



Uttlesford District Council

Chief Executive: Dawn French

Planning Policy Working Group

Date: Wednesday, 23 March 2016
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 any apologies for absence and declarations of interest.
- 2 Minutes of previous meeting** 5 - 10
To receive the minutes of the meeting held on 23 February 2016
- 3 Matters Arising**
To consider matters arising from the minutes
- 4 Green Belt Review report** 11 - 86
To consider a presentation on the outcome of the Green Belt review
- 5 Replacement Waste Local Plan** 87 - 94
To receive the Essex waste Local Plan Pre-Submission draft
- 6 Great Dunmow Neighbourhood Plan Submission Consultation** 95 - 98
To comment on the Neighbourhood Plan

- | | | |
|-----------|--|-----------|
| 7 | Issue and Options consultation - Report of Representations
To consider representations received in response to the recent consultation | 99 - 208 |
| 8 | DCLG consultation on technical planning changes
Report to follow | |
| 9 | Duty to cooperate update March 2016
To receive an update on recent duty to cooperate work | 209 - 228 |
| 10 | Work Programme
To consider the work programme | |

MEETINGS AND THE PUBLIC

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**PLANNING POLICY WORKING GROUP held at COUNCIL OFFICES
LONDON ROAD SAFFRON WALDEN on 23 FEBRUARY 2016 at 7.00pm**

Present: Councillor H Rolfe – Chairman
Councillors S Barker, A Dean, S Harris, A Mills, E Oliver and J Parry.

Officers in attendance: M Cox (Democratic Services Officer), R Fox (Planning Policy Team Leader), R Harborough (Director of Public Services and Interim Head of Paid Service), H Hayden (Planning Officer) and A Taylor (Assistant Director Planning and Building Control).

PP54 APOLOGIES FOR ABSENCE AND DECLARATION OF INTERESTS

Apologies for absence were received from Councillors P Davies, J Lodge and J Loughlin.

PP55 MINUTES

The minutes of the meeting held on 27 January 2016 were signed by the Chairman as a correct record.

PP56 BUSINESS ARISING

(i) Minute PP44 – Business Arising

In response to a question, officers confirmed that the terms of reference and tender details for the Highway and Transport Strategy had been circulated to all Members following the meeting.

(ii) Minute PP46 – Local Development Scheme

Councillor Dean was concerned that the working group's meetings were operating without formal procedure rules and asked that consideration be given to adopting suitable guidelines.

(iii) Minute PP47 – Statement of Community Involvement

Councillor Dean referred to the draft assessment of sites that had recently been published on the council's website. He was concerned that only parish/town councils and site promoters had been asked to comment. As a number of new sites had come forward, he felt that there should be wider opportunity for comment, for example from the Neighbourhood Plan groups.

The Planning Policy Team Leader said the purpose of this exercise was to receive comments on matters of fact and to update the assessments if necessary. It was not appropriate to comment on the merits of the

sites at this stage. He would however ensure that the Neighbourhood Plan groups had the opportunity to feed their comments through the parish councils.

PP57

PUBLIC SPEAKING

Mr Ken McDonald spoke to the meeting about the SHMA document. A full copy of his statement is attached to these minutes. His major concern centred around the figure of 568 houses a year quoted in the document. He questioned the methodology and assumptions behind the SHMA and was concerned that the council was rushing through the Plan preparation without full consideration of the figures.

In reply he was informed that the consultants had attended the last meeting of the working group and had explained the methodology used. The consultants were expert in their field and their methodology had been supported by Inspectors at examination.

The Chairman acknowledged that it was critically important for the figures to be correct. The council would follow Government guidance and cross check the numbers before submitting the plan.

PP58

NEW SETTLEMENT OPTIONS FOR THE LOCAL PLAN

The Planning Policy Team Leader presented a report on a new settlement option for the Local Plan. The report set out the advantages and disadvantages of a new settlement and the background to new settlements in Uttlesford, particularly in relation to the withdrawn Local Plan.

The report asked the working group to provide a steer on its approach to the concept of new settlements and whether this option should be taken forward in the Plan preparation. This would then be discussed at Cabinet and a decision made at the Extraordinary Council meeting on 21 March 2016.

Confirmation that the council was not ruling out a new settlement option would prevent officers wasting a lot of time in preparation and provide certainty for Members and the public. It would then form part of a basket of measures for further work by officers. In the summer the working group would consider a range of development strategies, including a preferred option, but without identifying sites. Once the direction of travel had been agreed, officers would come back to the working group with site specific options.

Councillor Parry questioned the purpose of the report as she thought any decision should come from an evidence led process. However, it appeared that officers were seeking clarity that the council wanted all options to be considered and this was a sensible way forward. In answer to her question, it was confirmed that the Council could decide not include single a settlement(s) options but it would have to give very clear reasons for its decision.

Councillor Dean said it was too early to rule out any development options without the evidence base being completed. The report before Members recommended that 'a new settlement option be considered seriously' but as far as he was concerned all the options were important at this stage. He said a new settlement(s) should not be considered in isolation, and there were still outstanding planning appeals for major developments in the district that could have an effect on this decision. He put forward a form of words, which he thought would address what was required and this was endorsed by the working group.

The working group RECOMMENDED to Cabinet and Full Council that a new settlement (or settlements) should continue to be investigated and analysed alongside all other possible options for housing and employment distribution and should not be dismissed at this stage from the potential options for inclusion in the Local Plan.

The working group said it was very important that all council members understood the process and urged attendance at the Local Plan briefing prior to the council meeting on 25 February 2016.

PP59

ISSUES AND OPTIONS CONSULTATION – SUMMARY OF REPRESENTATIONS

The working group received the summary of representations to the first part of the issues and options consultation. The remaining questions would be summarised at the next meeting. The Chairman thanked officers for their work in collating the report.

The working group discussed some of the main issues that had been raised in the consultation responses.

Councillor Dean asked how this report would be taken forward, and in particular how to accommodate Members' role in putting forward residents' views. He suggested there was a need for member/officer dialogue and a mechanism for facilitating this.

The Planning Policy Team Leader said that Members would have the opportunity to consider the responses to the questions in more detail during the next few months when they were considering the relevant reports.

The working group NOTED the report.

PP60

LOCAL PLAN INDICATIVE WORK PROGRAMME

The working group received an indicative work programme for the emerging Local Plan which set out the key processes and timeframes for getting the Local Plan in place by the end of 2017.

It was appreciated that this was an opening document for discussion, but the working group was not satisfied with the level of detail and felt the timeline

provided was too simplistic. Members would like to see a more detailed project plan as this was essential for the process to succeed. It would be helpful to know, for each constituent part - how far it was through the process, whether it was on target, the date it would be considered by the working group and the interdependencies with other studies. This would help to anticipate any possible delays.

The Planning Policy Team Leader said that there were detailed spreadsheets with charts, targets and milestones behind all the studies. However, there was a lot of detail and pulling this information together into a report for members would be time consuming. It was a question of making the best use of resources and balancing the work required on the plan preparation with Members' need for information.

The Chairman said he was confident that that Planning Policy team had a very clear picture of the programme and what was required but he also understood the working group's desire for a more detailed project plan.

Action: The Chairman would speak to officers about a possible way forward.

A question was asked about the apparent urgency to submit the Plan by the end of March 2017. It was explained that the Government had indicated the possibility of intervention and/or sanction after that date. The Government had recently issued a consultation document on this issue, which would be brought to the next meeting.

In answer to a question, the Planning Policy Team Leader said that work currently continuing on evidence base. There would be a paper on development strategies in June, and in September options for specific sites around the preferred the strategy. It was not yet clear how many sites would be found unsuitable during the early stages of the process.

Members asked about opportunities for public involvement and were informed that there would be a series of public meetings in the autumn prior to the public consultation at the end of the year. It was noted that there were only two months to deal with the consultation responses before the submission of the Plan. Members were informed that a summary of representations would be prepared and this would be submitted to the Inspector to be taken into account alongside the other evidence.

PP61

RESPONSE TO BASILDON LOCAL PLAN

The working group was informed that Basildon Borough Council had recently published its draft local plan for consultation. In relation to the Gypsy and Traveller Accommodation Strategy, it had stated that it was not able to find sufficient sites to meet its identified need. It proposed to meet this through the Duty to Cooperate and had contacted other Essex authorities with this request for to assistance.

Members AGREED with the proposed response that Uttlesford is currently unable to find sufficient gypsy and traveller sites to meet its own needs and

therefore does not have an overprovision of sites to assist Basildon in meeting its needs.

PP62 **DUTY TO COOPERATE**

Members were given an update on recent Duty to Cooperate work.

The Leaders of the four authorities had lobbied the Government about the key strategic transport priority of the M11 Junctions 7, 7A and 8 and a positive reply had been received.

In answer to a question, it was explained that DTC links were being maintained with South Cambs but it was currently focused on its Local Plan examination.

PP63 **PLANNING POLICY WORKING GROUP – FORWARD PLAN**

Members received a list of the key studies and reports to be consider by the working group over the next few months. The working group meeting dates were agreed as follows – 9 June, 19 July, 23 August, 13 September, 25 October and 28 November 2016.

It was clear that some of the reports to be considered would generate significant public interest and it might be necessary to arrange additional meetings to accommodate these discussions.

The meeting ended at 8.40pm.

Uttlesford Planning Policy Working Group – Meeting 23 February 2016
Statement by Ken McDonald, 2 Greenfields, Stansted Mountfitchet, CM24 8AH.

Good evening.

My name is Ken McDonald. I have lived in Uttlesford for 35 years.

I have no loyalty or leaning to any political party.

As there are quite a few facts quoted in this statement I will give each of you a copy.

There seems to have been little progress on following up the concerns I expressed to you three months ago about the robustness of the Strategic Housing Market Assessment" (the "SHMA"), despite your assurances.

May I remind you that you have not yet adopted the SHMA, yet all the talk is of its target of 568 houses a year. In fact, since "Business Arising" in the minutes of the meeting on 16th December, which recorded that ORS Consultants would be invited to explain the methodology and assumptions behind the SHMA, the SHMA has disappeared from view and there appears to be no record of any discussion of the consultants' presentation in January.

I note also that the various references I made to the SHMA in my response to the Issues and Options consultation have not appeared in the Summary of representations that you are due to consider this evening – in fact I failed to identify any of my considered responses – why did I bother? It is as if this group and the Local Plan process are paying only lip service to having any interest in other views.

Let me reiterate the concluding comment I made in November – that the SHMA proposal is for Uttlesford to increase its housing stock by **37%** over 22 years whilst the other districts in the SHMA are being asked to grow much less - between **16%** and **28%**. You will have seen the recent analysis by Chartered Accountant, Mike Young – showing that this 37% is higher than almost every other district in England. Having looked in some detail at the SHMA and the consultants' slides, I can find no explanation of their bizarre conclusion. Surely, you cannot continue to plan on the basis of a figure without understanding how and why it has been derived!

Paragraphs 5.5 and 5.6 of the SHMA state that the projection by the Department for Communities and Local Government is for an overall increase in the number of households in England as a whole of **23%** over the **25** years to 2037. Uttlesford's 'target' growth of **37%** over only **22** years is almost double the national annual rate. The consequence for Uttlesford is equivalent to an extra town bigger than Dunmow.

There is clearly something wrong.

I am concerned that this group has taken the view that the over-riding priority is to complete the series of tasks - to tick all the boxes – without questioning. I am concerned that your mindset is that there is no time to consider whether the outcomes of those tasks are realistic, no time to consider other views, and, perhaps worst of all, no time to consider the effect on Uttlesford and its residents.

Committee: Planning Policy Working Group

Agenda Item

Date: 23 March 2016

4

Title: Green Belt Review report

Author: Andrew Taylor, Assistant Director Planning and Building Control

Summary

1. The council commissioned a review of the Metropolitan Green Belt which falls within its boundary as part of the evidence base for the Local Plan.
2. Phase 1 of the study was completed and presented to the Working Group on 16 December 2015.
3. The final study has now been completed and submitted to the Council by the consultants.

Recommendations

4. That the Working Group note the published report, Uttlesford Green Belt Review February 2016, and its adoption into the Local Plan evidence base.

Financial Implications

5. Costs of the document were met from existing budgets.

Background Papers

6. 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

- 7.

Communication/Consultation	The document has been published on the website.
Community Safety	N/A
Equalities	The policy documents which will be prepared are subject to separate equalities impact assessments.
Health and Safety	N/A
Human Rights/Legal	N/A

Implications	
Sustainability	The policy documents which will be prepared are subject to separate equalities impact assessments.
Ward-specific impacts	All
Workforce/Workplace	Existing staff resources.

Situation

8. The Green Belt Review has provided an independent and objective appraisal of all existing Green Belt land in Uttlesford, as well as land outside the Green Belt boundaries which may be designated (if appropriate).
9. This report has been undertaken in accordance with the Brief, which sets out the main aim of the study *'to prepare an assessment of the District's Green Belt against these five purposes [the NPPF purposes], in sufficient detail to enable the Council to make informed decisions, should it decide to amend the Green Belt through its new Local Plan. The study should clarify what is meant by each of the five purposes, and how they will be applied in practice'*.
10. The NPPF advocates openness and permanence as essential characteristics of the Green Belt stating that *'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open'* (paragraph 79). The NPPF details five purposes of the Green Belt:
1. *'To check the unrestricted sprawl of large built-up areas;*
 2. *To prevent neighbouring towns merging into one another;*
 3. *To assist in safeguarding the countryside from encroachment;*
 4. *To preserve the setting and special character of historic towns; and*
 5. *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land'*. (paragraph 80)
11. The report has split the Green Belt into smaller parcels of land and then assessed them against the five purposes of the Green Belt. Each parcel has then been graded against the five purposes and then a final collective grade produced. The grading is summarised on colour coded maps.
12. The reports concludes that:
- Collectively, the areas of land in the north extent of the Uttlesford Green Belt play an important strategic role in keeping the land permanently open. Four of the five large built-up areas identified in Map 4.4 are located in the north half of the Uttlesford Green Belt designation where the Green Belt has an enhanced role to prevent sprawl. This is particularly seen around the large built-up areas of Bishop's Stortford, Stansted Mountfitchet and*

Stansted Airport which would be at risk of merging as a result of sprawl in the northern part of the Green Belt. The scale of the gaps are narrower and sprawl would result in the actual or perceived distance between the large built-up areas being significantly reduced, and potentially lost altogether. Large built-up areas are able to extend into open countryside where it is not bound by Green Belt policy, however the Uttlesford Green Belt is important in maintaining the distinct settlement patterns in the Green Belt and in keeping them as separate large built-up areas. There are fewer large built-up areas in the southern extent of the Green Belt designation, which are also at a greater scale apart. The Green Belt plays less of an important strategic role in keeping land permanently open in the south extent.

13. The report recommends some minor boundary changes in section 6.2. These boundary change suggestions relate to the area north of the A1060 in areas 24, 25, 26 and 29; a change in area 21 and a change in area 4 relating to Elms Farm in Stansted.
14. These suggested changes will be taken forward and considered as part of the Local Plan making process and are not for decision at this meeting.

Conclusion

15. The published report is an independent and objective appraisal of the Metropolitan Green belt falling within Uttlesford. The findings are that the Green Belt plays an important strategic role in preventing the coalescence of settlements and, with a few minor exceptions, should be retained in its current format.
16. The Working Group is asked to note the report and its adoption in to the evidence base for the Local Plan.

Risk Analysis

17.

Risk	Likelihood	Impact	Mitigating actions
The plan maybe found unsound because the plan has not been prepared in accordance with up to date and robust evidence	1. The production of robust evidence using experience consultants reduces the risk of impact.	3.If the plan is found unsound this will cause delay and uncertainty	Ensure that the evidence base is kept up to date and refreshed as 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.

Uttlesford District Council
Uttlesford Green Belt Review
Report: Methodology and
Assessment of Land Parcels

246505-4-05-03

Issue | 25 February 2016

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 246505-00

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Contents

	Page
1 Introduction	1
1.1 Background	1
1.2 Purpose of Reviews	1
1.3 Report Structure	1
2 Green Belt Context	2
2.1 History of the Green Belt	2
2.2 Green Belt in Uttlesford	2
2.3 Previous Green Belt Reviews	4
3 Policy, Guidance and Experience	5
3.1 National Context	5
3.2 Local Context	10
3.3 Other Context	11
3.4 Green Belt Review Experience	13
3.5 Implications for the Study	21
4 Methodology	24
4.1 Introduction	24
4.2 Consultation	26
4.3 Parcel Identification	27
4.4 General Area Assessment	31
4.5 Pro-Forma	44
4.6 Recommendations	44
5 Key Findings	45
5.1 Fundamental Aims	45
5.2 Green Belt General Areas	45
5.3 Overall Summary	53
6 Recommendations	58
6.1 Overview	58
6.2 Boundary Amendments	58
7 Conclusions	60

Table 3. 1 Green Belt Approaches in Neighbouring Authorities 16

Table 4. 1 Large Built-Up Areas Considered in Purpose 1 Assessment33

Table 4. 2: Settlements Considered in Purpose 2 Assessment38

Table 4. 3 Historic Settlements identified for consideration in Purpose 4
 Assessment.....43

Table 5. 1 Overall summary of findings for Purpose Assessment.....55

Figure 4.1 Methodology Overview24

Figure 4. 2 Criterion Scores31

Figure 4. 3 Diagram illustrating the relationship between large-built areas and
 land parcels, and whether the General Areas are contiguous, connected or
 enclosed.34

Figure 5.1 View looking north-east from the level crossing at Sawbridgeworth
 railway station in the south-west of the land parcel.....52

Figure 5.2 View looking south-west towards the level crossing at Sawbridgeworth
 Station in the south-west of the parcel.....53

Appendices

Appendix A

Glossary of Terms

Appendix B

Pro-Forma

1 Introduction

1.1 Background

Arup has been appointed by Uttlesford District Council to undertake a Green Belt Review as part of the evidence base to support the forthcoming Uttlesford Local Plan. The Green Belt Review assesses the Uttlesford Green Belt against the purposes of Green Belt as defined by the National Planning Policy Framework (NPPF).

1.2 Purpose of Reviews

The purpose of a Green Belt Review is to provide evidence of how different areas perform against the Green Belt purposes set out in national policy; planning authorities may then take this into account alongside other evidence in making decisions about possible changes to Green Belt boundaries. A boundary revision can take the form of an expansion or a contraction. However, equally a Green Belt Review may conclude that no changes are appropriate.

The Green Belt Review will provide an independent and objective appraisal of all existing Green Belt land in Uttlesford, as well as land outside the Green Belt boundaries which may be designated (if appropriate). This report has been undertaken in accordance with the Brief, which sets out the main aim of the study *‘to prepare an assessment of the District’s Green Belt against these five purposes [the NPPF purposes], in sufficient detail to enable the Council to make informed decisions, should it decide to amend the Green Belt through its new Local Plan. The study should clarify what is meant by each of the five purposes, and how they will be applied in practice’*.

1.3 Report Structure

The report is structured as followed:

- Chapter 0 sets out the context at the national and local level.
- Chapter 3 provides the policy context at the national and local level, together with a summary of Green Belt Assessments undertaken by neighbouring authorities;
- Chapter 4 sets out the methodology for the Study;
- Chapter 5 sets out the key findings of the Study;
- Chapter 6 provides recommendations from the assessments;
- Chapter 7 sets out the conclusions of the study
- Annex Report 1 contains the Green Belt General Area Review pro-formas.

2 Green Belt Context

2.1 History of the Green Belt

The concept of Green Belt dates back to the origins of the modern British planning system. Coined as a response to the impact of urban sprawl and the rapid change of rural areas around London, Green Belt policy is frequently cited as one of the planning system's most notable achievements.

During the late 19th and early 20th centuries, the rapid expansion of the railways suddenly brought once remote settlements within commuting distance of central London. The coining of the phrase *Metro-Land* in 1915 by the Metropolitan Railway Company and the subsequent waves of publicity containing evocative imagery of the historic villages and countryside areas north-west of London transformed previously isolated, rural areas into desirable locations for commuters, significantly increasing demand for housing.

During the post-war period, the urban area of London doubled in size and other settlements in the commuter belt, both villages and towns, also witnessed rapid growth. The arrival of the Great Eastern Railway in 1842 to Bishop's Stortford assisted in boosting the corn exchange and malting industry, and between 1841 and 1901 the population has significantly increased from 4,681 to over 7,000 reaffirming its place as an agricultural town as well as a commute district.¹ By 1844 the railway had reached Stansted Mountfitchet, with significant effects of replacing the coach services, bringing coal for fuel and slate for roofing, and enabling farm produce and livestock to be dispatched to London quickly for trade.²

Initially, the Metropolitan Green Belt, first suggested by Raymond Unwin in 1933 as a '*green girdle*' and defined by Patrick Abercrombie in the Greater London Plan of 1944 (later established in the Town and Country Planning Act of 1947), was designed to curtail the further unchecked growth of London's urban area, but was only 6 to 10 miles wide and was not able to restrict development in the wider commuter belt. Green Belt policy is frequently credited as one of the most notable achievements of the planning system, halting the outward '*urban sprawl*' of London into the countryside. Particularly after the Second World War, concerns were growing about the rapid change of rural areas around London.

