east of Elsenham, as far as Henham with its Conservation Area. The majority of the land lies to the east of the West Anglia Main Line. A planning application in this area has been called in by the Secretary of State for determination and a decision is anticipated during July 2015. The implications of this decision for the principles of development in the area will be carefully considered. Also within this area lies a separate Area of Search for Elsenham Key Village.

Area of Search 4: M11 Junction 8 – north-west (new settlement options)

- 3.8 This area of search lies to the north-west of Junction 8, and surrounds the area of Birchanger Type A village. The area is bounded by the A120 at Bishop's Stortford to the south-west and the M11 to the east. The area lies to the south of Foresthall Road, and includes Parsonage Spring, Digby Wood, and part of Birchanger Wood County Wildlife Sites.

Area of Search 5: M11 Junction 8 – south-east (new settlement options)

- 3.9 This area of search lies to the south-east of Junction 8, and is bounded by the M11 to the west, the A120 to the north, Hatfield Forest SSSI to the east, and Great Hallingbury (Type B village and designated Conservation Area) to the south.

Area of Search 6: South of A120, North of Hatfield Forest (new settlement options)

- 3.10 This area is located between Stansted Airport and the A120 to the north and Hatfield Forest SSSI to the south. To the east lie some balancing ponds which separated the area from Takeley. To the west lies Priory Wood County wildlife Sites.

Area of Search 7: North of A120, west of Great Dunmow (new settlement options)

- 3.11 Located north of the A120 west of Great Dunmow. This area has direct access to an existing junction on the A120 dual carriageway. A Registered Historic Park (Easton Lodge) and a SSSI (High Wood) are located within the broad area. Careful consideration will need to be given to whether suitable mitigation measures, including appropriate Green Infrastructure, design, and layout, can be achieved to make development in this location acceptable. Discussions with the relevant bodies relating to heritage and ecology will be needed.

Area of Search 8: South of the A120 (new settlement options)

- 3.12 This area was identified in a 2008 study commissioned by the East of England Regional Assessment (EERA – now defunct) as part of the then East of England Plan Review. This study undertook a high-level constraints screening exercise to identify potential areas for further assessment to host new settlements of 20,000+ dwellings. The study concluded that five areas merited further consideration. One of these was the area south of the A120, east of Hatfield Forest. Hatfield Forest SSSI and Garnetts Wood SSSI lie outside the area of search. There are two existing junctions onto the A120, one north of Barnston and south of Great Dunmow, and one west of Great Dunmow.

Area of Search 9: West of Braintree (new settlement options)

- 3.13 This area immediately adjoins the boundary of Uttlesford and Braintree districts. The area contains a number of County Wildlife Sites, including Boxted Wood and Moulin Wood. The Andrewsfield airstrip also lies within this area. Landownerships cross the boundary of Uttlesford and Braintree Districts. Braintree District has commissioned Garden City Developments to explore the principles and opportunities of Garden Cities with landowners and option holders in areas identified as potentially suitable for large scale settlements. Close working with Braintree Council will be necessary in assessment of this area to ensure that the requirements of the Duty to Co-Operate are met.

Area of Search 10: Saffron Walden (urban extensions)

- 3.14 Saffron Walden provides good access to a range of services and facilities in the town. However, recent appeal decisions suggest that assessment needs to be focused on understanding the impact of development options on the constrained street layout. Detailed consideration needs to be given to infrastructure capacity and the landscape context and setting of the town. Potential sites within the town will be considered through the Strategic Housing Land Availability Assessment (SHLAA).
- 3.15 Following the initial process above, land west of Saffron Walden at Audley Park Registered Historic Park will be excluded from further consideration. Seven initial areas of search have been identified and these are shown on the **inset map at Appendix B**.
- 3.16 **Area of Search 10a** lies between Windmill Hill and Little Walden Road. Outside the area of search to the south lies Bridge End Gardens Registered Historic Garden. Careful consideration will need to be given to the context and surroundings of the gardens.

- 3.17 **Area of Search 10b** lies between Little Walden Road and Ashdon Road. This extensive area of land includes the Harcamlow Way long-distance footpath and two County Wildlife Sites at Little Walden Road Quarry and Byrd's Farm Lane. Ashdon Road Commercial Centre lies to the eastern end of this area, and this has been granted planning permission for 167 homes plus employment land. Whitehill Wood County Wildlife Site lies outside the area of search to the east.
- 3.18 **Area of Search 10c** lies between Ashdon Road and Radwinter Road and includes the area surrounding the Community Hospital and the fuel storage depot. Pounce Wood County Wildlife Site lies outside the area of search to the east. South of Ashdon Road has been granted planning permission for 130 homes, 121 Radwinter Road has been granted planning permission for 52 homes, and 119 Radwinter Road has been granted planning permission for a 60-bed care home.
- 3.19 **Area of Search 10d** lies between Radwinter Road and Thaxted Road, and includes the area of Shire Hill Farm. This area was proposed for allocation for 800 residential units through the submission Local Plan (Policy Saffron Walden 1), withdrawn in January 2015. The Local Plan inspector concluded that the allocation was 'strategically sound', subject to reassurances about a link road between Radwinter Road and Thaxted Road¹. An appeal by Kier Homes for 300 residential units at the southern part of this site was dismissed at appeal in June 2015². Planning permission has been granted in this area for 200 houses or 220 houses and commercial development.
- 3.20 **Area of Search 10e** lies between Thaxted Road and Debden Road. The submission Local Plan (withdrawn January 2015) proposed to designate 7.8 hectares to the south of Lord Butler Leisure Centre and west of Thaxted Road to provide for rugby pitches, a running track, and additional facilities for a skateboard park (Policy Saffron Walden 1).
- 3.21 **Area of Search 10f** lies between Debden Road and Newport Road. Shortgrove Park Registered Historic Park lies outside the area of search to the south.
- 3.22 **Area of Search 10g** lies between Newport Road and Audley End Road. This area lies to the south of Saffron Walden County High School. Beechy Ride public bridleway passes through the area at the bottom of this valley landscape.
- Area of Search 11: Edge of Bishop's Stortford (urban extensions)**
- 3.23 An inset map of has been prepared (see Appendix D) which shows the potential for two Areas of Search.

¹ Uttlesford Local Plan Inspector's report, 19 December 2014, Paragraph 3.9

² Appeal ref: APP/C1570/A/14/2221494, DATED 2 June 2015 (Inspector: Mike Moore)

- 3.24 **Area of Search 11a** is located between the Stansted Road industrial estate in Bishop's Stortford and the A120 town bypass. Birchanger Wood County Wildlife Site lies outside the area of search to the south.
- 3.25 **Area of Search 11b** is located to the south of Beldams Lane in Bishop's Stortford, and north of the Sewage Treatment works. Bushy Mead County Wildlife Site lies outside the area of search on the opposite side of Hallingbury Road.
- 3.26 **Areas of Search 11a and 11b** are both designated Green Belt. An assessment should be carried out to assess the performance of the Uttlesford Green Belt against the five purposes of the Green Belt as set out in the NPPF (Paragraph 80). Following this, as part of work on the overall development strategy, the Council will need to make a decision about whether the exceptional circumstances exist (taking account of strategic considerations in the round) to merit release of any Green Belt.
- 3.27 Close working with East Hertfordshire District Council will be required to assess these areas of search and to ensure that the requirements of the Duty to Co-Operate are met.
- Area of Search 12: Great Dunmow (urban extensions)**
- 3.28 An inset map of Great Dunmow has been prepared (see Appendix C) which shows the potential for five Areas of Search around the town. Potential sites within the town will be considered through the Strategic Housing Land Availability Assessment (SHLAA).
- 3.29 **Area of Search 12a** is located between the A120 junction with the Stortford Road and Mill End. It includes the area of Ravens Farm. Hoglands Wood County Wildlife Site is located within the area, adjoining Great Dunmow. Adjoining the area to the east is Woodlands Park, where there is outstanding planning permission for around 925 dwellings still to be built. The southern part of the area has been granted permission for 790 dwellings (subject to the signing of a S106 obligation) West of Woodside Way (a recently constructed direct road link between the north and west sides of the town). A planning application to the north of this site has been called in by the Secretary of State for determination and a decision is anticipated during July 2015. The implications of this decision for the principles of development in the area will be carefully considered.
- 3.30 **Area of Search 12b** is located to the north of Great Dunmow in the Chelmer Valley as far as Church End. There is a Scheduled Monument (Parsonage Farm moated site) within this area. The northern part of Church End is a designated Conservation Area.

- 3.31 Note: the area between Church End and Great Dunmow comprises a recreation ground and protected area of open space and is not included within any areas of search.
- 3.32 **Area of Search 12c** is located in the area beyond St Edmunds Lane. The Merks Hall County Wildlife Site lies within the area of search. Permission for 22 custom-built units has been granted on appeal east of St. Edmunds Lane.
- 3.33 **Area of Search 12d** is located between Braintree Road and the A120. The northern part of the area includes Dunmow Park (private land). The southern part of the area includes a Sewage Treatment Works. The Flitch Way County Wildlife Site lies to the southern end of the area.
- 3.34 **Area of Search 12e** is located to the south of Ongar Road and north of the A120. Much of this land already has planning permission, including permission granted for 370 homes West of Chelmsford Road together with a retail store, and 100 homes south of Ongar Road. The area also includes some land north of Ongar road, part of which has been granted planning permission for 73 homes.
- 3.35 **Area of Search 12f** is located between the A120 and the B1256 Stortford Road. This area is bisected east-west by the Flitch Way, and there are a number of woodland blocks including Olives Wood, Ash Grove, and Oak Spring County Wildlife Sites.

Area of Search 13: Key Villages (village extensions/small sites)

- 3.36 There are seven Key Villages: Elsenham, Great Chesterford, Hatfield Heath, Newport, Stansted Mountfitchet, Takeley, and Thaxted. There have been a number of planning permissions granted recently in these villages. An assessment of the Green Belt will be needed for Hatfield Heath against the five purposes of Green Belt set out in the NPPF (Paragraph 80).

Area of Search 14: 'Type A' Villages (small sites)

- 3.37 There are 20 Type A villages as shown on the map of Areas of Search at Appendix A. There are many detailed local considerations which will need to be taken into account when assessing the potential of the 'Type A' Villages to contribute towards meeting housing needs. Further consideration will be given to how this will be undertaken in due course.

4. Scenario Building

- 4.1 It is very unlikely that, following assessment, all the areas of search will be found suitable, or will be necessary to meet objectively assessed levels of housing need. Having identified the initial areas of search, the next stage is to scope out some potential combinations of areas which could provide alternative options in the context of a given level of Local Plan development.

Level of development

- 4.2 Three different levels of development are proposed. The first level, of 580 dwellings per year, is based on the comments of the Uttlesford Local Plan Inspector in his report on the (withdrawn) Submission Local Plan in December 2014.
- 4.3 A higher level of development is proposed for testing purposes. This is considered necessary in order to ensure that the plan has tested the implications. This is necessary to ensure that the plan is properly justified. It is also important to test a higher level of growth in case of changes in population projections during the preparation of the plan.
- 4.4 Jointly with East Hertfordshire, Harlow, and Epping Forest Districts, the Council has commissioned a Strategic Housing Market Assessment (SHMA) to cover the M11 Housing Market Area. This is expected to report soon, and it should provide a figure of Objectively Assessed Need (OAN) for each District. Following careful consideration of the SHMA it will be necessary to review the level of growth set out in the scenarios to reflect the updated evidence.

A framework and a starting point

- 4.5 The scenarios presented below should not be mistaken for a 'menu' of options from amongst which the Council can choose a single one. Whilst residents, District Councillors, and others may indicate a preference for one or other scenario now, it is only upon completion of a review of the evidence over the coming months that the Council will be in a position to make an evidence-based decision, including on vital matters of deliverability.
- 4.6 The scenarios are limited in that at this stage until assessment has been carried out it is not possible to take a view in relation to the pace and phasing of development, which is a crucial in order to deliver a continuous flow of development over the plan period.
- 4.7 The scenarios should therefore be understood as a tentative first step towards understanding the implications of the levels of growth that the Council needs to plan for.

4.8 The scenarios set out below are not the only possible combinations of options from amongst the areas of search. It is important to limit the number of scenarios in order to provide a focused and distinct set of alternatives, which can then be subject to sustainability appraisal. This is a legal requirement of the Strategic Environmental Assessment (SEA) Directive.

Scenarios A to D (580 dwellings per year)

4.9 The following scenarios are based on an assumed level of growth at 580 dwellings per year. Extant permissions granted for around 5000 dwellings are common to all options. A windfall allowance³ of 50 dwellings per year or 750 over 15 years has been made. This approach was endorsed by the Local Plan inspector in his report of December 2014.

Table 2: Scenarios A-D (assuming District-wide provision of 580 per year or 8,700 over 15 years)

	Scenario A	Scenario B	Scenario C	Scenario D
Location	New settlement	Villages and BS	Towns	Hybrid
Extant permissions	5000	5000	5000	5000
Windfall allowance	750	750	750	750
Edge of Bishop's Stortford	0	500	0	500
Great Dunmow	0	0	1500	500
Saffron Walden	0	0	1500	500
Key Villages	0	1500	0	500
Type A Villages	0	1000	0	500
New settlement	3000	0	0	500
TOTAL	8750	8750	8750	8750

Scenario A: Focus on a new settlement (580 per year)

4.10 Under this scenario all the development would be focused on a single new settlement. The scale of the new settlement could ultimately reach 10,000 or more dwellings. However, applying reasonable assumptions of construction rates at around 300 dwellings per year, 3,000 dwellings could be completed by 2033, with the remainder of construction in the next 15-year plan period.

Scenario B: Focus on Villages and the edge of Bishop's Stortford (580 per year)

4.11 One possible method of distributing development amongst the villages would be to direct a higher level of development to the seven key villages and a lower level of development to the twenty 'Type A' villages. For illustrative

³ According to the Glossary in the National Planning Policy Framework, windfall means "Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available."

purposes, if assessment suggested the potential capacity for 1500 dwellings in the Key Villages, and this were distributed evenly between all seven, this would result in around 215 new dwellings per key village. If assessment suggested that there was potential for 1000 dwellings in the 20 Type A villages, this would result in 50 dwellings per village. In practice it is unlikely that villages will all have the same level of capacity and variations between the villages would need to be taken into account.

- 4.12 Bishop's Stortford lies within East Hertfordshire District, but the boundary of Uttlesford District directly adjoins part of the town. Subject to assessment, there may be the potential for a limited amount of development in the two areas of search identified here, perhaps in the region of 500 dwellings in total.

Scenario C: Focus on Towns (580 per year)

- 4.13 The towns of Saffron Walden and Great Dunmow are the main centres of population and services in the district. This scenario would see 1500 dwellings provided in each town. Both towns have accommodated considerable levels of development in recent years and there are extant planning permissions for significant amounts of further development. Careful consideration will need to be given to the character and setting of the towns, and also the capacity to expand existing services and facilities, such as schools and GP provision.

Scenario D: Hybrid Option 1 (580 per year)

- 4.14 This option would see development spread between towns and villages, and an assumption is made that a start could be made on delivery of housing at a new settlement towards the end of the plan period, with the majority of construction taking place after 2033. This scenario may be considered reasonable if assessment of a new settlement shows that there is no realistic prospect of early delivery.

Scenarios E-G (750 dwellings per year)

- 4.15 The following scenarios are based on the higher level growth assumption. The same common assumptions relating to extant permissions and windfall apply as under scenarios A-D.

Table 3: Scenarios E-G (assuming 750 dwellings per year or 11,250 over 15 years)

	Scenario E	Scenario F	Scenario G
Location	Two new settlements	Towns and Villages	Hybrid 2
Extant permissions	5000	5000	5000
Windfall allowance (50 per year)	750	750	750
Edge of Bishop's Stortford	0	500	500
Great Dunmow	0	1500	1000
Saffron Walden	0	1500	1000
Key Villages	0	1500	1000
Type A Villages	0	1000	1000
New settlements	6000	0	1500
TOTAL	11,750	11,750	11,750

Scenario E: Two New Settlements

- 4.16 This scenario is very similar to Scenario A but includes two new settlements, each developed at a rate of around 300 dwellings per year, reflecting the higher level of development needed to meet a higher District-wide housing requirement.

Scenario F: Towns and Villages

- 4.17 This scenario is a combination of scenarios B and C, reflecting the higher District-wide housing requirement under this scenario.

Scenario G: Hybrid Option 2

- 4.18 This scenario is similar to Scenario F but the introduction of a new settlement takes some of the pressure off the towns and villages.

Scenario H: No additional Local Plan provision

- 4.19 This scenario fails to meet the housing requirement. This scenario is not considered realistic because it would fail to meet national policy requirements for positive planning and the Council would not be able to demonstrate that it had made every effort to meet objectively assessed needs for development. It is very unlikely that such a plan would be found sound by a Planning Inspector following examination. Such a plan would result in a prolonged period of planning by appeal across the District in the absence of a five-year housing land supply.

Table 4: Scenario H: No additional Local Plan provision beyond existing permissions and windfall allowance.

	Scenario H
Location	No additional provision
Extant permissions	5000
Windfall allowance (50 per year)	750
Bishop's Stortford	0
Great Dunmow	0
Saffron Walden	0
Key Villages	0
Type A Villages	0
New settlements	0
TOTAL	5750

5. Next Steps

- 5.1 The above work provides a reasonable starting point and framework for initial consideration by Members, prior to the commencement of any work on formulation of the Local Plan. Members may comment on any aspect of the work presented here by emailing planningpolicy@uttlesford.gov.uk. These comments will then be taken into account before this work is revisited at the next Working Group meeting prior to public consultation.
- 5.2 It is proposed that the areas of search and the scenarios presented here will form the basis of a public consultation in the autumn, subject to any amendments and updates arising from initial input from Members and any updates needed as a result of the publication of the Strategic Housing Market Assessment.
- 5.3 The areas of search and scenarios will be provided to the Sustainability Appraisal consultants for appraisal using the framework contained within the SA Scoping Report. This document will be presented to Members at the next Working Group meeting, and it is proposed that this will form part of the supporting documentation published for public consultation.
- 5.4 The Work Plan considered by the Working Group on 13 July set out the overarching approach. Within the context of the overall Work Plan there are a significant number of sub-tasks which will need to be considered and the implications of this in terms of the assessment process will need to be made. A selection of key questions which will need to be addressed are set out below.

What are the local constraints and opportunities associated with each area?

- 5.5 With the assistance of the relevant specialists, work is currently underway to gather together all the available data across the District. This includes for existing, mapped data relating to the historic environment and ecological assets, agricultural land, environmental quality, traffic and transport, and policy designations used by both the District and County Councils. It will include qualitative as well as quantitative data, for example relating to landscape and historic character.
- 5.6 This data will be assembled and will provide a significant resource which the Council can draw upon. An audit of the available data will identify any gaps which may need to be filled through further evidence gathering. Consideration will then need to be given to whether assets may be preserved through layout and masterplanning or whether the evidence suggests that development should be restricted.

What provision will be made for on and off-site infrastructure?

- 5.7 In general, the larger the development, the more infrastructure can be provided on-site.
- 5.8 Small developments tend to rely on capacity within existing infrastructure nearby. The advantage of a Local Plan is that it can provide a framework for consideration of the cumulative impact of lots of small sites on existing infrastructure. It is anticipated that in most cases the existing capacity or expansion potential of infrastructure, such as schools and GP surgeries, will be limited. However, the requirement on Councils to 'make every effort' means that it must be clearly demonstrated whether or not capacity can be made available.
- 5.9 Large and small developments together can cumulatively create strains on off-site strategic infrastructure serving a wide area. In the case of secondary schools, hospitals, and transport in particular, this can often be a cross-boundary strategic planning issue requiring joint consideration with neighbouring authorities.
- 5.10 Provision of utilities, in particular the feasibility and costs of construction of new sewage treatment facilities and connection to existing treatment works, will need to be assessed in conjunction with the relevant statutory undertakers and the prospects for obtaining the necessary discharge consents will need to be agreed with the Environment Agency.

Is there a realistic prospect of delivery on the proposed timeline?

- 5.11 Prior to submission of the plan to the Planning Inspectorate for examination, it will be necessary to have identified proposals from landowners and developers, particularly for the first five years. This is necessary in order to demonstrate that the plan is effective (i.e. deliverable).
- 5.12 If the Local Plan process identifies suitable sites which the landowner has not expressed an interest in developing, a view will need to be reached on how far the Council is able to risk a delay to the plan whilst talks with the landowner proceed.
- 5.13 The Local Plan must demonstrate that it will provide a continuous supply of development throughout the plan period. The date when such a development could realistically begin to deliver housing completions, and the pace at which this can be maintained, will need to be carefully considered.
- 5.14 Consideration will need to be given to any site abnormalities such as site preparation, ground conditions, potential requirements for mineral extraction, and trigger points for housing delivery taking account of on and off-site infrastructure provision.

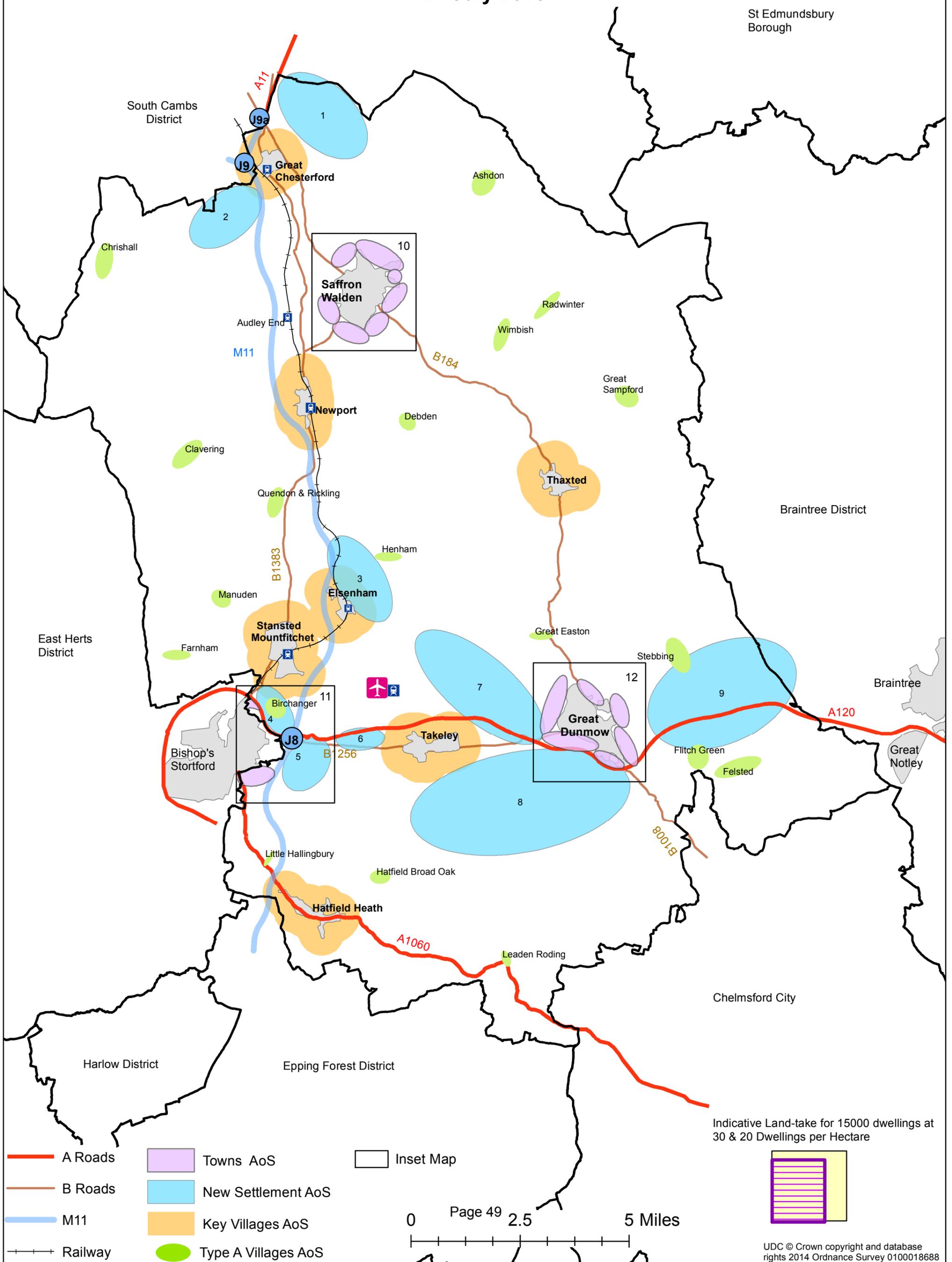
- 5.15 Careful consideration will need to be given to issues which may impact on deliverability. For example, one major difficulty with 2014 Submission Local Plan was the issue of the railway crossing at Elsenham, which closes for approximately 20 minutes every hour for trains to pass. The Uttlesford Local Plan Inspector commented that *“the future policy of Network Rail towards the continued existence of the crossing appears to be full of uncertainty... Opportunity to build in satisfactory integration between the two parts of the village would have been lost”* (19 December 2014, Paragraphs 2.6-2.7).

Does the plan rest on a coherent strategy and vision⁴ for managing development?

- 5.16 The plan should have a credible strategy and vision for jobs, housing, infrastructure and facilities across the District, taking account of the wider context and economic geography of the area and its key relationships with other areas. This strategy will be high-level and proportionate, providing a framework for planning applications rather than a detailed blueprint.
- 5.17 The vision should be informed by inputs from the local community, businesses, and other stakeholders. District Councillors have a crucial role to play in terms of obtaining this feedback and plugging it into the plan-making process.

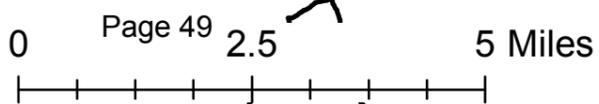
⁴ For further information see the report entitled “Towards a Fresh Vision of the District in 2033”, considered by the Planning Policy Working Group on 13 July 2015: www.uttlesford.gov.uk/ppwg

Uttlesford Local Plan Initial Areas of Search (AoS) for assessment 27 July 2015

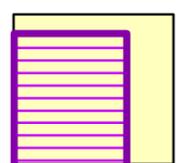


-  A Roads
-  B Roads
-  M11
-  Railway
-  Towns AoS
-  New Settlement AoS
-  Key Villages AoS
-  Type A Villages AoS

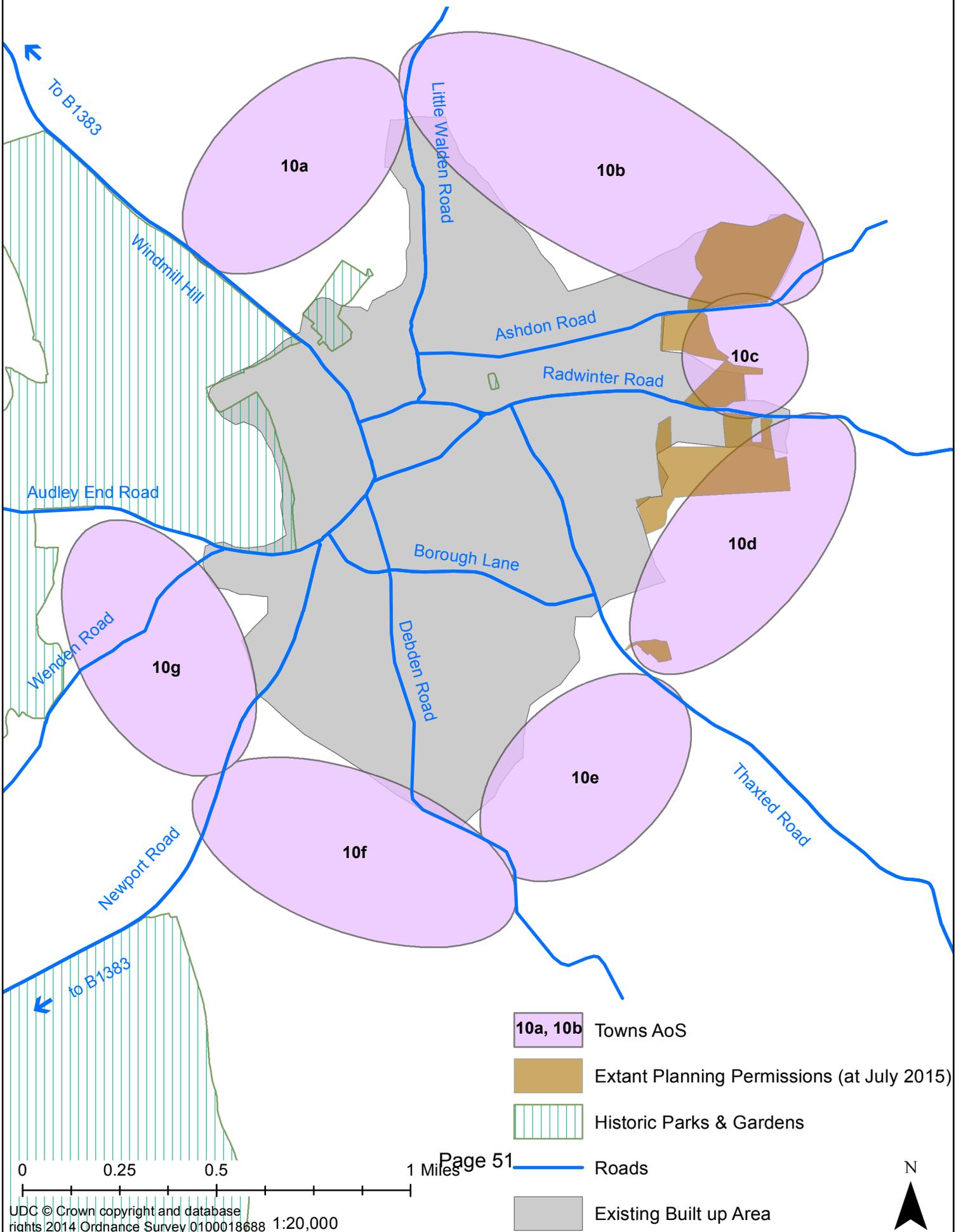
 Inset Map



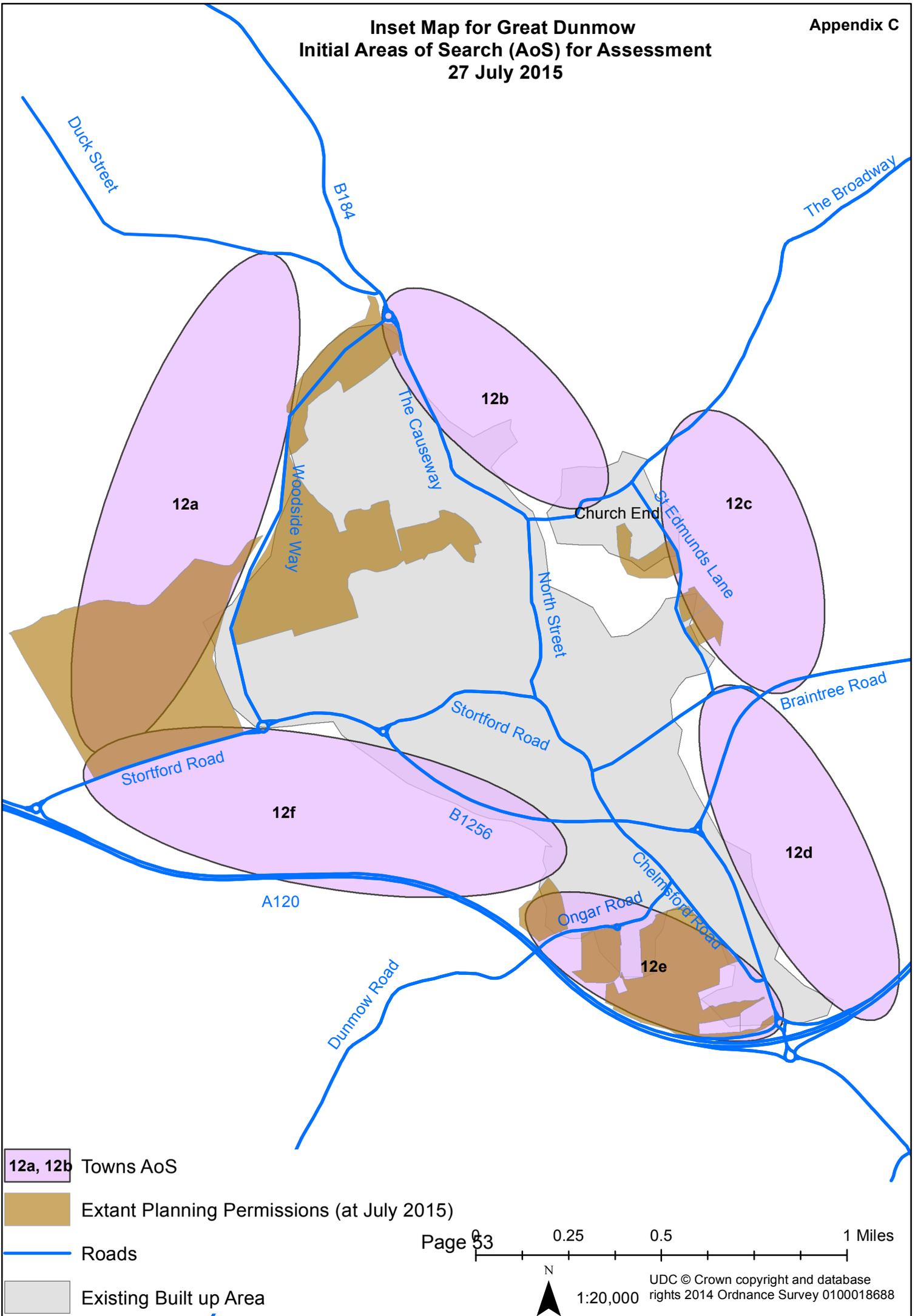
Indicative Land-take for 15000 dwellings at 30 & 20 Dwellings per Hectare



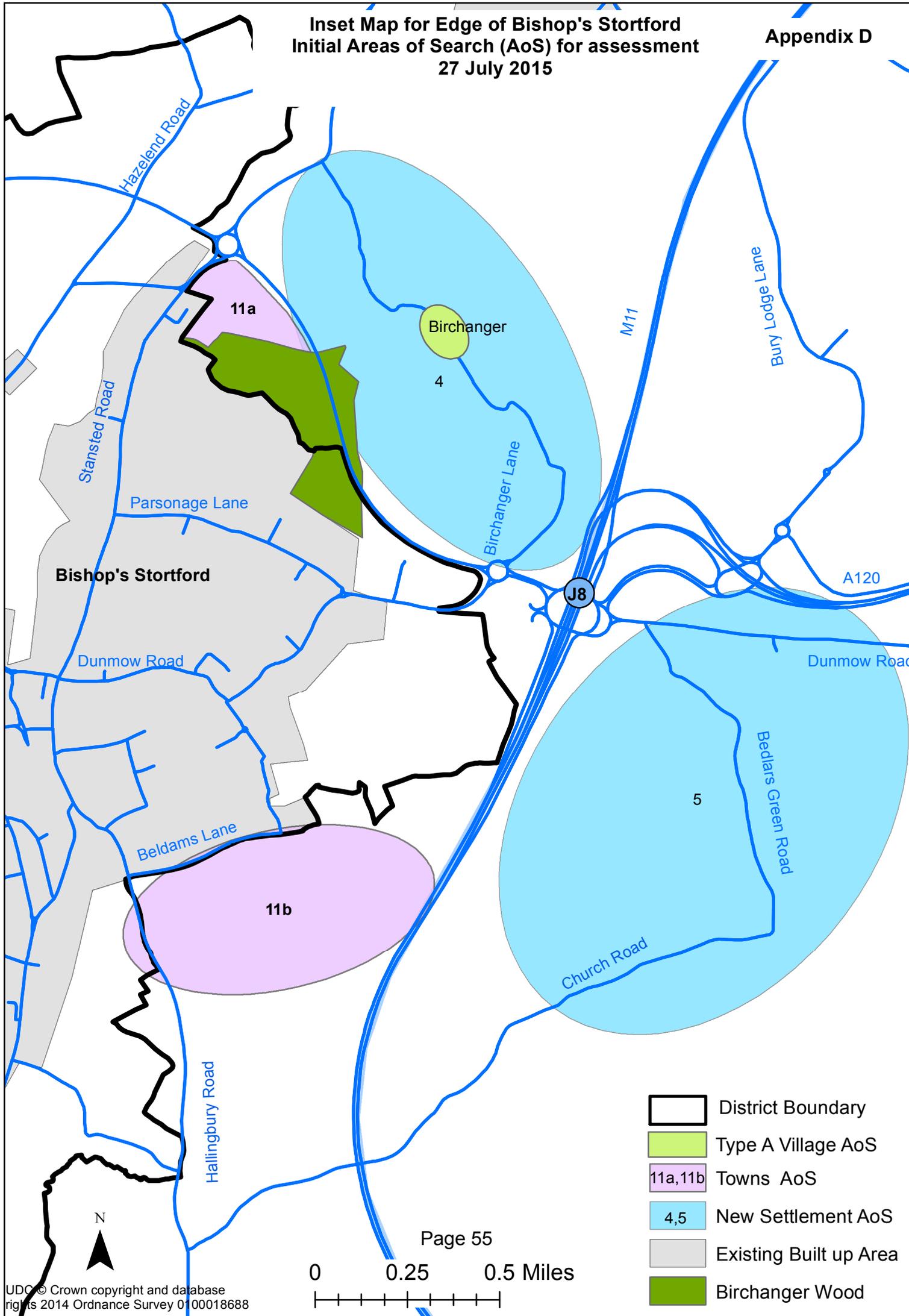
Inset Map for Saffron Walden
Initial Areas of Search (AoS) for Assessment
27 July 2015



Inset Map for Great Dunmow
Initial Areas of Search (AoS) for Assessment
27 July 2015



**Inset Map for Edge of Bishop's Stortford
Initial Areas of Search (AoS) for assessment
27 July 2015**



-  District Boundary
-  Type A Village AoS
-  11a,11b Towns AoS
-  4,5 New Settlement AoS
-  Existing Built up Area
-  Birchanger Wood

Committee: Planning Policy Working Group

Agenda Item

Date: 27 July 2015

6

Title: Sustainability Appraisal Scoping Report

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

Summary

1. The purpose of a Sustainability Appraisal is to improve the quality of the Local Plan by assessing its policies and proposals in a consistent and transparent manner and testing them against alternatives. It is an essential part of the Local Plan process and is produced in parallel with the Local Plan.
2. The first stage in preparing a Sustainability Appraisal is to produce a Scoping Report. This sets out the 'baseline data' and sustainability criteria against which the alternative options will be appraised.
3. There are currently two Scoping Reports. One published in 2011 for the Local Plan and one published in 2014 for the Gypsy and Traveller Site Allocations DPD. The Council is now producing a new Local Plan which will incorporate Gypsy and Traveller site allocations and therefore a new Scoping Report has been prepared for consultation. A new Scoping Report can also incorporate any changes to other relevant policies, plans and programmes, sustainability objectives and baseline information.
4. The first sustainability appraisal using the criteria and framework set out in the scoping report will be of the Areas of Search and Scenarios.

Recommendations

5. That the Draft Scoping report is published for consultation in accordance with the Statement of Community Involvement.

Financial Implications

6. To be met within existing budgets.

Background Papers

7. 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

- 8.

Communication/Consultation	The Scoping Report will be published for consultation in accordance with the directive and the Statement of Community Involvement
Community Safety	N/A
Equalities	The Local Plan will be subject to an Equalities Impact Assessment.
Health and Safety	N/A
Human Rights/Legal Implications	Producing an SA/SEA is national and international requirement.
Sustainability	The purpose of the Scoping Report is to set the framework to assess the sustainability of the Local Plan policies.
Ward-specific impacts	All
Workforce/Workplace	N/A

Situation

9. The requirement for a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) emanates from a national and international commitment to sustainable development as explained in Section 2.1 of the Scoping Report. The SEA originates from a European Directive requiring an assessment of the effects of certain plans and programmes on the environment. The Directive was transposed into English legislation in 2004. An SA is required by the Planning and Compulsory Purchase Act 2004. It examines the effects of proposed plans and programmes in a wider context, considering all the likely significant effects on the environment, economic and social factors. Whilst the requirements to produce a SA and SEA are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach, hereinafter known as a Sustainability Appraisal.
10. A Sustainability Appraisal (SA) will be undertaken at each key stage in the Local Plan preparation as illustrated at section 2.2 of the Scoping Report in a flow chart taken from the Planning Practice Guidance on Strategic Environmental Assessment and Sustainability Appraisal. This illustrates the iterative nature of the sustainability appraisal process, informing the development of the Local Plan at each stage.
11. At each stage that the Council produces a document for consultation, starting with broad areas of search to the final Local Plan submitted for Examination it will have been subject to a sustainability appraisal to assess how the strategy, policy or site performs against the sustainability objectives, whether there are

any significant effects and mitigation measures which would lead to sustainability improvements. The results of the assessment at each stage will help the Council in developing preferred strategies and sites, in assessing reasonable alternatives, and refining policies to take forward into the next stage. At the conclusion of the process there will be a clear audit trail of how the Council arrived at its strategies, policies and sites, the selection of the alternatives considered and why reasonable alternatives were rejected.

12. A Sustainability Appraisal is not an exact science. It involves a balance of value judgments about how we manage the impact of the Local Plan on the environment.
13. The Scoping Report is the first step in the SA (Stage A) and establishes a framework for carrying out the SA of the Local Plan. It presents the proposed structure and knowledge base for the appraisal.
14. The scoping report includes a set of sustainability objectives which cover social, environmental and economic factors. They are listed in Table 2 (paragraph 3.4) of the scoping report.
15. The scoping report sets out the various sustainability frameworks necessary for the assessment of the emerging Local Plan's vision, objectives, spatial strategies, policies and site allocations. For these purposes, separate approaches and / or assessment frameworks have been developed.

A) The Appraisal of Broad Areas of Search and Strategic Scenarios (section 4.1)

16. The assessment of Broad 'Areas of Search' and Strategic Scenarios has to reflect the strategic nature and scope of such areas. The appraisal will take the form of a narrative exploring the sustainability of each within known existing constraints and opportunities relevant to the general notion of the 13 identified Sustainability Objectives and on a broadly comparable basis.

B) The Appraisal of Policies (Section 4.2)

17. For each objective there are a number of key questions which are posed against the Local Plan policy. By answering these questions, the appraisal will be able to evaluate, in a clear and consistent manner, the nature and degree of impact, and whether significant effects are likely to emerge from the Plan's proposed policies. Table 4 (page 37) sets out the Key Questions.

C) The Appraisal of Sites (Section 4.3)

18. A slightly different approach is taken when it comes to assessing sites. Table 6 sets out a pro-forma which asks questions about sites which unlike the appraisal of policies includes spatial questions. For instance it asks about the site's location to designated sites (eg SSSI), and identified sites or zones (eg waste management facility, flood risk area); about the site's existing use or designation; it's proposed use and type of development. This is not intended to be a detailed project-level assessment of each site but a strategic level assessment, highlighting those broad impacts of the sites to inform the plan

making process. It is this part of the SA which overlaps with assessing the suitability of sites through the Strategic Housing Land Availability Assessment.

D) Appraisal of Strategic Sites/New Settlements (Section 4.4)

19. The appraisals of strategic sites/new settlements reflect the wider impact of such developments. The appraisal of strategic growth locations responds to their role as potential strategic allocations in line with the District’s objectively assessed need and Spatial Strategy options. This approach will enable alternative sites of a comparable scale within the District to be explored in line with the Local Plan context, encompassing additional broad sustainability criteria relevant to Garden Development principles in order to determine whether the most appropriate and sustainable sites and proposals are being progressed to the next stage.

E) Appraisal of Gypsy and Traveller sites. (section 4.5)

20. A framework which reflects the specific requirements of such sites as set out in Planning Policy for Traveller Sites (DCLG 2012) and Good Practice Guide on Designing Gypsy and Traveller sites (DCLG 2008) is used for Gypsy and Traveller sites and these are set out in Tables 8 and 9 (pages 68 and 72 respectively).
21. To comply with the SEA directive the Scoping Report and annexes will need to be published for a 6 week period of consultation with the three statutory consultation bodies (the Environment Agency, Natural England and Historic England) on the scope and level of detail within this report from which the Sustainability Appraisal is based. Other organisations listed on the Statement of Community Involvement (June 2015), Highways England and Essex County Council will also be directly consulted with. The documents will also be made available on the Uttlesford District Council’s website for wider consultation. The final Scoping Report will take into account the representations received and the framework will be used in the next stage of the Local Plan process which will be the Sustainability Appraisal of the Areas of Search. Details of the representations received and the response will be set out the Environment Report of that Sustainability Appraisal.

Risk Analysis

22.

Risk	Likelihood	Impact	Mitigating actions
That SA procedure has not been correctly followed	1. The Council is learning from its previous SA and taking on board advice sought from Planning Advisory	3. Local Plan found unsound	To seek advice from appropriate bodies such as Planning Advisory Service.

	Service.		
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- 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 Local Plan

**Sustainability Appraisal (SA) & Strategic Environmental
Assessment (SEA)**

Scoping Report - DRAFT FOR MEMBERS

July 2015

DRAFT

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Annexes

Annex A: Plans and Programmes

Annex B: Baseline Information

Glossary of Acronyms

ANGSt	Accessible Natural Greenspace Standard
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BARR	Buildings At Risk Register
CAMS	Catchment Abstraction Management Strategies
CPZ	Countryside Protection Zone
DCLG	Department for Communities and Local Government
DEFRA	Department for Environment, Food and Rural Affairs
DETR	Department of the Environment, Transport and the Regions
DPD	Development Plan Document
DSCF	Department for Schools, Children and Families
EA	Environment Agency
EC	European Community
ECC	Essex County Council
EEC	European Economic Community
EHER	Essex Historic Environment Record
EU	European Union
IMD	Index of Multiple Deprivations
JSA	Jobseekers Allowance
KSI	Killed or Seriously Injured
LDD	Local Development Document
LDF	Local Development Framework
LoWS	Local Wildlife Sites
MPS	Minerals Planning Statement
NAQS	National Air Quality Standards
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
ONS	Office for National Statistics
PAS	Planning Advisory Service
PDL	Previously Developed Land
PPG	Planning Policy Guidance

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PPS	Planning Policy Statement
PSA	Public Service Agreement
SA	Sustainability Appraisal
SA/SEA	Sustainability Appraisal incorporating the Strategic Environmental Assessment
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment (2013/14)
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
TPO	Tree Preservation Order
WDD	Waste Development Document

1 Introduction

1.1 Background

Uttlesford District Council commissioned Place Services of Essex County Council to undertake an independent Sustainability Appraisal (SA) on the Uttlesford Local Plan.

1.2 The Local Plan

The Uttlesford Local Plan (referred to hereafter as the Plan) responds to a national requirement that Local Planning Authorities (LPAs) must set planning policies in a local authority area. Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework.

The local plan will contain:

- The Council's vision, objectives and the spatial strategy for the future development of the district.
- Strategic Policies – policies which provide the overarching framework for planning decisions within the district
- Site Allocations Policies – covering detailed aspects of site delivery
- Development Management Policies – detailed policies against which planning applications will be considered.
- Gypsy and Traveller site allocations policies – specific policies covering the sites needed to deliver the required pitches and include e.g. access, design principles, landscaping.
- Policies Map and Key Diagram - The policies map will show all the policies and proposals and identify areas of protection on an Ordnance Survey base. The key diagram will illustrate the proposals.

In line with the National Planning Policy Framework, the Local Plan should be clear in setting out the strategic priorities for the area and the policies that address these, and which also provide the strategic framework within which any neighbourhood plans may be prepared to shape development at the community level.

2 Sustainability Appraisal / Strategic Environmental Assessment

2.1 The Requirement for Sustainability Appraisal

The requirement for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) emanates from a high level national and international commitment to sustainable development. The most commonly used definition of sustainable development is that drawn up by the World Trade Commission on Environment and Development in 1987 which states that sustainable development is:

‘development that meets the needs of the present without compromising the ability of future generations to meet their own needs.’

This definition is consistent with the themes of the NPPF, which draws upon The UK Sustainable Development Strategy Securing the Future’s five ‘guiding principles’ of sustainable development: living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

SEA originates from the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the ‘SEA Directive’) which came into force in 2001. It seeks to increase the level of protection for the environment; integrate environmental considerations into the preparation and adoption of plans and programmes; and promote sustainable development.

The Directive was transposed into English legislation in 2004 by the Environmental Assessment of Plans and Programmes Regulations (the ‘SEA Regulation’) which requires an SEA to be carried out for plans or programmes

‘subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and required by legislative, regulatory or administrative provisions’.

This includes Local Plans. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as *‘biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors’* as specified in Annex 1(f) of the Directive.

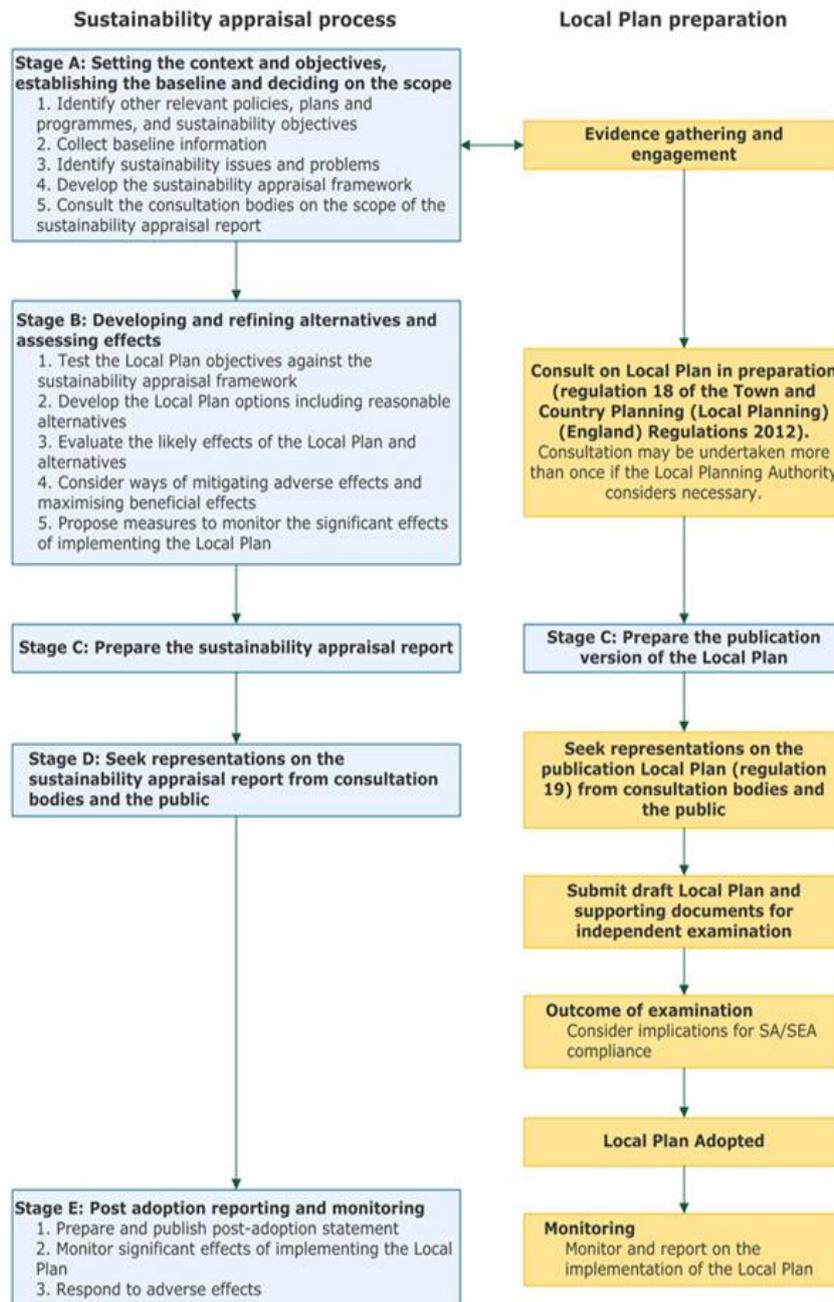
SA examines the effects of proposed plans and programmes in a wider context, taking into account economic, social and environmental considerations in order to promote sustainable development. It is mandatory for Local Plans to undergo a Sustainability Appraisal in accordance with the Planning and Compulsory Purchase Act 2004 as amended by the Planning Act 2008, and in accordance with paragraph 165 of the NPPF.

Whilst the requirements to produce a SA and SEA are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach providing that the requirements of the SEA Directive are met. This integrated appraisal process will hereafter be referred to as SA.

2.2 Background

The methodology adopted for the SA of the Uttlesford Local Plan at this stage follows that of the Sustainability Appraisal process. The following 5 sequential stages are documented below.

Figure 1: Stages in the Sustainability Appraisal Process and Local Plan Preparation



2.3 The Aim and Structure of this Report

This Scoping Report responds to Stage A in the SA process and sets the context and objectives of the SA, establishes the baseline and decides on the scope of the forthcoming Environment Report. There are 2 annexes to this Scoping Report which contain the supporting evidence.

SA Scoping Report – July 2015

Annex A contains a review of relevant plans and programmes.

Annex B contains the baseline information.

3 Sustainability Context, Baseline and Objectives

3.1 Introduction

The following section outlines the key findings of this Scoping Report which includes an outline of the plans and programmes, the baseline information profile for the Plan Area, together with the Sustainability Objectives and Site Pro forma formulated.

3.2 Plans and Programmes (Stage A1)

The Plan must comply with existing policies, plans and programmes at national and local levels and strengthen and support other local plans and strategies. It is therefore important to identify and review those policies, plans and programmes and sustainability objectives which are likely to influence the Plan. Local supporting documents which form the evidence base of the higher level planning documents have also been included within this list where relevant as they will shape policies and decisions in the District.

The plans and programmes have been categorised by a hierarchy of influence from national to sub-national to local however, it must be noted that no list of plans and programmes can be definitive. International Agreements and European Directives are transposed into complementary UK legislation and policy to ensure their objectives can be achieved; therefore the review need not go above the national level. Table 1 outlines the key documents, whilst a comprehensive description of these documents together with their relevance to the Plan is provided within Annex A.