2.2 Green Belt in Uttlesford

Between 1919 and 1939, thousands of acres of fertile inner-Essex market gardens were lost to development.³ As early as the mid-1930s, inspired by Raymond Unwin's '*green girdle*' concept and empowered by a Green Belts '*loan scheme*'

¹ A Brief History of Bishop's Stortford, Local Histories (<http://www.localhistories.org/bishops.html>)

² Stansted Mountfitchet Conservation Area Appraisal and Management Proposals, Uttlesford District Council, 2007 (<http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=1930&p=0>)

³ Hamson, P. (1969) *The Green Belt Saga*

initiated by the London County Council in 1935⁴, Essex County Council was purchasing land at the edges of London to designate as Green Belt, thus protecting it from development.⁵ While the imperative of protecting open land around London was further cemented by the creation of the first Metropolitan Green Belt by Patrick Abercrombie in the Greater London Plan of 1944, the impracticalities of local authorities purchasing large swathes of land were realised.

The Town and Country Planning Act of 1947 for the first time compelled County and Borough Councils to prepare twenty year development plans for their areas and enabled them to designate Green Belts to curtail the further unchecked growth of London's urban area. However, this original Green Belt's width of only 6 to 10 miles was not able to restrict development in the widening commuter belt.

Circular 42/55, released by government in 1955, encouraged local authorities to establish their own Green Belts. The Circular set out three main functions of the Green Belt: to check the growth of a large built-up area; to prevent neighbouring settlements from merging into one another; and to preserve the special character of a town. Following this, the draft Review of the Essex County Development, published in 1964 and approved by the Secretary of State in 1976, was the first plan to formally designate the boundaries of the Metropolitan Green Belt in Essex.⁶ This was later replaced by the Essex County Structure Plan.

Uttlesford lies at the outer edge of the Metropolitan Green Belt. The Green Belt designation was extended further in the 1995 Uttlesford Local Plan in order to '*prevent the communities from merging into an urban sprawl from the south of Bishop's Stortford to the north of Stansted Mountfitchet*'.⁷ The current Local Plan (2005) carries forward the Green Belt designation which featured in the previous 1995 Local Plan. The Uttlesford Green Belt covers 3,810 hectares, representing approximately 8% of the total area of the District. The Green Belt runs along the south-western edge of the District and comprises the very extremity of the Metropolitan Green Belt being the most northerly area of Green Belt in Essex.⁸

Current national policy set out in the NPPF upholds the spirit of the original Green Belt purposes and reaffirms the fundamental aim of Green Belt policy to prevent urban sprawl and maintain the openness of land. The NPPF goes on to advise that Local Planning Authorities should also plan positively to enhance the beneficial uses of the Green Belt. Within Uttlesford, the Green Belt offers protection to an area of attractive countryside, including a gently undulating arable farmland landscape occasionally punctuated by small villages and farmsteads, which covers much of the District, as well as the relatively unspoilt pasture and wetlands of the Stort Valley at the District's western edge.⁹ However, it is important to recognise that Green Belt is not designated on the basis of environmental quality but on planning grounds; the Green Belt's core role in Uttlesford has been to maintain the historic settlement pattern and prevent the

⁴ London Borough of Redbridge (20XX), Green Belt Review – Stage 1: Background

⁵ Powell, W.R. (1978) *A History of the County of Essex*

⁶ Castle Point Borough Council (2013) *Green Belt Boundary Review*

⁷ Uttlesford District Council (2011) *Green Belt Boundary Review Scoping Report*

⁸ Uttlesford District Council (2011) *Green Belt Boundary Review Scoping Report*

⁹ Chris Blandford Associates (2002) *Essex Landscape Character Assessment*

encroachment of unsuitable development into open countryside, in particular around Bishop's Stortford, Stansted Mountfitchet and Stansted Airport.

Following the withdrawal of the Submission Local Plan in January 2015, Uttlesford District Council have commenced work on a new Local Plan. In developing the new Local Plan, the Council will '*[give] equal consideration to all the options for development*', focussing growth options on a number of Areas of Search which include Great Dunmow, Saffron Walden, the villages, and new settlement options at locations with good access to the strategic transport network.¹⁰ It is likely that Uttlesford will come under pressure to accommodate increasing numbers of homes to cope with housing growth in the East of England and, potentially, the challenges facing neighbouring districts in meeting their objectively assessed needs. The Green Belt designation may be viewed by some as a constraint to meeting such housing need.

2.3 Previous Green Belt Reviews

There have been no recent Green Belt Reviews within the Uttlesford area.

¹⁰ Uttlesford District Council (2015) *Local Plan Update – Issue 1*

3 Policy, Guidance and Experience

3.1 National Context

At the national level, the NPPF, National Planning Practice Guidance and ministerial letters provide the policy and guidance context for the role and function of the Green Belt. The following sections summarise the current position.

3.1.1 National Policy

The NPPF sets out the Government's planning policies for England and how these are expected to be applied. Central to the NPPF is the '*presumption in favour of sustainable development*' which for plan-making means that local planning authorities should positively seek opportunities to meet development needs and should meet objectively assessed needs unless specific policies of the NPPF (such as Green Belt policy) indicate that development should be restricted.

Protection of Green Belt around urban areas is a core planning principle of the NPPF. Policy for protecting Green Belt land is set out in section 9 of the Framework which emphasises the great importance that the Government attaches to Green Belts.

Circular 42/55 released by Government in 1955 highlighted the importance of checking unrestricted sprawl of built-up areas and of safeguarding countryside from encroachment. It set out three main functions of the Green Belt which are now upheld in the NPPF:

- To check the growth of a large built-up area;
- To prevent neighbouring settlements from merging into one another; and
- To preserve the special character of a town.

The NPPF advocates openness and permanence as essential characteristics of the Green Belt stating that '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open*' (paragraph 79). The NPPF details five purposes of the Green Belt:

1. '*To check the unrestricted sprawl of large built-up areas;*
2. '*To prevent neighbouring towns merging into one another;*
3. '*To assist in safeguarding the countryside from encroachment;*
4. '*To preserve the setting and special character of historic towns; and*
5. '*To assist in urban regeneration, by encouraging the recycling of derelict and other urban land*'. (paragraph 80)

For ease of reference in this Review, these purposes are referred to as NPPF Purposes 1 to 5, with the assigned number corresponding to the order in which the purposes appear in the NPPF, as above.

In addition to the purposes of the Green Belt, the NPPF advocates enhancement to existing Green Belts. Paragraph 81 states that *'local planning authorities are required to plan positively to enhance the beneficial use of the Green Belt'* once Green Belt boundaries have been defined including looking for opportunities to:

- *'Provide access;*
- *Provide opportunities for outdoor sport and recreation;*
- *Retain and enhance landscapes, visual amenity and biodiversity; or*
- *Improve damaged and derelict land'.*

Paragraph 83 states that *'local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans'* and that *'once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan'*. Importantly, the NPPF acknowledges the permanence of Green Belt boundaries and the need for Green Belt boundaries to endure beyond the plan period (paragraph 83). The need to promote sustainable patterns of development when reviewing the Green Belt boundaries is also acknowledged (paragraph 84).

The NPPF seeks to align Green Belt boundary review with sustainable patterns of development (paragraph 84). Local planning authorities are encouraged to *'consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'*.

Paragraph 85 states that *'when defining boundaries, local planning authorities should:*

- *Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *Not include land which it is unnecessary to keep permanently open;*
- *Where necessary, identify in their plans areas of "safeguarded land" between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period;*
- *Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'*

3.1.2 National Guidance

The national Planning Practice Guidance is intended to provide up-to-date, accessible and useful guidance on the requirements of the planning system. The Guidance was updated in October 2014, reiterating the importance of the Green Belt and acknowledging that Green Belt may restrain the ability to meet housing need. The following paragraphs are relevant to Green Belt Assessment:

- Paragraph 044 Do housing and economic needs override constraints on the use of land, such as Green Belt?** – *‘The NPPF should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole, or specific policies in the Framework indicate that development should be restricted’ (as it is with land designated as Green Belt). ‘The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.’*
- Paragraph 045 Do local planning authorities have to meet in full housing needs identified in needs assessments?** – *‘Assessing need is just the first stage in developing a local plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.’*

The national Planning Practice Guidance does not provide any specific guidance on conducting a Green Belt Assessment *per se*.

3.1.3 Ministerial Statements

Letters from ministers of the Department for Communities and Local Government (DCLG) to the Planning Inspectorate (PINS) or local government officers or general statements by ministers have clarified or re-affirmed aspects of Green Belt policy. During his time as Planning Minister, Nick Boles issued a series of Ministerial Statements on the Green Belt which, in general, continued to emphasise the protection of the Green Belt.

Perhaps the most significant statement came in March 2014 when correspondence between Nick Boles and PINS reaffirmed the importance and permanence of the Green Belt and that Green Belt may only be altered in ‘exceptional circumstances’ through the preparation or review of local plans¹¹. The correspondence recognised the special role of the Green Belt in the framing of the presumption in favour of

¹¹ Nick Boles / DCLG (2014) *Inspectors’ Reports on Local Plans*, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/286882/140303_Letter_-_Sir_Michael_Pitt.pdf

sustainable development, which sets out that local authorities should meet objectively assessed needs unless specific policies in the Framework indicate development should be restricted, with the Green Belt identified as one such policy.

This position was reaffirmed in October 2014 when the national Planning Practice Guidance was amended (see section 3.1.1).

3.1.4 Legal Cases – ‘Very Special Circumstances’ and ‘Exceptional Circumstances’

The NPPF sets out that ‘*very special circumstances*’ relates to the consideration of planning applications in the context of existing Green Belt. Paragraph 87 states that ‘*As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances*’. Paragraph 88 consequently states that ‘*When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations*’. Paragraph 89 identifies those type of development within the Green Belt which may be considered as acceptable in the context of ‘*very special circumstances*’:

- Buildings for agricultural and forestry;
- Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

Paragraph 90 expands on the above list by identifying other forms of development that are also not inappropriate provided they ‘*preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt*’, namely:

- Mineral extraction;
- Engineering operations;

- Local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- The re-use of buildings provided that the buildings are of permanent and substantial construction; and
- Development brought forward under a Community Right to Build Order.

As set out in section 3.1.1 and 3.1.3, ‘exceptional circumstances’ relates to forward planning for Local Plans in the context of Green Belt boundaries. There is no definition of ‘exceptional circumstances’ provided in the NPPF. There is limited case history relating to decisions about the setting or change of Green Belt boundaries in local plans and the definition of ‘exceptional circumstances’. However, there are two recent relevant examples of note.

The first is the Solihull Local Plan (Solihull Metropolitan District Council). In this case, a developer’s sites in Tidbury Green were placed into the Green Belt by the Solihull Local Plan (SLP) adopted in December 2013. The developer challenged the SLP on three grounds: (i) that it was not supported by an objectively assessed figure for housing need; (ii) the Council has failed in its duty to cooperate; and (iii) the Council adopted a plan without regard to the proper test for revising Green Belt boundaries. The Claim succeeded at the High Court.

Solihull appealed against the decision, but the appeal was dismissed by the Court of Appeal. The Court held that the Inspector and Solihull had failed to identify a figure for the objective assessment of housing need as a separate and prior exercise, and that was an error of law. In addition, the Judge dismissed the Inspector’s reasons for returning the developer’s sites to the Green Belt, saying that:

‘The fact that a particular site within a council’s area happens not to be suitable for housing development cannot be said without more to constitute an exceptional circumstance, justifying an alteration of the Green Belt by the allocation to it of the site in question’.

More recently, in the case of Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council, this position was upheld. In this case, the Parish Council applied to the High Court to quash parts of the Aligned Core Strategies of the three authorities, arguing that: (i) it had failed to consider whether housing numbers should be reduced to prevent the release of green belt land; and (ii) it had failed to apply national policy in considering its release. However, the Claim was rejected.

In Paragraph 42 of the decision, referring to the earlier Solihull decision, the Judge stated:

‘In the case where the issue is the converse, i.e. subtraction, the fact that Green Belt reasons may continue to exist cannot preclude the existence of countervailing exceptional circumstance – otherwise, it would be close to impossible to revise the boundary. These circumstances, if found to exist, must be logically capable of trumping the purposes of the Green Belt; but whether they should not in any given case must depend on the correct

identification of the circumstances said to be exceptional, and the strength of the Green Belt purposes’.

While supporting the earlier Solihull case, the judgement also confirms that ‘exceptional circumstances’ may override the purposes set out in the NPPF, depending on the strength of these purposes. In determining what is exceptional, an authority should balance:

- The ‘*acuteness/intensity of the housing need*’;
- The ‘*constraints on the supply/availability of land...suitable for development*’;
- The ‘*difficulties in achieving sustainability without impinging on the green belt*’;
- The ‘*nature and extent of the harm to this green belt*’; and
- How far the impacts on green belt purposes could be reduced.¹²

In his decision, the Judge believed the Inspector had taken a ‘*sensible and appropriate*’ approach to adjudging the weight of exceptional circumstances versus the strength of the Green Belt purposes by weighing up the advantages and disadvantages of different alternative options for meeting housing need, including those which would not have involved Green Belt adjustments.

The need for a robust Green Belt Review is thus crucial in order to identify weak Green Belt, with this work feeding into the broader task of identifying what might constitute ‘exceptional circumstances’ within Uttlesford.

3.2 Local Context

At the local level, the adopted Uttlesford Local Plan (2005) provides the relevant context for Green Belt.

The Draft Local Plan (2014) was submitted for independent examination to the Secretary of State for Communities and Local Government via the Planning Inspectorate on 4th July 2014. Uttlesford District Council formally withdrew the Local Plan on 21st January 2015 over concerns of the soundness of the Plan. The Local Development Scheme (2016) sets out that the revised Local Plan will be submitted in March 2017 and adopted in December 2017.

Planning Policy for Uttlesford is currently made up of the NPPF, the 2005 Uttlesford Local Plan and saved policies, and the Minerals Plan and Waste Plan prepared by Essex County Council. The Uttlesford Local Plan was adopted on 20th January 2005 and the policies in it were saved for three years. In July 2007 the Council applied to the Secretary of State to extend the time period for the saved policies. All the policies in the Uttlesford Local Plan, except Takeley Local

¹² Calverton Parish Council v Nottingham City Council & Ors (2015) EWHC 1078 (Admin) (21 April 2015).

Policies 1 and 2 (Land west of Hawthorn Close and Land off St Valery) have been saved.¹³

The purpose and requirements of the Metropolitan Green Belt are stated in the Uttlesford Local Plan as following that:

‘A belt of countryside of countryside needs to be retained between Harlow, Bishop’s Stortford, Stansted Mountfitchet and Stansted Airport as part of the regional concept of containing the urban sprawl of London. Within the Green Belt development will only be permitted if it accords with national planning policy on green belts (PPG2) and Structure Plan Policy C2. Development permitted should preserve the openness of the Green Belt and its scale, design and siting should be such that the character of the countryside is not harmed.’

Policy S6 (Metropolitan Green Belt) states that infilling, limited development, or redevelopment compatible with the character of the settlement and its setting will be permitted within the villages of Hatfield Heath, Leaden Roding, Little Hallingbury and White Roding. Development uses permitted included for educational or community uses, redevelopment for business uses, and operational development such as sewage treatment, but must be compatible with the countryside setting and purposes of the Green Belt.

Policy E5 (Re-Use of Rural Buildings) states that the re-use and adaptation of rural buildings for business uses, small scale retail uses or for tourist accommodation will be permitted within the Metropolitan Green Belt, subject to compliance with some criteria listed in the Local Plan (page 21).

Policy H9 (Affordable Housing) states that due to the scale of the affordable housing needs, the Council will exceptionally release suitable land to meet local housing needs. In Green Belt villages the need will have to represent special circumstances to justify an exception to Policy S6.

3.3 Other Context

The Planning Advisory Service (PAS) published guidance for Green Belt Assessment in 2015 in the context of the need to accommodate strategic housing (and employment) requirements. The guidance highlights that *‘the purpose of a review is for the identification of the most appropriate land to be used for development, through the local plan. Always being mindful of all of the other planning matters to be taken into account and most importantly, as part of an overall spatial strategy’*.

Emphasis is placed on the need for assessment against the five purposes of the Green Belt in the first instance. The guidance acknowledges that there are planning considerations, such as landscape quality, which cannot be a reason to designate an area as Green Belt, but that could be a planning consideration when seeking suitable locations for development.

¹³ Local Development Scheme, Uttlesford District Council, February 2015
<http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=3012&p=0>

The guidance outlines considerations to be made in relation to the five purposes as set out below:

- Purpose 1: to check the unrestricted sprawl of large built up areas – consider the meaning of sprawl compared to 1930s definition, and whether positively planned development through a local plan with good masterplanning would be defined as sprawl.
- Purpose 2: to prevent neighbouring towns from merging into one another – the purpose does not strictly suggest maintaining the separation of small settlements near to towns. The approach will be different for each case. The identity of a settlement would not be determined solely by the distance to another settlement; the character of the place and of the land in between must be taken into account. A ‘scale rule’ approach should be avoided. Landscape character assessment is a useful analytical tool for this type of assessment.
- Purpose 3: to assist in safeguarding the countryside from encroachment – seemingly, all Green Belt does this so distinguishing between the contributions of different areas to this purpose is difficult. The recommended approach is to look at the difference between land under the influence of the urban area and open countryside, and to favour open countryside when determining the land that should be attempted to be kept open, accounting for edges and boundaries.
- Purpose 4: to preserve the setting and special character of historic towns – it is accepted that in practice this purpose relates to very few settlements as a result of the envelopment of historic town centres by development.
- Purpose 5: to assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of potentially developable land within urban areas must have already been factored in before Green Belt land is identified. All Green Belt would achieve this purpose to the same extent, if it does achieve the purpose, and the value of land parcels is unlikely to be distinguishable on the basis of this purpose.

The PAS guidance additionally recognises the relevance of the Duty to Cooperate, as set out in the Localism Act 2011, and soundness tests of the NPPF to Green Belt consideration. The NPPF requires local planning authorities to ‘*work collaboratively with other bodies to ensure strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans*’ (paragraph 179). Additionally the level of housing that a local authority is required to plan for is also determined by whether there is an ‘unmet requirement’ from a neighbouring authority (paragraph 182).

The guidance recognises that Green Belt is a strategic policy and hence a strategic issue in terms of the Duty to Cooperate. Areas of Green Belt should therefore be assessed collectively by local authorities. This is important particularly for areas of Green Belt land that fall into different administrative areas, and the significance attached to that land.

3.4 Green Belt Review Experience

3.4.1 Neighbouring Authorities' Experience

Local planning authorities now hold the responsibility for strategic planning following the revocation of regional strategies as created in the Localism Act 2011. The national Planning Practice Guidance outlines the duty to cooperate as:

'...a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.'

This Review covers the areas of the Green Belt falling within the administrative boundary of Uttlesford District Council, as well as areas in neighbouring authorities where there is no defensible boundary feature which aligns with the District boundary. However, the methodology and proposed Green Belt parcels were shared with the neighbouring authorities and discussed at a workshop held on 4th December 2015. Comments received have been taken into account as the Review progresses (see section 4.2).

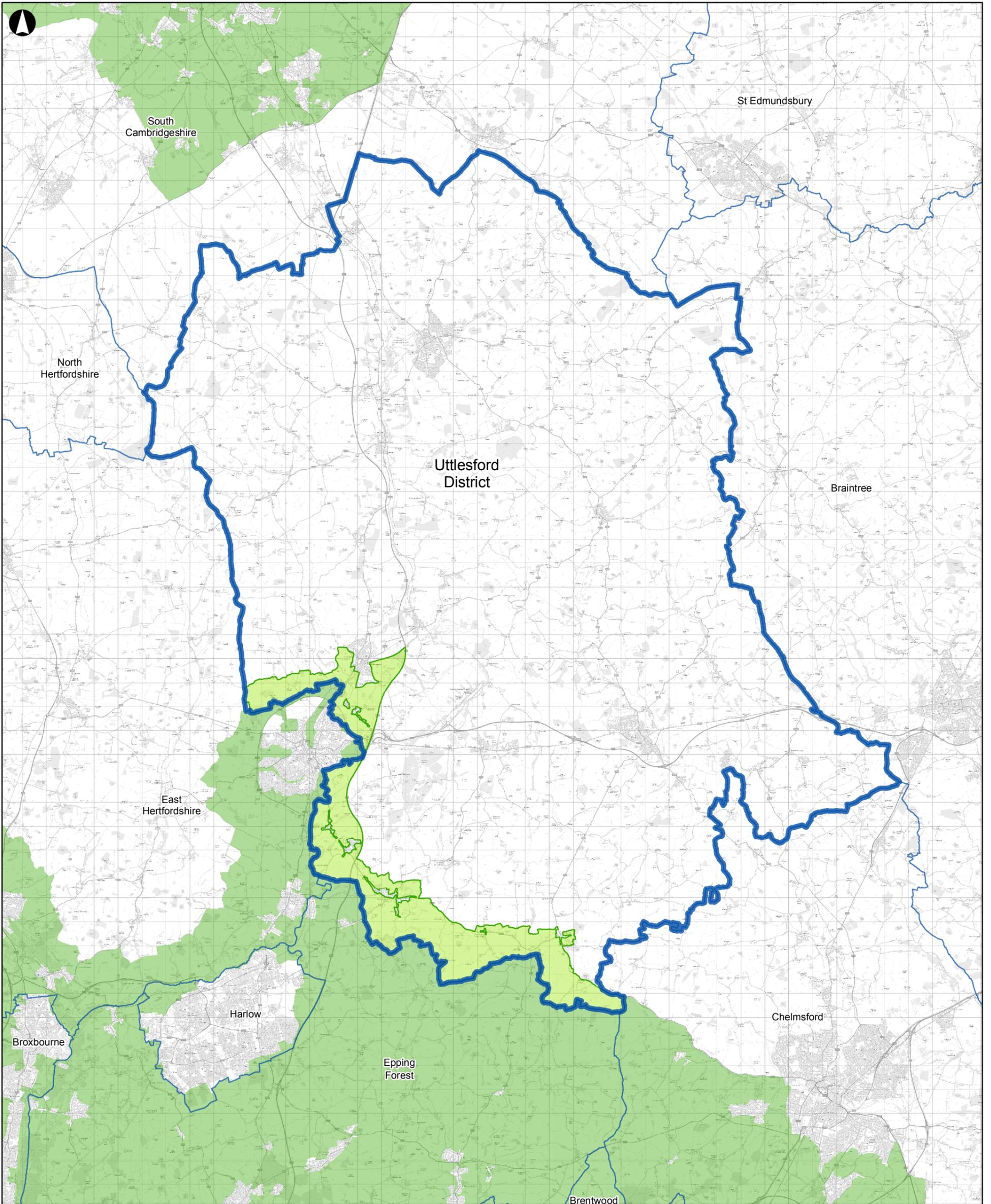
It is important to understand how each of the neighbouring local authorities are approaching Green Belt issues and the methodology employed in any reviews of the Green Belt they have undertaken. Green Belt in adjoining districts (Map 3.1) may achieve the purpose of checking unrestricted sprawl from the urban areas both within and outside Uttlesford. It may also play a role in protecting strategic gaps between urban areas and settlements both within and outside Uttlesford. The potential release of any Green Belt land within or outside Uttlesford may impact on settlement patterns and the role of the wider Metropolitan Green Belt.

The approaches to Green Belt Boundary Reviews taken in neighbouring authorities have been summarised in Table 3. 1. This table was shared with the authorities concerned for validation, verification of accuracy and to check the degree to which it matched current thinking within said authorities.

In summary:

- Over one third of Chelmsford is in Green Belt, and has checked the unrestricted growth of London and urban Chelmsford. However, there is no existing or planned Green Belt Assessment.
- Epping Forest have completed a Stage 1 Review, and have commissioned Stage 2 currently. The Stage 1 Review identified parcels along durable boundaries and the District boundary. Each land parcel was then assessed against purposes 1-4 against a set criteria, and was given a score from weak to strong. Purpose 5 was considered a strategic purpose so not assessed. This Review aligns very closely to the methodology set out in section 4 of this report, with the exception that the Epping Forest Stage 1 Review used an aggregated score. High level conclusions were reached about which parcels scored more or less highly against the purposes, for further consideration at a Stage 2 Review.

- East Hertfordshire has also completed a Green Belt Review, having already undertaken a Stage 1 and 2 Review in 2013. Original land parcels from the first Review were reassessed and amended, especially where parcels were large enough to make them smaller. Identifiable physical and visual features were used to define boundaries. Each parcel was then assessed from being '*fundamental*' to the purpose, to having limited or negligible importance to the purpose. An analysis of the land parcels was undertaken to indicate which parcels met the purposes the strongest and weakest. This would be considered further at Stage 2, also using objectively assessed housing needs.
- Harlow has undertaken a Stage 1 Review but the document has not been made publicly available.



Legend

- Uttlesford Green Belt
- Neighbouring Green Belt
- Neighbouring District Boundary
- Uttlesford District Boundary

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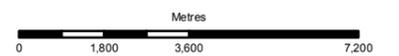
P1	18-11-15	CG	ML	AB
Issue	Date	By	Chkd	Appd

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Client
Uttlesford District Council

Job Title
Uttlesford Green Belt Boundary Review



Map 3.1 Uttlesford and Neighbouring Authorities' Green Belt

Scale at A3

1:150,000

Job No
000000-00

Drawing Status
Issue

Drawing No
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Issue
P1

Table 3. 1 Green Belt Approaches in Neighbouring Authorities

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology/Conclusions from Green Belt Assessment
Chelmsford City Council	Chelmsford Council’s Core Strategy spans across two different documents: The Core Strategy and Development Control Policies 2008; and The Core Strategy and Development Control Policies Focused Review 2013.	Over one third of the City Council’s area falls within the Metropolitan Green Belt which has checked the unrestricted growth of London. It has also protected the expansion of urban Chelmsford towards the south-west and protected the countryside to the south and west of the A130 and A1060 roads. Core Strategy DC1 states that inappropriate development is harmful to the Green Belt. When considering any planning application, substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by inappropriateness, and any other harm, is clearly outweighed by other considerations.	No existing or planned Green Belt Assessment.	N/A
Epping Forest District Council	Epping Forest current policies are from the Adopted 1998 Local Plan and the Adopted 2006 Local Plan Alterations.	The Epping Forest Green Belt makes up over 92% of the District. There are 18 Green Belt policies which set out the	Stage 1 Green Belt Review was completed in September 2015. Stage 2 Green Belt Review is currently underway.	The District’s Green Belt, as designated in the Local Plan was divided into parcels of land, generally following well-

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology/Conclusions from Green Belt Assessment
		<p>conditions under which development will or will not be permitted. The development of land or the construction of new buildings will not be granted planning permission, unless it meets strict criteria including that is it only for the purpose of agriculture, horticulture or forestry; is for the purpose of outdoor participatory sport and recreation; is for other uses which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in the Green Belt; or is in accordance with another Green Belt policy.</p>		<p>defined physical features and the outer boundary of the district. Each land parcel was given an appraisal on how they performed against each of the purposes, followed by an analysis of the aggregated score. Purpose 5 was excluded from the assessment as considered strategic in nature. In summary the criteria used for each purpose were:</p> <p>(1) Contribution of the parcel as an effective barrier against sprawl or as part of a wider network against sprawl. Are there any defensible boundaries?</p> <p>(2) Distance between settlements and whether the parcel provides a gap, and whether the reduction in the gap would visually and physically compromise the town separation.</p> <p>(3) Does the parcel protect the countryside and prevent encroachment by built development or urbanising influences.</p>

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology/Conclusions from Green Belt Assessment
				<p>(4) The extent to which the Green Belt contributes to the historic setting.</p> <p>The review concluded that a 'relatively strong' or 'strong' contribution was made to at least one of the Green Belt purposes in each parcel. It identified the parcels that made the highest score, but also indicated some areas of the district that did not perform as strongly in Green Belt terms as others. The information gathered will be taken forward for further assessment in Stage 2.</p>
<p>East Herts District Council</p>	<p>Current planning policies are set out in the Local Plan 2007 and 'saved' policies.</p>	<p>The District has identified the rural area as a key resource that needs to be conserved and where possible enhanced. It has secured the containment of settlements including Bishop's Stortford, Hertford, Ware and Sawbridgeworth. There are 15 Green Belt and Countryside policies which detail in what circumstances development may or may not be accepted. These include if the land will developed for agriculture or</p>	<p>The Council undertook a draft Green Belt Review in 2013 (parts 1 and 2) and identified a number of areas which could be removed from the Green Belt as development sites. Having initially commissioned a Critical Friend to appraise the Draft Review, the Council then decided to commission another full Green Belt Review, published in August 2015.</p>	<p>The review does not undertake an assessment of Purposes 5. The Green Belt Review identified the study area, then identified land parcels for development using physical and visual features. The land parcels were then assessed against the purposes for including land in the Green Belt, before finally identifying the sensitivity of these areas to development according to Green Belt Policy. The land</p>

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology/Conclusions from Green Belt Assessment
		<p>outdoor sports, replacement dwellings, and small scale affordable housing for local needs.</p>		<p>parcels score from having 'none' contribution to the purpose, to having 'paramount' importance. In summary the criteria used for each purpose were:</p> <p>(1) Land where strategic level of development would conflict fundamentally with Green Belt purpose/ would have no impact on this purpose of Green Belt.</p> <p>(2) Land that is fundamental to physical separation of neighbouring towns/land does not lie between two towns or has limited contribution to separation.</p> <p>(3) Countryside that is fundamental to the purpose of retaining land within Green Belt from encroachment/countryside is not important on this purpose.</p> <p>(4) Land makes a fundamental contribution to the setting and/or special character of a historic town; or land makes no contribution to the setting and/or special character of a</p>

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology/Conclusions from Green Belt Assessment
				<p>historic character of a historic town.</p> <p>The Review identifies those areas of the Green Belt which meet the purposes least well which should be further assessed against the Strategic Land Availability Assessment, noting that the requirement to meet the objectively assessed housing need can provide the exceptional circumstances for the release of land.</p>
Harlow Council	The Adopted Replacement Harlow Local Plan (July 2006) and Saved Policies for the current planning policies.	There is a general presumption against inappropriate in the Green Belt development except in exceptional circumstances. Any permitted development should preserve the openness of the Green Belt and should not conflict with any of the main purposes of including land within it. Development that is permitted must be of a scale, design and siting such as the character and appearance of the countryside is not harmed.	Harlow have undertaken a Stage 1 review but the document has not been made publically available yet.	N/A

3.4.2 Wider Experience

A brief examination of a selection of Green Belt Boundary Reviews carried out elsewhere in the country revealed the following key lessons in terms of methodology:

- A variety of approaches have been taken in assessing the functionality of Green Belt against the NPPF purposes. This partially reflects that each study has been undertaken in response to a specific brief and is tailored to the special local characteristics of the area in question.
- A two stage process has typically been used to firstly identify those Green Belt areas least sensitive to change and where development would be least damaging in principle, before moving onto a second stage to consider technical site constraints.
- For the purposes of assessment, authorities have primarily divided the Green Belt into land parcels for assessment using durable, significant and strong physical boundaries which are clearly defined in the methodology, though some have used grid squares of a defined size to identify the land parcels for assessment.
- Only those purposes deemed relevant to the local context have been used in reviews rather than necessarily using all five, while in some instances authorities have combined multiple purposes within their assessments.
- In terms of interpreting the national purposes, definition of terms (both within the purposes themselves and criteria applied) is of key importance to a successful and transparent assessment.
- Assessment criteria used to assess individual purposes have been tailored to local circumstances.
- Qualitative approaches are primarily used in assessments, although some authorities have used more quantitative measures. The approach to scoring in assessments varies from simplistic traffic light systems to more complex approaches to scoring.

3.5 Implications for the Study

National policy, as set out in the NPPF, emphasises the importance and permanence of Green Belt. The NPPF sets out clearly the five purposes that the Green Belt is intended to serve, highlights that the Local Plan process offers the only opportunity for the Green Belt boundaries to be reviewed and stresses that boundaries should be defined using permanent and recognisable physical features. Neither the NPPF, nor the supporting national PPG, provide guidance on how to conduct a Green Belt Assessment *per se*. The implied emphasis is thus on each authority to develop a methodology which is appropriate to the local context.

Crucial to the development of such a methodology is the establishment of satisfactory definitions for the key terms used in the NPPF purposes (yet not explicitly defined) – different interpretations of such terms would significantly

alter how the Review is carried out. While a number of Green Belt Boundary Reviews do not articulate clearly how terms have been defined, the Green Belt Boundary Review for Dacorum, St Albans and Welwyn Hatfield provided definitions based on a combination of legitimate sources (for example, the Oxford English Dictionary) as well as the known aspirations sought through national and local policy.

Some key definitions which were considered for this methodology include:

- *Large built-up areas* (Purpose 1): This originally referred to London for the Metropolitan Green Belt, but the scope of how this is interpreted has shifted over time to include other large settlements within the wider Green Belt area. The Dacorum, St Albans and Welwyn Hatfield review applied the term to London, Luton/Dunstable and Stevenage, though it is not immediately clear how this choice was reached. The Central Bedfordshire Green Belt Assessment applied the definition more broadly, considering any area deemed ‘urban’. When defining this term, the methodology for Uttlesford should consider the settlement structure across the District.
- *Sprawl* (Purpose 1): The definition of this term varies significantly. The PAS Guidance queries whether development that is masterplanned and promoted positively through a development plan would constitute sprawl, but this does not provide a specific and measurable definition which could be applied in a Green Belt Review, nor does it feel like an entirely satisfactory explanation of sprawl alone. Other Green Belt Reviews, for example the Guildford Green Belt and Countryside Study, have edged towards a more spatial definition, considering sprawl as the ‘*creeping advancement of development beyond a clear physical boundary of a settlement*’. Given sprawl is a multi-faceted concept, it would seem prudent to consider both of these spheres in the definition adopted in this methodology.
- *Neighbouring towns* (Purpose 2): The interpretation of ‘towns’ varies across previous Green Belt Boundary Reviews. While it tends to be aligned to the defined settlement hierarchy, as set out in the relevant development plan, some authorities have chosen to apply a more local purpose. For example, in Runnymede, the threat of coalescence between many smaller settlements led to the Green Belt Boundary Review considering all settlements equally, including those ‘*washed over*’ in the Green Belt. Given that in Uttlesford the Green Belt boundaries are for the most part closely abutting the edge of settlements, it might be most appropriate to consider all non-Green Belt areas as the ‘towns’ to be considered in the assessment.
- *Countryside* (Purpose 3): The Dacorum, St Albans and Welwyn Hatfield Review adopted a ‘*functional*’ as opposed to ‘*political economy*’ definition of this term, centred on pastoral and primary land uses, while others adopted broader definitions which took countryside to mean any open land. Evidently, this interpretation is not appropriate in areas which are entirely semi-urban, where Green Belt may have been applied to areas which are open but not genuinely of a ‘*countryside*’ character. Given the significant contrast between urban and rural areas in and around Essex, in a similar fashion to areas of Buckinghamshire or Hertfordshire, a similar ‘*functional*’ definition may be the most appropriate.

In addition to other Green Belt Boundary Reviews, the PAS guidance on Green Belt Assessments is particularly helpful in setting out key parameters to consider when developing a Green Belt Assessment methodology. The key points to note are:

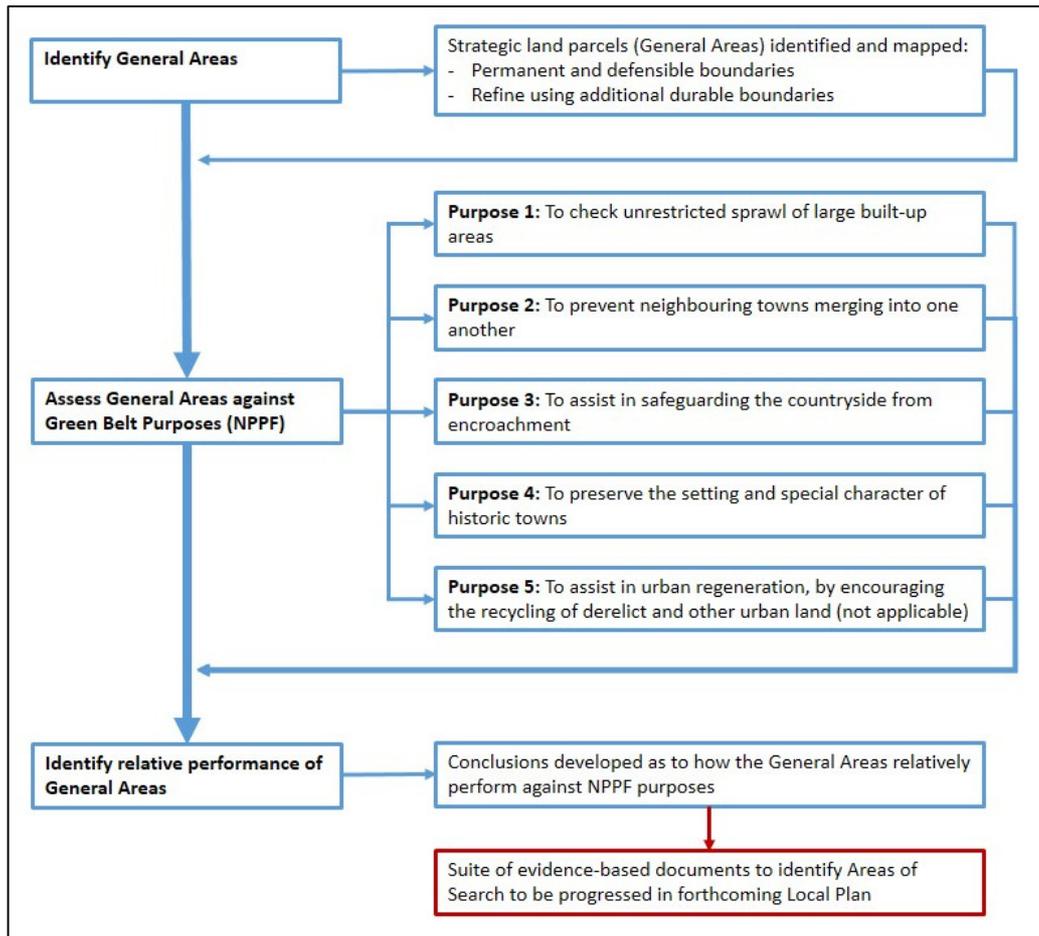
- A Green Belt Assessment is not an assessment of landscape quality, though elements of landscape assessment assist in assessing the Green Belt (for example, in identifying potential new boundaries or differentiating between areas of unspoilt countryside or semi-rural areas).
- The label '*historic towns*' applies to a select number of settlements and it is therefore accepted that the Purpose 4 assessment will only be relevant in very few instances. As set out in section 4 of this Methodology, it is considered that Purpose 4 is only relevant to the Uttlesford Green Belt Review in very limited locations.
- Purpose 5 is not helpful in terms of assessing relative value of land parcels and is therefore not relevant to the Uttlesford Green Belt Review.
- Green Belt is a strategic issue and should be considered collaboratively with neighbouring authorities under Duty to Cooperate, thus emphasising the importance of ongoing consultation with neighbouring stakeholders.

4 Methodology

4.1 Introduction

The following sections sets out the proposed methodology to be used for undertaking the Uttlesford Green Belt Review. An overview of the methodology is set out in Figure 4.1.

Figure 4.1 Methodology Overview



While there is a focus in the Tender Brief on the Areas of Search, the Review will assess the whole of the Green Belt within Uttlesford and will seek to ascertain:

- Whether all the land designated fulfils clear Green Belt purposes;
- The degree of significance attached to various parts of the Green Belt in strategic terms; and
- The extent to which some development in the Green Belt could promote sustainable patterns of development without compromising its overall purpose.

The extent of the Uttlesford Green Belt is shown in Map 4.1.

4.2 Consultation

4.2.1 Duty to Cooperate

Since the introduction of the Localism Act (2011), Local Authorities hold the responsibility for strategic planning and a clear duty to cooperate on strategic issues, such as Green Belt. The potential release of any Green Belt land within Uttlesford may also impact on the role of the Green Belt in adjoining authority areas as part of the wider London Green Belt (however, recommendations will only apply to Uttlesford and not to neighbouring authorities). As a result it will be important to engage with neighbouring authorities on the proposed methodology and Green Belt parcels for assessment.

A roundtable workshop was held with the following authorities on 4th December 2015 to discuss the methodology and proposed parcels for assessment:

- East Herts District Council;
- Epping Forest District Council;
- Harlow District Council; and
- Essex County Council.

Chelmsford City Council and Hertfordshire County Council were unable to attend the workshop, but were provided with the draft methodology separately for comment.

A summary of the comments and any alterations to the methodology and parcels is provided below:

- Discussion around certain parcel boundaries adjacent to Bishop's Stortford, including suggestion that certain parcels could be merged/split based on appropriate boundary features and differences in character. [NB: These were subsequently reviewed during site visits and boundaries adjusted as appropriate].
- Sawbridgeworth and Lower Sheering to be considered as a single Large Build-Up Area for Purpose 1 given their functional relationship, but identified separately when assessing for Purpose 2.
- Additional clarity required in relation to methodology for Purposes 1 and 3.

4.2.2 Planning Policy Working Group

The proposed methodology and Green Belt parcels for assessment were presented to the Council's Planning Policy Working Group (PPWG) on 16th December 2015. The primary comments on the methodology raised during the presentation related to: the relationship of Uttlesford's historic settlements to the existing Green Belt; and the possibility of establishing new Green Belt around existing historic settlements (for example, Newport and Saffron Walden) in order to protect their historic setting.

With regard to the relationship between Uttlesford's historic settlements (and neighbouring historic settlements) and the existing Green Belt, and following the site visits, it was determined that there was insufficient functional relationship to require NPPF Purpose 4 to be considered as part of the Study (see section 4.4.4).

With regard to the issue of establishing new Green Belt around existing historic towns (Newport and Saffron Walden), paragraph 82 of the NPPF states that:

'New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- *demonstrate why normal planning and development management policies would not be adequate;*
- *set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
- *show what the consequences of the proposal would be for sustainable development;*
- *demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and*
- *show how the Green Belt would meet the other objectives of the Framework.'*

Having considered the identified locations, and in consideration of the above NPPF criteria, it was deemed that there was insufficient justification for land around Newport and Saffron Walden to be considered for the establishment of new Green Belt, in particular given the distance of such new Green Belt from the outer edges of the Metropolitan Green Belt.