Table 1: Key Documents

National Plans and Programmes
Planning Practice Guidance (updated)
The Localism Act 2011
National Planning Policy Framework (March 2012)
The Future of Air Transport White Paper (December 2003) (to be superseded by Developing a sustainable framework for UK aviation once adopted)
Developing a sustainable framework for UK aviation - Scoping document (March 2011)
Building a Greener Future: Policy Statement (July 2007)
Community Infrastructure Levy An Overview, CLG (9th May 2011)
Underground, Under Threat - Groundwater protection: policy and practice (GP3)
Model Procedures for the Management of Land Contamination – Contaminated Land Report 11 (September 2004)
Natural Environment and Rural Communities Act 2006

Countryside and Rights of Way Act 2000
Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
Planning and Compulsory Purchase Act 2004
The Conservation of Habitats and Species Regulations, 2010
Sub-national Plans and Programmes
Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment – on behalf of EPOA (July 2014)
Essex Local Transport Plan 2011 (LTP3)
ECC Development Management Policies Adopted by UDC (February 2011)
ECC Parking Standards: Design and Good Practice Adopted by UDC (September 2009)
Essex Wildlife Trust Living Landscape Statements
Leading the way forward: Surface Access Strategy for Stansted 2008-2015
2011 Essex Biodiversity Action Plan
Commissioning School Places in Essex 2014-2019
Stansted Airport Environmental Noise Directive Noise Action Plan 2010-2015 - Draft for Consultation (June 2009)
River Basin Management Plan Anglian River Basin District (draft 2015)
River Basin Management Plan Thames River Basin District (draft 2015)
Essex Wildlife Trust Living Landscape plans
The Essex Local Area Agreement – ‘Health and Opportunity for the People of Essex’ 2008 – 2011 (2010 Refresh)
Essex Rural Strategy: 2020 Vision for Rural Essex 2010
The Essex Strategy 2008 – 2018
Local Plans and Programmes
Uttlesford Adopted Local Plan (January 2005) + Saved Policy Direction (December 2007)
Uttlesford Pre-Submission Local Plan (2014) WITHDRAWN
Sustainability Appraisal of the Uttlesford Pre-Submission Local Plan (2014)
Uttlesford Cycling Strategy (ECC, October 2014)

Employer and Business Survey (CN Research, 2009)
Employment Land Review (UDC, 2011)
Employment Land Monitoring (UDC, October 2014)
Housing Strategy 2012-15 (Uttlesford District Council, 2012)
Infrastructure Development Plan (UDC, April 2014)
Local Wildlife Site Review (Essex Ecology Services, October 2007)
Open Space, Sport Facility and Playing Pitch Strategy (The Landscape Partnership, 2012)
Local Reports and Assessments
Assessment of Uttlesford District's Local Plan on Air Quality in Saffron Walden (2013)
Gypsy and Traveller Issues and Options Sustainability Appraisal (ECC, December 2014)
Habitats Regulation Assessment (UDC, April 2014)
Green Belt Boundary Scoping Report (Uttlesford District Council, 2011)
Historic Settlement Character Assessment (Uttlesford District Council, 2007)
Affordable Housing Viability Assessment (Level, August 2010 & update 2012)
Demographic Forecasts Phases 1-6 (Edge Analytics, Quarter 1 - 2015)
Developer Contribution Guidance Viability Testing (KIFT Consulting, February 2014)
Housing Supply as at 31 March 2014 (Uttlesford District Council, 2014)
Housing Supply Windfall Allowance (Uttlesford District Council, 2014)
Housing Trajectory and Five-Year Land Supply 2015 (Uttlesford District Council, 2015)
Objectively Assessed Housing Need, Technical Assessment (Uttlesford District Council, October 2013)
Sites Viability Assessment (BNP Paribas Real Estate, March 2014)
Strategic Housing Land Availability Assessment 2013
Strategic Housing Market Assessment (2012 [new assessment commissioned expected 2015])
Landscape Character Assessment (Chris Blandford Associates, September 2006)
Protected Lanes Assessment (Essex County Council, March 2012)
Renewable Energy Study of the District of the District (Altechnica, January 2008)

District Retail Study (Savills, 2012, 2014)
Uttlesford Strategic Flood Risk Assessment (JBA Consulting, March 2008)
Town and Village Profiles (Uttlesford District Council, January 2012)
Great Chesterford Cycle Route Feasibility Study (Essex Highways, April 2014)
Local Plan Highway Impact Assessment (Essex Highways, March 2014)
Uttlesford District Historic Environment Characterisation Project (Essex County Council, 2009)
Water Cycle Study (Hyder Consulting, January 2010 & November 2012)
The Draft Great Dunmow Neighbourhood Plan (and accompanying SEA) (Plan preparation ongoing)
Arkesden Parish plan (2009)
Ashdon Parish plan (2007)
Birchanger Parish Plan (2006)
Chrishall Parish Plan (2007)
Felsted Parish Plan (2014)
Great Canfield Village Design Statement (2010)
Great Chesterford Parish Plan (2015)
Great Dunmow Town Design Statement (2009)
Hadstock Parish Plan (2007)
Little Bardfield Village Design Statement (2009)
Littlebury Parish Plan (2009)
Newport Village Plan (2010)
Radwinter Parish Plan 2007-2012
Stansted Parish Plan (2011)
Thaxted Village Design Statement (2010)
Wendens Ambo Parish Plan (2012)
White Roding Parish Plan (2009)

3.3 Baseline Information (Stage A2)

Annex B details the complete Baseline Information profile for the plan area and where relevant the district relevant to the content of the Plan.

The following section outlines a summary of the key baseline information and therefore the current state of the environment for Uttlesford.

3.3.1 Economy and Employment

- The district has the highest rate of economic activity at 74.4% compared to the county, region and country. Job density in Uttlesford (0.84) is higher than across the county (0.74), region (0.78) and nation (0.80).
- Uttlesford District is predominantly rural in nature and as such a significant proportion of businesses are based within rural locations with only 15% defined as being urban based.
- 81.7% of the working population in Uttlesford District are in employment which is higher than sub-national and national employment levels. The proportion of the District's working population who are economically active but unemployed is 3.0% which is below sub-national and national unemployment figures.
- The District's Employment Land Review (ELR) expected to impact on employment land by identifying Stansted Airport as a prospective opportunity for growth despite BAA having withdrawn its planning application for a second runway. Despite this, it is worthy of note that the government has already granted planning permission to increase the use of the existing runway to 35 million passengers per year and this is expected to be implemented.
- Stansted Airport employed 10,860 people in 2009, and this is expected to rise to 16,800 following the proposed increase in runway usage.

3.3.2 Housing

- Since 2001 4,887 new dwellings have been completed, falling short of the requirement for housing set out in the SHLAA.
- There are 33,930 dwellings within Uttlesford District, 86.7% of which are privately owned.
- Over the period 2007-2021, there is a need for 4,200 (52%) units of market housing, 2,600 (32%) units of intermediate affordable housing and 1,300 (16%) units of social rented housing in the District.
- 2012/13 registered an increase in homeless acceptances to 43, aligning with national trends. There is also a demand for more Gypsy and Traveller sites in Uttlesford, totalling 26 additional sites by 2033.

3.3.3 Population and Society

- Uttlesford has experienced a faster rate of population growth (14.81%) when compared with county (6.18%), regional (8.11%) and national level (6.99%).
- At 77.1% a higher proportion of pupils within Uttlesford attained five or more A*-C grades at

key stage 4 (KS4) than the county, regional and national equivalent. 64.3% of pupils who gained five or more A*-C grades did so in English and Mathematics which is considerably more than the national proportion of 53.4%. The proportion of pupils attaining five or more A*-G grades was also above the national figure and only 0.4% of all pupils in the District didn't receive any passes at KS4.

- The population of Uttlesford District has in general more qualifications than the overall sub-national and national populations. 93.4% of the working age population of Uttlesford District which accounts for 46,700 people are qualified to at least level 1 or higher compared to 85.0% across Great Britain. Level 1 represents foundation GNVQ, NVQ 1 or up to 5 GCSEs at grades A*-C. The most significant difference is that Uttlesford has comparatively higher proportions of the population qualified at Level 3 and Level 4 and above. With 59.3% of the population having attained at least 2 or more A levels, advanced GNVQ, NVQ 3 or equivalent (level 3) and 35.6% achieving a higher national diploma, degree and higher degree level or equivalent (level 4). Uttlesford has a significantly higher skilled workforce in comparison to the county and a slightly higher proportion than the regional level.
- School age population numbers are projected to grow relatively slowly and school capacity within Uttlesford is expected to be sufficient to accommodate children in the District. Primary schools are predicted to have a surplus of 288 places for the 2018/19 academic year. Secondary schools are predicted to have a surplus of 415 for the same time period.
- Uttlesford has the lowest level of deprivation for a local authority within Greater Essex. Of the 326 local authorities within England Uttlesford ranks within the bottom 10% for the four measures – extent, local concentration, average score and average rank

3.3.4 Health

- Life expectancy of residents within Uttlesford District is higher than the regional and national averages with men living for an average of 81.8 years and women on average living 85.1 years. In general, life expectancy is increasing within the District and nationwide. The implications of this will mean that as people live longer there will be increased pressure on services for the elderly.
- The prevalence of child obesity within the District is 5.4% which is lower than the county average of 8.1% and considerably below the national average of 9.4%. Adult obesity is 18.2% within the District which is considerably below both the county average of 24.5% and the national average of 23.0%.
- The proportion of adults participating in 30 minutes, moderate intensity sport has decreased in the most recent survey at the local, sub-national and national levels. In the District 42.0% of those in the survey were active in sport between October 2013 and October 2014.
- Accessible Natural Greenspace Standard (ANGSt) created by Natural England sets out the minimum amount of accessible natural greenspace that any household should be within reach of. As much as 54% of households within Uttlesford do not have any access to natural greenspace. The District covers around 64,000ha of land but only 894ha of it is considered to be accessible natural greenspace.

3.3.5 Transport

- 90.4% of households in Uttlesford own at least one vehicle, a far higher percentage than for the East of England (82.3%) and for England and Wales (73.9%). The highest percentage

of residents own 2 cars or vans whereas in both the East of England and England and Wales the majority of the population owned 1 car or van.

- Uttlesford District has a higher proportion of residents driving to work by either car or van (46.34%) when compared to regional and national levels as well as a larger proportion of residents working from home (6.43%). This could be related to the District being mainly rural. There is also a higher usage of trains as a mode of transport within the District compared to the national trend but fewer residents cycle or travel by underground or on a bus, minibus or coach. The proportion of residents who walk to work is comparatively similar to the regional and national levels.
- The work destination attracting the highest proportion of Uttlesford residents was the City of London (10.9%). The next most popular destinations for employment were the neighbouring areas of Cambridge with 991 commuters (5.5%) and Harlow with 410 (2.3%).
- Accessibility is a general issue within Uttlesford District, with only just over one third of residents being within 15 minutes of an employment site or retail centre and 50% being within 15 minutes of a GP. Over four fifths of the population of Uttlesford District live within 30 minutes of a primary school. The proportion of residents with access to a secondary school within 30 minutes walking or public transport is significantly smaller at 60%.

3.3.6 Cultural Heritage

- The majority of archaeological sites and deposits in Uttlesford District remain buried, hidden and thus preserved. However, the known archaeological resource in the District is very varied and highly significant. There are approximately 4,064 in records of archaeological sites and finds recorded on the Essex Historic Environment Record (EHER) for Uttlesford District as of December 2010.
- There are 3,731 designated listed buildings within the District and the majority of them are grade II listed. This means they are nationally important and of special interest. 1.8% of all the listed buildings are considered to be of exceptional interest and internationally important (grade I) and 4.6% are classed as particularly important buildings of more than special interest (grade II*).
- There are 73 Scheduled Monuments within the District which represents 24.5% of all Scheduled Monuments within Essex. They range from prehistoric burial mounds to unusual examples of World War II defensive structures and have been designated due to their national importance. Audley End located west of Saffron Walden, is designated as a Scheduled Monument, as well as a landscape park and historic house.
- There are seven registered parks and gardens within Uttlesford District which have each been designated by English Heritage as being “a park or garden of special historic interest” and 36 conservation areas within Uttlesford District which are defined as historical settlements and buildings having ‘special architectural or historical interest, the character of which is desirable to preserve or enhance’.

3.3.7 Biodiversity and Nature Conservation

- The Essex Biodiversity Action Plan (EBAP) highlights 25 species and 10 habitat action plans covering Essex.
- There are no international or European designated sites within Uttlesford. Nationally

designated sites include 2 National Nature Reserves (NNRs) and 12 Sites of Special Scientific Interest (SSSIs). There are also 281 locally important nature conservation areas which are designated as Local Wildlife Sites (LoWSs).

- There is a Public Service Agreement (PSA) target of at least 95% of all nationally important wildlife sites being brought into favourable condition. 8 of the 12 sites in Uttlesford are meeting this target. Those not are Ashdon Meadows, Debden Waters, Hall's Quarry and High Wood, Dunmow. The majority of Hall's Quarry and Debden Waters SSSI areas are in favourable conditions, however they are not meeting the PSA target because of unfavourable conditions in other sections. 35.03% Hall's Quarry and 39.87% of Debden Waters SSSI are in an unfavourable condition and declining.
- In addition to designated sites, consideration should also be given to non-designated value in regards to ecology on a site-by-site basis in order to protect and enhance species and habitats, including those that are protected. This could include Greenfield sites and areas of habitat considered to enrich appreciably the habitat resource within the context of local areas, such as species-rich hedgerows, municipal parklands or individual veteran trees.

3.3.8 Landscapes

- There are eight Landscape Character Areas (LCAs) in Uttlesford District as defined in a Landscape Character Assessment relevant to the District and each one has a recognisable pattern of landscape characteristics. A more detailed landscape character assessment defined 20 smaller local LCAs within the eight previously defined. With the exception of one they were all identified as being between moderate to highly sensitive of change.
- There is a significant proportion of ancient woodland in the District. Hatfield Forest is an important survival of a medieval forest, comprising a mixture of wood pasture with pollards, coppice woods, timber trees, a warren, lodge and lake. The Uttlesford Local Plan identifies a wildlife corridor of Ancient Woodland to the north-west of the settlement.
- Protected lanes have significant historic and landscape values and because of their age they often have significant biological value too. There are a number of both grade one and two protected lanes within the District.
- More than 60 verges have been designated as being Special Roadside Nature Reserves in the District. They are considered important for their ecological value as they contain rare or uncommon fauna and act as corridors interlinking fragmented or isolated habitats.

3.3.9 Water Environment

- None of the rivers in the Roding, Beam and Ingreborne catchment currently achieve good or better ecological or biological status/potential now. A total of 67% are classified as having poor biological status, and 11 % of the assessed river water bodies have bad status. By 2015 the status for at least one element was expected to have improved by 31% which is second to the Upper Lee catchment, also in the Thames region, where 44% should improve over the same timescale. 16% of rivers in this catchment currently achieve good or better ecological status/potential and 10% have good or high biological status now, with 62% at poor biological status, but none classed as bad status. The Cam and Ely Ouse and Combined Essex catchments achieve higher percentages of water bodies with at least good biological status at over 27% and 33% respectively but Combined Essex catchment reported only 7% of water bodies achieving good ecological status/potential.

- Of all the river courses in the District, the Cam and Ely Ouse displayed the highest percentage assessed at good chemical status and good overall status including chemical and ecological at 94% and 17% respectively. However, the Upper Lee catchment was predicted to register the highest % improvement for one or more element in the river of 44% by 2015.
- Surface water flooding risk in the District was highlighted through the modelling of surface water in Saffron Walden, Great Dunmow and Stansted Mountfitchet, which identified drainage paths and potential areas that may be susceptible to surface water ponding. In numerous locations surface water reaches depths of more than 60 cm.
- A 2008 SFRA was undertaken to accompany the District's Local Plan. The SFRA is a planning tool that enables the council to select and develop sustainable site allocations away from vulnerable flood risk areas. The SFRA will assist the council to make the spatial planning decisions required to inform the Local Plan and contained recommendations. In regards to land use planning, water quality raises a range of challenges from development, including point source pollution from required sewage treatment, water abstraction to supply people and industry and diffuse pollution from urban sources.

3.3.10 Climate and Energy

- More than half the District's 2,808.9GWh energy consumption is from petroleum products which are a result of transport, domestic and commercial industries (66.20%). In contrast only 15.9GWh of energy consumed is from bioenergy and waste products. This is the second highest percentage of total energy consumption from renewable sources (0.57%) compared with neighbouring areas, second to Maldon (0.92%).
- The transport industry is responsible for the majority of CO₂ emissions within Uttlesford with 38.3%, followed by domestic consumption (31.1%) and industry and commercial consumption (30.7%). Uttlesford is ranked as the third place district in Essex for per capita reductions in CO₂ emissions with 21.3%, which is higher than the county percentage of 17.6%. Harlow and Maldon were ranked higher than Uttlesford with 25.0% and 21.4% respectively.
- Mean summer precipitation has a 67% likelihood of decreasing by up to 10% across the whole region by 2020 and by 2050 the south of the East of England will see decreases by up to 20%. By 2050 much of the region is expected to see a mean winter precipitation increase of between 10% and 20%.
- Up to March 2011 Uttlesford District had issued 125 Code for Sustainable Homes certificates, 64 at the design stage and 61 post construction. This total number is below the Essex average of 156 certificates issued.

3.3.11 Air and Noise

- The main air quality issues within the District following the first round of air quality assessments in 1998 to 1999 were found to be emissions of NO₂ and PM₁₀ from vehicles on the M11 and A120. However, no air quality management areas (AQMA) have been declared in Uttlesford for these as national air quality objectives were not predicted to be exceeded. Further assessments found 3 junctions in Saffron Walden showing NO₂ levels exceeding the objectives which have been declared AQMA and 2 other sites in the District have since reported exceedances in NO₂ levels.

- In 2009, five of these locations reported levels of NO₂ above the threshold limit of 40 µg/m³ set by the National Air Quality Strategy (NAQS) – four were located in Saffron Walden and one was located in Stansted. Three of the five sites, all of which were in Saffron Walden were in places of relevant exposure. This included the site in Debden Road which like the Burton End site in Stansted was outside the existing AQMAs.
- Ambient or environmental noise is defined as noise which is either unwanted or harmful. It is created by human activities and includes noise emitted by transport including road traffic and air traffic, as well as from sites of industrial activity. Britain's third busiest international airport, Stansted Airport is located within the District and a major motorway, the M11 traverses through it down the eastern side. Both these forms of transportation generate ambient noise which can impact people living or working nearby.
- There are no dwellings situated in close enough proximity of Stansted Airport that experience noise levels exceeding 75dB at any time of day but under 100 people do experience noise that exceeds 70dB during the day, evening and night. Noise level produced on the M11 exceeds 75dB across the day, evening and night at the point of source and dissipates across a large area surrounding the road. The B1256 also creates ambient noise above 75dB but noise levels dissipate across a much smaller distance. The new A120 has been constructed which is likely to have increased noise implications, despite alleviating noise levels on the B1256.

3.3.12 Waste

- The majority of local authority collected household waste is sent for recycling, composting or reuse in the Plan Area. Despite this, no non-household local authority collected waste is recycled, composted or re-used.
- Households within Uttlesford District Council produce 136.89kg per household less waste than the county average, and a larger percentage of this waste is recycled re-used or composted (55.53%), than the Essex average.
- Six transfer facilities have been granted planning permission within Essex and Southend, to support a materials recovery facility, in Basildon. These will, once constructed, accept waste from the Waste Collection Authority vehicles directly from kerbside collection. Here waste will be bulked up, ready for transportation to Basildon. Uttlesford waste is scheduled to be bulked up at Great Dunmow.

3.3.13 Minerals

- There are localised deposits of silica sand, chalk, brickearth and brick clay in Essex. Marine dredging takes place in the extraction regions of the Thames Estuary and the East Coast, whilst aggregate is landed at marine wharves located in east London, north Kent, Thurrock, and Suffolk. Essex has no landing wharves of its own. There are no hard rock deposits in the County so this material must be imported into Essex. This currently occurs via rail to the existing rail depots at Harlow and Chelmsford.
- The majority of the sand and gravel produced in Essex (about 78%) is used within the County itself. This position looks unlikely to change over the long-term. Consequently the main factor influencing production of sand and gravel in the future will be the need to meet the minerals demand for the whole of Essex created by major development and new infrastructure projects within Essex itself.

- Extensive chalk resources are present under the surface but outcrop only in the North West, particularly in Uttlesford District Currently. They are extracted at only one site in the form of white chalk at Newport Quarry, used mostly in agricultural practices, although small quantities are used by the pharmaceutical industry. In Essex they are not associated with a land bank as it is extracted as an industrial mineral rather than as an aggregate.

3.3.14 Data Limitations

Not all relevant information was available at the local level and specific to the Plan Area and as a result there are some gaps within the data set. It is believed however that the available information shows a comprehensive view on sustainability within the Plan Area. New data that becomes available will be incorporated in the SEA.

It should be noted that while the baseline will be continually updated throughout the SEA process, the information outlined within this report represents a snapshot of the information available at the beginning of July 2015.

3.4 Key Sustainability Issues and Problems and SA Objectives (Stage A3 and A4)

The outcome of Stages B3 – B4 of the SA Process is the identification of key sustainability issues and problems facing the district which assist in the finalisation of a set of relevant SA Objectives which would set the framework for the appraisal of the Plan during its preparation. The objectives are also derived from the review of plans and programmes and a strategic analysis of the baseline information.

The appraisal will then be able to evaluate, in a clear and consistent manner, the nature and degree of impact and whether significant effects are likely to emerge from the Plan's proposed policies. The following table outlines the stages which led to the formulation of the SA Objectives, which were based on the key issues for the Plan Area.

Table 2: Key sustainability issues and problems and the likely evolution of the Plan Area in the absence of a Plan

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
Biodiversity	From the Essex Biodiversity Action Plan (EBAP) there are 25 species and 10 habitat action plans covering Essex.	Although biodiversity and ecological designations are protected internationally and nationally, allocating sites and devising policy criteria in a locally relevant planned system enables specialist input on a site-by-site basis and the best outcomes in light of all alternatives.	1) Retain, enhance and conserve biodiversity and the water environment

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
Designated sites	<p>There are no international or European designated sites within Uttlesford. Nationally designated sites include 2 National Nature Reserves (NNRs) and 12 Sites of Special Scientific Interest (SSSIs). There are also 281 locally important nature conservation areas which are designated as Local Wildlife Sites (LoWSs).</p>	<p>Although landscape designations are protected nationally, allocating sites and devising policy criteria in a locally relevant plan-led system enables input by landscape specialists on a site-by-site basis and the best outcomes in light of all alternatives</p>	
	<p>There is a Public Service Agreement (PSA) target of at least 95% of all nationally important wildlife sites being brought into favourable condition. 8 of the 12 sites in Uttlesford are meeting this target. Those not are Ashdon Meadows, Debden Waters, Hall's Quarry and High Wood, Dunmow. The majority of Hall's Quarry and Debden Waters SSSI areas are in favourable conditions, however they are not meeting the PSA target because of unfavourable conditions in other sections. 35.03% Hall's Quarry and 39.87% of Debden Waters SSSI are in an unfavourable condition and declining.</p>		
Water environment	<p>Of all the river courses in the District, the Cam and Ely Ouse displayed the highest percentage assessed at good chemical status and good overall status including chemical and ecological at 94% and 17% respectively. However, the Upper Lee catchment was predicted to register the highest % improvement for one or more element in the river of 44% by 2015.</p>	<p>Without the Plan's policy direction, it is possible that permissions are granted without suitable conditions. Water quality issues such as these are often tackled through initiatives on sustainable drainage systems.</p>	
Landscape features	<p>There are eight Landscape Character Areas (LCAs) in Uttlesford District as defined in a</p>	<p>Although landscape designations are protected nationally,</p>	<p>2) Retain, enhance and conserve the</p>

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
	<p>Landscape Character Assessment relevant to the District and each one has a recognisable pattern of landscape characteristics. A more detailed landscape character assessment defined 20 smaller local LCAs within the eight previously defined. With the exception of one they were all identified as being between moderate to highly sensitive of change.</p> <p>There is a significant proportion of ancient woodland in the District. Hatfield Forest is an important survival of a medieval forest, comprising a mixture of wood pasture with pollards, coppice woods, timber trees, a warren, lodge and lake. The Uttlesford Local Plan identifies a wildlife corridor of Ancient Woodland to the north-west of the settlement.</p>	<p>allocating sites and devising policy criteria in a locally relevant plan-led system enables input by landscape specialists on a site-by-site basis and the best outcomes in light of all alternatives.</p>	<p>character of the landscape and the quality of soil</p>
Minerals	<p>The majority of the sand and gravel produced in Essex (about 78%) is used within the County itself. This position looks unlikely to change over the long-term. Consequently the main factor influencing production of sand and gravel in the future will be the need to meet the minerals demand for the whole of Essex created by major development and new infrastructure projects within Essex itself.</p> <p>Extensive chalk resources are present under the surface but outcrop only in the North West, particularly in Uttlesford District Currently. They are extracted at only one site in the form of white chalk at Newport Quarry, used mostly in agricultural practices,</p>	<p>Allocating sites and devising policy criteria in a locally relevant plan-led system enables input by geological specialists on a site-by-site basis to determine the most appropriate ways to preserve mineral deposits in order to deliver the best outcomes in light of all alternatives.</p>	

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
	<p>although small quantities are used by the pharmaceutical industry. In Essex they are not associated with a land bank as it is extracted as an industrial mineral rather than as an aggregate.</p>		
<p>Cultural Heritage</p>	<p>The majority of archaeological sites and deposits in Uttlesford District remain buried, hidden and thus preserved. However, the known archaeological resource in the District is very varied and highly significant. There are approximately 4,064 in records of archaeological sites and finds recorded on the Essex Historic Environment Record (EHER) for Uttlesford District as of December 2010.</p>	<p>Although heritage and historic designations are protected nationally, allocating sites and devising policy criteria in a locally relevant planned system enables input by historic environment specialists on a site-by-site basis and the best outcomes in light of all alternatives.</p>	<p>3) To maintain and enhance the district's cultural heritage, assets and their settings</p>
	<p>There are 3,731 designated listed buildings within the District and the majority of them are grade II listed. This means they are nationally important and of special interest. 1.8% of all the listed buildings are considered to be of exceptional interest and internationally important (grade I) and 4.6% are classed as particularly important buildings of more than special interest (grade II*).</p>		
	<p>There are 73 Scheduled Monuments within the District which represents 24.5% of all Scheduled Monuments within Essex. They range from prehistoric burial mounds to unusual examples of World War II defensive structures and have been designated due to their national importance. Audley End located west of Saffron Walden, is designated as a Scheduled Monument, as well as a landscape</p>		

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
	<p>park and historic house.</p> <p>There are seven registered parks and gardens within Uttlesford District which have each been designated by English Heritage as being “a park or garden of special historic interest” and 36 conservation areas within Uttlesford District which are defined as historical settlements and buildings having ‘special architectural or historical interest, the character of which is desirable to preserve or enhance’.</p>		
Energy consumption	<p>More than half the District’s 2,808.9GWh energy consumption is from petroleum products which are a result of transport, domestic and commercial industries (66.20%). In contrast only 15.9GWh of energy consumed is from bioenergy and waste products.</p> <p>This is the second highest percentage of total energy consumption from renewable sources (0.57%) compared with neighbouring areas, second to Maldon (0.92%).</p>	<p>The Plan has the scope to allocate sites that are located in close proximity to sustainable transportation means and also promote their inclusion as part of site policy. An absence of a plan-led approach may see development arise that does not factor in such requirements, as well as the potential for renewable energy means and energy efficiency measures.</p>	4) To reduce contributions to climatic change
Climate change	<p>Mean summer precipitation has a 67% likelihood of decreasing by up to 10% across the whole region by 2020 and by 2050 the south of the East of England will see decreases by up to 20%.</p> <p>By 2050 much of the region is expected to see a mean winter precipitation increase of between 10% and 20%.</p>	<p>An absence of a plan-led approach to development needs could see a larger amount of sites not factoring in the cumulative impacts of water availability and infrastructure, as well as sustainable drainage systems.</p>	

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
Carbon Dioxide Emissions	<p>The transport industry is responsible for the majority of CO2 emissions within Uttlesford with 38.3%, followed by domestic consumption (31.1%) and industry and commercial consumption (30.7%).</p>	<p>The Plan has the scope to allocate sites that are located in close proximity to sustainable transportation means and also promote their inclusion as part of site policy. An absence of a plan-led approach may see development arise that does not factor in such requirements, as well as the potential for renewable energy means and energy efficiency measures.</p>	5) Reduce and control pollution
	<p>Uttlesford is ranked as the third place district in Essex for per capita reductions in CO2 emissions with 21.3%, which is higher than the county percentage of 17.6%. Harlow and Maldon were ranked higher than Uttlesford with 25.0% and 21.4% respectively.</p>	<p>An absence of the Plan could see less strategic commitment to minimise carbon emissions which would have increased effects on pollution output.</p>	
Water quality	<p>Of all the river courses in the District, the Cam and Ely Ouse displayed the highest percentage assessed at good chemical status and good overall status including chemical and ecological at 94% and 17% respectively. However, the Upper Lee catchment was predicted to register the highest % improvement for one or more element in the river of 44% by 2015.</p>	<p>Without the Plan's policy direction, it is possible that permissions are granted without suitable conditions. Water quality issues such as these are often tackled through initiatives on sustainable drainage systems.</p>	
	<p>None of the rivers in the Roding, Beam and Ingreborne catchment currently achieve good or better ecological or biological status/potential now. A total of 67% are classified as having poor biological status, and 11 % of the</p>		