4.3 Parcel Identification

4.3.1 Green Belt Parcels (General Areas)

Any potential alterations to the Green Belt must be based on a new permanent and defensible boundary; thus, permanent man-made and natural features have been selected as the basis of criteria for the identification of the General Areas. In particular, the boundaries of the General Areas are based on the following features (Map 4.2):

- Motorways;
- A and B Roads;
- Railway lines;
- Rivers (e.g. Stort, Roding)
- Brooks (e.g. Bourne, Stansted, Pincey, Parsonage).

Given the range of urban and rural conditions found in Uttlesford, from the semi-urban fringes of Bishop's Stortford in the north of the District's Green Belt area to the relatively unspoilt countryside in the south, a flexible approach to the identification of General Areas for assessment was deemed necessary. This was achieved through consideration of further sub-division of General Areas during the site visits in and around the non-Green Belt settlements using additional durable boundary features if required, such as

- Unclassified public roads and private roads;
- Smaller water features, including streams, canals and other watercourses;
- Prominent physical features (e.g. ridgelines);
- Existing development with strongly established, regular or consistent boundaries;
- Protected woodland or hedgerows.

This process of sub-division took account of the local context and involved an element of professional judgement. Such additional boundary features were also utilised in identifying General Areas in the south/south-east of the District where there is a largely rural character and flat topography.

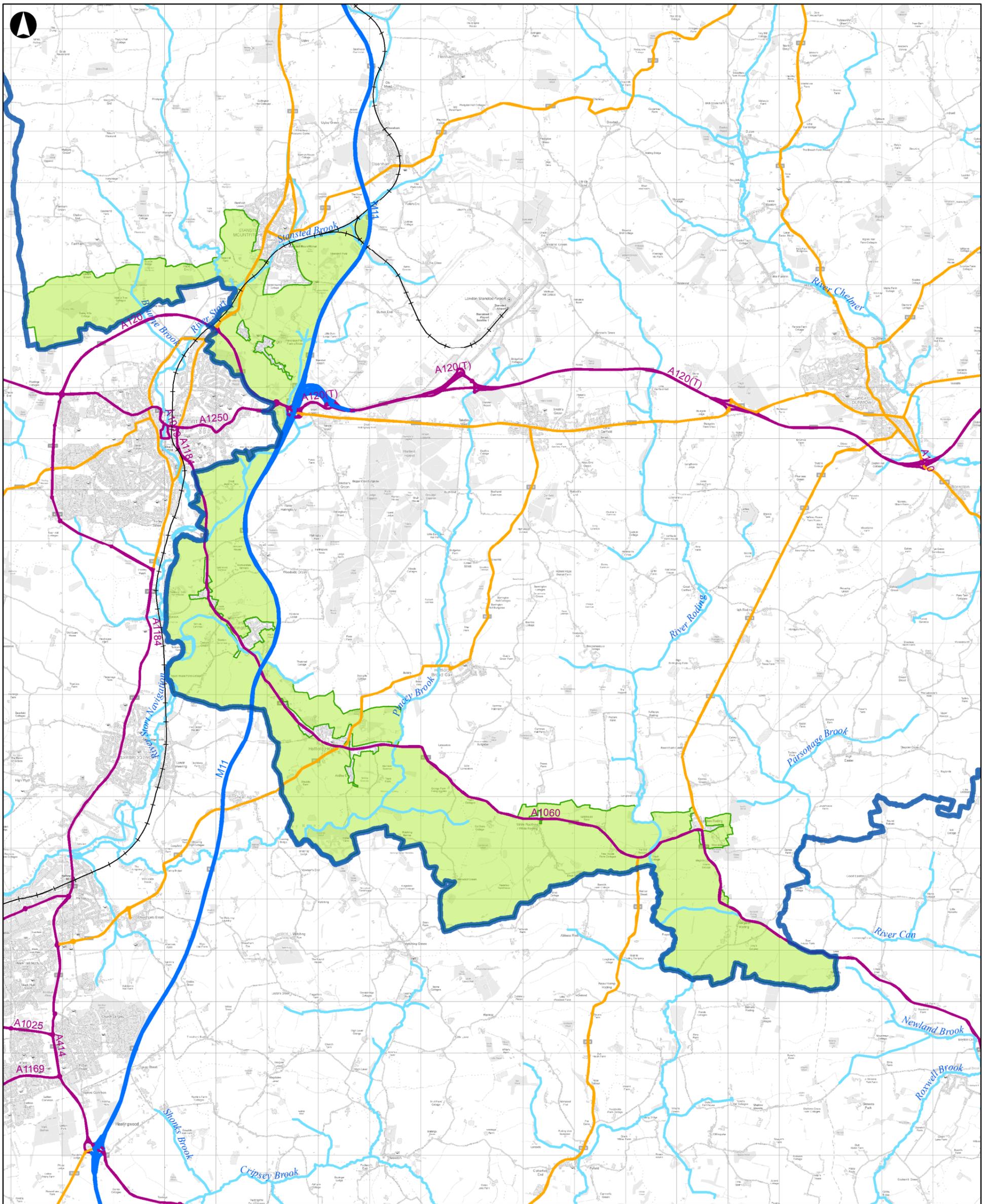
In some cases, boundary features were located close together, for example where roads, rivers, and/or railway lines running closely parallel to each other. Where appropriate, these features were taken together to form one boundary rather than separately which would lead to small slithers of Green Belt land which would not form logical parcels for assessment.

It was decided that, in cases where the Uttlesford District boundaries do not coincide with permanent and durable boundary features, General Areas would overlap with Green Belt in neighbouring authority areas to align with the nearest durable feature. This approach ensured a consistent approach to the assessment of Green Belt throughout Uttlesford and took into account the strategic, cross-boundary nature of the Metropolitan Green Belt. In cases where Green Belt at the edge of the District is not deemed to meet Green Belt purposes, this may have implications for its designation, not just within Uttlesford but also outside the District. However, it is important to note that this assessment will not directly influence the approaches to Green Belt in neighbouring authorities and no recommendations are ultimately made beyond the boundaries of Uttlesford.

4.3.2 General Areas

A total of 31 General Areas were identified for assessment (see Map 4.3¹⁴).

¹⁴ These were confirmed with officers from the respective neighbouring authorities at a workshop held on 4th December 2015.



Legend

- Motorway
- Railway Line
- A Road
- B Road
- River
- Lake / Reservoir
- Uttlesford Green Belt
- Uttlesford District Boundary

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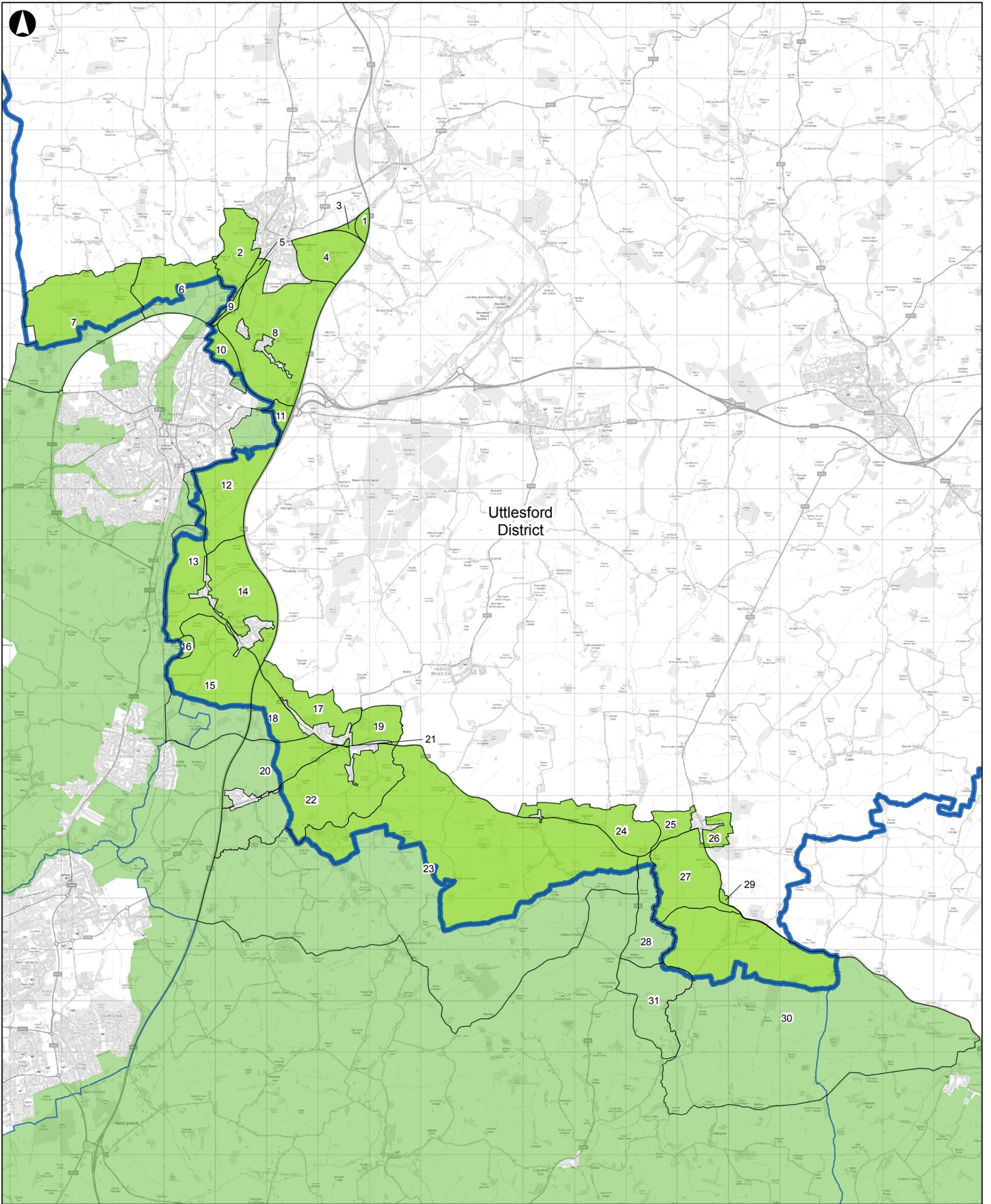


**Map 4.2 Defining Features
for General Areas**

Scale at A3
1:70,000

Job No 000000-00	Drawing Status Issue
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Drawing No 4.1	Issue P1
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Legend

- General Areas
- Uttlesford Green Belt
- Neighbouring Green Belt
- Uttlesford District Boundary
- Neighbouring District Boundary

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Map 4.3 General Areas

Scale at A3

1:70,000

Job No
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Drawing Status
Issue

Drawing No
4.3

Issue
P1

4.4 General Area Assessment

Each of the General Areas identified in Map 4.3 was assessed against the NPPF purposes for Green Belt. There is no national guidance, which establishes exactly how such an assessment should be undertaken. The PAS guidance, recent examples and previous experience reiterates the need to respect local circumstances and the unique characteristics that affect the way that the NPPF purposes of the Green Belt are appraised.

The purpose of the assessment was to establish any differentiation in terms of how the General Areas in the existing Green Belt function and fulfil the purposes of the Green Belt.

For each purpose, one or more criteria were developed using both qualitative and quantitative measures. A score out of five was attributed for each criterion (Figure 4. 2). If a General Area was considered to have no contribution to a specific purpose, in addition to the detailed analysis undertaken, a statement was added to the pro-forma to this effect and a score of zero was attributed.

It is important to note that each of the NPPF purposes is considered equally significant, thus no weighting or aggregation of scores across the purposes was undertaken. As such, a composite judgement was necessary to determine whether, overall, General Areas are meeting Green Belt purposes strongly or weakly.

Figure 4. 2 Criterion Scores

Overall Strength of General Area against criterion	Score	Equivalent Wording
	1	Meets Criterion Weakly or Very Weakly
	2	Meets Criterion Relatively Weakly
	3	Meets Criterion
	4	Meets Criterion Relatively Strongly
	5	Meets Criterion Strongly or Very Strongly

Following the individual purpose assessments, an overall score was developed for each General Area. A rule of thumb was applied whereby:

- Any General Area scoring relatively strong, strongly or very strongly (4 or 5) against the criteria for one or more NPPF purpose was judged to be **strong** Green Belt overall;
- A General Area scoring moderately (3) against at least one purpose and failing to score strongly against any purpose (4 or 5) was adjudged as **moderate** Green Belt; and
- A General Area fulfilling the criteria relatively weakly, weakly or very weakly (1 or 2) across all purposes was deemed to be **weak** Green Belt.

The assessment also considered whether there were any small-scale sub-areas within General Areas which might be less sensitive and thus able to accommodate change. In these cases if present, a further assessment would consider the potential for Green Belt boundaries to be adjusted without significantly reducing ability to

meet NPPF purposes. These recommendations will be taken forward to inform any decisions taken on amending the Green Belt boundaries following further assessment work if required.

The following sections examine the definition of each of the five purposes of the Green Belt in relation to local objectives and role of the Green Belt in terms of achieving its purpose locally; and set out the criteria and associated scoring applied.

4.4.1 Purpose 1

Purpose 1: To check unrestricted sprawl of large built-up areas.

The original strategic purpose of the Metropolitan Green Belt was to check the sprawl of London. However, given the Uttlesford Green Belt is not directly adjacent to Greater London, this assessment also considers the role of General Areas in restricting the sprawl of large built-up areas across the District and within neighbouring local authorities. Large built-up areas for the purpose of this Review have generally been defined to correspond to the Tier 1 settlements (or equivalent) identified in the respective Local Plans for each authority or used in recent Green Belt studies, both within and outside Uttlesford, to ensure a robust and evidence-based approach to the assessment (see Map 4.4; Table 4. 1)¹⁵

For Uttlesford, large built-up areas are defined as the Market Towns identified in the withdrawn Uttlesford Local Plan (2014). Although withdrawn, the settlement hierarchy is considered to be a robust assessment of the settlement hierarchy for the district and is therefore appropriate for this Review. In addition, Stansted Airport is also considered a large built-up area given the size and scale of the built-form that the area covers, which is comparative to the extent of other large built-up areas that have been included in the Review. Similarly, Stansted Mountfitchet has been defined as a large built-up area in the Review, contrary to its identification as a ‘*key village*’ in the withdrawn Uttlesford Local Plan 2014. Stansted Mountfitchet has a different scale and character to other identified key villages and is considered to be more comparable in scale to other large built-up areas that have been considered for assessment, notably Sawbridgeworth which occupies a similar geographical area.

Although ‘*sprawl*’ is a multi-faceted concept and thus has a variety of different definitions, this Review has adopted a simple definition, considering sprawl as ‘*the outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way*’. In order to appraise the extent to which the Green Belt keeps this in check, it is necessary to consider:

- a) Whether the General Area falls at the edge of one or more distinct large built-up area(s);

¹⁵ These were confirmed with officers from the respective neighbouring authorities at a workshop held on 4th December 2015.

- b) The degree to which the General Area is contained by built-form, and the nature of this physical containment, as well as the linkage to the wider Green Belt; and
- c) The extent to which the edge of the built-up area has a strongly defined, regular or consistent boundary.

Table 4. 1 Large Built-Up Areas Considered in Purpose 1 Assessment

Uttlesford ¹⁶	Neighbouring Local Authorities ^{17, 18}
Stansted Airport ¹⁹ Stansted Mountfitchet	Bishop's Stortford (East Herts) Chelmsford Urban Area (Chelmsford) Harlow (Harlow) Sawbridgeworth (East Herts) / Lower Sheering (Epping) ²⁰

There are two stages in this assessment:

Assessment 1(a)

Firstly, a General Area must be at the edge of one of more distinct large built-up areas in order to prevent development which would constitute sprawl. This criterion must therefore be met for Purpose 1 to be fulfilled and was applied on a *Pass/Fail* basis.

Assessment 1(b)

As stated at Assessment 1(a), Green Belt should function to protect open land at the edge of large built-up area(s) (Table 4.1). However, the extent to which a General Area prevents sprawl is dependent on its relationship with the respective built-up area(s).

Assessment 1(b) initially focussed on the degree to which Green Belt abuts or is contained by the built-up area(s), the nature of this relationship and links to the wider Green Belt. The following criteria area were used for assessment (see Figure 4. 3):

¹⁶ While Saffron Walden and Great Dunmow are identified as Market Towns, it was considered that they are located sufficiently far from the Uttlesford Green Belt so as to make them not relevant for this Review.

¹⁷ Large built-up areas within East Herts have been defined as the six 'main towns' and the one large 'Group 1' village (Watton-at-Stone) identified for consideration under Purpose 1 in the East Herts Green Belt Review (August 2015). However, it was considered that the following large built-up areas are located sufficiently far from the Uttlesford Green Belt so as to make them not relevant for this Review: Hertford, Ware, Stanstead Abbots, St Margarets, Watton-at-Stone.

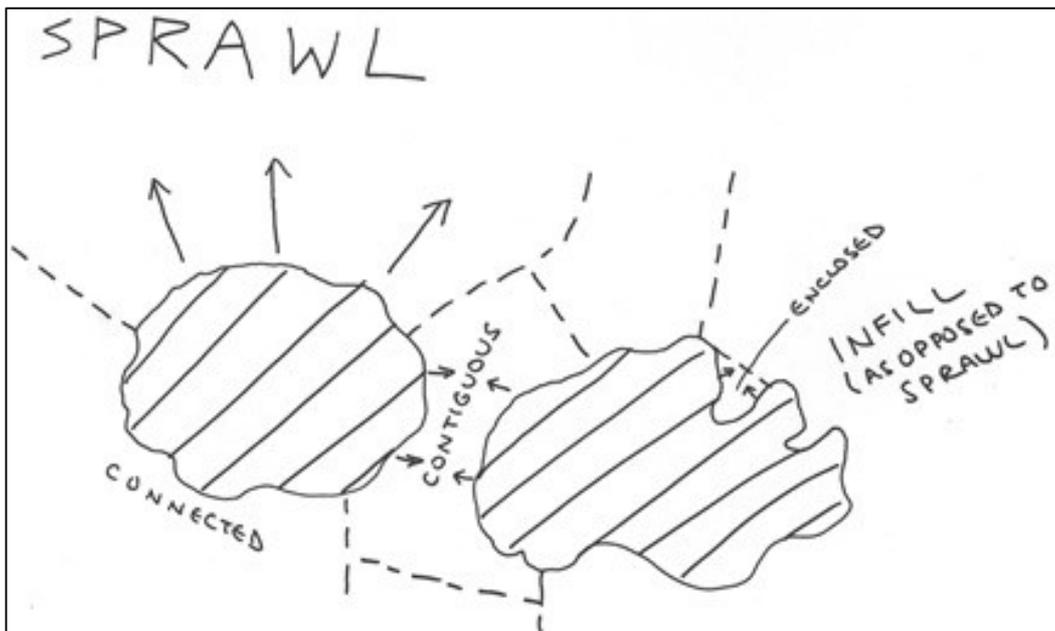
¹⁸ Large built-up areas within Chelmsford have been defined using the Settlement Hierarchy contained in the adopted Core Strategy and Development Control Policies (February 2008). However, it was considered that the South Woodham Ferrers Urban Area is located sufficiently far away from the Uttlesford Green Belt so as to make it not relevant for this Review.

¹⁹ The boundaries of the Stansted Airport large built-up area are defined by the Countryside Protection Zone.

²⁰ Sawbridgeworth / Lower Sheering are considered to act as a single functional settlement with regard to Purpose 1, as discussed and agree at the workshop on 4th December 2015.

- A General Area predominantly surrounded or enclosed by two or more distinct areas of built form and that also retains a strong link to the wider Green Belt, would play a particularly important role in preventing sprawl. For the purpose of this assessment, this is referred to as ‘contiguous’.
- A General Area displaying a low level of containment by a large-built area, such as if it was simply abutting a large-built area, may prevent sprawl but to a lesser extent. This assessment refers to such areas as ‘connected’ with a large built-up area.
- A General Area almost entirely contained or surrounded by built development which forms part of a single built-up area and has limited connections to the wider Green Belt, would only prevent sprawl to a limited extent (rather, potential development would likely be classified as infill), is referred to here as ‘enclosed’ by a single built-up area.

Figure 4. 3 Diagram illustrating the relationship between large-built areas and land parcels, and whether the General Areas are contiguous, connected or enclosed.



This initial assessment was supplemented by additional analysis on the role of Green Belt in preventing sprawl which would not otherwise be restricted by another barrier. The NPPF states that Local Authorities should ‘define boundaries clearly, using physical features that are readily recognisable and likely to be permanent’ (paragraph 85). Boundary identification reflected this, based on the following definitions:

- Examples of durable features (likely to be permanent):
 - Infrastructure: motorway; public and made road; railway line; river.

- Landform: stream, canal or other watercourse; prominent physical feature (e.g. ridgeline); protected woodland/hedge; existing development with strongly established, regular or consistent boundaries.
- Examples of features lacking in durability (soft boundaries):
 - Infrastructure: private/unmade road; bridleway/footpath; power line.
 - Natural: field boundary; tree line.

Where sprawl would not otherwise have been restricted by a durable boundary feature, the extent to which the existing built form had strongly established or recognisable boundaries was assessed based on the following definitions:

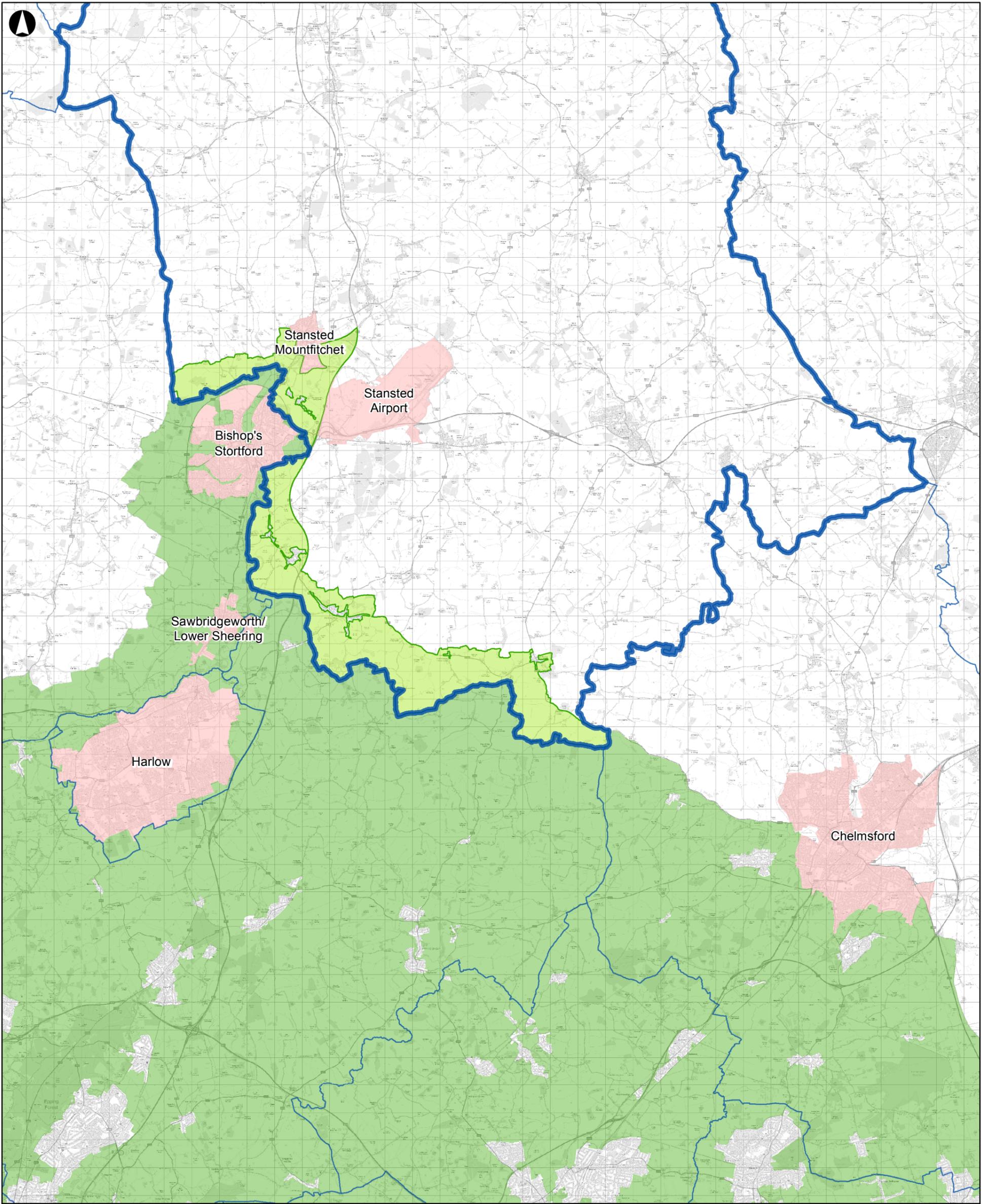
- *'Regular'* or *'Consistent'* built form comprising well-defined or rectilinear built-form edges, which would restrict development in the Green Belt.
- *'Irregular'* or *'Inconsistent'* built-form comprising imprecise or softer edges, which would not restrict growth within the Green Belt.

Purpose 1 Assessment Criteria

The criteria used to assess the General Areas against Purpose 1 are set out below. Ordnance Survey base maps and aerial photography, together with observations during the site visits, was used to undertake this assessment.

Purpose 1 Assessment Criteria

Purpose	Criteria	Score
To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more large built-up areas.	PASS: General Area meets Purpose 1. FAIL: General Area does not meet Purpose 1 and will score 0 for Criteria (b).
	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.	5+: General Area is contiguous with two or more large built-up areas which are predominantly bordered by features lacking in durability or permanence.
		5: General Area is contiguous with two or more large built-up areas which are predominantly bordered by prominent, permanent and consistent boundary features.
		3+: General Area is connected to one or more large built-up area(s) which is/are predominantly bordered by features lacking in durability or permanence.
		3: General Area is connected to one or more large built-up area(s) which is/are predominantly bordered by prominent, permanent and consistent boundary features.
		1+: General Area is enclosed by one large built-up area which is predominantly bordered by features lacking in durability or permanence.
		1: General Area is enclosed by one large built-up area which is predominantly bordered by prominent, permanent and consistent boundary features.
	Score	xx/5



Legend

- Large Built-Up Areas
- Uttlesford Green Belt
- Neighbouring Green Belt
- Neighbouring District Boundary
- Uttlesford District Boundary

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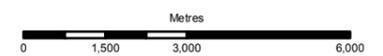
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**Map 4.4 Large Built-Up
Areas Considered in Purpose 1
Assessment**

Scale at A3

1:130,000

Job No
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Drawing Status
Draft

Drawing No
4.4

Issue
P1

4.4.2 Purpose 2

Purpose 2: To prevent neighbouring towns merging into one another.

In addition to the clear function of this purpose in preventing towns from merging and therefore protecting existing gaps between towns, it also forms the basis for maintaining the existing settlement pattern. National policy provides no guidance over what might constitute ‘towns’ and whether this purpose should also take into consideration the gaps between smaller settlements.

Given the general concentration of development outside of the Green Belt in Uttlesford, the assessment of General Areas considered gaps between all non-green Belt settlements, together with relevant Key Villages beyond the boundaries of the Green Belt identified in the withdrawn Uttlesford Local Plan (2014). Although withdrawn, it is understood that this settlement hierarchy will be utilised in the forthcoming Local Plan and is therefore appropriate for this Review. Settlements in neighbouring local authority areas adjacent to areas of Green Belt in Uttlesford were identified as being all non-Green Belt settlements, together with settlements identified in respective Green Belt Review and using relevant local plans (Map 4.5; Table 4. 2:)²¹.

Table 4. 2: Settlements Considered in Purpose 2 Assessment

Uttlesford	Neighbouring Local Authorities
Birchanger	Bishop’s Stortford (East Herts)
Elsenham	Chelmsford Urban Area (Chelmsford)
Hatfield Heath	Fyfield (Epping Forest)
Leaden Roding	Harlow (Harlow)
Little Hallingbury	Lower Sheering (Epping Forest)
Stansted Airport	Roxwell (Chelmsford)
Stansted Mountfitchet	Sawbridgeworth (East Herts)
Takeley	Sheering (Epping Forest)
Wright’s Green	Writtle (Chelmsford)
White Roding	

The extent to which an area of Green Belt protects a land gap was assessed using the following definitions:

- ‘*Essential gaps*’, where development would significantly reduce the perceived or actual distance between settlements.
- ‘*Wider gaps*’, where limited development may be possible without coalescence between settlements.
- ‘*Less essential gaps*’, where development is likely to be possible without any risk of coalescence of settlements.

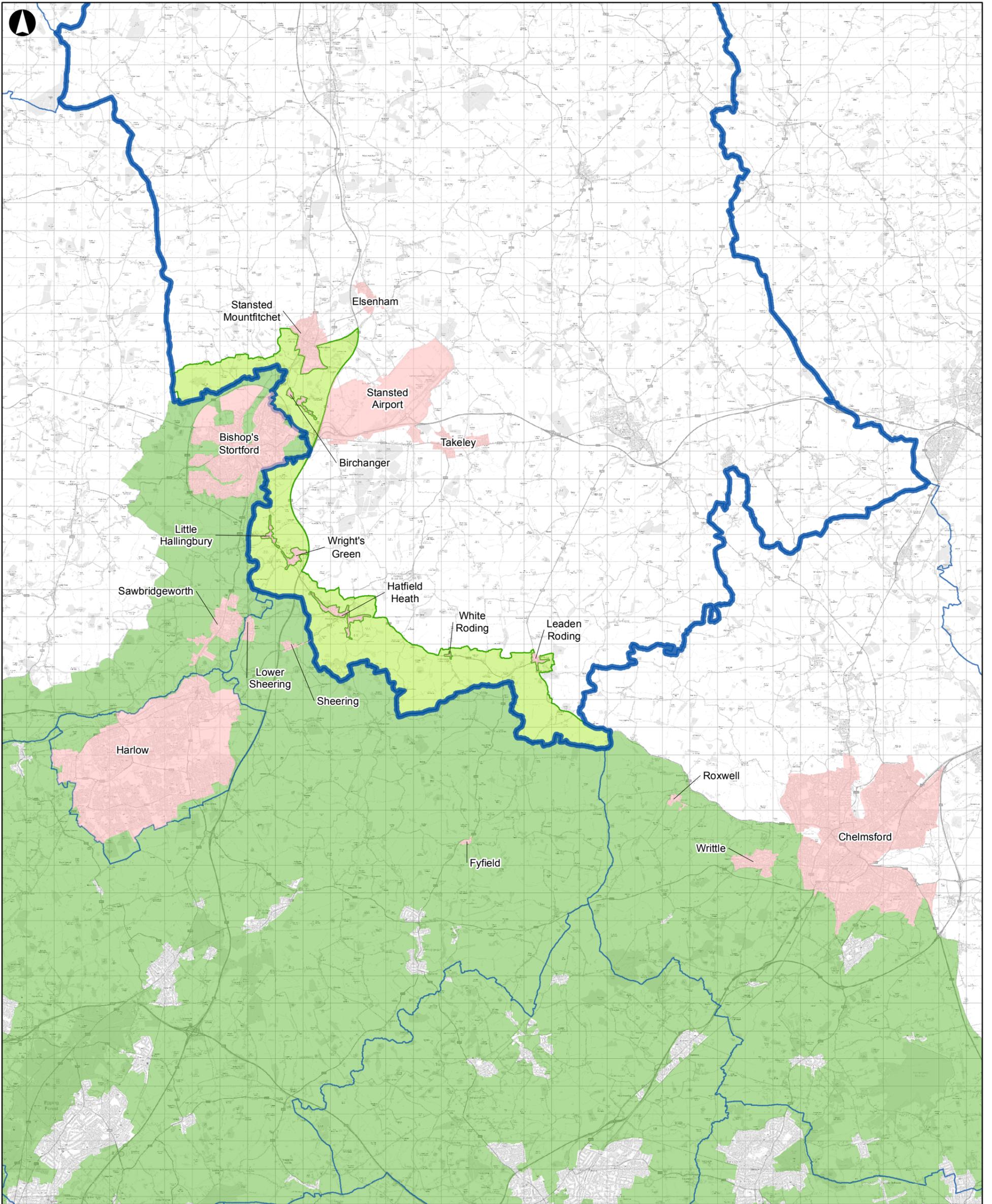
²¹ These were confirmed with officers from the respective neighbouring authorities at a workshop held on 4th December 2015.

Purpose 2 Assessment Criteria

The criteria used to assess the General Areas against Purpose 2 are set out below.

Purpose 2 Assessment Criteria

Purpose	Criteria	Score
To prevent neighbouring towns from merging	Prevents development that would result in merging of, or significant erosion of, gap(s) between neighbouring settlements, including ribbon development along transport corridors that link settlements.	5: An essential gap between non-Green Belt settlements, where development would significantly visually or physically reduce the perceived or actual distance between them.
		3: A wider gap between non-Green Belt settlements where there may be scope for some development, but where the overall openness and the scale of the gap is important to restricting merging.
		1: A less essential gap between non-Green Belt settlements, which is of sufficient scale and character that development is unlikely to cause merging of settlements.
		0: General Area does not provide a gap between any settlements and makes no discernable contribution to separation.
	Score	xx/5



Legend

- Settlement
- Uttlesford Green Belt
- Neighbouring Green Belt
- Neighbouring District Boundary
- Uttlesford District Boundary

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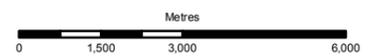
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Map 4.5 Settlements Considered in Purpose 2 Assessment

Scale at A3

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Job No
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Drawing Status
Draft

Drawing No
4.5

Issue
P1

4.4.3 Purpose 3

Purpose 3: To assist in safeguarding the countryside from encroachment

This purpose seeks to safeguard the countryside from encroachment, or a gradual advancement of urbanising influences through physical development or land use change. The assessment considered openness and the extent to which the Green Belt can be characterised as ‘*countryside*’, thus resisting encroachment from development. Openness refers to the extent to which Green Belt land could be considered open from an absence of built development rather than from a landscape character perspective, where openness might be characterised through topography and presence or otherwise of woodland and hedgerow cover.

Historic open land uses associated with the urban fringe and urban characteristics as well as the countryside exist in the Uttlesford and include, but are not limited to public utilities, motorways and their intersections, educational institutions, hotels and some small areas of residential development. Some of these semi-urban uses have an impact on the ‘*openness*’ of the Green Belt as identified in the assessment.

Purpose 3 Assessment Criterion

The criterion used to assess the General Areas against Purpose 3 is set out below. Ordnance Survey base maps and aerial photography were reviewed in order to undertake the openness assessment. The percentage of built form within a General Area was calculated using GIS tools based on the land area of features that are classified as manmade (constructed) within the Ordnance Survey MasterMap data, excluding roads and railway lines. The data includes buildings, surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures.

The score attributed to a Local Area was initially determined on the basis of the percentage built form. Scores were considered further in light of qualitative assessments of character, undertaken through site visits and revised as judged appropriate²². This assessment considered, in particular, the extent to which Local Areas might be reasonably identified as ‘*countryside*’ / ‘*rural*’ (in line with the NPPF). In order to differentiate between different areas, broad categorisation was developed encompassing assessments of land use (including agricultural use), morphology, context, scale and links to the wider Green Belt:

- ‘*Strong unspoilt rural character*’ was defined as land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.

²² For example, General Areas with a relatively low level of built form (i.e. between 10-15%) and a largely rural character would score 3; however a General Area with a relatively low level of built form (i.e. between 10-15%) but with an urban character (such as formal open space designation covering the entire General Area) would score 1. This allows for adjustments to the score as appropriate in situations where the character and the percentage of built form are not aligned.

- ‘*Largely rural character*’ was defined as land with a general absence of built development, largely characterised by rural land uses and landscapes but with some other sporadic developments and man-made structures.
- ‘*Semi-urban character*’ was defined as land which begins on the edge of the fully built-up area and contains a mix of urban and rural land uses before giving way to the wider countryside. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).
- ‘*Urban character*’ was defined as land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.

Purpose 3 Assessment Criteria

Purpose	Criteria	Score
Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development.	5. Contains less than 5% built form and possesses a strong unspoilt rural character.
		4. Contains less than 10% built form and possesses a largely rural character.
		3. Contains between 10% and 15% built form and/or possesses a largely rural character.
		2. Contains more than 15% built form and/or possesses a semi-urban character.
		1. Contains less than 20% built form and possesses an urban character.
		0. Contains more than 20% built form and possesses an urban character.
Score		xx/5

4.4.4 Purpose 4

Purpose 4: To preserve the setting and special character of historic towns.

This purpose serves to protect the setting of historic settlements by retaining the surrounding open land or by retaining the landscape context for historic centres. As outlined in the advice note published by PAS²³, the assessment of this purpose relates to very few settlements in practice, due largely to the pattern of modern development that often envelopes historic towns today. Cambridge is a good example of a settlement where the setting of the historic centre is contextualised by rural features, where the views across the ‘backs’ retain a special status in planning terms.

Following discussions with the Council at the project inception meeting, it was determined that there are no instances where the Uttlesford Green Belt directly

²³ PAS (2015) *Planning on the Doorstep: The Big Issues – Green Belt*.

abuts, or plays a functional role in the setting of, historic towns/cores within the District. However, examination of Green Belt studies undertaken by neighbouring authorities, together with the Essex Historic Towns SPG (1999), identified the following settlements as being of possible relevance to Purpose 4:

- East Herts (East Herts Green Belt Review (2015):
 - Bishop's Stortford – Some 'inner' parts of the Bishop's Stortford green wedges identified.
 - Sawbridgeworth – In particular the north-east side which is identified in the East Herts Green Belt Review as having a noticeable historical character that extends to the edge of the settlement. The settlement as a whole is also identified in the Epping Forest Green Belt Review Stage 1 (September 2015).
 - Watton-at-Stone.
- Epping Forest (Epping Forest Green Belt Review Stage 1 (September 2015) and the Essex Historic Towns SPG (1999)):
 - Epping.
 - Chipping Ongar.
 - Waltham Abbey.
- Chelmsford (Essex Historic Towns SPG (1999):
 - Chelmsford.
 - Pleshey.

Table 4. 3 sets out those settlements from the above listed which were initially considered relevant to the Review on the basis of their potential functional relationship with the Uttlesford Green Belt.

Table 4. 3 Historic Settlements identified for consideration in Purpose 4 Assessment

Uttlesford	Neighbouring Local Authorities
N/A	Sawbridgeworth (East Herts)

However, following the site visits, it was agreed with the Council that Purpose 4 was not relevant to the Uttlesford Green Belt Review only one General Area (15) was located near to the historic element of Sawbridgeworth (defined by a Conservation Area) and only adjoined on its very south-east corner (land within East Hertfordshire). It was therefore deemed that the General Area, in particular the land within Uttlesford District, had no functional relationship with the historic area of Sawbridgeworth. Given that no other General Areas abut any identified historic areas, it was agreed that Purpose 4 should be excluded from the Review. See section 5.2.5 for further information relating to General Area 15 and Purpose 4.

4.4.5 Purpose 5

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Purpose 5 focuses on assisting urban regeneration through the recycling of derelict and other urban land. As outlined in Section 3.3, the advice note issued by PAS suggests that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. Therefore, assessment of Green Belt against this purpose will not enable a distinction between General Areas as all Green Belt achieves the purpose to the same extent.

Furthermore, during engagement with the Council, it was confirmed that there are no planned urban regeneration schemes that were being inhibited by Green Belt designations.

As a result, Purpose 5 was excluded from the Review.

4.5 Pro-Forma

The pro-forma template for the General Area assessments is provided in Appendix B.

4.6 Recommendations

Following completion of the General Area assessments, the criterion scores for Purposes 1-3 were collated and tabulated across all of the General Areas, to highlight those areas meeting the purposes to a lesser or greater extent.

General Areas which meet the Green Belt purposes strongly have been identified clearly and the recommendation made to the Council that these Areas are less preferable for release.

As identified in chapter 5, no General Areas were identified as performing weakly. However, where Green Belt boundary anomalies were identified during the assessments, these are identified in the findings of this report.

It is understood that the outcome and recommendations from the Review will form part of the Council's suite of evidence-based studies to determine which of the identified Areas of Search should be progressed in its forthcoming plan making (and conversely, which to rule out). It is this suite of documents which will demonstrate any 'exceptional circumstances' to justify an amendment to the Green Belt boundaries through the Local Plan process.

5 Key Findings

5.1 Fundamental Aims

According to the NPPF, the fundamental aim of Green Belt policy is to ‘*prevent urban sprawl by keeping land permanently open*’ and the essential characteristic of Green Belts are their openness and permanence. Whilst General Areas have been assessed individually to ascertain their contribution to preventing sprawl under the Purpose 1 assessment, the Study has also noted qualitatively that, at the strategic level, wider swathes of Green Belt play a particularly important role with respect to the fundamental aim.

Collectively, the areas of land in the north extent of the Uttlesford Green Belt play an important strategic role in keeping the land permanently open. Four of the five large built-up areas identified in Map 4.4 are located in the north half of the Uttlesford Green Belt designation where the Green Belt has an enhanced role to prevent sprawl. This is particularly seen around the large built-up areas of Bishop’s Stortford, Stansted Mountfitchet and Stansted Airport which would be at risk of merging as a result of sprawl in the northern part of the Green Belt. The scale of the gaps are narrower and sprawl would result in the actual or perceived distance between the large built-up areas being significantly reduced, and potentially lost altogether. Large built-up areas are able to extend into open countryside where it is not bound by Green Belt policy, however the Uttlesford Green Belt is important in maintaining the distinct settlement patterns in the Green Belt and in keeping them as separate large built-up areas. There are fewer large built-up areas in the southern extent of the Green Belt designation, which are also at a greater scale apart. The Green Belt plays less of an important strategic role in keeping land permanently open in the south extent.

5.2 Green Belt General Areas

5.2.1 Local Areas for Assessment

A total of 31 General Areas were identified for assessment (see Map 4.3) using the methodology described in Section 4.3. General Areas were defined using permanent and durable features including motorways, roads, railway lines, and rivers. Following consultation with stakeholders and site visits, parcel boundaries were reviewed and revised if necessary.

The completed pro-formas for each General Area can be found in Annex Report 1. Table 5.1 sets out the scores for each General Area against NPPF Purposes 1-3. The scoring is illustrated spatially in Maps 5.1 – 5.3, and overall scores in Map 5.4.