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
	<p>assessed river water bodies have bad status. By 2015 the status for at least one element was expected to have improved by 31% which is second to the Upper Lee catchment, also in the Thames region, where 44% should improve over the same timescale. 16% of rivers in this catchment currently achieve good or better ecological status/potential and 10% have good or high biological status now, with 62% at poor biological status, but none classed as bad status. The Cam and Ely Ouse and Combined Essex catchments achieve higher percentages of water bodies with at least good biological status at over 27% and 33% respectively but Combined Essex catchment reported only 7% of water bodies achieving good ecological status/potential.</p>		
Fluvial flooding	<p>A 2008 SFRA was undertaken to accompany the District's Local Plan. The SFRA is a planning tool that enables the council to select and develop sustainable site allocations away from vulnerable flood risk areas. The SFRA will assist the council to make the spatial planning decisions required to inform the Local Plan and contained recommendations</p>	<p>Site selection criteria, as well as a Flood Risk Assessment, are used to identify whether broad potential future locations for development represent the most appropriate choices in terms of flood risk. Without the Plan, the level of detail used to inform</p>	6) To reduce the risk of flooding
Surface water flooding	<p>Surface water flooding risk in the District was highlighted through the modelling of surface water in Saffron Walden, Great Dunmow and Stansted Mountfitchet, which identified drainage paths and potential areas that may be susceptible to surface water ponding. In numerous locations surface water reaches depths of more than 60 cm.</p>	<p>decisions of a strategic nature may not be as robust, especially regarding cumulative impacts. In addition, policy content can be used to set conditions on developments, or determine their refusal in areas of flood risk.</p>	

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
Transport	<p>90.4% of households in Uttlesford own at least one vehicle, a far higher percentage than for the East of England (82.3%) and for England and Wales (73.9%). The highest percentage of residents own 2 cars or vans whereas in both the East of England and England and Wales the majority of the population owned 1 car or van.</p>	<p>The Plan should seek the correct allocations to reduce emissions resulting from commuting miles whilst also exploring the validity of sustainable transportation; neither of which could be managed on a strategic scale without the Plan.</p>	<p>7) To promote and encourage the use of sustainable methods of travel</p>
	<p>Uttlesford District has a higher proportion of residents driving to work by either car or van (46.34%) when compared to regional and national levels as well as a larger proportion of residents working from home (6.43%). This could be related to the District being mainly rural. There is also a higher usage of trains as a mode of transport within the District compared to the national trend but fewer residents cycle or travel by underground or on a bus, minibus or coach. The proportion of residents who walk to work is comparatively similar to the regional and national levels.</p>		
	<p>The work destination attracting the highest proportion of Uttlesford residents was the City of London (10.9%). The next most popular destinations for employment were the neighbouring areas of Cambridge with 991 commuters (5.5%) and Harlow with 410 (2.3%).</p>		
Accessibility	<p>Accessibility is a general issue within Uttlesford District, with only just over one third of residents being within 15 minutes of an employment site or retail centre.</p>	<p>If the plan was without considering accessibility, large proportions of the population would be without access to vital services such as GPs, which could result in</p>	<p>8) To ensure accessibility to services</p>
	<p>Only 50% of residents are within 15 minutes of a GP.</p>		

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
	Over four fifths of the population of Uttlesford District live within 30 minutes of a primary school.	serious adverse impacts on residents of Uttlesford. With the plan, it is simple to include considerations for accessibility to services from the onset and attain a more holistic approach.	
	The proportion of residents with access to a secondary school within 30 minutes walking or public transport is significantly smaller at 60%.		
Life expectancy	Life expectancy of residents within Uttlesford District is higher than the regional and national averages with men living for an average of 81.8 years and women on average living 85.1 years. In general, life expectancy is increasing within the District and nationwide.	The implications of increased life expectancy will mean increased pressure on services for the elderly, especially regarding care and suitable health services.	9) To improve the population's health and promote social inclusion
Obesity	The prevalence of child obesity within the District is 5.4% which is lower than the county average of 8.1% and considerably below the national average of 9.4%. Adult obesity is 18.2% within the District which is considerably below both the county average of 24.5% and the national average of 23.0%.	Obesity rates in adults will continue to be higher than rates in children, increasing the risk of certain diseases and reducing life expectancy and social wellbeing. The absence of a plan-led approach may see cumulative developments arise that do factor in the need for strategic open space and recreational requirements.	
Sport participation	The proportion of adults participating in 30 minutes, moderate intensity sport has decreased in the most recent survey at the local, sub-national and national levels. In the District 42.0% of those in the survey were active in sport between October 2013 and October 2014.		
Housing delivery	The NPPF's requirement for housing targets to be determined objectively at the District level (OAN) will ensure a higher dwellings per annum target than previously.	Housing will largely be delivered through 'planning by appeal' with a lack of evidence provided by a plan-led approach. This may see housing delivered contrary to local needs.	10) To provide appropriate housing and accommodation to meet existing and future needs
	The absence of an adopted Local		

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
	Plan post-NPPF in which to determine housing targets and broad locations for growth.		
Housing ownership and need	There are 33,930 dwellings within Uttlesford District, 86.7% of which are privately owned. Over the period 2007-2021, there is a need for 4,200 (52%) units of market housing, 2,600 (32%) units of intermediate affordable housing and 1,300 (16%) units of social rented housing in the District.	A plan-led system allows specific developments to be come forward in line with tenure and housing mix requirements as specified in relevant policy.	
Gypsy and Traveller sites	There is a demand for more Gypsy and Traveller sites in Uttlesford, totalling 26 additional sites by 2033.	The absence of pitch provision in a plan-led system is likely to see an increase in unauthorised sites.	
School Capacity	School age population numbers are projected to grow relatively slowly and school capacity within Uttlesford is expected to be sufficient to accommodate children in the District. Primary schools are predicted to have a surplus of 288 places for the 2018/19 academic year. Secondary schools are predicted to have a surplus of 415 for the same time period.	Without factoring in school capacity within a plan-led system, cumulative pressure would be put existing educational facilities.	11) To promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development
Utilities	The projected housing increases facing the wider County will put pressures on utility suppliers.	Without a plan-led system the cumulative and holistic approach to house building is unlikely to be evidenced.	
Transport	The projected housing increases facing the wider County will put pressures on road and rail infrastructure.	Without a plan-led system the cumulative and holistic approach to house building is unlikely to be evidenced.	

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
KS4 equivalent achieved	<p>At 77.1% a higher proportion of pupils within Uttlesford attained five or more A*-C grades at key stage 4 (KS4) than the county, regional and national equivalent. 64.3% of pupils who gained five or more A*-C grades did so in English and Mathematics which is considerably more than the national proportion of 53.4%. The proportion of pupils attaining five or more A*-G grades was also above the national figure and only 0.4% of all pupils in the District didn't receive any passes at KS4.</p>	<p>Without a plan-led system the cumulative and holistic approach to house building is unlikely to be evidenced. This has implications for school capacities and the potential need for new educational facilities to be developed to support the future population.</p>	
Adult qualifications	<p>The population of Uttlesford District has in general more qualifications than the overall sub-national and national populations. 93.4% of the working age population of Uttlesford District which accounts for 46,700 people are qualified to at least level 1 or higher compared to 85.0% across Great Britain. Level 1 represents foundation GNVQ, NVQ 1 or up to 5 GCSEs at grades A*-C.</p> <p>The most significant difference is that Uttlesford has comparatively higher proportions of the population qualified at Level 3 and Level 4 and above. With 59.3% of the population having attained at least 2 or more A levels, advanced GNVQ, NVQ 3 or equivalent (level 3) and 35.6% achieving a higher national diploma, degree and higher degree level or equivalent (level 4). Uttlesford has a significantly higher skilled workforce in comparison to the county and a slightly higher proportion than the regional level.</p>		12) To improve the education and skills of the population
Job density	<p>Job density in Uttlesford (0.84) is higher than across the county</p>	<p>The plan has the scope for a holistic approach</p>	13) To ensure sustainable

Key Issues	Description / Supporting Evidence	Likely evolution in absence of Plan	SA Objective
	(0.74), region (0.78) and nation (0.80).	to development to ensure that housing and employment development are allocated in support of one another. The plan can also safeguard sites for future employment use. The absence of a plan would likely see a less joined-up approach to housing and employment needs.	employment provision and economic growth
Location of businesses	Uttlesford District is predominantly rural in nature and as such a significant proportion of businesses are based within rural locations with only 15% defined as being urban based.		
Employment	<p>The proportion of the District's working population who are economically active but unemployed is 3.0% which is below sub-national and national unemployment figures.</p> <p>Stansted Airport employed 10,860 people in 2009, and this is expected to rise to 16,800 following the proposed increase in runway usage.</p>		

The above highlighted key sustainability issues and problems have formulated relevant SA Objectives, which are shown in the final column. This definitive list can be found in the following table alongside their relevance to the environmental, social or economic themes of sustainable development.

Table 3: The SA Objectives

SEA Objective	Environmental	Social	Economic
1) Retain, enhance and conserve biodiversity and the water environment	✓		
2) Retain, enhance and conserve the character of the landscape and the quality of soil	✓	✓	
3) To maintain and enhance the district's cultural heritage, assets and their settings	✓	✓	
4) To reduce contributions to climatic change	✓		
5) Reduce and control pollution	✓	✓	
6) To reduce the risk of flooding	✓	✓	✓

SEA Objective	Environmental	Social	Economic
7) To promote and encourage the use of sustainable methods of travel		✓	
8) To ensure accessibility to services		✓	✓
9) To improve the population’s health and promote social inclusion		✓	
10) To provide appropriate housing and accommodation to meet existing and future needs		✓	✓
11) To promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development	✓	✓	✓
12) To improve the education and skills of the population		✓	✓
13) To ensure sustainable employment provision and economic growth		✓	✓

3.4.1 The Compatibility of the SA Objectives

A total of 13 SA Objectives have been derived for the appraisal of the Plan. They are based on the scope of the document, policy advice and guidance and to the assessment of the current state of the environment.

It is useful to test the compatibility of SA Objectives against one another in order to highlight any areas where potential conflict or tensions may arise. The result of this internal compatibility of the SA Objectives is shown in the figure below.

In the compatibility matrix the 13 SA objectives are numbered in sequence along each axis and they represent a balance of economic, social and environmental factors.

The following key has been used to illustrate their compatibility:

✓	Where the objectives are compatible
/	Where it is uncertain the objectives are related
0	Where the objectives are not related
x	Where the objectives are incompatible

The matrix below illustrates the compatibility of the SA Objectives.

Figure 2: Compatibility Matrix of the SA Objectives

1														
2	✓													
3	✓	✓												
4	✓	/	/											
5	✓	✓	✓	✓										
6	✓	✓	/	✓	✓									
7	✓	0	0	✓	✓	0								
8	0	0	/	✓	✓	0	✓							
9	✓	✓	0	✓	✓	✓	✓	✓						
10	/	/	/	✓	0	0	✓	✓	0					
11	/	/	/	0	0	0	✓	✓	✓	✓				
12	0	0	0	0	0	0	✓	✓	✓	0	✓			
13	/	/	/	0	0	0	✓	✓	0	✓	✓	✓		
	1	2	3	4	5	6	7	8	9	10	11	12	13	

It is to be expected that some objectives are not compatible with other objectives thereby indicating that tensions could occur. Objectives which are based around environmental issues sometimes conflict with economic and social objectives, and vice versa.

The compatibility of the objectives relevant to the Plan is shown in the compatibility matrix above. Instances of uncertainty between objectives are explained further:

- **Objective 1 and Objectives 10, 11, & 13:** SA Objective 1, which seeks to retain, enhance and conserve biodiversity and the water environment, may conflict with the general principles of delivering housing, infrastructure and employment development as specified in SA Objectives 10, 11 and 13. This potential incompatibility does not mean that these objectives are not achievable in unison however; development in sensitive and appropriate locations and / or with suitable mitigation measures would be considered compatible.
- **Objective 2 and Objectives 4, 10, 11 & 13:** SA Objective 2, regarding retaining and enhancing landscapes and soil quality may not always be compatible with the development requirements of housing, employment and infrastructure and also reducing the contributions to climate change in some renewable energy schemes (SA Objective 4). This is location specific however and related predominantly to allocating development sites in suitable locations and with mitigation where necessary and viable.
- **Objective 3 and Objectives 3, 6, 8, 10, 11 & 13:** SA Objective 3, regarding maintaining

and enhancing cultural heritage assets and their settings may not be compatible with development requirements (SA Objectives 10, 11 and 13). In addition potential incompatibility exists with SA Objectives 3 and 6 where some energy efficiency and renewable energy measures and also flood alleviation schemes or systems may not be compatible with the historic environment. Similarly, incompatibility could surround a desire to ensure accessibility to services (SA Objective 8) in a number of the District's settlements; many of which have historic cores and town / local centres with designated Conservation Areas.

4 The Sustainability Appraisal Frameworks (Stage A4)

The following section sets out the various sustainability frameworks necessary for the assessment of the emerging Local Plan's vision, objectives, policies and site allocations. For these purposes, separate approaches and / or assessment frameworks have been developed to cover:

- Broad 'Areas of Search' and Strategic Scenarios;
- Policy content;
- Site Allocations;
- Strategic Sites / New Settlements; and
- Gypsy and Traveller pitch provision.

Different approaches and/or frameworks are needed in the SA to assess different stages in the plan-making process and different elements of the Local Plan. For instance, the assessment of Broad 'Areas of Search' and Strategic Scenarios has to reflect the strategic nature and scope of such areas. The framework to assess site allocations includes spatial questions and criteria which would not be suitable for the useful appraisal of strategic and development management policies. The appraisals of strategic sites/new settlements reflect the wider impact of such developments. The framework for gypsy and traveller pitch provision reflects the specific requirements of such sites. These different approaches and/or frameworks are explored further in the following sub-sections.

4.1 The Appraisal of Broad Areas of Search and Strategic Scenarios

The first stage in the plan-making process will involve the LPA exploring 'areas of search' across the District in order to develop spatial strategy selection. These 'areas of search', forming part of the District's Development Strategy, will be subject to Sustainability Appraisal to assist the Council in ensuring that the emerging Local Plan is justified, and has been assessed against reasonable alternatives.

The approach to developing 'areas of search' ensures that the LPA is 'making every effort' to meet housing needs. It also assists in the process of developing spatial strategy options that can be considered reasonable. Areas of search might explore broad locations such as extensions to existing towns, key villages, smaller (Type A) villages and locations for new settlements based on known existing constraints and opportunities.

From the identification and assessment of 'areas of search' a number of scenarios will be developed, which will explore options for the distribution of growth in different areas of the District as can be considered suitable. A broad range of scenarios will be subject to Sustainability Appraisal in order to identify constraints, opportunities and to assist in the development of any additional, sustainable hybrid scenarios.

It should be noted that the appraisal of these 'areas of search' and scenarios will be strategic in nature and scope; it will not be possible to appraise such high level areas and scenarios in any more detail as specific site boundaries and the quantum of development in each broad location have not yet been determined. The appraisal of the 'areas of search' and scenarios will take the form of a narrative exploring the sustainability of each within known existing constraints and opportunities relevant to the general notion of the 13 identified Sustainability Objectives and on a broadly comparable basis only.

4.2 The Appraisal of Policies

The SEA Framework is an important tool in the SEA process. It provides the context against which the Plan's emerging policies can be assessed and sets out the SEA objectives with additional criteria / key questions that should be asked to decipher whether the suggested approach adheres to the principles of sustainability; and indicators which can monitor the impact of the documents.

Table 4: The SA Framework (Policy Content)

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
<p>1) Retain, enhance and conserve biodiversity and the water environment</p>	<p>Conservation and protection of nationally and locally important designated sites</p> <p>Condition of some of the SSSIs</p> <p>Sensitivity of water environment to physical change</p>	<p>Will it conserve and enhance natural/semi natural habitats?</p> <p>Will it conserve and enhance species diversity, and in particular avoid harm to indigenous BAP priority species?</p> <p>Will it maintain and enhance sites designated for their nature conservation interest?</p> <p>Will it maintain and enhance the connectivity of habitats and their ability to deliver ecosystem services e.g. flood risk management, climate change mitigation & adaptation and access for health?</p> <p>Will there be any impacts on the water environment as a result of hydromorphological changes and vice versa?</p>	<p>Spatial extent of designated sites within the District</p> <p>Achievement of Biodiversity Action Plan targets</p> <p>Ecological potential assessments</p> <p>Distance from site to nearest:</p> <ul style="list-style-type: none"> - SSSIs - NNR - LoWS - Ancient Woodland - Protected lanes <p>Other sensitive designated or non-designated receptors</p> <p>Condition of the nearest sensitive receptors (where viable)</p> <p>Site visit surveys on typical abundance and frequency of habitats (DAFOR scale)</p>
<p>2) Retain, enhance and conserve the character of the landscape and the</p>	<p>The local landscape varies in its sensitivity to change</p>	<p>Will landscape character areas be protected?</p> <p>Will it enhance and/or conserve the countryside?</p> <p>Will the District’s best agricultural land be</p>	<p>Developments permitted contrary to Landscape Character Assessment ‘sensitivities to</p>

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
quality of soil		protected?	change'. Number and extent of field boundaries affected. Percentage of applications permitted on the District's best agricultural land (from ALC)
3) To maintain and enhance the district's cultural heritage, assets and their settings	A strong historic integrity with historic settlements and many historic buildings and monuments	<p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in both urban and rural areas?</p> <p>Will areas of historic character be protected from development?</p> <p>Will the character and setting of historic settlements be protected as identified in the Uttlesford District Historic Environment Characterisation Project (ECC, 2009)?</p> <p>Does it seek to enhance the range and quality of the public realm and open spaces?</p> <p>Will it reduce the amount of derelict, degraded and underused land?</p> <p>Does it encourage the use of high quality design principles to respect local character?</p> <p>Will any adverse impacts be reduced through adequate mitigation?</p>	<p>Proximity to nearest (including its setting):</p> <ul style="list-style-type: none"> - Scheduled Monument? - Listed Building? - Conservation Area? - Registered Historic Park or Garden? - Site identified in the Historic Environment Record? - Building of local interest? - Other historic feature? <p>Number and spatial extent of listed buildings</p> <p>Number and spatial extent of scheduled monuments</p>

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
			<p>Buildings At Risk Register</p> <p>Heritage at risk surveys</p> <p>Percentage of conservation area demolished or otherwise lost.</p> <p>Amount of derelict properties and/or vacant land</p> <p>Numbers of buildings being removed from the buildings at risk register</p> <p>Amount of damage to listed buildings or scheduled monuments</p> <p>Management of designated and undesignated historic environment assets</p> <p>Numbers of undesignated historic environment assets lost through the planning process.</p>
<p>4) To reduce contributions to climatic change</p>	<p>Future climate change projections</p> <p>Energy consumption</p> <p>High private vehicle usage</p>	<p>Will it reduce emissions of greenhouse gases by reducing energy consumption?</p> <p>Will it lead to an increased proportion of energy needs being met from renewable sources?</p> <p>Does it ensure more sustainable modes of travel are provided?</p> <p>Will it encourage greater energy efficiency?</p>	<p>Carbon Dioxide emissions</p> <p>Energy consumption GWh/households</p> <p>Spatial extent of flood zones.</p> <p>Air Quality Management Areas and PM10 emissions</p> <p>Percentage of energy supplied</p>

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
		<p>Will it improve the efficient use of natural resources?</p>	<p>from renewable sources.</p>
<p>5) Reduce and control pollution</p>	<p>Number of AQMAs and other areas exceeding NO2 threshold</p> <p>Ambient noise levels around Stansted airport and major roads</p> <p>Water quality targets in order to reduce and control pollution across all waterbodies (including surface and groundwaters), and from all land uses proposed, including wastewater and as a result of increased energy use</p>	<p>Will it improve, or not detrimentally affect air quality?</p> <p>Will emissions be limited to levels that will not damage natural systems and affect human health?</p> <p>Does it ensure that National Air Quality Standards are met at relevant points?</p> <p>Does it seek to improve or avoid increasing traffic flows generally and in particular through AQMAs?</p> <p>Does it seek to protect rural areas from increased traffic?</p> <p>Will it lead to no deterioration on the quality of water bodies?</p> <p>Does it promote the inclusion of Sustainable Drainage Systems in new developments?</p> <p>Does it seek to reduce, or not detrimentally affect noise levels?</p> <p>Does it seek to protect soil quality, including the remediation of contaminated sites?</p>	<p>Number and spatial extent of AQMA's in the District</p> <p>NO2 emissions</p> <p>Recorded traffic flows</p> <p>Location and extent of AQMAs in relation to infrastructure requirements</p> <p>Location and extent of potentially significant junctions in relation to infrastructure requirements</p> <p>Percentage of water bodies at good ecological status or potential</p> <p>Percentage of water bodies assessed at good or high biological status</p> <p>Percentage of water bodies assessed at good chemical status</p> <p>Number of Sustainable Drainage Systems applications and number granted</p> <p>Ambient noise levels</p> <p>Development on PDL</p>

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
<p>6) To reduce the risk of flooding</p>	<p>Fluvial flood risk Pluvial flood risk Flood risk from other sources</p>	<p>Does it seek to avoid development in areas at risk of flooding?</p> <p>Does it seek to avoid increasing flood risk in areas away from initial development?</p> <p>Does it take account of climate change in relation to flooding?</p> <p>Does it seek to manage and mitigate the risk of flooding?</p> <p>Is/will the sequential test being used to reach decisions on development proposals?</p> <p>Will developer contributions be utilised for the provision and maintenance of flood defences?</p> <p>Does it require sustainable drainage systems to be included within new development?</p>	<p>Location of main rivers in District.</p> <p>Spatial extent of flood zones 2 and 3</p> <p>Residential properties flooded from main rivers</p> <p>Planning permission in identified flood zones granted permission contrary to advice from the Environment Agency</p> <p>Incidences of flooding and location</p> <p>Distance of site to floodplains</p> <p>SFRA results</p> <p>Incidences of flood warnings in site area</p> <p>Distance to ‘Areas susceptible to surface water flooding’ – EA Maps</p> <p>On site and nearby topography via ordnance survey mapping</p>
<p>7) To promote and encourage the use of sustainable methods of travel</p>	<p>High private vehicle usage Public transport, walking and cycling coverage across the District</p>	<p>Will it increase and/or improve the availability and usability of sustainable transport modes?</p> <p>Will it seek to encourage people to use alternative modes of transportation other than private vehicle?</p> <p>Will it contribute positively to reducing social</p>	<p>Access to services and business’ by public transport</p> <p>Indices of Multiple Deprivation</p> <p>Travel to work methods and flows</p> <p>Car ownership</p>

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
		exclusion by ensuring access to jobs, shopping, leisure facilities and services? Will it reduce the need to travel? Will it lead to the integration of transport modes? Will it improve rural public transport?	Network performance on roads Public transport punctuality and efficiency
8) To ensure accessibility to services	Access to services such as education, healthcare and jobs, and other amenities Access to natural greenspace Self-sustainability	Will it contribute positively to reduce social exclusion by ensuring access to jobs, shopping, services and leisure facilities for all? Will it improve access to jobs, shopping, services and leisure facilities? Will it reduce the need to travel? Will it increase traffic in rural areas? Does it protect or increase village facilities? Will it lead to the integration of transport modes? Does it seek to concentrate development and facilities in town centres or where access via sustainable travel is greatest? Will it assist in reducing the number of road casualties and ensure ease of pedestrian movement especially for the disabled?	Residents opinion on availability of open space/leisure facilities Access to services by public transport Indices of Multiple Deprivation – sub-domain scores Natural England Accessible Natural Greenspace Standards Recorded traffic flows KSI casualties for adults and children Car ownership Location of site with regards to areas of high deprivation
9) To improve the population’s health and promote social inclusion	Access and provision of healthcare Needs of an ageing population	Will it reduce health inequalities? Will it improve access to high quality health facilities?	Life Expectancy Indices of Multiple Deprivation – sub-domain scores

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
	<p>Access to natural greenspace</p> <p>Access to Sport and recreation</p> <p>Access to facilities generally on foot or by bicycle</p> <p>Obesity and other health issues</p>	<p>Will it improve air quality?</p> <p>Will it improve water quality?</p> <p>Will it increase access to sport and recreation facilities and open space?</p> <p>Will improve services for young people?</p> <p>Will it contribute positively to reducing social exclusion for all members of society?</p> <p>Will it ensure access to jobs, shopping, leisure facilities and services is available for all?</p> <p>Will there be measures to increase the safety and security of new development and public realm?</p> <p>Does it seek to reduce inequalities between areas and support cultural identity?</p> <p>Will it encourage access by walking or cycling, and will it increase the overall rates of walking and cycling?</p>	<p>Residents opinion on availability of open space/leisure facilities</p> <p>Air Quality Management Areas (number and performance) and PM10 emissions</p> <p>KSI casualties for adults and children</p> <p>Natural England Accessible Natural Greenspace Standards (ANGSt)</p> <p>Recorded key offences</p> <p>Location and extent of recreational facilities to development site</p> <p>Location and extent of accessible greenspace to development site</p> <p>Proximity of site to healthcare facilities</p> <p>Percentage of population obese</p>
<p>10) To provide appropriate housing and accommodation to meet existing and future needs</p>	<p>Housing affordability</p> <p>Future population and household projections</p> <p>Future housing growth and need</p> <p>Affordable and social housing</p>	<p>Will it provide housing which meets local needs?</p> <p>Will it increase the range and affordability of housing for all social groups to the designated target?</p> <p>Will it reduce the number of unfit homes?</p> <p>Does it allow for homes to be adapted for lifetime use, or make provisions for them to be</p>	<p>House Prices</p> <p>LA dwelling stock below the 'Decent Home Standard'</p> <p>Indices of Multiple Deprivation Score – particularly Housing and Services Domain and the Living Environment Deprivation Domain</p>

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
		<p>included in new development?</p> <p>Does it seek to deliver self-build and custom build homes?</p> <p>Does it respond to the needs of an ageing population?</p> <p>Will homes be designed with a low carbon footprint?</p> <p>Are dwellings easily accessed by transport links, jobs, services, commercial areas and leisure facilities?</p> <p>Will homes be designed to enhance the existing street scene creating a better cultural heritage & public realm?</p> <p>Will homes be sufficiently phased during the plan period and beyond in light of the East of England Plan or subsequent targets?</p> <p>Will homes be supported by adequate greenspace?</p> <p>Does it support affordable housing in rural areas?</p> <p>Will rural housing be supported by local services?</p> <p>Does it make provision for gypsy and traveller accommodation?</p>	<p>Number of affordable dwelling completions</p> <p>Annual dwelling completions</p> <p>Size and age of housing stock</p> <p>Access to sustainable transport links</p> <p>Population projections and forecasts</p> <p>Crime rates</p>
11) To promote the	Water resources	Does it seek to ensure the provision of sufficient	Water cycle study

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
<p>efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development</p>	<p>Open space</p> <p>Housing growth to be supported by jobs, infrastructure and services</p> <p>Foul water disposal / sewerage infrastructure</p> <p>Reducing waste arising and dealing with waste in a more sustainable manner</p>	<p>infrastructure in line with projected increases in population?</p> <p>Does it ensure that adequate school expansion, new healthcare and community facilities are provided where the size of housing development requires it?</p> <p>Will water resources be able to accommodate growth?</p> <p>Does it ensure the reinforcement of wastewater treatment works or the provision of alternatives (where required) to support growth?</p> <p>Will financial contributions be adequate to provide the necessary infrastructure?</p> <p>Does it seek to promote the minimisation of waste at its source, and integrate solutions into the design of new development?</p> <p>Does it ensure that infrastructure/highway improvements will be made (where required) to support growth?</p> <p>Will it ensure that infrastructure is provided prior to use or through phasing of development?</p> <p>Will it improve the efficient use of natural resources?</p>	<p>S106 agreement contributions</p> <p>Transport Assessments</p> <p>Additional capacity of local schools</p> <p>Number of GPs and dentists accepting new patients</p> <p>ANGSt</p> <p>Amount of waste recycled/landfilled.</p>
<p>12) To improve the education and skills of the population</p>	<p>Provision of education</p> <p>Areas deprived of training,</p>	<p>Does it seek to improve existing educational facilities and/or create more educational facilities?</p>	<p>GCSE or equivalent performance</p> <p>Level 2 qualifications by working</p>

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
	education and skills	<p>Does it seek to improve existing training and learning facilities and/or create more facilities?</p> <p>Will the employment opportunities available be mixed to suit a varied employment skills base?</p> <p>Will new housing be supported by school expansion or other educational facilities where necessary?</p>	<p>age residents</p> <p>Level 4 qualifications and above by working age residents</p> <p>Employment status of residents</p> <p>Average gross weekly earnings</p> <p>Standard Occupational Classification</p>
13) To ensure sustainable employment provision and economic growth	<p>Local employment and wage differences</p> <p>Level of unemployment</p> <p>High proportion of rural based businesses</p>	<p>Will it increase vitality of existing towns and local centres?</p> <p>Does it promote and enhance the viability of existing centres by focusing development in such centres?</p> <p>Will retailing in town centres be enhanced in areas of identified need?</p> <p>Will it encourage employment and reduce unemployment overall?</p> <p>Does it secure more opportunities for residents, of all abilities, and in all employment sectors, to work in the district?</p> <p>Will new housing be supported by adequate local employment opportunities?</p> <p>Will it improve business development and attract investment?</p> <p>Does it support small businesses to grow and</p>	<p>Employment land availability</p> <p>Typical amount of job creation (jobs per ha) within different use classes.</p> <p>Percentage change and comparison in the total number of VAT registered businesses in the area</p> <p>Businesses by industry type</p> <p>Amount of vacant industrial floorspace</p> <p>Amount of high quality agricultural land</p> <p>Travel to work flows</p> <p>Employment status by residents and job type</p> <p>Job densities</p>

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
		<p>encourage business innovation?</p> <p>Will it make land and property available for business development?</p> <p>Will it enhance the Districts potential for tourism?</p> <p>Will it encourage rural economy and diversification of it?</p> <p>Does it enhance consumer choice through the provision of range of shopping, leisure and local services to meet the needs of the entire community?</p> <p>Does it prevent further loss of retail and other services to rural areas?</p> <p>Will it lead to development having an adverse impact on employment for existing facilities?</p>	<p>Economic activity of residents</p> <p>Average gross weekly pay</p> <p>Proportion of business in rural locations</p> <p>Amount of retail, leisure and office floorspace in town centres.</p> <p>Implemented and outstanding planning permissions for retail, office and commercial use</p> <p>Number and type of services</p> <p>Pedestrian footfall count</p> <p>Number of post offices closed down</p> <p>Number of village shops closed down</p>

4.2.1 The Appraisal of Policies

The SEA of the Plan (within the forthcoming Environmental Report) will assess the document’s policies against the SEA Objectives outlined in the SEA framework. The aim is to assess the sustainability effects of the Plan following implementation. The assessment will look at the secondary, cumulative, synergistic, short, medium and long-term permanent and temporary effects in accordance with Annex 1 of the SEA Directive, as well as assess alternatives and provide mitigation measures where appropriate. The findings will be accompanied by an appraisal matrix which will document the effects over time.