5.2.2 Purpose 1 Assessment

19 of the 31 General Areas (61%) do not lie at the edge of an identified large built-up area and do not directly prevent sprawl, thus failing to meet Purpose 1. While some of these General Areas abut the edges of settlements such as Hatfield

Heath and White Roding, they play no role in preventing the sprawl of ‘large built-up areas’ (in reference to the specific policy set out in NPPF Paragraph 80, and defined for the purposes of this Assessment in of this report).

With the exception of General Areas 1, 3, 14 and 16, all the General Areas that fail Purpose 1 and do not prevent the sprawl of large built-up areas are in the southern half of the Uttlesford Green Belt, lying to the east of the M11 as shown in Map 5.1. This southern area of the Green Belt has no identified large built-up areas (as shown in Map 4.4) so were able only to score a 0 for Purpose 1 in line with the methodology. This highlights the importance of the northern half of the Uttlesford Green Belt in preventing sprawl of large built-up areas.

No parcels score a 1 or 1+ for Purpose 1 which would have indicated General Areas that were enclosed by a large built-up area and which were predominantly bordered by features which were either lacking in durability or permanence (1+), or that were permanent and consistent boundary features (1).

11 of the 31 General Areas (35%) score a 3 or 3+ for Purpose 1, meaning that the General Area is connected to large built-up areas. All of these parcels are located in the north of the Uttlesford Green Belt (west of the M11) where the Green Belt plays a role in preventing the sprawl of Bishop’s Stortford (eight General Areas), Stansted Mountfitchet (four General Areas), and Stansted Airport (two General Areas). Four of these General Areas (three connected to Bishop’s Stortford – General Areas 2, 10, 12, and 13; and one connected to Stansted Mountfitchet – General Area 2) score a 3+ for Purpose 1 meaning the land parcels play a heightened role in preventing sprawl by providing a barrier where the boundary between the Green Belt and the large built-up area is not robust, durable or readily recognisable.

General Area 8 is the only land parcel that meets Purpose 1 strongly and scores a 5 as it is contiguous with both Bishop’s Stortford and Stansted Airport. General Area 8 plays a particularly important role in preventing sprawl from two large built-up areas into open land. None of the parcels score a 5+.

5.2.3 Purpose 2 Assessment

Four of the 31 General Areas (13 %) fail to meet Purpose 2 and make no discernable contribution to the separation of settlements. Three of these (General Areas 7, 19, and 26) are located at the outer edge of the Metropolitan Green Belt and are not situated between settlements considered in the Purpose 2 Assessment (shown in Map 4.5). As such, these parcels cannot score more than 0. General Area 27 is located between Leaden Roding and Fyfield, but the scale of the gap is large enough that it makes no discernible contribution to separation.

A total of six land parcels (19%) meet Purpose 2 weakly scoring 1; five of which are in the south half of the Uttlesford Green Belt where there are fewer settlements considered for this purpose (as shown in Map 4.5). Parcels 23 and 30 are the two largest parcels in the Study and provide a less essential gap between non-Green Belt settlements where some development would be unlikely to cause the merging of settlements.

The highest proportion of General Areas score a 3 for Purpose 2, totalling 15 of the 31 land parcels (48%). This indicates that the land parcels meet the Green Belt purpose, but where there may be some scope for development without causing the merging of neighbouring towns. These General Areas are predominantly located in the north and middle of the Uttlesford Green Belt, forming a wider gap between settlements including Stansted Mountfitchet, Wright's Green, and Hatfield Heath. The scale of the gap between these neighbouring towns is smaller than in the southern extent of the Green Belt.

Six of the 31 land parcels (19%) score a 5, meeting Purpose 2 strongly. These General Areas are identified as essential gaps between non-Green Belt settlements where development would significantly visually or physically reduce the perceived or actual distance between them. The scale of the gaps are at the narrowest here and between settlements situated in close proximity to one another, for example General Area 8 which separates Stansted Mountfitchet and Stansted Airport from merging and General Area 20 which is essential in preventing Sheering and Hatfield Heath from merging. These land parcels are particularly important to keeping the settlement pattern in the Uttlesford Green Belt.

5.2.4 Purpose 3 Assessment

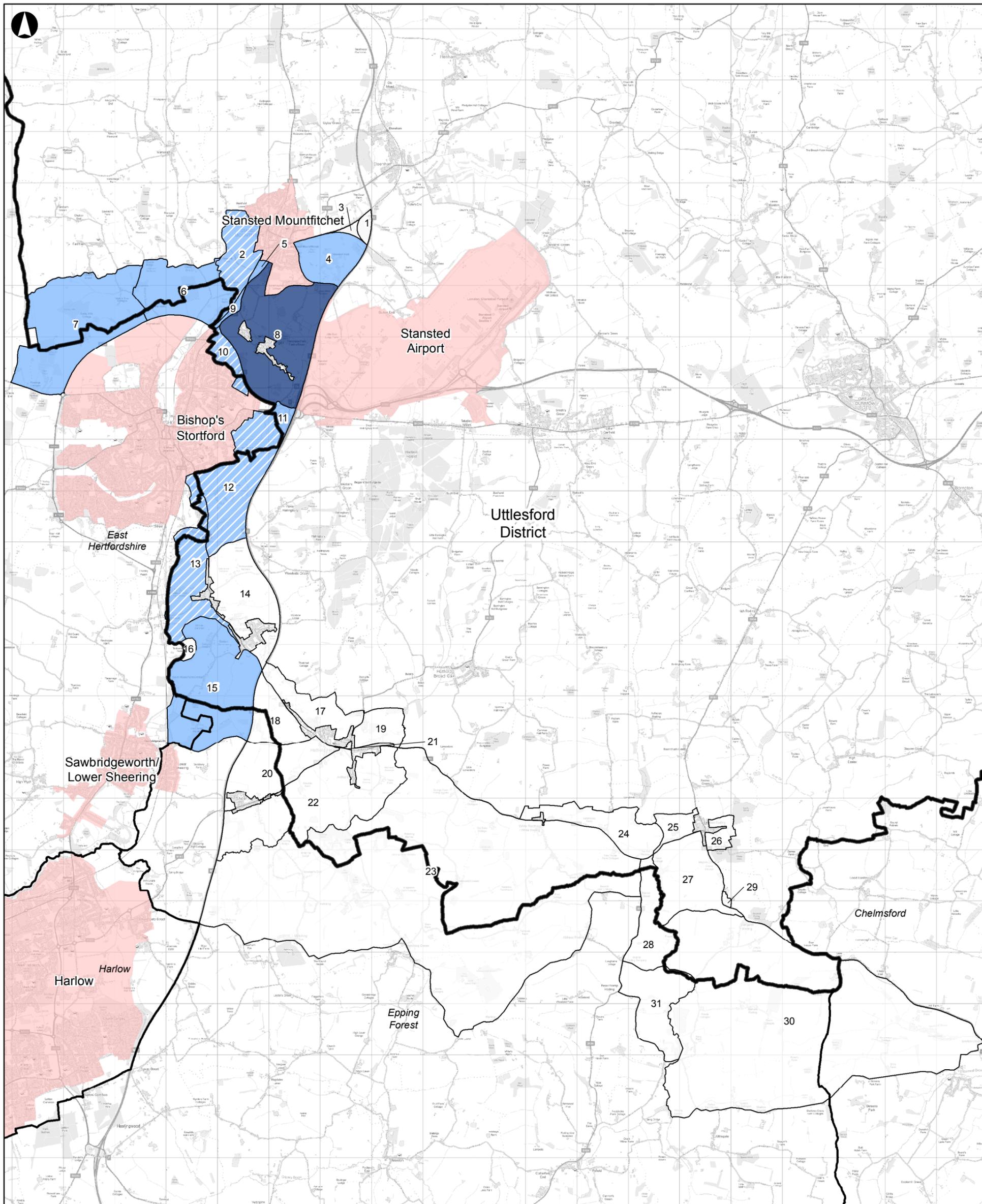
The majority of the General Areas meet Purpose 3 strongly in contributing to safeguarding the countryside from encroachment. 25 of the 31 land parcels (81%) contained less than 3% built form, an indication of the largely rural character of the Uttlesford Green Belt. Qualitative assessment on site affirmed the lack of urbanising influences and showed that the existing built-form was largely small areas of ribbon development, agricultural buildings, or churches/community uses. There were also some small business parks and utilities distributed across the study area, but their urbanising impact was low.

Only one land parcel (General Area 11, situated east of Bishop's Stortford) scored a 0 for Purpose 3. 24% of this land parcel is covered by built form, including a hotel, Welcome Break services, and a petrol station. The rural feel is significantly diminished by the M11 and approach roads. This land parcel does little to assist the countryside from encroachment.

No land parcels scored a 1 or 2, which would have indicated General Areas that have 15-20% built-form and possess a semi-urban or urban character.

Only General Area 5, situated north-east of Bishop's Stortford, scored a 3 for Purpose 3, characterised as largely rural with approximately 13% built form. This is a very small land parcel with a large manor house, small-industrial site, and several houses.

Despite the two anomalies discussed above, the remaining land parcels were largely open and rural in feel, with a general absence of built-form. 14 of the 31 General Areas (45%) score a 4 for Purpose 3, and characterise the land parcels as containing less than 10% built form and possessing a largely rural character. These land parcels show where the Green Belt is protecting the openness of the countryside to a large extent.



Legend

Purpose 1b		3+		General Areas
0		4		Neighbouring District Boundary
1		4+		Uttlesford District Boundary
1+		5		P1 Settlements
3		5+		

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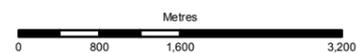
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Job Title
Uttlesford Green Belt Boundary Review



Map 5.1b Purpose 1b Assessment Scores

Scale at A3

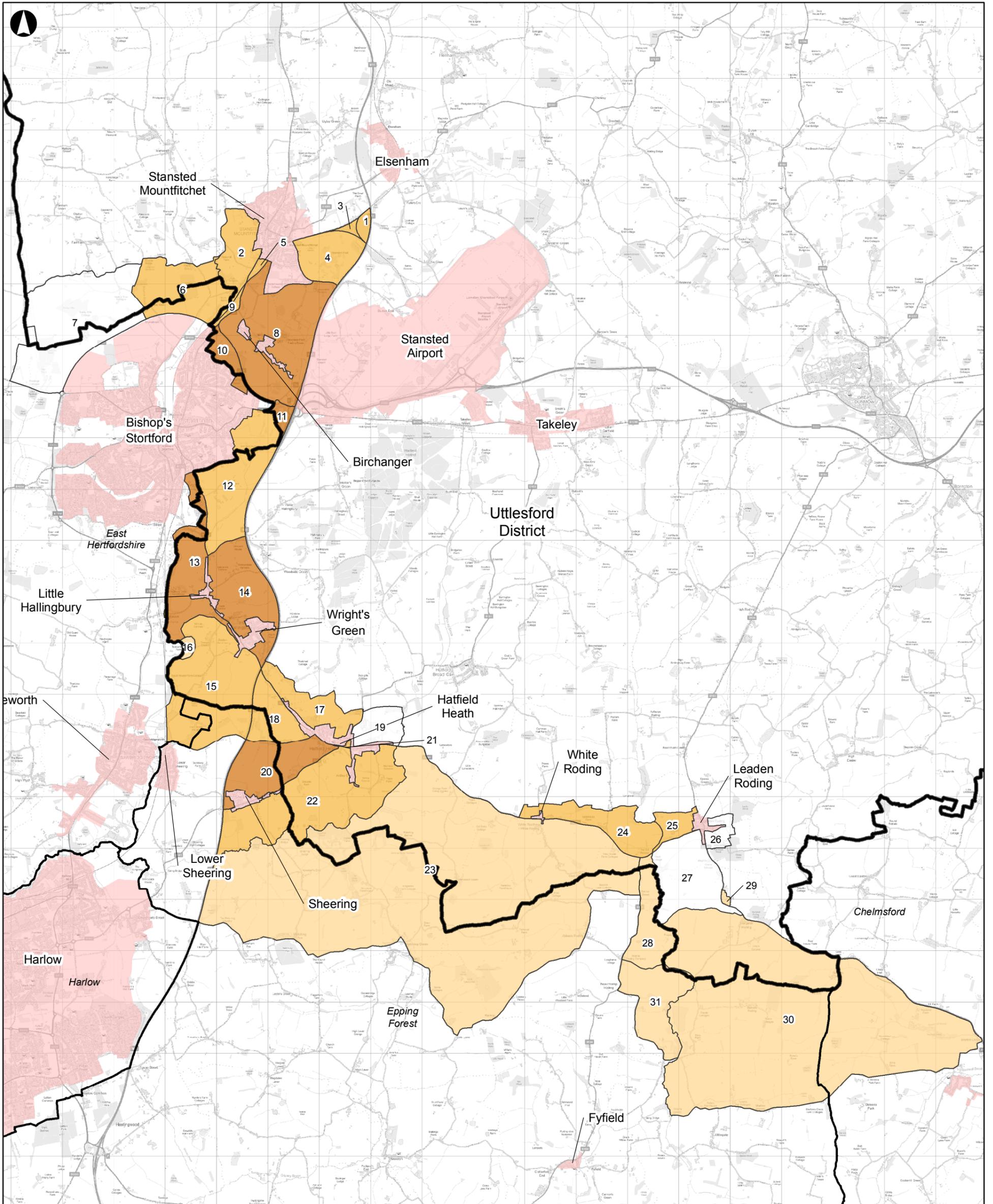
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Drawing Status
Draft

Drawing No
5.1b

Issue
P1



Legend

Purpose 2

	General Areas
	0
	1
	3
	5

	Neighbouring District Boundary
	Uttlesford District Boundary

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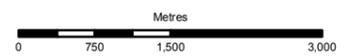
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Map 5.2 Purpose 2 Assessment Scores

Scale at A3

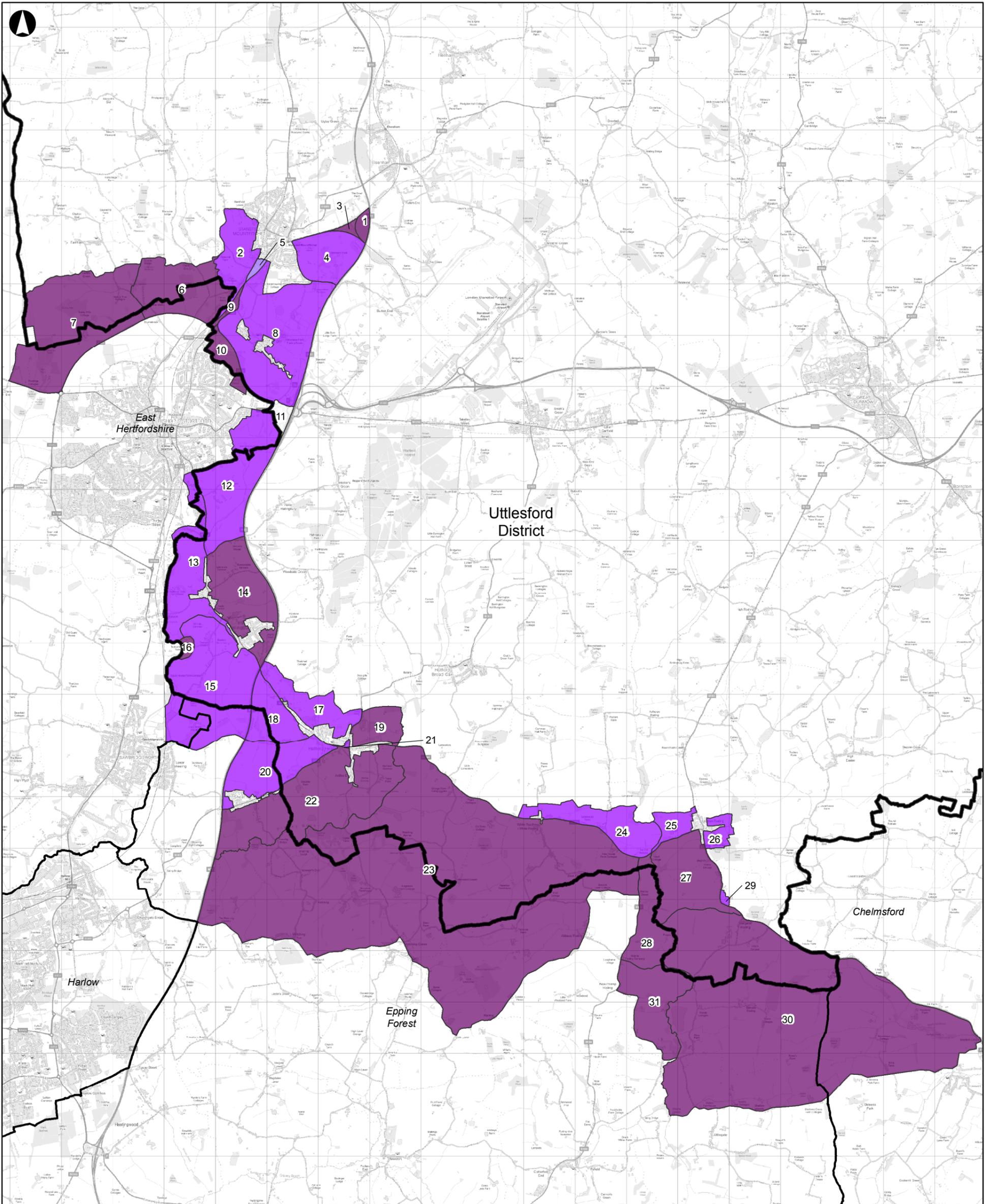
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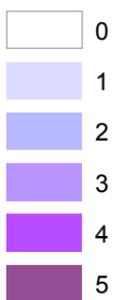
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P1



Legend

Purpose 3



- General Areas
- Neighbouring District Boundary
- Uttlesford District Boundary

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**Map 5.3 Purpose 3
Assessment Scores**

Scale at A3

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Drawing Status
Issue

Drawing No
5.3

Issue
P1

General Areas scoring 4 were largely situated in the north of the Uttlesford Green Belt (to the west of the M11), apart from General Areas 24, 25, and 26 which were noted for their largely rural interiors to the parcel, but with the presence of some commercial use, a sub-station/sewage works, a church and a school. Those land parcels scoring 4 in the north of the Green Belt are in closer proximity to large built-up areas so are more susceptible to encroachment to the countryside. General Area 2 for example contains some housing development and sewage works on Limekiln Lane, and in General Area 13 there is development associated with an allotment, a canoe club, and a caravan site. Despite the small percentage of built-form, land parcels scoring 4 were largely characterised with areas of arable uses, rural settings, and rolling hills with views across open countryside, and which assist the prevention of the countryside from encroachment to a greater extent.

The remaining 15 land parcels (55%) scored very highly for Purpose 3. With a score of 5, these land parcels contained less than 5% built-form and possess a strong unspoilt rural character. Around half of these parcels are in the south of the Uttlesford Green Belt, and given their distance from large-built up areas and urban influences, their score is perhaps unsurprising. These land parcels are dominated by rural land uses, rolling hills, and long views. However, even land parcels located near large-built up areas including Bishop's Stortford, Stansted Mountfitchet and Stansted Airport in the north of the Green Belt score strongly on Purpose 3, and share similar characteristics to those described in the south part of the Green Belt. These 15 land parcels strongly assist the safeguarding of the countryside from encroachment.

5.2.5 Purpose 4 Assessment

Purpose 4 seeks to preserve the setting and special character of historic towns. The purpose serves to protect the surrounding open land or by retaining the landscape context for historic centres. As set out in section 4.4.4, the only historic town of relevance to the Study is Sawbridgeworth; specifically the Sawbridgeworth Conservation Area which is located to (but not within) the very south-west corner of General Area 15. There are some references in the Sawbridgeworth Conservation Area Appraisal (2014) to the relationship between this section of the Conservation Area and the wider countryside. These are provided below (emphasis added):

*6.22 From the east the Lower Sheering conservation area is **approached through rolling countryside down a steep winding lane with hedgerows and trees either side. The group of former malting buildings which form the basis of the conservation area can be seen across the fields in splendid isolation.** The approach is thence down Lower Sheering Lane, lined with abundant trees to the right but open to the fields to the left.*

*6.23 Closer views are of the listed buildings looming above a small group of brick cottages which emphasise their massive height. **Views out from the conservation area here are over open countryside which enhances their setting.***

7.107 There are good middle distance views of each group [re East Maltings buildings] from the opposite sides of the railway line and long distance views from the river valley to the north, the Hatfield Heath Road and Hallingbury Road.

There is therefore an identified relationship between the wider countryside (East Herts Green Belt) and the Conservation Area. However, it was noted from the site visits that only the furthest south-west corner of General Area 15 (within East Herts) is connected to the Conservation Area and the relationship between the land parcel and the Conservation Area is minimal. The approach is not characterised by rolling hills and views are short. The photographs below show the view from the edge of the Conservation Area looking towards the East Herts Green Belt (Figure 5.1) and the view from the edge of the East Herts Green Belt looking towards the Conservation Area (Figure 5.2).

Figure 5.1 View looking north-east from the level crossing at Sawbridgeworth railway station in the south-west of the land parcel.



Figure 5.2 View looking south-west towards the level crossing at Sawbridgeworth Station in the south-west of the parcel.



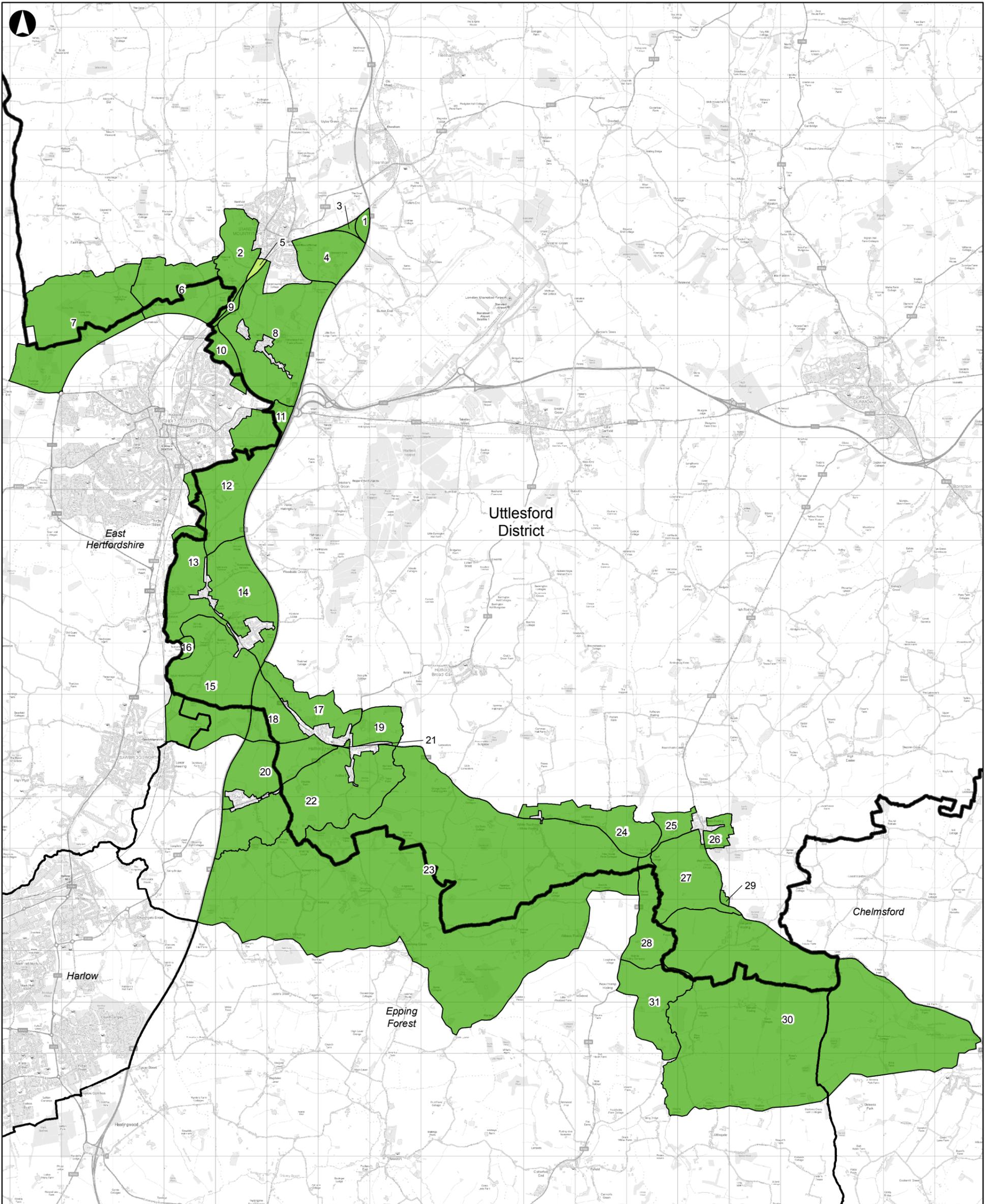
It was deemed that General Area 15 makes a very limited contribution to Purpose 4 and no contribution to Purpose 4 to the Uttlesford Green Belt. Although providing a broad contextual setting for the north-east corner of the Conservation Area by maintaining open land, there is little direct visual interface with the Conservation Area itself as the approach offers no long views into countryside and is marred by the backs of buildings including a pub and railway station.

5.3 Overall Summary

All 31 General Areas meet two or more of the NPPF purposes. The individual purpose scores for the Green Belt General Areas are set out in Table 5. 1 below, and are shown geographically in Maps 5.1b-5.3, and overall scores in Map 5.4.

In order to summarise the outcomes from the assessment, the Local Areas have been categorised as follows:

- 30 Local Areas are judged to be **strong** Green Belt, meeting **at least one** of the purposes strongly (scoring 4 or 5);
- 1 Local Area is judged to be **moderate** Green Belt, scoring moderately (3) against **at least one** purpose and failing to score strongly against any purpose (4 or 4);
- 0 Local Areas are judged to be **weak** Green Belt, as **at least one** purpose is met moderately or strongly.



Legend

- Overall Scores**
- Strong
 - Moderate
 - Weak
- General Areas
 - Neighbouring District Boundary
 - Uttlesford District Boundary

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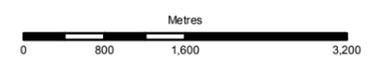
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Map 5.4 Overall Assessment Scores

Scale at A3
1:70,000

Job No
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Drawing Status
Draft

Drawing No
5.4

Issue
P1

Table 5. 1 Overall summary of findings for Purpose Assessment

Parcel	Area (hectares)	Purpose Assessments				
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Overall Summary
		(a) Land parcel is at the edge of one large built up area	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	Protects the openness of the countryside and is least covered by development	- Weak - Moderate - Strong
1	12.71	FAIL	0	3	5	Strong
2	99.76	PASS	3+	3	4	Strong
3	6.94	FAIL	0	3	5	Strong
4	102.97	PASS	3	3	4	Strong
5	6.30	PASS	3	3	3	Moderate
6	180.44	PASS	3	3	5	Strong
7	378.47	PASS	3	0	5	Strong
8	329.45	PASS	5	5	4	Strong
9	8.15	PASS	3	3	5	Strong
10	38.61	PASS	3+	5	5	Strong
11	17.94	PASS	3	5	0	Strong
12	224.67	PASS	3+	3	4	Strong

Parcel	Area (hectares)	Purpose Assessments				
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Overall Summary
		(a) Land parcel is at the edge of one large built up area	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	Protects the openness of the countryside and is least covered by development	- Weak - Moderate - Strong
13	161.67	PASS	3+	5	4	Strong
14	186.61	FAIL	0	5	5	Strong
15	341.41	PASS	3	3	4	Strong
16	9.64	FAIL	0	1	5	Strong
17	95.58	FAIL	0	3	4	Strong
18	90.02	FAIL	0	3	4	Strong
19	62.66	FAIL	0	0	5	Strong
20	155.37	FAIL	0	5	4	Strong
21	1.78	FAIL	0	3	4	Strong
22	376.83	FAIL	0	3	5	Strong
23	2270.29	FAIL	0	1	5	Strong
24	125.85	FAIL	0	3	4	Strong
25	35.46	FAIL	0	3	4	Strong
26	28.39	FAIL	0	0	4	Strong

Parcel	Area (hectares)	Purpose Assessments				
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Overall Summary
		(a) Land parcel is at the edge of one large built up area	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	Protects the openness of the countryside and is least covered by development	- Weak - Moderate - Strong
27	175.98	FAIL	0	0	5	Strong
28	109.03	FAIL	0	1	5	Strong
29	5.07	FAIL	0	1	4	Strong
30	1537.20	FAIL	0	1	5	Strong
31	153.84	FAIL	0	1	5	Strong

6 Recommendations

6.1 Overview

As set out in chapter 5, all General Areas were deemed to meet Green Belt purpose either moderately or strongly. There are no General Areas which do not meet Green Belt purposes and therefore no parcels in their entirety are recommended for further consideration for release. It has been shown that the Green Belt in Uttlesford is performing an important role in terms of national policy requirements.

At a strategic level, the northern part of the Uttlesford Green Belt plays a particularly important role in preventing sprawl (Purpose 1) and coalescence (Purpose 2) given the close relationship between the Green Belt and the large built-up areas of Bishop's Stortford, Stansted Mountfitchet, Stansted Airport and Sawbridgeworth/Lower Sheering. This swathe of Green Belt scores particularly strongly compared to the southern end of the Green Belt with regard to Purpose 1, and still strongly but to a lesser extent with regard to Purpose 2. In contrast, the southern part of the Uttlesford Green Belt plays more of a strategic role with regard to Purpose 3 in safeguarding the countryside from encroachment.

At a local level, individual parcels are responsible for protecting the Green Belt from sprawl from large built-up areas and a high proportion of the land parcels form the wider, if not the essential, gap between settlements. All parts of the Green Belt therefore are evidenced to play an important strategic role in preventing the countryside from encroachment to a large extent. Any further subdivision of these General Areas would jeopardise the role they play in maintaining settlement patterns and avoiding encroachment into open countryside. The Green Belt has contributed to the low percentage of built-form observed throughout the designated area, ensuring limited encroachment across most areas in the Green Belt. The General Areas demonstrate policy compliancy with the NPPF purposes and show a very good example of where the Green Belt is serving well across the original functions and across the different purposes.

6.2 Boundary Amendments

In undertaking the site visits and assessments, it was observed that there may be opportunity to rationalise some of the land parcel boundaries to better align with the NPPF paragraph 85 which states that Local Authorities should '*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent*'.

General Areas 24, 25, 26 and 29 are located to the north of the A1060 which acts as a permanent and defensible boundary for much of the northern edge of the Uttlesford/Metropolitan Green. To the north of the A1060, these parcels lack clear outer edges, often comprising small-scale tree-lines, field boundaries, and small river tributaries. As these four parcels lie at the outer extend of the Green Belt, it may be considered appropriate whether the boundary of the Green Belt might be

better defined by the A1060. It must be noted that these parcels all score strongly in their overall assessment, so boundary amendments would be justified on rationalisation alone rather than their NPPF compliancy. However, it is not considered that the strategic purpose of the Green Belt would be harmed if such a change was made.

General Area 21 is also considered to contain a boundary anomaly. Taken as a whole, the General Area scores strongly for Purposes 2 and 3 (however failing to meet Purpose 1). However, the land parcel contains a small slither of Green Belt land running along the northern edge of the A1060 (Stortford Road) which in practice is simply a grass verge to this road. It is suggested that the Green Belt boundary might be amended to align with the A1060 (Stortford Road) and omit the grass verge, which in itself makes no contribution to the Green Belt purposes.

In General Area 4, planning permission has recently been granted for the construction of 53 residential units, together with flood alleviation works and landscape re-profiling, public open space, community allotments, and footpaths and cycleway in the north-west corner of the site at Elms Farm (planning application reference UTT/14/2133/DFO). It may therefore be appropriate to consider adjustment of the Green Belt boundary in this location to be the outer extent of this approved scheme, which may act to strengthen the role of the rest of General Area 4 in preventing the outward sprawl of the large built-up area of Stansted Mountfitchet. Similarly, within General Area 17, a new development of 14 new residential properties and allotments on Broomfields Road north of Hatfield Heath has recently been built within the Green Belt. As with General Area 4, revision of the Green Belt could be made to exclude this built-form from the designation.

7 Conclusions

This review has examined the performance of the Green Belt in and around Uttlesford against the Green Belt purposes, as set out in the NPPF. The assessment has considered 31 Green Belt General Areas, bounded by readily recognisable, durable physical features.

The Uttlesford Green Belt, totalling 8% of the District, was originally established as part of the wider Metropolitan Green Belt to curtail the further unchecked growth of London's urban area by the Town and Country Planning Act of 1947. In 1995, the Uttlesford Local Plan extended the designation further to prevent the communities from merging into an urban sprawl from the south of Bishop's Stortford to the north of Stansted Mountfitchet.

Although the Green Belt is not designated on the basis of environmental quality, within Uttlesford the Green Belt offers protection to areas of attractive countryside, arable farmland, and small villages. Conversely it is likely that Uttlesford will come under pressure to accommodate the demand of housing growth in the East of England and possibly neighbouring authorities' objectively assessed needs. The core function of the Green Belt is however to maintain the historic settlement pattern and prevent the encroachment of unsuitable development into open countryside, in particular around Bishop's Stortford, Stansted Mountfitchet and Stansted Airport.

The 31 identified General Areas were assessed against three of the five NPPF purposes which were deemed relevant to the Uttlesford context. Overall, 30 of these land parcels were identified as performing strongly against Green Belt purposes, and the final land parcel was identified as moderately performing. Uttlesford is an example of well-functioning Green Belt, demonstrating that it meets the original purposes of preventing outward sprawl of its large built-up areas and is compliant to both NPPF and local policies.

It is not recommended that any General Areas are considered for release from the Green Belt. The north part of the Uttlesford Green Belt plays a strategic role in preventing the sprawl of Bishop's Stortford, Stansted Mountfitchet and Stansted Airport, whereas the southern part of the designation performs highly at preventing the encroachment of the countryside. At a local assessment level, individual parcels are essential to contributing to avoiding the merging of settlements and maintaining the historic settlement pattern. The scale, design and siting of existing development does not harm the character of the countryside and the Green Belt will ensure that this character is not further diminished.

The report has identified where consideration might be given to Green Belt boundary adjustments, to ensure boundaries are permanent and defensible. For any such amendments to the Green Belt boundary the Council should consider whether there are 'exceptional circumstances' to justify any alterations in the preparation of the new Local Plans. This will apply equally to any proposed additions or subtractions to land designated Green Belt.

Appendix A

Glossary of Terms

Term	Definition
Connected	Displaying a low level of containment and rather simply adjoining the urban area.
Contiguous	Predominantly surrounded by built form (from at least two large built-up areas) but also retaining a strong link to the wider Green Belt.
Duty to Cooperate	A legislative requirement in the Localism Act 2011 which places a duty on local planning authorities and county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.
Enclosed	Almost entirely contained or surrounded by built development.
Encroachment	A gradual advancement of urbanising influences through physical development or land use change.
Essential Gap	A gap between settlements where development would significantly reduce the perceived or actual distance between them.
General Area	Green Belt land parcel defined by permanent and defensible boundaries, for use during the Green Belt assessment.
Large Built-Up Area	Areas defined to correspond to the major settlements identified in the respective Local Plans for each local authority, both within and outside Uttlesford, and used in the NPPF Purpose 1 assessment.
Largely Rural Character	Land with a general absence of built development, largely characterised by rural land uses and landscapes but with some other sporadic developments and man-made structures.
Less Essential Gap	A gap between settlements where development is likely to be possible without any risk of coalescence between them.
Neighbouring Town	Refers to settlements within Uttlesford, as well as settlements in neighbouring authorities immediately adjacent to Uttlesford's Green Belt, for the assessment against NPPF Purpose 2.
Open Land	Open land refers to land that is lacking in built development.
Openness	Openness refers to the extent to which Green Belt land could be considered open from an absence of built development.
Semi-Urban Character	Land which begins on the edge of the fully built up area and contains a mix of urban and rural land uses before giving way to the wider countryside. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).
Sprawl	The outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way.
Strong Unspoilt Rural Character	Land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.

Term	Definition
Urban Character	Land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.
Wider Gap	A gap between settlements where limited development may be possible without coalescence between them.

Appendix B

Pro-Forma

General Area		[Insert Context Plan]
Area (ha)		
Local Authority		
Description		

Location Plan	[Insert Location Plan]
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Purpose 1	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas.		
	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.		
Purpose 1: Total Score			/5

Purpose 2	Criteria	Assessment	Score
(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements.		
Purpose 2: Total Score			/5

Purpose 3	Criteria	Assessment	Score
(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development.		
Purpose 3: Total Score			/5

Site Photos	[Insert Site Key Plan]
Photograph 1:	[Insert Photo]
Photograph 2:	[Insert Photo]
Photograph 3:	[Insert Photo]
Photograph 4:	[Insert Photo]

Committee: Planning Policy Working Group

Agenda Item

Date: 23 March 2016

5

**Title: Replacement Waste Local Plan
Pre-Submission Draft**

Author: Sarah Nicholas, Senior Planning Officer :

Summary

1. Essex County Council has published the Pre-Submission Draft of the Replacement Waste Local Plan. The Plan provides the key principles and policies to guide the future management of waste in the Plan area up until 2032. Members can view the plan on the ECC website at www.essex.gov.uk/WLP
2. This consultation/engagement provides the final opportunity for public consultation before the Plan is submitted for an Examination in Public by a Planning Inspector. The Planning Inspector is only able, by law, to consider representations on matters of soundness and legal compliance. The responses sought at this stage must therefore be based on these elements. Representations are required by 14 April.
3. Members will recall that at the meeting of 13 July 2015 a response to the Consultation on the Revised Preferred Approach was considered and agreed.
4. The Pre-Submission Draft Plan allocates five sites in Uttlesford. Maps are included below.
5. **Little Bullocks Farm, Great Canfield (site 1)** is located south of an existing minerals extraction site and is allocated for minerals extraction in the Minerals Local Plan 2014 and is allocated for inert landfill (i.e. construction, demolition and excavation waste)

Little Bullocks Farm, Great and Little Canfield (site 2) is located west of an existing minerals extraction site and is allocated for minerals extraction in the Minerals Local Plan 2014 and is allocated for non-reactive hazardous landfill (i.e. asbestos)

Crumps Farm, Little Canfield (site 3) is located adjacent to the southern boundary of an existing minerals extraction site and is allocated for the recycling of inert waste (i.e. construction, demolition and excavation waste)

Gaunts End, Elsenham is a Greenfield site, located south of an existing minerals extraction site and is allocated for the recycling of inert waste (i.e. construction, demolition and excavation waste).

Newport Quarry is an existing minerals extraction site and is allocated for both inert landfill and for the recycling of inert waste (i.e. construction, demolition and excavation waste)

6. ECC have to allocate sites for waste management facilities by 2031/32 for including 1.5 million tonnes per annum for the management of inert waste and 50,250 tonnes per annum for the management of hazardous waste. It is appreciated that although some of the sites in Uttlesford are not ideal, specifically the site at Elsenham, it is considered that ECC have considered all the potential sites countywide, have considered the most efficient use of mineral sites and will be able to mitigated against the impacts of the development though the Development Management Policies and the development principles for each of the allocations.

Recommendations

7. That there are no objections on matters of soundness.

Financial Implications

8. None

Background Papers

9. None

Impact

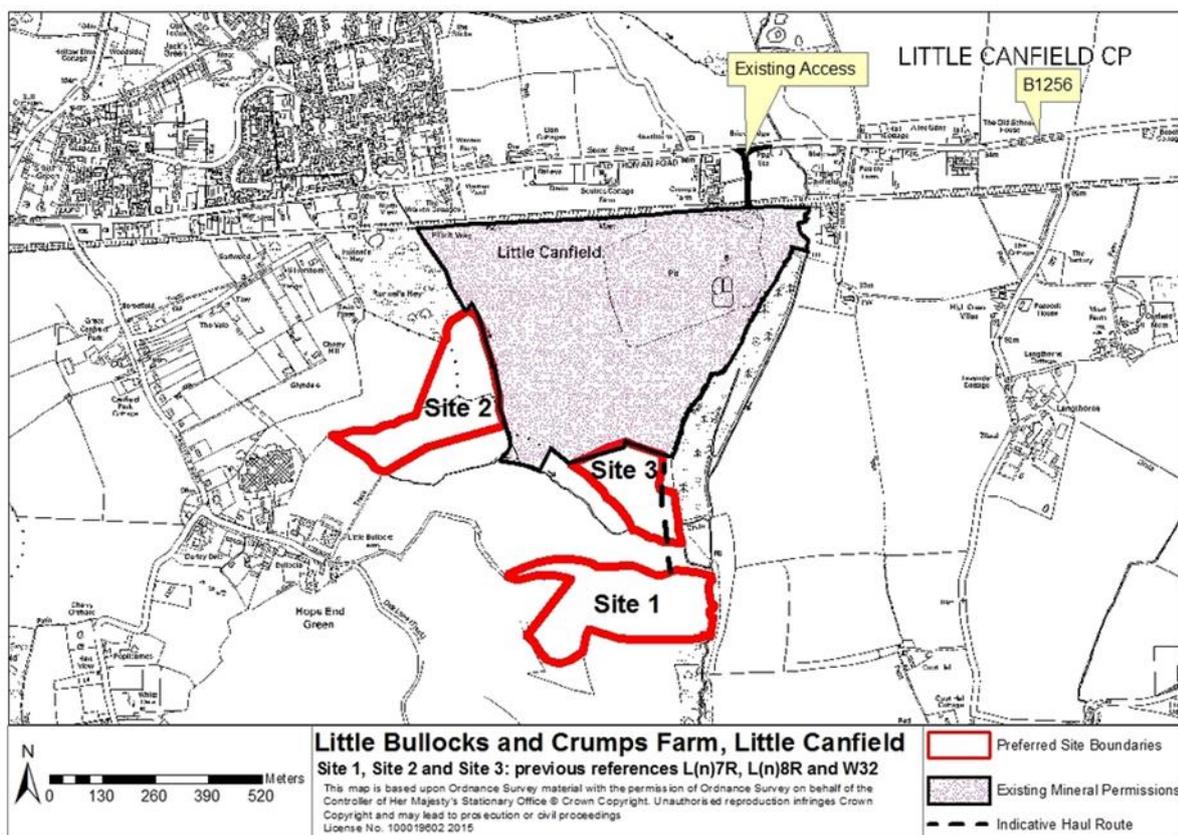
- 10.