For clarity, within the Environmental Report, assessments will likely be set out in the same format as shown in Table 5.

Table 5: Impact on SA objectives

	Sustainability Objectives												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term													
Medium Term													
Long Term													

The content to be included within the table responds to those ‘significant effects’ of the policy or element of the Plan subject to assessment. Assessment will also look at the following:

- Temporal effects;
- Secondary, Cumulative and Synergistic effects;
- The appraisal of Alternatives;
- Impacts on indicators; and
- Proposed mitigation measures / recommendations

These, and ‘significant effects’ are further described in the following sub-sections.

4.2.2 Description of ‘Significant Effects’

The strength of impacts can vary dependant on the relevance of the policy content to certain SEA objectives or themes. Where the policies have been appraised against the SEA Objectives the following key has been used to illustrate a range of possible impacts:

✓✓	Significantly Positive	X	Negative
✓	Positive	XX	Significantly Negative
/	Uncertain	0	No impact

Commentary is also included to describe the significant effects of the policy on the SEA objectives.

4.2.3 Description of ‘Temporal Effects’

The appraisals of the policies contained within the Plan recognise that impacts may vary over time. Three time periods have been used to reflect this and are shown in the appraisal tables as S (short term), M (medium term) and L (long term). For the purpose of the Plan S, M and L depict:

(S) Short term and (M) Medium Term: Early stages of the plan period.

(L) Long term: Latter stages of the plan period

4.2.4 Description of ‘Secondary, Cumulative and Synergistic Effects’

In addition to those effects that may arise indirectly (secondary effects), relationships between different policies will be assessed in order to highlight any possible strengthening or weakening of impacts from their implementation together. Cumulative effects respond to impacts occurring directly from two different policies together, and synergistic effects are those that offer a strengthening of more than one policy that is greater than any individual impact.

4.2.5 Description of ‘Alternatives Considered’

Alternatives for the direction of policies will be appraised and chronicled alongside each appraisal, together with the reason for their rejection / non-progression. This sub-section may only be applicable in the latter stages of the plan, where preferred approaches are set out.

4.2.6 Description of ‘Impacts on Indicators’

In order to quantify the potential impacts highlighted in the policies, a range of indicators have been identified directly relevant to the impacts specified. These will help monitor the successfulness of the policy and to what extent it has helped deliver sustainable development.

4.2.7 Description of ‘Proposed Mitigation Measures / Recommendations’

Negative or uncertain impacts may be highlighted within appraisals. As such, mitigation measures may be needed and these will be highlighted in this section for each policy where relevant. In addition to this, this section will also include any recommendations that are not directly linked to negative or uncertain impacts, but if incorporated may lead to sustainability improvements.

4.3 The Appraisal of Sites

In addition to the above SA Framework formulated for the appraisal of the policy content within the Plan, a separate framework is required for the appraisal of the sustainability of preferred and alternative (non-preferred) site allocations within the document.

Sites will be subject to appraisal using a pro forma developed taking in the key issues of the area and all relevant available information across a range of sustainability criteria. In addition, the consultation of this Scoping Report will allow input from the Statutory Consultees and any other relevant stakeholders and interested parties and comment on the pro forma is welcomed at this stage.

It is worthy of note that in line with the pro forma, appraisals will not be intended to be a detailed project-level assessment of each site, such as that provided by an Environmental Impact Assessment (EIA), but aim to provide a strategic level assessment highlighting those broad impacts of the sites to inform the plan-making process.

4.3.1 Assumptions made in the Site Pro Forma and in the assessment of sites

Assumptions have been made in the assessment of sites. It is assumed that the information received is as factually correct and up-to-date as possible from the following sources:

- The 'Strategic Housing Land Availability Assessment (SHLAA)' of each site;
- The information supplied for each site from the call-for-sites process;
- Any versions of the Local Plan evidence base used (including evidence base formulated for the withdrawn Local Plan 2014 where deemed relevant)

It should be noted that if sources of information utilised for the assessment of sites are updated, versions of the information / data will be used to enable a consistent level of information across all site assessments. Where new evidence base documents are published or updated during the plan-making process, these will be used to amend any previous site assessments in so far as this can be utilised consistently for all sites. It is likely that evidence base documents will be updated and commissioned relevant to the scope of Preferred Sites only. In these instances, the Sustainability Appraisal will be able to utilise this information commensurate to the scope of the updated evidence only.

4.3.2 Exclusionary criteria and links to the District's SHLAA

Exclusionary criteria will be used to determine whether sites can be considered 'reasonable' for the purposes of exploration in the plan making process and the Sustainability Appraisal. To ensure a joined-up approach to excluding sites, the Sustainability Appraisal will not consider those sites that have been initially excluded for assessment in the District's SHLAA due to 'availability' or 'viability' means where this information is available and forthcoming. For the purpose of minimising duplication and to ensure an iterative plan-making and Sustainability Appraisal process, it should be noted that the finalised Sustainability Appraisal of sites will also act as the 'suitability' element of the District's SHLAA of sites.

Table 6: The Site Pro Forma

SA Objective	Site Criteria	Source	Major positive (++)	Positive (+)	Negative (-)	Major negative (- -)	Uncertain / Unknown / (/)	No / negligible impact (0)
1) Retain, enhance and conserve biodiversity and the water environment.	Proximity of any:	GIS mapping	Site is not within a SSSI IRZ	Site is within a SSSI IRZ but is for a use that would not require consultation with Natural England	Site is adjacent to a SSSI.	Site is within a SSSI.	Where applicable Site is within a SSSI IRZ and would require consultation with Natural England	Where applicable
	- SSSIs (including IRZs)							
	- NNRs	GIS mapping	N/A	Over 100m	Within 100m	On site	Where applicable	Where applicable
	- LoWS	GIS mapping	N/A	Over 100m	Within 100m	On site	Where applicable	Where applicable
2) Retain, enhance and conserve the character of the landscape and the quality of	Will the site be located in an area noted for its high sensitivity to change (from Essex Landscape	Landscape Character Assessment 2006	Urban area	Low to moderate sensitivity to change / Moderate sensitivity to	Moderate to high sensitivity to change / Relatively high	N/A	Where applicable	Where applicable

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soil	Character Assessment)?			change	sensitivity to change			
	Will any Tree Preservation Orders (TPOs) be affected?	GIS mapping	N/A	No TPO(s) on site	TPO(s) on site	N/A	TPO(s) adjacent to site	Where applicable
	Is the site greenfield or brownfield?	Aerial mapping	100% Brownfield	Brownfield (approx. 75% plus)	Greenfield (approx. 75% plus)	100% Greenfield	Approximately 50% brownfield / greenfield Where applicable	Where applicable
	Is the site located within the Greenbelt?	GIS mapping	100% of site not in greenbelt	N/A	100% of site within the greenbelt, but acceptable under 'special circumstances'	100% of site within the greenbelt	Site is partly within the Greenbelt	Where applicable
	Is the site located within the Countryside Protection Zone (CPZ)?	GIS mapping	100% of site not in CPZ	N/A	100% of site within the CPZ but does not lead to the coalescence between the airport and	100% of site within the CPZ	Site is partly within CPZ	Where applicable

					existing development / does not adversely affect the open characteristics of the zone.			
Will the site result in a loss of high quality agricultural land?	Agricultural Land Classification (ALC)	N/A (no Grade 4 or 5 in the Plan Area)	Urban area / extension to an existing site / Other land primarily in non-agricultural use	Grade 2	N/A (no Grade 1 in the Plan Area)	Grade 3	Where applicable	

3) To maintain and enhance the district's cultural heritage assets and their settings	Might the site have an impact on, or harm the significance of, the following assets:	This element undertaken by Historic Environment Advisors / Consultants at Place Services	Proposal would result in a designated asset being removed from the 'at risk' register (enabling development).	No harm to the significance of a heritage asset.	Harm to the significance of a heritage asset but capable of mitigation.	Substantial harm to the significance of a heritage asset not capable of mitigation (loss or partial loss of an asset).	Uncertainty surrounding impacts.	Where applicable.
	<ul style="list-style-type: none"> - Scheduled (Ancient) Monuments - Listed Buildings - Registered (Historic) Parks and Gardens - Conservation Areas - Heritage assets (local lists) - Archaeology 							
	- Ancient Woodland	GIS mapping	The site is over 100m from Ancient Woodland	N/A	Ancient Woodland is within 100m of the site	Ancient Woodland is on the site	N/A	Where applicable
Will there be any material harm caused to the form	GIS mapping / Site information / site policy (where	N/A	Access is not via protected	Access is via protected	N/A	Unknown	Where applicable	

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	and alignment of protected historic lanes?	available)		lane / access is via protected lane but would not require amendment to form or alignment	lane and would require amendment to form or alignment			
4) To reduce contributions to climate change	There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5) To reduce and control pollution	Is the site in or within 100 metres of any AQMA or area otherwise identified as of poor air quality?	Policy EN2 – Air Quality GIS mapping	N/A	Site is not within 100m of an AQMA OR 100m of the central reservation of the M11	Site is within 100m of an AQMA AND/OR 100m of the central reservation of the M11	N/A	Where applicable	Where applicable

				OR 35m either side of the A120	AND/OR 35m either side of the A120			
	Is the site within a ground water source protection zone?	GIS mapping	N/A	Not in GPZ	Within outer zone (Zone 2, Zone 2c)	Within inner zone (Zone 1, Zone 1c)	Within total catchment (Zone 3)	Where applicable
	Is the site within close proximity to mineral extraction or waste management facilities?	Allocations in the Adopted Minerals Local Plan (2014) and the emerging Replacement Waste Local Plan (ongoing)	Site is beyond 250m of either an existing or proposed site for mineral extraction or a site either existing as or allocated for a waste management facility.	N/A	Site is within 250m of either an existing or proposed site for mineral extraction or a site either existing as or allocated for a waste management facility.	Site is proposed for a hospital or school within 250m of either an existing or proposed site for mineral extraction or a site either existing as or allocated for a waste management facility.	Where applicable	Where applicable
	Is the site on contaminated land?	Call-for-sites information as submitted	N/A	N/A	N/A	N/A	Yes - Impact for information only; as commentary	Site is not on contaminated land

							in site appraisals	
6) To reduce the risk of flooding	Is the site within: - a flood risk zone	GIS mapping	N/A	Zone 1 (no flood risk)	Zone 2	Zone 3a / 3b	Uncertain (to include commentary in appraisal)	Where applicable
	Would the site be located in an area of high / medium / low / very low risk of flooding from surface water?	EA Mapping	Very low	Low	High	N/A	Where applicable	Where applicable
7) To promote and encourage the use of sustainable methods of travel	Is the site within 800 metres walking and cycling distance of an existing public transport node?	GIS mapping	Within 800m of a bus stop and train station	Within 800m of a bus stop OR train station	Over 800m to a bus stop and train station	N/A	Where applicable	Where applicable
	Would the proposal see a loss of footpaths / cycleways?	Aerial mapping / Call-for-sites information as submitted	N/A	N/A	N/A	Loss of public footpath or cycleway	Diversion of public footpath or cycleway required	Where applicable

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8) To ensure accessibility to services	Will the site be located within 800 metres walking and cycling distance of a GP surgery (NHS Primary Healthcare Facility)?	GIS mapping / NHS Choices Services near you	N/A	Within 800m of a GP surgery	Over 800m to a GP surgery	N/A	Where applicable	Where applicable
	Is the site within 800 metres walking and cycling distance of convenience shopping?	GIS mapping	N/A	Within 800m of convenience shopping / food store	Over 800m to convenience shopping / food store	N/A	Where applicable	Where applicable
	Will the site be located within 800 metres of a primary school?	GIS mapping	N/A	Within 800m of an existing primary school	Over 800m to an existing primary school	N/A	Where applicable	Where applicable
	Will the site be located within 4.8km of a secondary school?	GIS mapping	Less than 2.4km to an existing secondary school	Within 2.4km - 4.8km of an existing secondary school	Over 4.8km to an existing secondary school	N/A	Where applicable	Where applicable
	Does the site provide safe highway access?	Call-for-sites information as submitted	Existing site with suitable existing access	Adequate or good access off adequate or good standard of	Poor access and / or road of poor standard. Likely to be	No access	Access poor but capable of being improved. Road of	Where applicable

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				road. Not affected by safety issues.	subject to safety issues from surrounding uses incapable of mitigation.		adequate or good standard. Likely to be affected by safety issues but capable of mitigation	
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<p>9) To improve the population's health and promote social inclusion</p>	<p>Does the site conform to Natural England ANGSt? ANGSt recommends that everyone, wherever they live, should have an accessible natural greenspace: - of at least 2 hectares in size, no more than 300 metres (5 minutes' walk) from home; - at least one accessible 20 hectare site within two kilometres of home; - one accessible 100 hectare site within five kilometres of home; and - one accessible 500 hectare site within ten kilometres of home;</p>	<p>GIS mapping</p>	<p>Site conforms to 4/4 of the ANGSt criteria</p>	<p>Site conforms to 3/4 of the ANGSt criteria</p>	<p>Site conforms to 1/4 of the ANGSt criteria</p>	<p>Site conforms to none of the ANGSt criteria</p>	<p>Where applicable Site conforms to 2/4 of the ANGSt criteria</p>	<p>Non-residential allocations</p>
<p>Will the site see a</p>		<p>Call-for-sites</p>	<p>Proposal</p>	<p>No loss of</p>	<p>Loss of</p>	<p>N/A</p>	<p>Uncertain</p>	<p>Where</p>

	loss of land designated for recreational use?	information as submitted	includes recreational land	recreational land	recreational land			applicable
	Is there a PROW or Bridleway on / adjacent to the site?	GIS Mapping	N/A	No PROW or Bridleway(s) on site	PROW or Bridleway on site	Numerous PROWs and/or Bridleways on site	PROW or Bridleway adjacent to site	Where applicable
	Will the site see a loss of land designated for community facilities?	Call-for-sites information as submitted	Proposal includes community facility	No loss of a community facility	Loss of a community facility	N/A	Uncertain	Where applicable
	Will the site impact on the Flitch Way?	GIS Mapping	N/A	Site is over 100m from the Flitch Way	Site is within 100m of the Flitch Way	Site is on or adjacent to the Flitch Way	Uncertain	Where applicable
10) To provide appropriate housing and accommodation to meet existing and future needs	Will the site meet local thresholds for affordable housing?	Call-for-sites information as submitted	Development includes 40% of the total number of dwellings as affordable dwellings.	Development includes 20-39% of the total number of dwellings on site as affordable dwellings.	Development on sites of 5-14n dwellings with less than 20% affordable dwellings proposed	Development on sites of 15 dwellings or more with less than 40% affordable dwellings proposed.	Where applicable.	Non-residential proposals
	Will there be a suitable housing	Call-for-sites information as	Proposal includes / is		N/A	N/A	Where applicable	N/A

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	mix?	submitted	<p>for housing for older people, residential care home, nursing home</p> <p>OR</p> <p>Proposal includes / is for self-build or custom- build housing</p>					
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	Will the density of the proposal fall within desired density ranges?	Policy HO1 - Housing Density: Potential yield per hectare	<p>Within town Development Limits of Saffron Walden and Great Dunmow: 35-67.</p> <p>Within Development Limits of any other settlement: 30-50.</p> <p>Adjacent to any settlement 30-50.</p>	N/A	N/A	<p>Within town Development Limits of Saffron Walden and Great Dunmow: above 67.</p> <p>Within Development Limits of any other settlement: above 50.</p> <p>Adjacent to any settlement: above 50.</p>	Where applicable	Non-residential proposals
11) To promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable	<p>Are utilities available on site?</p> <p>Criterion to be updated once relevant evidence base documents and assessments are progressed.</p>	Call-for-Sites information as submitted	Utilities are available	Appear to be no significant constraints	No utilities available	N/A	Where applicable	Where applicable

development	Can an existing level of infrastructure be expected in line with site's broad location and place within the settlement hierarchy?	Location regarding Local Plan Settlement Hierarchy.	Within or contiguous to development boundaries of Market Towns (Saffron Walden or Great Dunmow)	Within or contiguous to development boundaries of Key Villages (Elsenham, Great Chesterford, Hatfield Heath, Newport, Stansted Mountfitchet, Takeley, Thaxted_	Within or contiguous to development boundaries of Type B Rural Settlements (Arkesden, Aythorpe Roding, Barnston, Berden, Broxted, Elmdon, Great Canfield, Great Hallingbury, Hadstock, Hempstead, High Easter, High Roding, Langley, Lindsell, Littlebury, Little Canfield, Little Easton,	Within the (open) countryside	Within or contiguous to development boundaries of Type A Rural Settlements (Ashdon, Birchanger, Chishall, Clavering, Debden, Farnham, Felset, Flitch Green, Great Easton, Great Sampford, Hatfield Broad Oak, Henham, Leaden Roding, Little Hallingbury, Manuden, Quendon and Ricking, Radwinter,	Where applicable
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					Little Dunmow, Ugley, Wendens Ambo, Wicken Bonhunt, Widdington, White Roding, other small villages and hamlets).		Stebbing, Wimbish) Where applicable	
Would the site meet the preferred threshold for a new primary school?	New primary threshold – 700 new houses or mixed development of 1,000 (one form entry – ECC preferred)	The development meets the threshold for the provision of a new primary school	N/A	N/A	N/A	N/A	N/A	All other sites
Would the site meet the preferred threshold for a new secondary school?	New secondary (inc. Sixth Form) threshold. 6,000 houses is required for six forms of entry (ECC preferred).	The development meets the threshold for the provision of a new secondary school	N/A	N/A	N/A	N/A	N/A	All other sites

<p>12) To improve the education and skills of the population</p>	<p>Is there capacity in primary schools? (individual impacts – cumulative impacts will be undertaken for sites within catchments)</p>	<p>Commissioning School Places in Essex (per school: Forecast Surplus / Deficit including adjustment for new housing). ECC Developer's Guide to Contributions 2010 (exemptions for contributions to school places for 1-bed flats)</p>	<p>N/A</p>	<p>Potential dwelling yield of site can be accommodated by nearest primary school.</p>	<p>Potential yield of site can not be accommodated by both the nearest primary school.</p>	<p>N/A</p>	<p>Where applicable</p>	<p>Site is not proposed for housing, or is specifically for 1-bed flats.</p>
	<p>Is there capacity in primary and secondary schools? (individual impacts – cumulative impacts will be undertaken for sites within catchments)</p>	<p>Commissioning School Places in Essex (per school: Forecast Surplus / Deficit including adjustment for new housing). ECC Developer's Guide to Contributions 2010 (exemptions for contributions to</p>	<p>N/A</p>	<p>Potential dwelling yield of site can be accommodated by nearest secondary school.</p>	<p>Potential yield of site can not be accommodated by both the nearest secondary school.</p>	<p>N/A</p>	<p>Where applicable</p>	<p>Site is not proposed for housing, or is specifically for 1-bed flats.</p>

		school places for 1-bed flats)						
	Would the development increase the demand for Early Years places?	ECC preferred thresholds for new school provision. Early years threshold – 0.09 additional places per new house and 0.045 additional spaces per new flats.	N/A	N/A	N/A	N/A	For information only – Site would require additional place(s).	Site would not require additional place(s). Where applicable
13) To ensure sustainable employment provision and economic growth	Is the site proposed for employment development?	Call-for-Sites information as submitted	Site is proposed for employment	Site is proposed for mixed-use development	Proposal will see a loss of previously employment land	N/A	All other uses	Where applicable
	Will there be a net increase or loss of retail provision?	Call-for-sites information as submitted / Site proposal, planning history.	N/A	Proposal is for, or includes, retail use	Site is currently for retail use and proposal would see a change of use	N/A	Where applicable	Where applicable
	Will the proposal increase rural employment	Call-for-Sites information as submitted	N/A	Employment proposals in rural areas /	Employment proposals in rural areas /	N/A	Where applicable	Where applicable

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	opportunities in a sustainable location?	Aerial mapping		the countryside (as defined) within or adjacent to existing development boundaries	the countryside (as defined) physically separated from existing development boundaries			
	Distance to main employment areas (B1, B2, B8)	GIS / Aerial Mapping	N/A	Less than or equal to 800m from existing employment area	More than 800m from existing employment area	N/A	Where applicable	Employment proposals Where applicable

4.4 The Appraisal of Strategic Sites / New Settlements

4.4.1 Introduction

It is important to emphasise that the Local Plan is strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the Plan is reflected in the scope of the SA. For the purposes of the Local Plan and the accompanying SA Environmental Report, it should be noted that specific policies and allocations for new Settlements will be subject to different sustainability criteria than those of the Site Pro Forma, commensurate to their scale.

4.4.2 The Approach to Strategic Sites / New Settlements in the Local Plan

Such allocations and their reasonable alternatives will be appraised at the site-level within a separate Sustainability Appraisal of each strategic site / new settlement. This approach is taken because of detailed evidence required for these allocations, the possible cross-boundary nature of such allocations and evidence, and the need for a joined up approach to the Sustainability Appraisal between LPAs exploring sustainable locations for developments of a similar scale of growth.

Site level appraisals will be appropriate only once further work has been undertaken for the each strategic site / new settlement. and as a result of joint working with the relevant neighbouring authorities. The Sustainability Appraisal of the Local Plan is relevant to the District only and it should be noted that the methodology and Sustainability Framework (including the pro forma) does not explicitly encompass those sustainability issues of neighbouring authorities. It is believed that the notion of separate Sustainability Appraisals for each strategic site / new settlement would be able to be more focused to specific locales and in scope, as well as better conforming to the requirements of the SEA Directive. It is also considered that the appraisal of sites of a strategic scale would not be able to be consistent or comparable with the appraisal of non-strategic sites in the same document; what constitutes a constraint for a small scale site may not be so for a large scale one, which would have far greater scope at addressing concerns on site as part of the development, particularly regarding necessary infrastructure requirements.

As a result of this, it is more appropriate that Strategic Sites / New Settlements be explored in context of the strategic nature of the Local Plan within this document. The appraisal of the Strategic Sites / New Settlements responds to their role as strategic allocations in line with the District's objectively assessed need and Spatial Strategy options. Alternative sites of a comparable scale within the District are also explored in line with the Local Plan context in order to determine whether the most appropriate and sustainable sites and proposals are being progressed to the 'strategic site / new settlement' stage. This approach is consistent with that taken for the appraisal of 'areas of search' and alternative scenarios for the District's spatial strategy.

4.4.3 The Appraisal of Strategic Sites / New Settlements within the context of the Local Plan

A purpose of this approach is also to help develop the policy content of such allocations and determine what is needed to create sustainable Strategic Sites / New Settlements. This policy approach will be used to ascertain the broad implications of development in the areas as they have been identified. This approach also allows the Strategic Site / New Settlement to be allocated and

developed in line with growth in the rest of the District, looking at the cumulative aspects and impacts of growth identified within the wider Local Plan area.

It is intended that within the Local Plan context, Strategic Sites / New Settlements are explored in line with the Sustainability Framework for policy content, encompassing additional broad sustainability criteria relevant to Garden City / Settlement principles where relevant. This approach would consider the sustainability of strategic scale sites / new settlements as broad locations in accordance with the District’s own specific requirements and sustainability issues, as well as within the context of wider aspirations for sustainable Garden City / Settlements. This would also ensure that the most sustainable options are progressed to the benefit of the District’s specific needs and also, where relevant, not to the detriment of large scale sustainable development principles for any neighbouring authorities where cross boundary options are explored.

The following table explores the compatibility of the Sustainability Appraisal objectives and general Garden City / Settlement Principles for the purposes of this assessment. The sustainability appraisal of Strategic Sites / New Settlements within the context of the Local Plan will offer commentary and broadly comparable impacts as to how options respond to Garden City / Settlement Principles in addition to the criteria set out in the sustainability framework for policy content. The table also explores how far the SA Objectives and Garden City / Settlement Principles conform to the SA Objectives of neighbouring authorities’ Local Plan Sustainability Appraisals for the purposes of a consistent appraisal of any cross-boundary strategic sites.

Table 7: Compatibility of the SA Objectives and Garden City / Settlement Principles

SA Objective	Conformity to Garden City / Settlement Principles	Commentary / Nature of the Appraisal
1) Retain, enhance and conserve biodiversity and the water environment	Generous green space linked to the wider natural environment, including a surrounding belt of countryside to prevent sprawl, well connected and biodiversity rich public parks, and a mix of public and private networks of well-managed, high-quality gardens, tree-lined streets and open spaces	Biodiversity and landscape can be seen as a constraint to development and also a benefit within the context of Garden City / Settlement principles. With that in mind these objectives will be used to assess any existing insurmountable physical limitations of options but also their potential to integrate existing features within them. Options will also be assessed as to their relationship with and impact on neighbouring towns and settlements (maintaining adequate separation).
2) Retain, enhance and conserve the character of the landscape and the quality of soil		
3) To maintain and enhance the district’s cultural heritage, assets and their settings	N/A	Although not specifically related to the aspirations of options due to their nature as newly created settlements, heritage assets can be a

SA Objective	Conformity to Garden City / Settlement Principles	Commentary / Nature of the Appraisal
		constraint on specific locations. The objective will be used to assess the suitability of options in a local context and on a broadly comparable basis, with the potential for mitigation on site or recommendations as to how the site could be progressed to minimise or eradicate potential impacts.
4) To reduce contributions to climatic change	N/A	The assessment of sites in relation to their potential to reduce contributions to climate change would be difficult to conclude at this stage and at the level of detail commensurate to the strategic nature of the Local Plan. It should be considered that new Garden Settlements will have the maximum potential for renewable energy and energy efficiency at the anticipated scales.
5) Reduce and control pollution	N/A	The assessment of sites in relation to their potential to reduce and control pollution would be difficult to conclude at this stage and at the level of detail commensurate to the strategic nature of the Local Plan. The broad assessment of options in relation to any known contaminants and / or other potential constraints that may affect viability will be undertaken. Options will also be assessed as to their relationship with and impact on occupiers of existing properties and neighbouring areas.
6) To reduce the risk of	N/A	The scale and aspirations of

SA Objective	Conformity to Garden City / Settlement Principles	Commentary / Nature of the Appraisal
flooding		Garden City / Settlements indicate that areas at risk from flooding may not be as significant a constraint as smaller and more detailed proposals. The comparable assessment of sites at this stage can broadly set the policy framework of strategic sites in relation to flood risk.
7) To promote and encourage the use of sustainable methods of travel	Integrated and accessible transport systems – with a series of settlements linked by rapid transport providing a full range of employment opportunities (as set out in Howard’s vision of the ‘Social City’).	Garden City / Settlement principles acknowledge the desirability of sustainable transport methods, however there may be some degree of constraint associated with the limitations of rail services in the District. With this in mind, the broad principle of integrated transport systems will be assessed for site options.
8) To ensure accessibility to services		
9) To improve the population’s health and promote social inclusion	Opportunities for residents to grow their own food, including generous allotments	Facilities for the benefit of health and social inclusion are not explicitly covered within Garden City / Settlement principles, however it should be noted that the likely scale of options will maximise the potential of such facilities to be integrated within developments. As such, the assessment of sites regarding health and social inclusion would be difficult to assess in any detail with thin the context of the Local Plan without a comparable level of detail in proposals.
10) To provide appropriate housing and accommodation to meet existing and future needs	Beautifully and imaginatively designed homes with gardens, combining the very best of town and country living to create healthy	Strategic scale housing delivery will be provided by all options. In addition, the details of housing types would be provided at the planning

SA Objective	Conformity to Garden City / Settlement Principles	Commentary / Nature of the Appraisal
	<p>homes in vibrant communities</p> <p>Mixed-tenure homes and housing types that are affordable for ordinary people</p>	<p>application stage. As such, the appraisal of strategic scale sites within the context and level of information required at the Local Plan stage will respond to broad locational criteria in regards to analysis of sites conformity with spatial strategy options and the District's objectively assessed need.</p>
<p>11) To promote the efficient use of resources, including land and ensure the necessary infrastructure to support sustainable development</p>	<p>Land value capture for the benefit of the community</p> <p>Strong vision, leadership and community engagement</p> <p>Community ownership of land and long-term stewardship of assets</p>	<p>It is likely that the scale of options explored for strategic growth in the Local Plan context would enable supporting infrastructure to be delivered as part of developments. The appraisal of options at this level would highlight any broad infrastructure concerns for comparison and to aid the formulation of any site specific policy in future iterations of the Local Plan.</p>
<p>12) To improve the education and skills of the population</p>	<p>N/A</p>	<p>For the purposes of assessing broad locations for strategic scale development against this Sustainability Objective, it should be assumed that the provision of educational facilities would be desirable for inclusion within the proposal. It should be noted that ECC's threshold for a new primary school is 700 new houses or mixed development of 1,000 (one form entry – ECC preferred) and the threshold for new secondary school provision (inc. Sixth Form) is approximately 6,000 houses for six forms of entry (ECC preferred).</p>

SA Objective	Conformity to Garden City / Settlement Principles	Commentary / Nature of the Appraisal
<p>13) To ensure sustainable employment provision and economic growth</p>	<p>A strong local jobs offer in the Garden City itself, with a variety of employment opportunities within easy commuting distance of homes</p> <p>Strong local cultural, recreational and shopping facilities in walkable neighbourhoods</p>	<p>For the purposes of assessing broad locations for strategic scale development against this Sustainability Objective, it should be assumed that employment development will be integrated into the proposals. Options' broad location in regards to existing employment areas will be subject to assessment as per the Garden City / Settlement Principle. There will also be similar assumptions and assessment regarding shopping facilities.</p>

4.5 The Appraisal of Gypsy and Traveller Sites

Uttlesford District Council commissioned Place Services of Essex County Council to undertake an independent Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) on the District's Gypsy and Traveller Local Plan in 2014. The work completed to date included a SA Scoping Report (October 2014) and a subsequent SA Environmental Report (December 2014). This appraisal assessed the suitability of:

- The Plan's Vision and Objectives;
- Site Delivery Options; and
- Gypsy and Traveller allocations put forward to Uttlesford District Council.

The sites assessed were put forward in response to a requirement to provide a district-wide total of 26 new permanent pitches and plots to 2033 as identified in the Gypsy and Traveller Accommodation Assessment (GTAA).

It is the Council's intention to integrate the allocation of Gypsy and Traveller plots and pitches into a single Local Plan for the district to which this Scoping Report responds. It is important to note that no particular policy direction or Gypsy and Traveller pitches and plots have yet been agreed as preferred allocations. It should also be noted that although the SA sustainability framework and site assessment pro forma formulated for the allocation of Gypsy and Traveller plot and pitch provision have been subject to independent consultation, the wider Local Plan process enables additional sites to come forward for consideration.

The following tables reiterate the SA site pro forma for assessing the sustainability of potential Gypsy and Traveller policy and plot and pitch provision developed for the SA of the District's previous Gypsy and Traveller Local Plan 2014. For the purposes of inclusion within the wider Local Plan context, these SA Frameworks have again been published for consultation.

Table 8: The Sustainability Framework for the assessment of Gypsy and Traveller policy

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
<p>1) To retain, enhance and conserve the biodiversity, the water environment and the character of the landscape.</p>	<p>The natural environment and biodiversity</p> <p>Landscape character and quality</p>	<p>Does the policy seek to protect:</p> <ul style="list-style-type: none"> - SSSIs - NNR - LoWS - Ancient Woodland - Protected lanes <p>Does the policy seek to locate development away from areas noted for their high sensitivity to change (from Essex Landscape Character Assessment)?</p> <p>Does the policy seek to minimise any Tree Preservation Orders (TPOs) being affected?</p> <p>Does the policy seek to direct sites on Brownfield land?</p> <p>Does the policy seek to protect the Greenbelt?</p> <p>Does the policy seek to protect the Countryside Protection Zone?</p> <p>Does the policy seek to protect high quality agricultural land?</p> <p>Does the policy ensure that the scale of sites will not be perceived as dominant to the nearest settled community?</p>	<p>Condition of SSSIs in proximity to G,T&TS sites</p> <p>Number of G,T&TS sites and distances from NNRs, LoWSs, Ancient Woodland</p> <p>Number of G,T&TS sites with access arrangements via Protected Lanes</p> <p>Number of G, T&TS sites located in areas of high sensitivity to change in the LCA.</p> <p>Proportion of new G,T&TS sites on brownfield land</p> <p>Number of G,T&TS sites in the Greenbelt</p> <p>Number of G,T&TS sites in the CPZ</p> <p>Number of G,T&TS sites on the highest quality agricultural land</p> <p>Distances of sites to nearest established settlements</p>

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
2) To maintain and enhance the district's cultural heritage, assets and their settings	Archaeology The historic environment and settings	Does the policy seek to protect: <ul style="list-style-type: none"> - Scheduled Monuments? - Listed Buildings? - Conservation Areas? - Registered Park or Gardens? - Other historic or cultural features? - Known archaeological deposits? 	Number of G,T&TS sites affecting the significance of Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks or Gardens Number of G,T&TS sites on locations in the EHER
3) To reduce and control pollution	Road traffic emissions Noise Groundwater issues Waste recycling space / facilities Air quality	Does the policy seek to locate sites away from the District's AQMA? Does the policy seek to protect the ground water protection zone? Does the policy consider residential amenity and the relationship with adjacent uses?	Distances of G,T&TS sites to the AQMA Number of G,T&TS sites within the GPZ
4) To reduce the risk of flooding	Flooding Surface water flooding	Does the policy have a suitable direction on surface water flooding issues? Does the policy seek to direct sites away from: <ul style="list-style-type: none"> - flood risk zone 2? - flood risk zone 3a / b? 	Recorded flood incidences on/next to G,T&TS sites Number of G,T&TS sites on FZ2 / 3a / 3b (and distance where nearby)
5) To ensure access to key services and encourage the use of sustainable methods of	Access to jobs and services Safe pedestrian and vehicle access	Does the policy ensure access is in close proximity to a public transport node? Does the policy have a suitable direction on the	Distance of sites to public transport nodes Distance of sites to healthcare

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
travel		accessibility of healthcare facilities? Does the policy have a suitable direction on accessibility to convenience shopping? Does the policy ensure safe highway access?	facilities Distance of sites to known convenience shopping Sites approved contrary to site assessment for highway access
6) To improve health and promote social inclusion	Community cohesion Inclusive access to sports facilities Access to natural greenspace	Does the policy consider distances to accessible natural greenspace? Does the policy factor in the provision of or distance to recreational land? Does the policy have a suitable direction on contaminated land (including proximity to refuse sites or industrial processes)? Does the policy have a suitable direction regarding enclosure and the isolation of Gypsy, Traveller to rest of the community?	Sites' distances to ANG Number of sites with recreation land provision Distances from sites to existing recreation land Sites' distances to contaminated land
7) To provide appropriate accommodation to meet existing and future needs	Appropriate accommodation	Does the policy ensure that the sizes of yards are adequate for the number of pitches/plots? Does the policy ensure that there is space for visiting caravans? Does the policy ensure that there is space for play areas for children?	Known average yard size per pitch on individual sites Known average visitor spaces per pitch on individual sites Known size of play areas per pitch on individual sites
8) To improve the education and skills of the population	School capacity Access to education, skills and training opportunities	Does the policy ensure adequate accessibility to a primary school? Does the policy ensure adequate accessibility to	Sites' distances to nearest primary school (and whether they conform to standards [800m])

SA Objective	Sustainability Issue(s)	Key Questions – Strategy and Policy	Potential Indicators
		<p>a secondary school?</p> <p>Does the policy factor in the capacity of primary schools to support the size of allocation?</p> <p>Does the policy factor in the capacity of secondary schools to support the size of allocation?</p>	<p>Sites' distances to nearest secondary school (and whether they conform to standards [4.8km])</p> <p>Capacity of nearest primary school to individual sites</p> <p>Capacity of nearest secondary school to individual sites</p>
<p>9) To support sustainable employment provision and economic growth</p>	<p>Employment facilities / opportunities</p>	<p>Does the policy ensure that yards have capacity for work related space / storage?</p> <p>Does the policy ensure sites are suitable for mixed residential and business uses?</p>	<p>Number of sites with yard space / yards space per pitch on individual sites</p> <p>Number of sites with business space / size of business space per pitch on individual sites</p>

Table 9: The Site Pro Forma for the assessment of Gypsy and Traveller allocations

SA Objective	Site Criteria	Source	Major positive (++)	Positive (+)	Negative (-)	Major negative (- -)	Uncertain / Unknown / Negligible (!)	No impact (0)
1) Retain, enhance and conserve the biodiversity, the water environment and the character of the landscape.	Proximity of any:							
	- SSSIs	GIS mapping	N/A	Over 100m	Within 100m	On site	N/A	N/A
	- NNRs	GIS mapping	N/A	Over 100m	Within 100m	On site	N/A	N/A
	- LoWS	GIS mapping	N/A	Over 100m	Within 100m	On site	N/A	N/A
	- Ancient Woodland	GIS mapping	N/A	Over 100m	Within 100m	On site	N/A	N/A
	Will the site be located in an area noted for its high sensitivity to change (from Essex Landscape Character Assessment)?	Landscape Character Assessment 2006	N/A	Low to moderate sensitivity to change / Moderate sensitivity to change	Moderate to high sensitivity to change / Relatively high sensitivity to change	N/A	N/A	Urban area
	Will any Tree	GIS mapping	N/A	None on	On site	N/A	Adjacent to	N/A

Preservation Orders (TPOs) be affected?			site			site	
Is the site greenfield or brownfield?	Aerial mapping	N/A	Brownfield	Greenfield	N/A	Mixed brownfield and greenfield	N/A
Is the site located within the Greenbelt?	GIS mapping	Not in greenbelt	N/A	Within the greenbelt, but acceptable under 'special circumstances'	Within the greenbelt	Partly within the Greenbelt	N/A
Is the site located within the Countryside Protection Zone?	GIS mapping	Not in CPZ	N/A	Within the CPZ but does not lead to the coalescence between the airport and existing development / does not adversely affect the open characteristics of the	Within the CPZ	Partly within CPZ	N/A

					zone.			
	Will the site result in a loss of high quality agricultural land?	Agricultural Land Classification	N/A	Urban area / extension to an existing site / Other land primarily in non-agricultural use	Grade 2	N/A	Grade 3	N/A
2) To maintain and enhance the district's cultural heritage assets and their settings	Will the site harm the significance of the following assets:							
	<ul style="list-style-type: none"> - Scheduled Ancient Monuments - Listed Buildings - Historic Parks and Gardens - Conservation Areas - Heritage assets (local lists) - Archaeology 	UDC Site Assessments (this element undertaken by Historic Environment Advisors/Consultants at Place Services)	N/A	No harm to the significance of a heritage asset.	Harm to the significance of a heritage asset but capable of mitigation.	Significant harm to the significance of a heritage asset not capable of mitigation	Uncertainty surrounding impacts	N/A

	Will there be any material harm caused to the form and alignment of protected historic lanes?	GIS mapping / Site information / site policy (where available)	N/A	Access is not via protected lane / access is via protected lane but would not require amendment to form or alignment	Access is via protected lane and would require amendment to form or alignment	N/A	Unknown	N/A
3) To reduce and control pollution	Is the site in or within 100 metres of any AQMA?	GIS mapping	N/A	No	Yes	N/A	N/A	N/A
	Is the site within a ground water source protection zone?	GIS mapping	N/A	Not in GPZ	Within outer zone (Zone 2, Zone 2c)	Within inner zone (Zone 1, Zone 1c)	Within total catchment (Zone 3)	N/A
	Residential amenity – relationship with existing adjacent uses.	UDC Site Assessments	N/A	Unlikely to adversely affect existing adjoining uses	Close proximity to existing residential properties where potential impacts of light, visual, noise, traffic	N/A	Close proximity to existing residential properties where potential impacts of light, visual, noise, traffic	N/A

					are not reasonably capable of mitigation		are capable of mitigation	
4) To reduce the risk of flooding	Is the site within: - a flood risk zone	GIS mapping	N/A	Zone 1 (no flood risk)	Zone 2	Zone 3a / 3b	Uncertain (to include commentary in appraisal)	N/A
5) To ensure access to key services and encourage the use of sustainable methods of travel	Is the site within 800 metres walking and cycling distance of an existing public transport node?	GIS mapping	N/A	Yes	No	N/A	N/A	N/A
	Will the site be located within 800 metres walking and cycling distance of a GP surgery?	GIS mapping / NHS Choices Services near you	N/A	Yes	No	N/A	N/A	N/A
	Is the site within 800 metres walking and cycling distance of convenience shopping?	GIS mapping	N/A	N/A	N/A	N/A	For information only – unreliable data.	N/A

	Is the site located in an area of highest deprivation nationally for Barriers to Housing and Services?	IMD, 2010 LSOA level	N/A	No	Yes	N/A	On border of two LSOAs that perform differently	N/A
	Does the site provide safe highway access?	UDC Site Assessment	Existing site with suitable existing access	Adequate or good access off adequate or good standard of road. Not affected by safety issues.	Poor access and / or road of poor standard. Likely to be subject to safety issues from surrounding uses incapable of mitigation.	No access	Access poor but capable of being improved. Road of adequate or good standard. Likely to be affected by safety issues but capable of mitigation	N/A
6) To improve health and promote social inclusion	Is there capacity in the nearest GP surgery?	NHS	N/A	Yes	No	N/A	N/A	N/A
	Will the site be within: - 300m of accessible natural greenspace of at least 2ha in	GIS mapping	N/A	Yes	No	N/A	N/A	N/A

size?								
- 2km of a 20ha accessible natural greenspace?	GIS mapping	N/A	Yes	No	N/A	N/A	N/A	
- 5km of a 100ha accessible natural greenspace?	GIS mapping	N/A	Yes	No	N/A	N/A	N/A	
- 10km of a 500ha accessible natural greenspace?	GIS mapping	N/A	Yes	No	N/A	N/A	N/A	
Will the site see a loss of recreational land?	Aerial mapping	N/A	No	Yes	N/A	Uncertain	N/A	
Is the site on contaminated land?	UDC Site Assessment	N/A	N/A	N/A	N/A	Yes - Impact for information only; as commentary in site appraisals	No	
Is the site in close proximity to refuse sites or industrial processes?	Aerial mapping	N/A	No	Yes	N/A	Unknown	N/A	

	Might the site be enclosed to the extent that occupants are isolated from the rest of the community?	Aerial mapping / Site information (where available)	N/A	N/A	N/A	N/A	Potentially enclosed – impact for information only; as commentary in site appraisals	N/A
7) To provide appropriate accommodation to meet existing and future needs	Does the site have existing water supply?	Site information / site policy (where available)	Yes and existing	Yes although potentially insufficient to meet the reasonable demands of number of residents	No but capable of being provided	No and incapable of being provided	Unknown	N/A
	Does the site have existing electricity / gas supply?	Site information / site policy (where available)	Yes and existing	Yes although potentially insufficient to meet the reasonable demands of number of residents	No but capable of being provided	No and incapable of being provided	Unknown	N/A
	Does the site have existing sewerage?	Site information / site policy	Yes and existing	Yes although potentially	No but capable of being	No and incapable of being	Unknown	N/A

		(where available)		insufficient to meet the reasonable demands of number of residents	provided	provided		
	Does the site have existing communal facilities?	Site information / site policy (where available)	Yes and existing	Yes although potentially insufficient to meet the reasonable demands of number of residents	No but capable of being provided	No and incapable of being provided	Unknown	N/A
	Is there space for visiting caravans?	Site information / site policy (where available)	N/A	Yes	No	N/A	Unknown	N/A
	Is there space for play areas for children?	Site information / site policy (where available)	N/A	Yes	No	N/A	Unknown	N/A
8) To improve the education and skills of the	Will the site be located within 800 metres of a primary school?	GIS mapping	N/A	Yes	No	N/A	N/A	N/A

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population	Will the site be located within 4.8km of a secondary school?	GIS mapping	N/A	Yes	No	N/A	N/A	N/A
	Is there capacity in the closest primary school?	Commissioning School Places in Essex	N/A	Forecast Surplus inc. adjustment for new housing	Forecast Deficit inc. adjustment for new housing	N/A	Forecast zero capacity inc. adjustment for new housing	N/A
	Is there capacity in the closest secondary school?	Commissioning School Places in Essex	N/A	Forecast Surplus inc. adjustment for new housing	Forecast Deficit inc. adjustment for new housing	N/A	Forecast zero capacity inc. adjustment for new housing	N/A
9) To support employment provision and economic growth	Does the site have capacity for work related space / storage?	Site information / site policy (where available)	N/A	Yes	N/A	N/A	Unknown	No
	Is commercial or other work activity envisaged for the site?	Site information / site policy (where available)	N/A	Yes	N/A	N/A	Unknown	No

4.6 Next Steps – Consulting on the Scope of the SA

This Scoping Report will be subject to consultation. There are three statutory consultees that are required to be consulted for all Sustainability Appraisal and Strategic Environmental Assessment documents. These are:

- The Environment Agency;
- Natural England; and
- Historic England.

In addition to these, Uttlesford District Council may wish to expand this list of consultees to include relevant stakeholders and interested parties.

All comments on the content of this Scoping Report should be sent to:

planningpolicy@uttlesford.gov.uk

Planning Policy Team
Council Offices
London Road
Saffron Walden
Essex
CB11 4ER

5 Monitoring

The significant sustainability effects of implementing a Local Plan must be monitored in order to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. The SA Framework of this Scoping Report contains suggested indicators in order to monitor each of the SA Objectives, however these may not all be collected due to limited resources and difficulty in data availability or collection.

Guidance stipulates that it is not necessary to monitor everything included within the SEA Framework, but that monitoring should focus on significant sustainability effects, e.g. those that indicate a likely breach of international, national or local legislation, that may give rise to irreversible damage or where there is uncertainty and monitoring would enable preventative or mitigation measures to be taken.

Upon adoption the Plan will be accompanied by an Adoption Statement which will outline those Monitoring Indicators identified and deemed most appropriate for future monitoring of the Plan.

This information is issued by
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or made available in alternative formats, on request.

Published July 2015

Committee: Planning Policy Working Group

Agenda Item

Date: 27th July 2015

7

Title: Approach to Local Plan Transport Assessment

Author: Jeremy Pine, Planning Policy /
Development Management Liaison Officer

Key decision: No

Summary

1. In formulating a new Local Plan, transport assessment is a very important requirement. This report explains the basic principles that the Council will need to follow in building up its plan-making transport evidence base. The report looks at:
 - i) national policy and guidance,
 - ii) transport assessment
 - iii) comments raised by the Local Plan Inspector about the transport assessment work carried out, and
 - iv) work programme, including the benefits of appointing an independent transport consultant to assist the Council.

Recommendations

2.
 - i) That Members support the approach set out in the report, and
 - ii) That any Member comments or suggestions on the approach be discussed.

Financial Implications

3. The costs associated with the carrying out of the transport assessment can be met from existing budgets:

Background Papers

4. None

Impact

- 5.

Communication/Consultation	Formal consultation as the Local Plan develops will be carried out in accordance with the Statement of Community Involvement.
Community Safety	None
Equalities	The Local Plan impacts on all sectors of

	the community.
Health and Safety	None
Human Rights/Legal Implications	None
Sustainability	Appraisal of alternatives to the emerging plan will be undertaken.
Ward-specific impacts	All.
Workforce/Workplace	Planning Policy Team and other officers as appropriate.

Situation

6. Following receipt of the report of the Planning Inspector on the previously submitted Local Plan in December 2014, the Plan was withdrawn in January of this year. The District Council has now restarted the plan formulation process, an important part of which will be transport assessment.
7. A robust transport evidence base is required to support the preparation of a new plan. The evidence base can facilitate a plan being found sound, and can reduce costs and delays of new development.
8. The transport evidence base should identify opportunities for encouraging a shift to more sustainable transport usage where reasonable to do so, and highlight the necessary infrastructure requirements.

Risk Analysis

9.

Risk	Likelihood	Impact	Mitigating actions
Without an adequate transport evidence base, a local plan can be found unsound.	2. Can be addressed and managed through the Working Group discussion process, "Duty to co-operate" meetings and other meetings with Highways England and local highway authorities.	3. There are considerable risks from impacts on the highway that cannot be mitigated.	Ongoing discussion with relevant parties, and the iterative process of model formulation and testing. Appoint an independent transport consultant to assist the Council with the preparation of the Local Plan.

1 = Little or no risk or impact

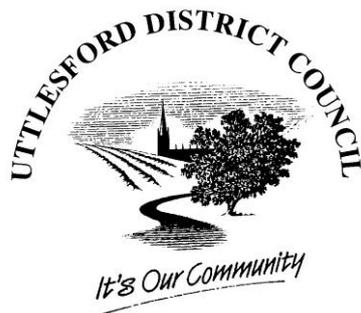
2 = Some risk or impact – action may be necessary.

3 = Significant risk or impact – action required

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

**UTTLESFORD LOCAL PLAN
APPROACH TO LOCAL PLAN TRANSPORT ASSESSMENT**

JULY 2015



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INTRODUCTION

1. Following receipt of the report of the Planning Inspector on the previously submitted Local Plan in December 2014, the Plan was withdrawn in January of this year. The District Council has now restarted the plan formulation process, an important part of which will be transport assessment.
2. This report explains the basic principles that the Council will need to follow in building up its plan-making transport evidence base. The report looks at:
 - i) national policy and guidance,
 - ii) transport assessment
 - iii) Local Plan Inspector's comments, and
 - iv) work programme.

NATIONAL POLICY AND GUIDANCE

3. In March 2012 the National Planning Policy Framework (NPPF) was published, and a set of Planning Practice Guidance (PPG) was issued a year later. This framework is underpinned by the Planning and Compulsory Purchase Act 2004. Plan-making is part of a "quasi-judicial" process and therefore local planning authorities are constrained by national policy and guidance in terms of what they must do in their local plans if those plans are to be found sound by the Planning Inspectorate and carry legal force.
4. HM Treasury has just published its productivity plan entitled "Fixing the foundations: Creating a more prosperous nation". In the plan, the Government has confirmed that it will set a deadline for local authorities to put local plans in place, with the deadline being set by the summer recess. Where plans are not in place, the Secretary of State will intervene to arrange for local plans to be written, in consultation with local people.

National Planning Policy Framework

5. Promoting sustainable transport is an important feature of the NPPF. Sustainable transport refers to public transport, walking and cycling. It can also refer to other measures designed to reduce car use such as personal, company and railway station travel planning, car sharing and travel information packs for new residents of new houses. Many of these other measures can be secured by planning conditions or obligations. Paragraph 29 states that (inter alia):

“the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas”

6. More is said of this issue later in this report, especially in relation to the relatively high levels of car ownership and car use within the district.
7. Paragraph 30 gives further advice which local authorities need to take into account when looking at development options:

“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing local plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport”.

8. Similar advice to Paragraph 30 is given in Paragraphs 34 and 35, namely locating significant traffic generators where the need to travel can be minimised and the use of sustainable transport modes can be maximised. Again, the differing needs of rural areas are highlighted.
9. Paragraph 37 refers to planning policies aiming for a balance of land uses so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
10. Paragraph 38 is prescriptive about larger scale housing developments:

“For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including working on site. Where practical, particularly within larger-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties”.

Planning Practice Guidance

11. The relevant guidance is entitled “Transport evidence bases in plan making and decision taking”. The opening paragraph (001) states that:

“The transport evidence base should identify the opportunities for encouraging a shift to more sustainable transport usage, where reasonable to do so; and highlight the infrastructure requirements for inclusion in infrastructure spending plans”.

12. The guidance gives advice on what type of baseline information should inform a local plan transport assessment and what detailed information is required for the assessment to take place. The guidance also advises on assessment methodology. In relation to how the assessment is produced, Paragraph 005 advises that:

“The transport assessment should be produced at a local plan level in partnership with all relevant transport and planning authorities, transport providers and key stakeholders, for example the Local Economic Partnership. It may be appropriate for the transport assessment to cover an area wider than the local plan at least initially given the size of some travel to work areas (this would be similar to the Strategic Housing Market Assessment). This process should help to identify any potential measures that may be required to mitigate negative impacts”.

13. The local SHMA area covers East Herts, Epping Forest, Harlow and Uttlesford districts. “Duty to co-operate” transport assessment meetings between these authorities, Essex and Herts County Councils and Highways England are ongoing, looking as cross-boundary strategic highway matters.
14. Paragraph 003 identifies seven key issues which need to be considered in developing a transport evidence base. These are worth highlighting in this report as some common emerging themes are clearly evident from what has been said earlier in this report. The issues are:
 - i) assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms,*
 - ii) assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport,*
 - iii) highlight and promote opportunities to reduce the need for travel where appropriate,*
 - iv) identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate,*
 - v) consider the cumulative impacts of existing and proposed development on transport networks,*
 - vi) assess the quality and capacity of transport infrastructure and its ability to meet forecast demands, and*
 - vii) identify the short, medium and long-term transport proposals across all modes.*
15. The guidance (in Paragraph 004) identifies three stages of transport assessment during the preparation of a local plan. More is said of these three stages later in this report. The three stages are:
 - i) issues and opportunities*
 - ii) options testing*
 - iii) preparation of the final submission.*

TRANSPORT ASSESSMENT

Strategic level assessment work

16. Transport assessment is an iterative process, becoming more refined and detailed as the process draws to a conclusion. In relation to the withdrawn plan, “duty to co-operate” transport assessment work looked at the effect on the strategic transport network taking into account the impacts of existing and committed development and proposed development within Uttlesford and its neighbouring authorities. This work is ongoing as the various authorities prepare and refine their new plans. The main strategic assessment relates to impacts upon M11 J7 and J8, the A120, A414 and A1184 and Bishop’s Stortford and Harlow town centres. Essex County Council is also proceeding with work on proposed M11 Junction 7A prior to a formal public consultation in 2016. Junction 7A is a proposed new junction between J7 and J8 to improve access into and out of the Harlow area, as Harlow is currently only served by J7 which is already very busy.
17. Initial assessment work for issues and opportunities and options testing is undertaken by assessing the effect of differing amounts and locations of development by loading relevant trip generation data for various proposed land uses into a transport model and carrying out a run or a number of runs of the model. Each run would therefore test a particular development scenario for comparison against each other and against a baseline. From these runs, stresses and strains on the network links and junctions can be identified from, for instance, increased queueing and / or congestion.
18. Paragraph 32 of the NPPF states that development should only be prevented or refused when transport impacts would be severe. However, “severe” is not defined. A judgement will need to be made on whether impacts are severe. Highways England has stated that it considers an impact to be severe if it compromises safety (e.g. queueing onto a motorway carriageway), although County Councils mostly have no defined position on this. The term “gridlock” is often colloquially used in describing adverse effects on the highway, but it has no meaning in planning policy. Evidence will always be required, probably in the form of results from transport modelling, to assess transport impacts against Paragraph 32.
19. Subsequent model runs can include building in proposed mitigation (such as junction improvements and / or new links) with the ideal aim of achieving a “nil detriment” position with regard to queueing and congestion etc. A “nil detriment” position is one where queueing and congestion would be no worse in a “post development” world compared to the baseline. In reality, assessors will probably be seeking to achieve an outcome where effects are not “severe”. More localised modelling may be required to assess effects in more detail on particular parts of the network.
20. Initial assessment work is harder to carry out when participating local authorities are at different stages of local plan preparation. This is

because it is difficult to assess what the actual effect on the network will be when development amounts and locations are not finally determined across the model area. There is a considerable risk of a plan being found unsound if authorities progress their plans at a different pace because modelling is likely to be incomplete. In an ideal world, co-operating local authorities would progress their plans at the same pace, but reality is not like that.

21. A new strategic computer based model is being commissioned by Essex County Council to replace the existing ones that are being used. The new model is designed to help with the assessment of M11 J7A, and separate runs can be made to consider the effects of development being proposed in the emerging local plans. The model is a VISUM type model, which is a German acronym for "Traffic in cities – simulation model". The model uses mobile phone data to provide trip information together with traffic data collected on roads and junctions across the area to reflect actual flows. The model can identify transport modes being used and also interchanging. The model base year will be 2014. Highways England has been engaged with the model preparation process, but the model has not yet been signed off as being fit for purpose by either Highways England or the DfT.
22. A plan showing the full VISUM model area is attached at the end of this report. The full model area is shown in red, and the network links feeding into the model are shown in blue. The full model area includes the SW portion of Uttlesford, and does not include M11 J9 at Great Chesterford / Stump Cross or the A120 east of Little Canfield beyond the junction with the B1256 (old A120).
23. There are three other models which can be used for transport assessment within the district. These are summarised in Table 1 below (all information provided by Essex County Council):

Table 1: Transport models for use in transport assessment

Model name	Coverage	Type	Age	Status
Uttlesford Local Plan model (used for the Highway Impact Assessment)	Uttlesford	Spreadsheet model. Traffic distribution based on census information, including journey to work, but also includes data collected on the ground	3 yrs	Live and available

		to reflect actual flows and movements. Works well in rural areas.		
M11 J8	Junction and immediate approaches	“Linsig” model – computer based for modelling traffic signal operation, based on traffic data and journey to work data	Current	Being updated with date from M11 J7A model
A120 / B1383 (Bishop’s Stortford bypass)	Junction only	“Arcady” computer based model for modelling roundabouts from actual traffic data and journey to work data and information provided by developers.	Current	Available for use

24. As the preparation of the new Local Plan progresses, a decision will need to be made as to whether the coverage of the existing models is adequate or whether further coverage is needed. This will depend on the options for development that are taken forward.

25. The Council will need to work closely with neighbouring districts to understand the cumulative highway impacts of growth proposed in their Local Plans. This will include East Herts Council (and Herts County Council) in relation to M11 J8, South Cambridgeshire District Council (and Cambridgeshire County Council) in relation to M11 J9, and Braintree District Council in relation to the A120.

Local assessment work

26. At a more local level, Essex Highways were commissioned to prepare the Uttlesford Local Plan Highway Impact Assessment (HIA). The assessment was published in 2013 in time for the plan pre-submission consultation. This was a study

“to assess the existing situation in key locations, and then assess the implications of the ULP in highway terms at key junctions, and identify and evaluate mitigation measures, if required. Two future years, 2018 and 2026 have been assessed, with a base year of 2012. This is in order to more clearly understand the impact of already committed development, and then the cumulative effect of the ULP proposals” (Page 1). An updated HIA was published in March 2014, focussing on Saffron Walden, Great Dunmow and Elsenham.

27. A large part of the HIA is still likely to be useful, but it will need to be carefully reviewed to make sure that it is fit for purpose. Further HIA modelling work may be required depending upon which options are taken forward.
28. The “Call for Sites” identification process requires site promoters to submit a transport assessment. These assessments will be critically appraised by the Council through the Local Plan process.

Sustainable transport

29. Uttlesford is a large district with a relatively small and dispersed population. As a result, public transport connectivity within the district is often regarded as being poor with, for instance, much of the bus network being run under contract and with subsidy.
30. In spite of this perception, the district does have some more robust assets. In particular, these are:
- i) West Anglia Main Line rail services, including the recent enhancement to the Stansted Airport to Cambridge service which now runs half-hourly between peak hours on weekdays,*
 - ii) parts of the local bus network (mainly in the south of the district) where service frequencies are higher and hours of operation longer because of demand from the airport, and*
 - iii) sections of the National Cycle Network that run through the district, namely Route 11 from Stansted Mountfitchet to Cambridge (via Ickleton) and Route 16 which connects Stansted Airport with Braintree (via the Flitch Way) and which will continue to Witham.*
31. As both NPPF and PPG advice is strongly geared towards use of sustainable modes of transport, any transport assessment will need to consider in the issues and opportunities and options testing stages how the district’s existing assets can contribute to reduced car use.

General comment

32. It must be stressed that local plan transport assessment is not about looking in detail at individual sites and identifying what local mitigation measures may be required. This is the function of transport assessments and transport impact statements which are submitted with planning applications. However, the Local Plan should show that there is a reasonable prospect that necessary mitigation measures can be delivered. For development expected in the first five years of the plan period more detail is likely to be required. Local Plan policies will set out any significant mitigation measures that are required. Any more localised measures that may emerge from transport assessment of planning applications can be secured by either planning conditions or a planning obligation.

LOCAL PLAN INSPECTOR'S COMMENTS

33. This section of the report looks at some of the general issues that the Inspector dealt with in his conclusions, and which are likely to arise again with any fresh transport assessment.

Strategic Impact

34. The Local Plan Inspector's main conclusion on transport assessment referred to PPG Paragraph 005, which requires a robust transport evidence base to be in place at Local Plan submission. He did not consider that there was sufficient evidence that potential measures had been identified to mitigate the negative impacts, particularly those affecting a wider area than a single authority.
35. Looking at the wider effect on the strategic road network, he commented in his conclusions about concerns expressed by both Highways England (Highways Agency as it was at that time) and Essex County Council that there had been insufficient investigation of the cumulative impact of development on the strategic road network, in particular M11 J8. He referred to the Agency's concern that sites had been identified before it was clear that deliverable measures to manage any unacceptable impacts were available. This is a criticism that mainly arises from the differing stages of local plan preparation that had been reached.
36. He was also concerned that further modelling work being undertaken at that time could identify the need for more costly improvements which would need Local Enterprise Partnership funding. He also noted that reference had been made to improvements which may become necessary at some stage if Stansted Airport expands beyond its present cap, and which may bring in additional resources for J8 improvements. However,

the timing of that is uncertain and could be subject to wide variation from the Airport's present aspirations.

37. Stansted Airport is currently growing at a very fast rate, currently about 2.5 – 3mppa (million passengers per annum) each year. This is twice the average growth rate achieved from the opening of the terminal in 1990 to the start of the economic downturn. Table 2 below shows three possible growth scenarios to 25 and 35mppa (currently, throughput is about 21.5mppa). M.A.G refers to the Manchester Airports Group which purchased the airport in March 2013.

Table 2: Growth scenarios at Stansted Airport

Growth to:	25mppa	35mppa
Rate of growth		
Average since M.A.G ownership	June 2017	May 2023
Since start of 2015	July 2016	December 2019
"Split the difference"	January 2017	March 2021

38. Assuming a target date for adoption of the new plan in 2017, it is likely that any effects from any expansion of Stansted Airport beyond its existing planning caps that might be permitted could be felt early in the plan period if the airport is to retain "business as usual" growth. In view of the Inspector's comments, strategic network assessment will have to take into account headroom for any future growth at the airport. In the transport assessments submitted with the "Call for Sites", the Council asked for assessments to assume growth to 45mppa, the presumed maximum capacity of the single runway.
39. In Paragraph 2.26 of his conclusions, the Inspector repeated a question that he had asked earlier, *"is the present state of evidence sufficient to demonstrate that (when the models under development have been run) the Uttlesford allocations, taken together with those in nearby Districts, will be sound in the sense of being compatible with the capacity of the road network"*? His answer was that he could not conclude that the question had been answered sufficiently positively.

Elsenham / Henham

40. When assessing the localised impacts of Elsenham Policy 1, the Inspector took into account what the HIA said about travel patterns in Uttlesford as a rural district. There are five indicators, which are set out below:
- i) higher than average household car ownership (only 10% of households do not have a car, compared with 26% nationally),*
 - ii) higher than average cars per household (1.6 compared to 1.2 nationally),*
 - iii) higher than average level of travel to work by car (41% compared with 38% nationally),*

- iv) lower than average travel to work by train (0.5% compared with 2.6% nationally), and
- v) journeys to work are longer than average (44% of journeys are longer than 10km, compared with 28% nationally).

41. When considered together, the conclusion to be drawn from these five indicators is that Uttlesford residents and workers have a higher propensity to travel by car than the national average, and for longer distances, especially commuting. Car commuters can be resilient to change of mode because of the very convenience of origin to destination or origin to interchange driving. In a rural area such as Uttlesford, meeting NPPF policy to maximise the use of sustainable transport can therefore be (and will continue to be) challenging.
42. Improvements to public transport can have counter-intuitive effects in locations where there is a higher propensity to travel by car. The Inspector saw a clear benefit from residents being able to use the West Anglia Main Line stopping services at Elsenham, but then commented that the 2014 HIA showed that there had been some reduction in passenger use at Elsenham since 2011/12 because of better services offered by the Stansted Express from Bishop's Stortford and Stansted Mountfitchet. This is an example of where improved rail services have likely increased local road trips from Elsenham to make use of the improved rail services available for the other stations contrary in this respect to the aim of NPPF Paragraph 34.
43. The Inspector commented that Elsenham's distance from the strategic road network *"in a location embedded within a network of rural roads acknowledged as currently unfit to serve expansion on the scale proposed"* (Paragraph 2.16) was a major disadvantage of Elsenham Policy 1. He noted that some public transport improvements would be possible (such as enhanced local bus services) and that the planned growth of local facilities could reduce the demand for travel. He went on to conclude in the same paragraph that:
- "Nonetheless, the development would place substantial increased pressures upon existing unsuitable rural routes. Various proposed mitigation measures and solutions have been proposed for overcoming this disadvantage but these have not been shown either to be clearly able to secure their objectives or to be deliverable. My overall conclusion on the evidence is that there are serious doubts that Elsenham could overcome the connectivity disadvantages of its location sufficiently to be regarded as consistent with national policy or effective in being able to secure sustainable development".*
44. One theme that has been referred to in this report is minimising the need to travel. The Inspector acknowledged that planned growth of local facilities would help to reduce transport demands at Elsenham. In the Development Strategy: Options Stage Methodology report to the PPWG on 13th July 2015, five basis conceptual options were explained, namely

urban intensification, urban extensions, village extensions, infilling and free-standing new settlements. In all of these, travel reduction can be encouraged by locating housing near to jobs, schools, shops, leisure and other facilities, but consumer choice and the propensity to travel by car can blunt travel reduction efforts. There is no overall one “right” solution to travel reduction.

45. Village extensions can be effective in reducing the need to travel if the extra use / trade / custom that new residents bring allow local facilities to stay open. A good example of this would be a primary school with a declining school roll – the option being closure and the need to travel to another school. Also, the retention of local facilities greatly assists people with reduced mobility.

Saffron Walden

46. Whilst the Inspector said that he thought Saffron Walden Policy 1 was a sound strategic allocation, he queried what the function was of the proposed link between Thaxted Road and Radwinter Road. He commented that it seemed to be regarded as an extension of the present cross-town route from London Road to Thaxted Road. He doubted whether Saffron Walden Policy 1 either had sufficient precision and effectiveness, or whether it provided the County and District Councils with a way of securing objectives where the policy would be implemented incrementally by developers with different focuses and timescales.
47. The Inspector who dismissed the Kier appeal against refusal of outline planning permission for up to 300 houses said that (Paragraph 66 of his decision letter):

“In terms of access to services and facilities by sustainable transport modes, my conclusion is that, taking account of the opportunities available in a market town in a largely rural District, the site would provide a suitable location for housing”.

This echoes the comments of the Local Plan Inspector about the site being a sound strategic allocation, but the Kier Inspector attached only limited weight to the provision of an interim and the full link road because of uncertainties about delivery. He said that it had not been satisfactorily demonstrated that the residual cumulative impacts on the local road network would not be severe.

Main conclusions

48. Four main conclusions can be drawn from what the Local Plan (and the Kier) Inspectors said. These are matters which will need to be borne in mind as the new Local Plan is prepared.

Conclusion 1

49. Unresolved modelling and mitigation of the strategic road network is an effective “show stopper” for the local plan process.

Conclusion 2

50. High levels of car ownership and a high propensity to travel by car in a district like Uttlesford can (and probably will) make it difficult to increase use of sustainable transport modes and reduce the need (or desire) to travel.

Conclusion 3

51. New links that are proposed need to have a clear purpose backed up by evidence, a means of delivery and a clear timescale for implementation.

Conclusion 4

52. There needs to be clear, robust evidence to justify why cumulative impacts on links and / or junctions would or would not be “severe” as the case may be.

WORK PROGRAMME

53. The Council has started a procurement process to appoint an independent transport consultant to assist it in the preparation of the Local Plan. There are a number of issues that the consultant should be able to help with. These are (not in any order of importance):

- i) helping to put together a transport assessment work programme identifying key milestones to ensure national policy requirements are met,*
- ii) commenting in more detail and in more depth than planning officers can on transport issues that have been raised at Local Plan Examinations and relevant local appeals, and what lessons can be learned,*
- iii) advising on the scope of transport modelling required and specifying modelling runs,*
- iv) interpreting modelling requirements,*
- v) assisting with the design of mitigation measures for testing, if necessary,*
- vi) providing support at the Examination in Public,*
- vii) providing a “Critical Friend” review of the HIA and other work carried out to date,*
- viii) providing high-level assessment of the ‘areas of search’.*

54. Whilst an independent transport consultant can greatly assist the Council, it will still be for Highways England and Essex County Council as the statutory consultees to take a view on the emerging Local Plan.

55. The Work Plan and Risk Assessment report to the PPWG on 13th July 2013 set out an indicative work plan in Table 1 on Page 21 of the agenda. Based on that table, Table 3 below gives more detail on the transport

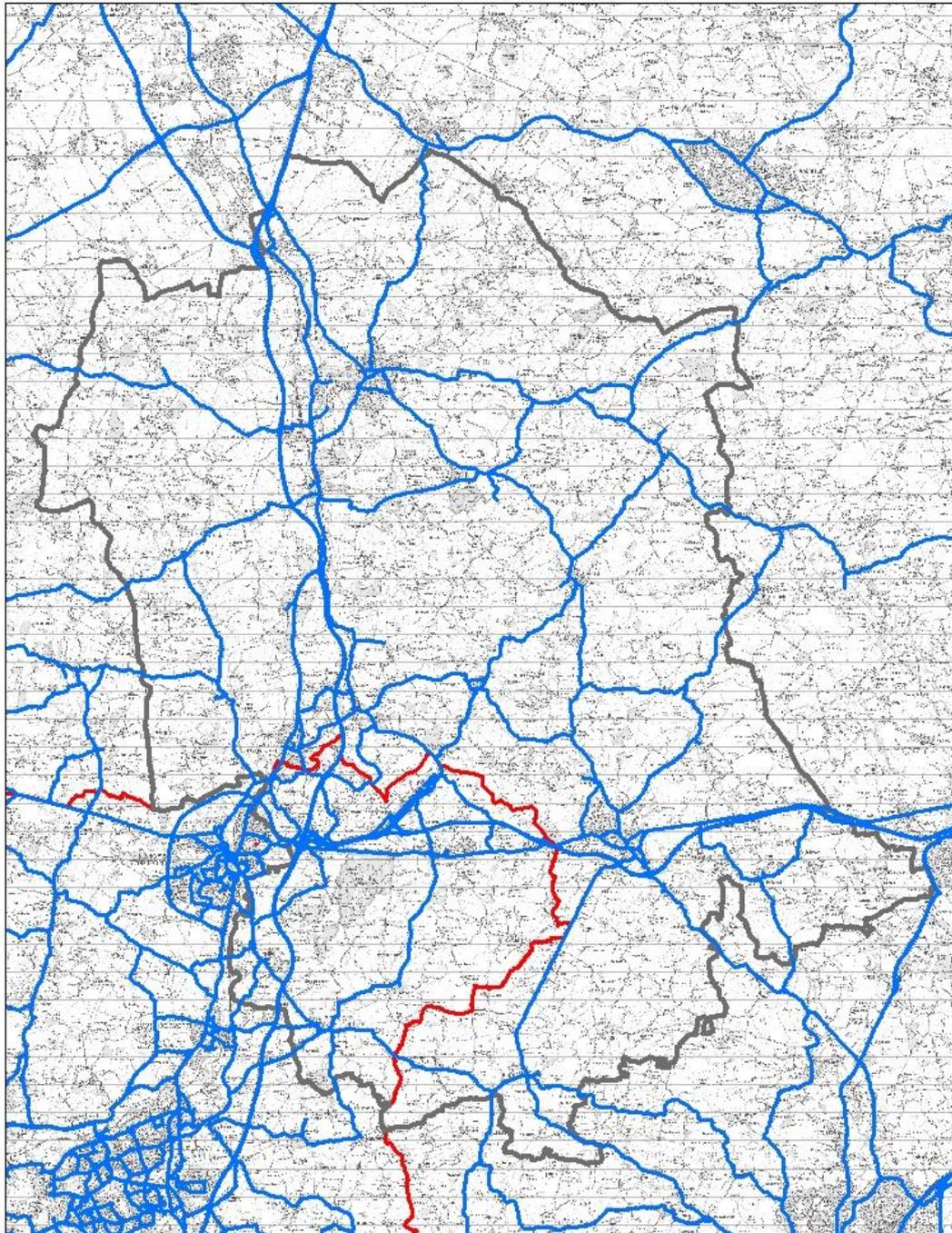
assessment programme (Task 6 in Table 1). No times are included in the work programme, but the overall work plan will be used to update the Local Development Scheme.

Table 3: Initial transport assessment programme

<p><u>Step 1</u> Initial preparation</p>	<p><i>Continue work on the development of the strategic modelling, especially assessing effects on M11 J8. Work with Highways England, Essex CC, Herts CC, East Herts and Harlow Councils and M.A.G.</i></p> <p><i>Consider whether the current suite of models will remain fit for purpose for use within Uttlesford. Assess need for model refinement or whether new models are required.</i></p> <p><i>Appoint an independent transport consultant.</i></p>
<p><u>Step 2</u> Options</p>	<p><i>Continue strategic modelling work, looking for deliverable solutions to any severe effects that have been identified.</i></p> <p><i>Commission model refinement / new models if required. Begin model runs on emerging options.</i></p> <p><i>Engage with public transport providers over opportunities for increasing use of public transport. Look at opportunities to integrate walking and cycling within the emerging options.</i></p> <p><i>Engage with site promoters on issues and further clarification required on their transport assessments</i></p>
<p><u>Step 3</u> Plan formulation</p>	<p><i>Continue work on strategic modelling.</i></p> <p><i>Analyse emerging options model runs, and design any mitigation that is required. Carry out further model runs to assess the effectiveness of the mitigation.</i></p>
<p><u>Step 4</u> Draft plan</p>	<p><i>Continue mitigation testing as an iterative process on the draft plan option.</i></p>
<p><u>Step 5</u> Refinement</p>	<p><i>Commission any further more local modelling / study work that may be necessary</i></p>
<p><u>Step 6</u> Pre-submission</p>	<p><i>Carry out the further modelling and study work to refine the pre-submission plan.</i></p>

APPENDIX 1

M11 J7A VISUM MODEL – AREA COVERAGE



-  District Boundary
-  2014 Network Link
-  Full Model Area

1:170,000 

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Committee: Planning Policy Working Group

Agenda Item

Date: 27 July 2015

8

Title: Neighbourhood Development Plans and the Local Plan

Author: Martin Paine, Planning Policy Team Leader

Summary

1. The attached report proposes that the District Council should encourage Parish Councils to submit a Neighbourhood Area designation to the District Council by the end of 2015, should they intend to prepare a Neighbourhood Plan to become part of the Development Plan for the area, to guide future planning applications in a manner consistent with the emerging Local Plan.
2. It provides guidance relating to Neighbourhood Development Plans and their relationship with Local Plans, in order to assist Parish Councils in making this decision.

Recommendations

That the report be supported as a basis for approaching Parish Councils regarding their intentions in respect of the preparation of Neighbourhood Development Plans aligned with the emerging Local Plan.

Financial Implications

3. As set out in the report, some budget to provide expert consultancy advice is available to support Parish Councils preparing Neighbourhood Plans. Further details of funding for Neighbourhood Plans is included in the report.

Background Papers

4. None

Impact

Communication/Consultation	It is intended that the attached report should be emailed to Parish Clerks
Community Safety	None
Equalities	The Local Plan impacts on all sectors of the community.
Health and Safety	None

Human Rights/Legal Implications	None
Sustainability	Will be assessed as part of work on the Local Plan and, where relevant, Neighbourhood Plans.
Ward-specific impacts	All.
Workforce/Workplace	Planning Policy Team and potential resources required by Parish Councils preparing Neighbourhood Plans.

Situation

5. This report follows on from early discussion of the Options stage methodology discussed by the Planning Policy Working Group on 13 July 2015.
6. Traditionally, Local Plans allocate development in villages. This can help to ensure development is spread around the district and ensure that new development helps to support essential rural services such as shops, pubs and village schools.
7. An alternative approach would be to leave development in the villages entirely to Parish Councils, who may or may not choose to allocate sites through Neighbourhood Development Plans. Neighbourhood Development Plans differ from Parish Plans in that following successful referendum, examination and adoption by the Local Planning Authority they attain the same weight in the consideration of planning applications as Local Plans.
8. However, some Parish Councils may feel that the resources and level of commitment required are significant and may therefore choose not to prepare a Neighbourhood Development Plan. This is a likely scenario and will result in a patchwork of plans across the District.
9. Such a scenario would make it difficult to demonstrate to a Local Plan inspector that the District Council had 'made every effort' to meet Objectively Assessed Needs for housing across the area. For this reason it is highly likely that the Local Plan will need to consider allocating some development sites in some villages as part of an overarching strategy for the District. In doing so the District Council will need to take account of input from Town and Parish Councils.
10. Neighbourhood Development Plans can provide a way for an enhanced level of community participation in the site allocation process, and are encouraged by the District Council. However, as set out in the NPPF and the PPG (see Section 1 and Appendix A to this report) it is important that such plans should be consistent with emerging Local Plans.

11. This consideration applies not only to small sites but also to the edges of towns, which may need to grow across administrative boundaries into a neighbouring Parish area. It also applies to any potential new settlements which may be located within one or more Parishes. Such developments could be critical to delivery of the development strategy for the Local Plan. As national policy and guidance makes clear, it is not the role of Neighbourhood Development Plans to obstruct development.
12. In order to facilitate the alignment of any potential Neighbourhood Development Plans with the Local Plan, any Parish Councils which have not yet done so are encouraged to submit any proposed Neighbourhood Plan areas to the District Council for consideration by the end of 2015. This should allow Parish Councils sufficient time to seek local views and make a decision through their Parish meetings, and to prepare applications to the District Council.
13. This would then allow time for significant progress on Neighbourhood Development Plans to be made by the time of examination of the Local Plan. This would demonstrate to a Local Plan inspector that a clear delivery mechanism for development in the villages is in place, enabling the District Council to comply with the requirements for a positively prepared and effective plan (NNPF Paragraph 182).

Parish Forum 28 September 2015

14. A Parish Forum is to be held at the District Council offices at Saffron Walden on 28 September 2015 (at 7pm). The Forum will cover a range of different issues but it is proposed that the Forum should be used to give further consideration to ways in which the District Council can work together with Parish Councils in relation to the issues referred to in this report.

Risk Analysis

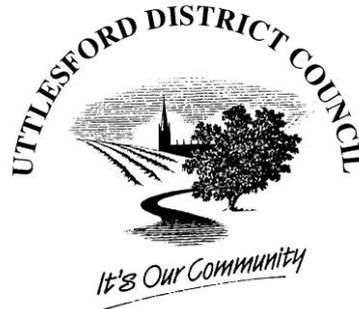
Risk	Likelihood	Impact	Mitigating actions
Without the proposed approach there is a risk that there could be inconsistency between Neighbourhood Development Plans and the Local Plan.	1. Can be addressed and managed through co-operative working with Parish Councils	3. Could result in the Local Plan being found unsound due to lack of a positively prepared and effective plan.	Communication with Parish Councils, including at the Parish Forum on 28 September.

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.



Neighbourhood Development Plans and the Local Plan

27 July 2015

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1. Introduction

- 1.1 This document proposes that the District Council should encourage Parish Councils to submit a Neighbourhood Development Plan Area to the District Council by the end of 2015 for consideration, should they intend to prepare a Neighbourhood Plan to become part of the Development Plan for the area, to guide future planning applications in a manner consistent with the emerging Local Plan.
- 1.2 The document also provides guidance relating to Neighbourhood Development Plans and their relationship with Local Plans, in order to assist Parish Councils in making this decision.

Background

- 1.3 A report to the Planning Policy Working Group on 13 July 2015 addressed a number of conceptual options for the Local Plan development strategy, including urban intensification, urban extensions, infilling, freestanding new settlements, and village extensions. In relation to the conceptual options of village extensions, the report includes the observations set out below.

“These are similar in concept to urban extensions, but are much smaller in scale. Sometimes village extensions can relate well to an existing village, and can help to secure the long-term future viability of some village facilities, for example by using spare capacity in a village school. Village extensions can assist with provision of the 5-year housing land supply because they usually do not require significant lead-in time for provision of infrastructure or site preparation. They may score highly in terms of deliverability.

“The disadvantage of most villages is that they are relatively remote from the full range of facilities and residents are heavily dependent on private car usage, which can cumulatively add to the strains on the wider transport network as well as local rural roads. To address these issues most Local Plans categorise villages according to the level of services and facilities and therefore suitability in principle for modest scale development. However in practice even villages with a relatively good range of facilities are capable of accommodating only a small amount of development.

“Because of the small scale of villages relative to towns, these locations are often very sensitive to development and detailed consideration of the landscape setting and character is necessary in order to avoid substantial harm. In terms of the Local Plan work programme, it may be difficult to resource detailed study of a large number of small sites in multiple villages.

It is necessary for the District Council to reach a view on the overall approach to villages, taking into account the strategic nature of Local Plans, the relatively small contribution to development needs which may be made by the villages collectively, and the new powers and responsibilities invested in Parish Councils through Neighbourhood Planning. It may be that the District Council chooses to focus on providing allocations in only a very small number of villages based on sustainability criteria.”

- 1.4 This report sets out how the Local Plan development strategy and Neighbourhood Planning may inter-relate, particularly in relation to the many small site options around the villages.

The Settlement Hierarchy

- 1.5 The Planning Inspector took a pragmatic approach in his report on the settlement hierarchy proposed by the 2014 Submission Local Plan.

Local Plan Inspector’s Report, 19 December 2015

“3.24 The settlement classifications in table 2 of ULP are based broadly on the level of services available at each settlement. This is a more appropriate evidential base than the system underlying the classification of settlements in the present local plan. There will always be scope for debate about how much weight to apply to one factor or another and the appropriate categorisation for individual towns or villages where their services are at the margin between different classifications. However, the content of table 2 (and the resulting roles of the particular settlements) is generally soundly set out.

“3.25 Having said this, where it can be justified by relevant economic, social and environmental factors a case can sometimes be made to direct a greater or lesser amount of development to a settlement than would reflect its strict place in the settlement hierarchy. Some of the factors discussed during the hearing (eg locally identified demographic and other needs, local constraints and opportunities, patterns of bus services, and inter-relationships between particular settlements) can be relevant to such decisions and can be considered in taking the plan forward.”

- 1.6 Table 1 presents the relevant extracts from the table referred to above.

Table 1: Key Villages and Type A Villages

<p>Key Villages: Major focus for development in the rural area – suitable for a scale of development that would reinforce role as provider of services to a wide rural area. <i>Elsenham, Great Chesterford, Hatfield Heath, Newport, Stansted Mountfitchet (including Foresthall Park), Takeley, Thaxted</i></p>
<p>Type A Villages: Villages with primary school with some local services, e.g. village hall/pub/shop – suitable for a scale of development that reinforce role as a local centre. <i>Ashdon, Birchanger, Chrishall, Clavering, Debden, Hatfield Broad Oak, Henham, Leaden Roding, Little Hallingbury, Manuden, Farnham, Felsted, Flitch Green, Great Easton, Great Sampford, Quendon and Rickling, Radwinter, Stebbing, Wimbish.</i></p>

- 1.7 It is not proposed to re-assess the settlement hierarchy, as this would be likely to result in protracted and subjective discussions about the different weightings attributed to various facilities in each village. More importantly, it will be necessary to undertake discussions with Parish Councils to understand the local context and any areas which could have potential for further consideration, to help inform the consideration of any sites assessed through the SHLAA process.

Areas of Search

- 1.8 A number of maps have been prepared which show ‘areas of search’, or broad areas, all of which the Council proposes to investigate through the Local Plan process, so that there is a clear justification in terms of rejected areas as well as areas eventually taken forward. The process will follow the evolving strategy and the planning merits or demerits of the locations covered by the Areas of Search, rather than by sites submitted by landowners and developers.
- 1.9 Initial Areas of Search for the seven Key Villages are shown in orange, and the areas of search for the Type A villages are shown in green (see report entitled ‘Preparing a Justified Local Plan for Uttlesford’, 27 July 2015).
- 1.10 Neighbourhood Development Plans may also be prepared for towns or parts of towns, and the approach to these needs to align particularly closely with the emerging Local Plan. For example, Bishop’s Stortford in neighbouring East Hertfordshire recently adopted a Neighbourhood Plan following a successful examination and referendum, and a second Neighbourhood Plan is in preparation in parallel with the District (Local) Plan.¹

¹ www.bishopstortfordtc.gov.uk/neighbourhood-plan

National Guidance

- 1.10 The National Planning Policy Framework (NPPF) and the national Planning Practice Guidance (PPG) set out the requirements for the production of Neighbourhood Development Plans. **Appendix A** reproduces some of the PPG for information.
- 1.11 According to the PPG, *“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.*
- 1.12 A Neighbourhood Development Plan should support the strategic development needs set out in the Local Plan and plan positively to support local development, as outlined in paragraph 16 of the National Planning Policy Framework.

National Planning Policy Framework, Paragraph 16 (extract)

Neighbourhoods should:

- develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;
- plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan

- 1.13 According to PPG, “A neighbourhood plan must address the development and use of land. This is because if successful at examination and referendum the neighbourhood plan will become part of the statutory development plan once it has been made (brought into legal force) by the planning authority. Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise (see [section 38\(6\) of the Planning and Compulsory Purchase Act 2004](#)).”
- 1.14 Consistency between Local Plans and Neighbourhood Development Plans is essential, as set out in PPG:

Planning Practice Guidance (extract)

Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- the emerging neighbourhood plan
- the emerging Local Plan
- the adopted development plan

with appropriate regard to national policy and guidance.

The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.

The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan.

Paragraph: 009 Reference ID: 41-009-20140306

Current Neighbourhood Development Plan Areas in Uttlesford

- 1.15 Great Dunmow, Felsted, Saffron Walden, and Great and Little Chesterford currently have approved Neighbourhood Development Plan areas. A Neighbourhood Development Plan Area for Stansted Mounfitchet is currently (July 2015) at consultation. Further information and updates: www.uttlesford.gov.uk/communityledplans

2. Approaches to development in the villages

- 2.1 Traditionally, Local Plans allocate development in villages. This can help to ensure development is spread around the district and ensure that new development helps to support essential rural services such as shops, pubs and village schools.
- 2.2 An alternative approach would be to leave development in the villages entirely to Parish Councils, who may or may not choose to allocate sites through Neighbourhood Development Plans. Neighbourhood Development Plans differ from Parish Plans in that following successful referendum, examination and adoption by the Local Planning Authority they attain the same weight in the consideration of planning applications as Local Plans.
- 2.3 However, some Parish Councils may feel that the resources and level of commitment required are significant and may therefore choose not to prepare a Neighbourhood Development Plan. This is a likely scenario and will result in a patchwork of plans across the District.
- 2.4 Such a scenario would make it difficult to demonstrate to a Local Plan inspector that the District Council had 'made every effort' to meet Objectively Assessed Needs for housing across the area. For this reason it is highly likely that the Local Plan will need to consider allocating some development sites in some villages as part of an overarching strategy for the District. In so doing, the District Council will need to take account of input from Town and Parish Councils.
- 2.5 Neighbourhood Development Plans can provide a way for an enhanced level of community participation in the site allocation process, and are encouraged by the District Council. However, as set out in the NPPF and the PPG (see Section 1 and Appendix A to this report) it is important that such plans should be consistent with emerging Local Plans.
- 2.6 This consideration applies not only to small sites but also to the edges of towns, which may need to grow across administrative boundaries into a neighbouring Parish area. It also applies to any potential new settlements which may be located within one or more Parishes. Such developments could be critical to delivery of the development strategy for the Local Plan. As national policy and guidance makes clear, it is not the role of Neighbourhood Development Plans to obstruct development.
- 2.7 In order to facilitate the alignment of any potential Neighbourhood Development Plans with the Local Plan, any Parish Councils which have not yet done so are encouraged to submit any proposed Neighbourhood Development Plan areas to the District Council for consideration by the end of 2015. This should allow Parish Councils sufficient time to seek local views

and make a decision through their Parish meetings, and to prepare applications to the District Council.

- 2.8 This would then allow time for significant progress on Neighbourhood Development Plans to be made by the time of examination of the Local Plan. This would demonstrate to a Local Plan inspector that a clear delivery mechanism for development in the villages is in place, enabling the District Council to comply with the requirements for a positively prepared and effective plan (NNPF Paragraph 182).

Parish Forum 28 September 2015

- 2.9 A Parish Forum is to be held at the District Council offices at Saffron Walden on 28 September 2015 (at 7pm). The Forum will cover a range of different issues but it is proposed that the Forum should be used to give further consideration to ways in which the District Council can work together with Parish Councils in relation to the issues referred to in this report.

3. Further Information and Resources

- 3.1 Detailed guidance on the preparation of a Neighbourhood Development Plan is set out in PPG. Parish Councils should familiarise themselves with this guidance prior to making a decision in respect of whether to prepare a Neighbourhood Development Plan
- 3.2 In order to fund and progress Neighbourhood Development Plans, there are a number of grants that neighbourhood planning groups can apply for. Locality provide direct grants and can provide technical support to neighbourhood planning groups across the country. Central government has recently announced that groups can apply for grants from the £22.2m Neighbourhood Planning Support programme that runs from April 2015 - 2018. Further information on how to apply and eligibility can be found here:
<http://mycommunity.org.uk/programme/neighbourhood-planning>
- 3.3 Uttlesford District Council has retained an expert in Neighbourhood Planning to work with Town and Parish Councils preparing Neighbourhood Development Plans and also has a small amount of money available for grants.
- 3.4 'Locality' offers a wide range of support, including:
- Direct Support packages for groups at the very beginning of the process, those close to pre-submission consultation, and for those preparing to submit their Neighbourhood Plans
 - The advice service provided by Locality offers free telephone advice on 0300 020 1864, Mon-Fri 9.30am – 12.30pm.
 - Planning Aid England offers free, general planning advice by phone and email, and online (<http://www.rtpi.org.uk/planningaid>)
- 3.5 The following websites also provide a range of tools and case studies, including examples of innovative ways of raising funding, Shared Learning activities, and online bulletins:
- Neighbourhood Planning Community Knowledge Hub:
<http://planning.communityknowledgehub.org.uk>
 - Planning Aid England's Forum for Neighbourhood Planning:
<http://www.ourneighbourhoodplanning.org.uk>
 - The Prince's Foundation for the Built Environment:
www.princes-foundation.org/our-work/supporting-communities-and-neighbourhoods-planning
 - CPRE in partnership with NALC:
www.planninghelp.org.uk, www.cpre.org.uk, www.nalc.gov.uk

- 3.6 The Planning Advisory Service offers a variety of materials of relevance to Neighbourhood Planning: www.pas.gov.uk
- 3.7 The Neighbourhood Planning Regulations governing the procedural requirements are online:
www.legislation.gov.uk/ukxi/2012/637/contents/made
Part 5, “Neighbourhood Development Plans” sets out the procedures for Neighbourhood Plans.
- 3.8 Information on Community Led planning including Parish Plans and Neighbourhood Development Plans is available on the District Council’s website at www.uttlesford.gov.uk/communityledplans.

Appendix A: National Planning Practice Guidance

Extract from PPG online at <http://planningguidance.planningportal.gov.uk/>

Note: PPG is subject to change. More extensive guidance may be found on the planning portal website (link above) and Parish Councils should consult the full guidance before making a decision as to whether or not to prepare a Neighbourhood Plan.

What is neighbourhood planning?

Paragraph: 001 Reference ID: 41-001-20140306

What is neighbourhood planning?

Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.

Revision date: 06 03 2014

Paragraph: 002 Reference ID: 41-002-20140306

What can communities use neighbourhood planning for?

Local communities can choose to:

- set planning policies through a neighbourhood plan that is used in determining planning applications. [For further details in this guidance click here.](#)
- grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order. [For further details in this guidance click here.](#)

Neighbourhood planning is not a legal requirement but a right which communities in England can choose to use. Communities may decide that they could achieve the outcomes they want to see through other planning routes, such as incorporating their proposals for the neighbourhood into the [Local Plan](#), or through other planning

mechanisms such as [Local Development Orders](#) and [supplementary planning documents](#) or through pre-application consultation on development proposals. Communities and local planning authorities should discuss the different choices communities have to achieving their ambitions for their neighbourhood.

Revision date: 06 03 2014

Paragraph: 003 Reference ID: 41-003-20140306

What are the benefits to a community of developing a neighbourhood plan or Order?

Neighbourhood planning enables communities to play a much stronger role in shaping the areas in which they live and work and in supporting new development proposals. This is because unlike the parish, village or town plans that communities may have prepared, a neighbourhood plan forms part of the development plan and sits alongside the [Local Plan](#) prepared by the local planning authority. Decisions on planning applications will be made using both the Local Plan and the neighbourhood plan, and any other material considerations.

Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see.

To help deliver their vision communities that take a proactive approach by drawing up a neighbourhood plan or Order and secure the consent of local people in a referendum, will benefit from 25 percent of the revenues from the Community Infrastructure Levy arising from the development that takes place in their area.

Communities without a parish or town council will still benefit from this incentive. If there is no Parish or Town Council the charging authority will retain the Levy receipts but should engage with the communities where development has taken place and agree with them how best to spend the neighbourhood funding. Charging authorities should set out clearly and transparently their approach to engaging with neighbourhoods using their regular communication tools e.g. website, newsletters, etc. The use of neighbourhood funds should therefore match priorities expressed by local communities, including priorities set out formally in neighbourhood plans.

Revision date: 06 03 2014

What is a neighbourhood plan and what is its relationship to a Local Plan?

Paragraph: 004 Reference ID: 41-004-20140306

What should a Neighbourhood Plan address?

A neighbourhood plan should support the strategic development needs set out in the [Local Plan](#) and plan positively to support local development (as outlined in [paragraph 16 of the National Planning Policy Framework](#)).

A neighbourhood plan must address the development and use of land. This is because if successful at examination and referendum the neighbourhood plan will become part of the statutory development plan once it has been made (brought into legal force) by the planning authority. Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise (see [section 38\(6\) of the Planning and Compulsory Purchase Act 2004](#)).

Neighbourhood planning can inspire local people and businesses to consider other ways to improve their neighbourhood than through the development and use of land. They may identify specific action or policies to deliver these improvements. Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.

Revision date: 06 03 2014

Related policy

National Planning Policy Framework

- [Paragraph 16](#)

Paragraph: 005 Reference ID: 41-005-20140306

Must a community ensure its neighbourhood plan is deliverable?

If the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable. The National Planning Policy Framework requires that the sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be [developed viably](#) is threatened.

Revision date: 06 03 2014

Paragraph: 006 Reference ID: 41-006-20140306

Does a neighbourhood plan have the same legal status as the Local Plan?

A neighbourhood plan attains the same legal status as the [Local Plan](#) once it has been agreed at a referendum and is made (brought into legal force) by the local planning authority. At this point it becomes part of the statutory development plan. Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise (see [section 38\(6\) of the Planning and Compulsory Purchase Act 2004](#)).

Revision date: 06 03 2014

Paragraph: 007 Reference ID: 41-007-20140306

What weight can be attached to an emerging neighbourhood plan when determining planning applications?

Planning applications are decided in accordance with the development plan, unless material considerations indicate otherwise. An emerging neighbourhood plan may be a material consideration. [Paragraph 216 of the National Planning Policy Framework](#) sets out the weight that may be given to relevant policies in emerging plans in decision taking. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies. Whilst a referendum ensures that the community has the final say on whether the neighbourhood plan comes into force, decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan. The consultation statement submitted with the draft neighbourhood plan should reveal the quality and effectiveness of the consultation

that has informed the plan proposals. And all representations on the proposals should have been submitted to the local planning authority by the close of the local planning authority's [publicity period](#). It is for the decision maker in each case to determine what is a material consideration and what weight to give to it.

Revision date: 06 03 2014

Related policy

National Planning Policy Framework

- [Paragraph 216](#)

Paragraph: 008 Reference ID: 41-008-20140306

In what circumstances might it be justifiable to refuse planning permission before a neighbourhood plan is made (brought into force) on the grounds of prematurity?

Guidance on the relevance of prematurity to a decision on a planning application can be found [here](#).

Revision date: 06 03 2014

Paragraph: 009 Reference ID: 41-009-20140306

Can a Neighbourhood Plan come forward before an up-to-date Local Plan is in place?

Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its [Local Plan](#).

A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the [basic condition](#). A draft Neighbourhood Plan or Order is not tested against the policies in an emerging Local Plan although the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.

Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- the emerging neighbourhood plan
- the emerging Local Plan
- the adopted development plan

with appropriate regard to national policy and guidance.

The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.

The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan. This is because [section 38\(5\) of the Planning and Compulsory Purchase Act 2004](#) requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan.

Revision date: 06 03 2014

The role of the local planning authority in neighbourhood planning

Paragraph: 021 Reference ID: 41-021-20140306

What role should the local planning authority play in neighbourhood planning?

A local planning authority must:

- take decisions at key stages in the neighbourhood planning process
- provide advice or assistance to a parish council, neighbourhood forum or community organisation that is producing a neighbourhood plan or Order as required by [paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 \(as amended\)](#).

Revision date: 06 03 2014

Paragraph: 022 Reference ID: 41-022-20150209

How should a local planning authority carry out its neighbourhood planning functions?

A local planning authority should:

- be proactive in providing information to communities about neighbourhood planning
- fulfil its duties and take decisions as soon as possible, and within [statutory time periods](#) where these apply
- set out a clear and transparent decision making timetable and share this with those wishing to prepare a neighbourhood plan or an Order
- constructively engage with the community throughout the process.

Revision date: 09 02 2015 [See revisions](#)

Paragraph: 081 Reference ID: 41-081-20150209

Is there a time period within which a local planning authority must take decisions?

Where a local planning authority has the responsibility for the neighbourhood planning process, it should make every effort to conclude each stage promptly. Timely decision taking is important particularly at the start and at the end of the process. Examples might be when taking the decision on whether to designate a neighbourhood forum, and when satisfying itself that a neighbourhood

plan or an Order proposal has met the relevant legal tests and should proceed to referendum.

In the case of an application for a neighbourhood area to be designated, regulations prescribe the time period within which a local planning authority must make a decision, further details can be found [here](#).

Revision date: 09 02 2015

Paragraph: 023 Reference ID: 41-023-20140306

Who takes the decisions on neighbourhood planning in a local planning authority?

The Council's Executive takes the decisions on neighbourhood planning in a local planning authority (where the authority operates executive arrangements). The Executive may be able to delegate others in the authority to discharge these duties. The neighbourhood planning functions may be delegated to a committee or another authority. For further details see the [Local Government Act 2000](#) and the [Local Authorities \(Functions and Responsibilities\) \(England\) Regulations 2000](#).

Revision date: 06 03 2014

Designating a neighbourhood area

Paragraph: 024 Reference ID: 41-024-20140306

What is the process for designating a neighbourhood area?

An application must be made by a parish or town council or a prospective neighbourhood forum (or a community organisation in the case of a Community Right to Build Order) to the local planning authority for a neighbourhood area to be designated (see [regulation 5 of the Neighbourhood Planning \(General\) Regulations 2012 \(as amended\)](#)). This must include a statement explaining why the proposed neighbourhood area is an appropriate area.

Revision date: 06 03 2014

Paragraph: 025 Reference ID: 41-025-20140306

Should the community consult the local planning authority before making an area application?

The community should consult the local planning authority before making an area application. There should be a positive and constructive dialogue about the planning ambitions of the community and any wider planning considerations that might influence the neighbourhood planning process if the outcome of that process is to be a neighbourhood plan or Order that meets the [basic conditions](#) for neighbourhood planning.

Revision date: 06 03 2014

Paragraph: 026 Reference ID: 41-026-20140306

Can a parish council propose a multi-parish neighbourhood area?

A single parish council (as a relevant body) can apply for a multi-parished neighbourhood area to be designated, as long as that multi-parished area includes all or part of that parish council's administrative area.

Revision date: 06 03 2014

Paragraph: 027 Reference ID: 41-027-20140306

In a multi-parished neighbourhood area when does a town or parish council

need to gain the consent of the other town or parish council/s in order to take the lead in producing a neighbourhood plan or Order?

A single parish or town council (as a relevant body) can apply for a multi-parished neighbourhood area to be designated as long as that multi-parished area includes all or part of that parish or town council's administrative area. But when the parish or town council begins to develop a neighbourhood plan or Order (as a qualifying body) it needs to secure the consents of the other parish councils to undertake neighbourhood planning activities. Gaining this consent is important if the pre-submission publicity and consultation and subsequently the submission to the local planning authority are to be valid.

Revision date: 06 03 2014

Paragraph: 028 Reference ID: 41-028-20140306

Can a group apply for a neighbourhood area to be designated if they are not a designated neighbourhood forum?

A group can apply for a neighbourhood area to be designated even if it is not yet a designated neighbourhood forum. However, in order to be sure that the group is the appropriate body to lead neighbourhood planning in that area, the group must demonstrate that it is capable of becoming the designated neighbourhood forum for the neighbourhood area they are applying to have designated.

The organisation or body should be able to demonstrate that it is capable of meeting the conditions for designation (see [section 61F\(5\) of the of the Town and Country Planning Act 1990 as applied to Neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004](#)). It may wish to explain what steps it has taken and is taking towards meeting the conditions for designation. For example it may have a draft written constitution with an open membership policy.

Revision date: 06 03 2014

Paragraph: 029 Reference ID: 41-029-20140306

Can a community organisation apply to have a neighbourhood area designated?

A [community organisation](#) (or prospective community organisation) can apply for a neighbourhood area to be designated in connection with a Community Right to Build Order proposal (or anticipated proposal). This can include all or part of a parish council's administrative area, if that area has not already been designated.

Revision date: 06 03 2014

Paragraph: 030 Reference ID: 41-030-20140306

Can a neighbourhood area cross local planning authority administrative boundaries?

A parish council, prospective neighbourhood forum or community organisation can put forward the neighbourhood area that they consider appropriate for neighbourhood planning; this does not have to follow administrative boundaries. The area application must be made to each of the local planning authorities which has part of its administrative area within the proposed neighbourhood area.

Revision date: 06 03 2014

Paragraph: 031 Reference ID: 41-031-20140306

How should local planning authorities work together when cross boundary neighbourhood planning is proposed?

Where a neighbourhood area is proposed that crosses the administrative boundaries of two or more local planning authorities, the authorities are encouraged to agree a lead authority to handle neighbourhood planning in a particular neighbourhood area. A lead authority approach:

- simplifies the process for the community
- minimises the duplication of work by the local planning authorities
- provides opportunities for authorities to share resources

Revision date: 06 03 2014

Paragraph: 032 Reference ID: 41-032-20140306

What flexibility is there in setting the boundaries of a neighbourhood area?

In a parished area a local planning authority is required to have regard to the desirability of designating the whole of the area of a parish or town council as a neighbourhood area (see [61G\(4\) of the Town and Country Planning Act 1990](#)). Where only a part of a parish council's area is proposed for designation, it is helpful if the reasons for this are explained in the supporting statement. Equally, town or parish councils may want to work together and propose that the designated neighbourhood area should extend beyond a single town or parish council's own boundaries.

In areas where there is no parish or town council those wishing to produce a neighbourhood plan or Order must put forward a neighbourhood area using their understanding and knowledge of the geography and character of the neighbourhood.

Revision date: 06 03 2014

Paragraph: 033 Reference ID: 41-033-20140306

What could be considerations when deciding the boundaries of a neighbourhood area?

The following could be considerations when deciding the boundaries of a neighbourhood area:

- village or settlement boundaries, which could reflect areas of planned expansion
- the catchment area for walking to local services such as shops, primary schools, doctors' surgery, parks or other facilities
- the area where formal or informal networks of community based groups operate
- the physical appearance or characteristics of the neighbourhood, for example buildings may be of a consistent scale or style
- whether the area forms all or part of a coherent estate either for businesses or residents
- whether the area is wholly or predominantly a business area
- whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway
- the natural setting or features in an area
- size of the population (living and working) in the area

Electoral ward boundaries can be a useful starting point for discussions on the appropriate size of a neighbourhood area; these have an average population of about 5,500 residents.

Revision date: 06 03 2014

Paragraph: 034 Reference ID: 41-034-20140306

Can those who have submitted an area application change the boundaries once the application has been submitted?

There is no specific provision for withdrawing an area application once it has been submitted. If those making an area application subsequently want to change the neighbourhood area they should inform the local planning authority concerned. Where the local planning authority has not yet made a decision on the area application, it has the option of advising that a new application be submitted with the revised boundary. If the local planning authority accepts the new application it must publish and consult on this new area application for at least six weeks.

Revision date: 06 03 2014

Paragraph: 035 Reference ID: 41-035-20140306

Must a local planning authority designate a neighbourhood area and must this be the area applied for?

A local planning authority must designate a neighbourhood area if it receives a valid application and some or all of the area has not yet been designated (see [section 61G\(5\) of the Town and Country Planning Act 1990 Act as applied to Neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004](#)).

The local planning authority should take into account the relevant body's statement explaining why the area applied for is considered appropriate to be designated as such. See [section 61G\(2\)](#) and [Schedule 4C\(5\)\(1\)](#) of the Town and Country Planning Act 1990 Act, as amended, for a description of 'relevant body'.

The local planning authority should aim to designate the area applied for. However, a local planning authority can refuse to designate the area applied for if it considers the area is not appropriate. Where it does so, the local planning authority must give reasons. The authority must use its powers of designation to ensure that some or all of the area applied for forms part of one or more designated neighbourhood areas.

When a neighbourhood area is designated a local planning authority should avoid pre-judging what a qualifying body may subsequently decide to put in its draft neighbourhood plan or Order. It should not make assumptions about the neighbourhood plan or Order that will emerge from developing, testing and consulting on the draft neighbourhood plan or Order when designating a neighbourhood area.

Revision date: 06 03 2014

Paragraph: 036 Reference ID: 41-036-20140306

Can a neighbourhood area include land allocated in the Local Plan as a strategic site?

A neighbourhood area can include land allocated in a [Local Plan](#) as a strategic site. Where a proposed neighbourhood area includes such a site, those wishing to produce a neighbourhood plan or Order should discuss with the local planning authority the particular planning context and circumstances that may inform the local planning authority's decision on the area it will designate.

Revision date: 06 03 2014

Paragraph: 037 Reference ID: 41-037-20140306

Can a local planning authority amend the boundary of a neighbourhood area once it has been designated?

A local planning authority can amend the boundary of a neighbourhood area after it has been designated only if the local planning authority is responding to a new application for a neighbourhood area to be designated.

Revision date: 06 03 2014

Paragraph: 038 Reference ID: 41-038-20140306

Can a local planning authority consult on applications to designate a neighbourhood area and a neighbourhood forum at the same time?

A local planning authority can consult on applications to designate a neighbourhood area and a neighbourhood forum at the same time. However, if the neighbourhood area then designated is not the same as the one originally applied for, a prospective

neighbourhood forum may find that it has to revisit its membership, purpose or constitution and submit a revised forum application.

Revision date: 06 03 2014

Paragraph: 039 Reference ID: 41-039-20140306

What should a local planning authority do if it receives more than one neighbourhood forum application for the same area or part of the same area?

A local planning authority can only designate one neighbourhood forum for a neighbourhood area. Where there are competing forum applications the local planning authority should encourage a dialogue between the applicants in order that they can consider working together as a single neighbourhood forum. The onus is on the prospective neighbourhood forums to be constructive and to reach an agreed solution.

If prospective neighbourhood forums cannot agree to work together one course of action open to a local planning authority is first to designate a neighbourhood area if it has not already done so. This provides certainty about the conditions that any organisation or body will need to meet in order to be designated as the neighbourhood forum for the particular neighbourhood area.

The local planning authority can then assess each neighbourhood forum application against the conditions for designation and evaluate each application in light of the factors set out in [section 61F\(5\) and section 61F\(7\) of the Town and Country Planning Act 1990 Act as applied to Neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004](#).

Revision date: 06 03 2014