Communication/Consultation	The consultation is being undertaken by ECC
Community Safety	N/A
Equalities	N/A
Health and Safety	N/A
Human Rights/Legal Implications	N/A
Sustainability	A sustainability appraisal accompanies the Local Plan
Ward-specific impacts	Sites are proposed in the following parishes:- Elsenham, Great and Little Canfield, Great Hallingbury, Newport.
Workforce/Workplace	N/A

Situation

11. Three sites are allocated at **Little Bullocks and Crumps Farm, Great and Little Canfield**, as an extension to the existing mineral/waste site at Crumps Farm.

- **Site 1** is allocated for inert landfill. This site is allocated for extraction in the Minerals Local Plan 2014.
- **Site 2** is allocated for hazardous landfill – restricted to non-reactive hazardous waste (i.e. asbestos) with no liquids, slurries, sludge, clinical wastes or oils to be deposited on the site. This site is allocated for extraction in the Minerals Local Plan 2014.
- **Site 3** is allocated for inert waste recycling.



12. The Council raised concerns in the previous consultation that the existing Crumps Farm mineral extraction site is not being considered as a waste site and whether the most efficient use is being made of mineral sites; how the sites would be accessed; the cumulative impact of a hazardous waste site in close proximity to the adjoining sites and whether such waste could continue to be accepted outside the County.

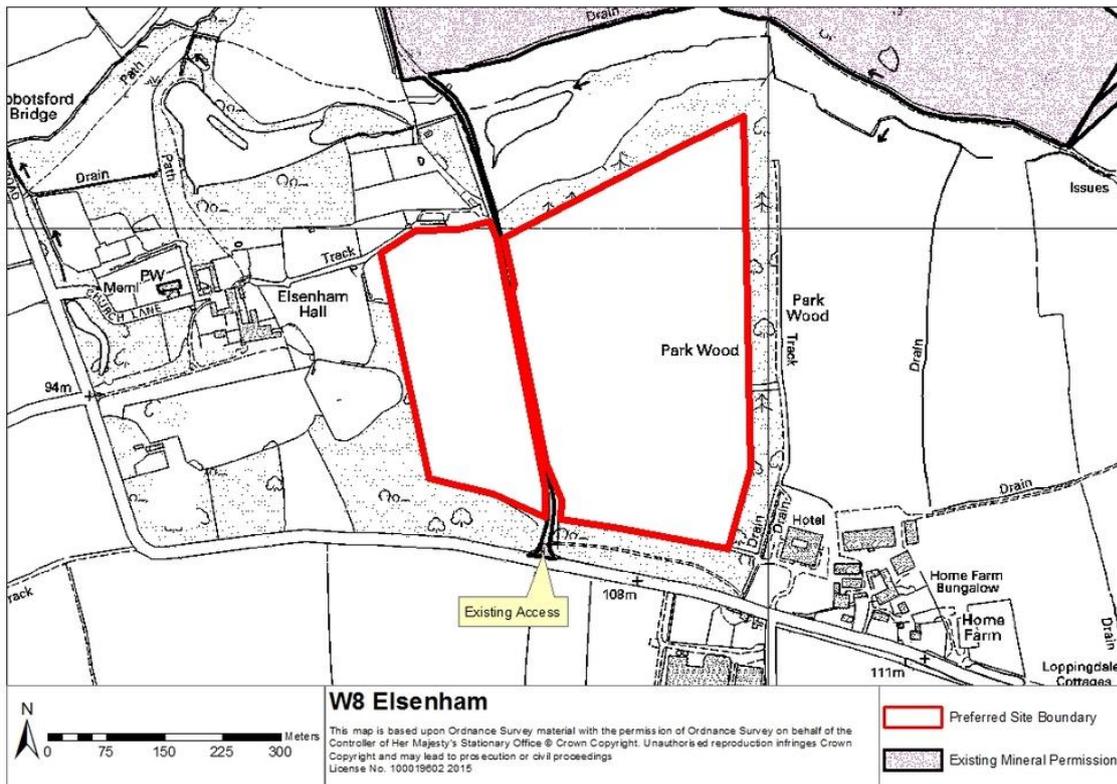
13. The County Council sets out their response to our representations in their Report of Site Methodology and Assessment Outcomes available on the website at www.essex.gov.uk/WLP In relation to hazardous waste, the Waste

Authorities need to make efforts to provide capacity where possible. The allocation of Little Bullocks Farm represents the only opportunity available in the Plan area for the disposal of a stable element of hazardous waste. Essex County Council confirms that existing and preferred mineral sites are being used in the most efficient way, with regard to waste uses. Site 3 was not originally recommended for any allocation but the County Council consider that greater efficiencies would result for the inert recycling operation as a whole by the allocation of site 3 for recycling and site 1 solely for landfill (as opposed to recycling and landfill as previously proposed). The cumulative impact of the three sites has been considered in the Sustainability Appraisal (SA). The SA notes that there may be cumulative negative impacts on water quality, biodiversity and the localised transport network but that this has been recognised in the development principles listed in the Plan mitigating the impacts of these sustainability objectives.

14. The Plan requires that all the sites would be accessed via the existing access from Crumps Farm onto Stortford Road. An internal haul road would be required between the sites and the Crumps Farm access.

15. *Officer comment: - It is considered that the issues raised by the Council in the previous consultation have been considered and taken into account in the pre-submission draft plan. It is considered that this group of sites makes the best use of mineral sites. It is appreciated that a site for disposal of non-reactive hazardous waste needs to be dealt with within the County and only some sites will be suitable for this and only this site has been proposed for this use by site operators.*

16. A site in **Elsenham** is proposed for inert waste recycling.

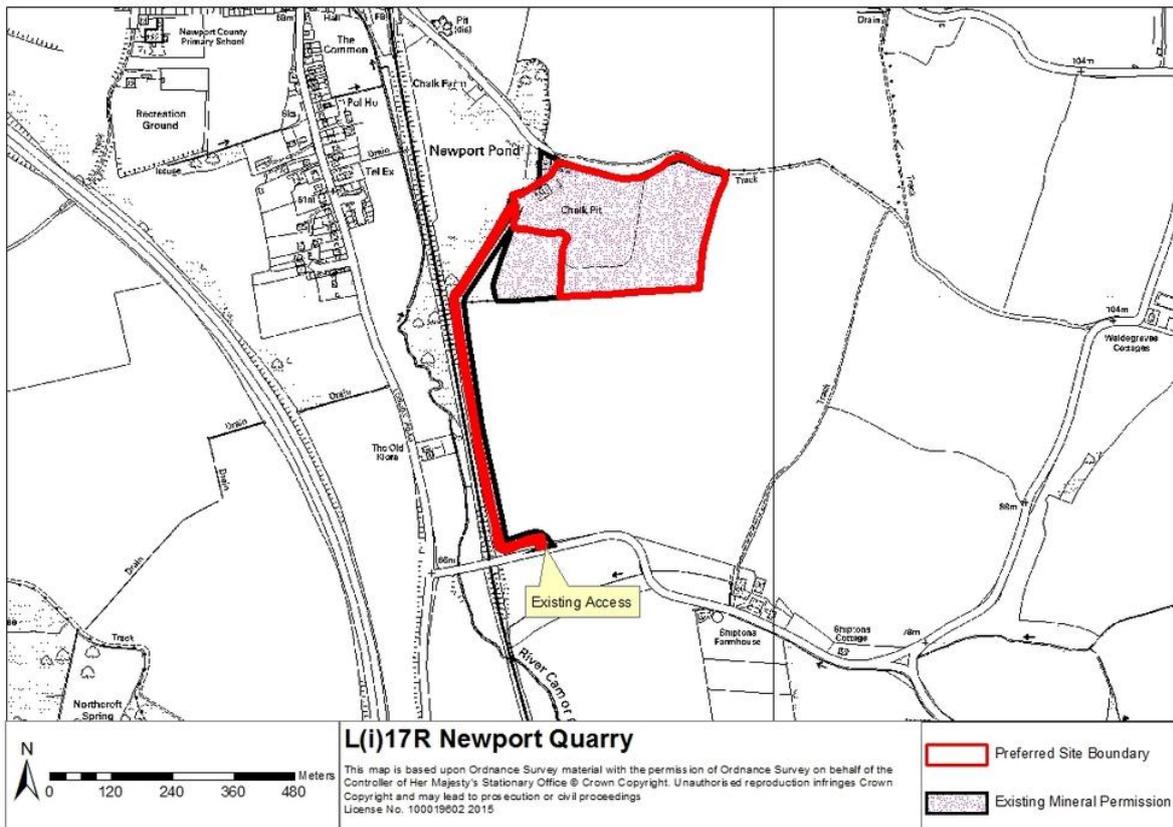


17. The site adjoins the access to the quarry which lies to the north. In the previous consultation the Council raised concerns about the impact of this site on historic and natural assets. The Pre-Submission Plan includes the following development principles

- a vehicle routing agreement;
- retention of existing woodland and new planting
- Land to the west of the haul road to be retained for mitigation purposes – including a robust scheme of landscaping with the waste management facility being entirely located within land to the east of the haul road.
- The impacts on designated and undesignated assets – the setting and significance of the listed buildings in the vicinity and the relationship and impact on the historic parkland – need to be addressed.

18. *Officer comments: - It is considered that the issues raised by the Council in the previous consultation have been considered and taken into account in the pre-submission draft plan to mitigate against the impact of the development.*

19. **Newport Quarry** is allocated for inert landfill and inert waste recycling.



20. The site is an existing quarry and the Pre-Submission Plan includes the following development principles.

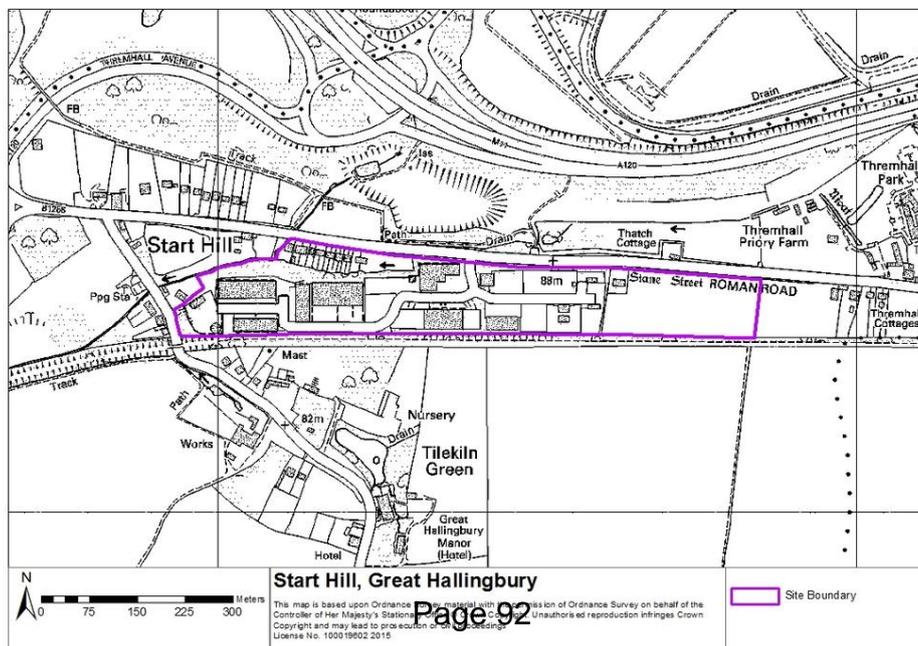
- Site to be continued to be restored to chalk grassland
- Areas already restored should not undergo further development other than to development the chalk grassland habitat
- No development to occur outside the quarried areas.
- Vehicle routing agreement and consideration of any additional traffic management.

21. *Officer comments: - It is considered that this site, as an existing quarry is an efficient use of land for waste purposes.*

22. The Revised Preferred Approach Waste Local Plan not only safeguarded the **waste transfer facility at Great Dunmow** but in addition showed it as an allocation which allowed the intensification/expansion of the site. The Council raised concerns that this might result in the site expanding beyond the scale of development permitted. Since the Revised Preferred Approach was consulted upon the site has been reconsidered by ECC through a detailed site assessment process and is still deemed to be acceptable. However, the case for allocating this recently operational LACW transfer station for further uplift in capacity (in contrast to safeguarding) has not been quantified. As such, its inclusion in the RWLP on this basis is not being pursued.

23. To afford the Plan more flexibility than reliance on allocated sites only the Plan includes **Areas of Search** within which proposals for waste management development will be permitted. Within Uttlesford the Pre-Submission Plan includes the industrial estate at **Start Hill, Great Hallingbury**. The Ashdon Road Commercial Centre, Saffron Walden which was identified as an Area of Search in the previous consultation has subsequently been removed due to the proximity to an extant residential planning permission.

24. *Officer comment: - no objections are raised the identification of this site within the Areas of Search.*



Risk Analysis

25.

Risk	Likelihood	Impact	Mitigating actions
That there are issues which have not been identified	1. low	That the Council will be unable to raise such issues with the Inspector.	That the Council carefully consider the Plan and the Sustainability Appraisal.

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.

Committee: Planning Policy Working Group

Agenda Item

Date: 23 March 2016

6

Title: Great Dunmow Neighbourhood Plan
Submission Consultation

Author: Hannah Hayden Planning Officer

Summary

1. Great Dunmow Town Council has prepared a Neighbourhood Plan. They submitted the Plan on 1 March 2016, which is currently being published for a period of six weeks. This is our opportunity to formally comment on the document, all representations will be sent to the independent examiner for consideration.

Recommendations

2. That the comments set out below are considered by the group and sent to the Independent Examiner along with any other additional comments from the group as the Council's response to the Great Dunmow Neighbourhood Plan Submission consultation 2016.

Financial Implications

3. No costs associated with this decision although the costs of the external examination are met from the Council from the Neighbourhood Planning Reserve.

Background Papers

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

None

Impact

- 5.

Communication/Consultation	Six week public consultation ending 12 April 2016
Community Safety	N/A
Equalities	N/A
Health and Safety	N/A

Human Rights/Legal Implications	N/A
Sustainability	N/A
Ward-specific impacts	Great Dunmow North and South
Workforce/Workplace	N/A

Situation

Background

6. Great Dunmow Town Council has been developing a neighbourhood development plan for many years. The Council is legally required to provide advice and assistance in the making of proposals for neighbourhood plans. The Planning department have provided constructive comments to the neighbourhood development plan working group on the emerging plan proposals on a number of occasions prior to submission.
7. Great Dunmow parish was formally approved as a neighbourhood area for the purposes of drafting a neighbourhood development plan on 25 October 2012. The pre submission consultation took place initially on the 31 July 2014 with a further consultation taking place September/October 2015. The Submission neighbourhood plan is published for consultation between 1 March and 12 April 2016.
8. An independent examiner has been appointed to examine the neighbourhood development plan. A copy of all representations made during the consultation on the Submission must be sent to the examiner along with the plan proposal and other relevant documents.

Policy Context

9. Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area.
10. Neighbourhood development plans are required to be in general conformity with the strategic policies contained in the Local Plan, contribute to the achievement of sustainable development and have regard to national policies and advice. Once adopted they become part of the development plan and will be referred to in the assessment of relevant planning applications.

Response

11. The Council submitted comments in response to the Neighbourhood Development Plan Pre Submission consultation in October 2015. A number of the Council's concerns have been addressed; however those which haven't are set out below and it is proposed that these are sent as the Council's response to the submission consultation.

12. *Policy DS9: Building for Life* – the first part of this policy is to encourage this approach; however, the final paragraph is insisting that a self-assessment is submitted with a planning application. This is not a national requirement or part of our local requirements. There needs to be a strong justification for the inclusion of this policy and its approach, at present there is insufficient justification.
13. *Policy DS15 Local Housing Needs* – The figures in this policy have come from the SHMA, however figures for affordable housing and figures for market housing have been merged to come up with an average percentage. This approach is not supported; affordable housing and market housing are two distinct areas of housing need.
14. There is also a requirement in this policy for 5% bungalows on schemes of 20+ units. The Council require 5% on schemes of 10+ dwellings, there is no evidence to support a different policy approach.
15. *Policy S0S2 Sporting Infrastructure Requirements* – there is no evidence to support the inclusion of this policy and it is not clear where the 30 unit threshold has come from. Developer contributions can only be collected in relation to designated schemes and then a maximum of 5 contributions per scheme. There is no guidance on the criteria that should be used for the calculation of contributions.

Risk Analysis

16.

Risk	Likelihood	Impact	Mitigating actions
Not submitting a response	1 – unlikely, the Council is preparing a response	1 - The Council's views would not be taken into account by the examiner	Ensure that a response is received within the consultation deadline

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.

Committee: Uttlesford Planning Policy Working Group

Agenda Item

Date: 23 March 2016

7

Title: Issues and Options Consultation –
summary of representations

Author: Hannah Hayden Planning Officer

Summary

1. Consultation on the Issues and Options ended in December 2015. All of the representations are available to view on the Council's consultation portal on the website.
2. In total 6944 representations were received by 731 people/organisations.
3. Attached is a summary of representations to questions 4, 5, 8, 11, 15, 16, 17, 18 and 19 of the Consultation. This report concludes the summary of representations. Members will recall that they considered the other questions at the previous meeting on 23 February 2016.

Recommendations

4. That the working group note the responses and use them to inform the local plan process.

Financial Implications

5. None

Background Papers

6. 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

- 7.

Communication/Consultation	Public Consultation took place between October and December 2015
Community Safety	N/A
Equalities	N/A
Health and Safety	N/A

Human Rights/Legal Implications	N/A
Sustainability	The consultation was subject to a sustainability appraisal which was out to consultation at the same time
Ward-specific impacts	ALL
Workforce/Workplace	N/A

Situation

8. Consultation on the Issues and Options Consultation took place between 22 October and 4 December 2015, a total of 6 weeks.
9. 6944 comments were received from 731 people/organisations. The attached report summaries the representations made to the following questions:
 - Question 4: Infrastructure Planning
 - Question 5: Employment
 - Question 8: Natural Environment and Historic Environment
 - Question 11: New Settlement Areas of Search
 - Question 15: Villages
 - Question 16: Development at 580 dwellings per year
 - Question 17: Development at 750 dwellings per year
 - Question 18: Other Scenarios
 - Question 19: Other Points
10. Officers have not made any response to the comments received as the evidence base is still being prepared and a firm response at this stage to representations could prejudge the content of the Plan.

Risk Analysis

11.

Risk	Likelihood	Impact	Mitigating actions
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That the Council fails to summarise representations received.	1 - Low	An Inspector may raise procedural concerns.	Robust administrative and IT systems
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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.

**Summary of representations
Issues and Options Consultation
22 October – 4 December 2015**

Questions

- 4: Infrastructure Planning
- 5: Employment
- 8: Natural Environment and Historic Environment
- 11: New Settlement Areas of Search
- 15: Villages
- 16: Development at 580 dwellings per year
- 17: Development at 750 dwellings per year
- 18: Other Scenarios
- 19: Other Points

March 2016

Question 4

Infrastructure Planning

Please provide details of any particular infrastructure issues which you feel the Council needs to consider if possible providing evidence.

This question was responded to by 514 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to <http://www.uttlesford.gov.uk/article/3038/Planning-Policy-Consultations>.

Overarching Summary

- Sport England view evidence base on sports provision inadequate
- Greater London Authority note study on enhancing the West Anglia Mainline could improve rail links between Uttlesford and key locations along the line
- Environment Agency require update of Water Cycle Study
- Highways England note Congestion on approaches to junction 8 M11. Some junctions on the A120 are reaching capacity, notably Galleys Corner Braintree
- Essex County Council key issues were childcare/education/Surface water flooding/involvement in latest UDC transport study
- South Cambridgeshire District Council require the impacts of new developments on the A1301 and A1307 in the northern part of UDC to be fully understood
- Most consider an existing deficit of infrastructure in all areas of the district
- Transport, education, health most mentioned as lacking
- Transport often mentioned as most pressing issue as effects most others
- Saffron Walden travel/traffic considered the worst by most
- Need for a Saffron Walden bypass often suggested

STATUTORY BODIES AND OTHER GROUPS

Sport England - Sport England developed guidance for local authorities to assist with Local Plan policies and for sports facilities. Sport England/Public Health England, has produced Active Design (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. It sets out ten principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design/use in the master planning process. Sport England previously raised concerns on the emerging Uttlesford Sports Strategy 2015 not robust/up to date evidence base. Considers emerging UDC Sports Strategy inadequate to inform plan.

Natural England - All new residential development (or mixed development with a significant residential component) should include sufficient accessible green space, including informal semi-natural areas, to meet a significant proportion of the residents daily needs (especially dog walking). Reason to provide a good quality of life for residents and to minimise any increase in the level of recreational pressure placed upon existing semi-natural areas and, in particular, Hatfield Forest.

Greater London Authority - The West Anglia Task Force is currently assessing a range of potential opportunities for enhancing the West Anglia Mainline. These potential investments could improve rail links between Uttlesford and key locations along the line, as well as helping to support housing and economic development opportunities across the wider London Stansted Cambridge corridor. The Task Force is looking at options including four-tracking the railway in the Upper Lea Valley, and having a branch of the potential future Crossrail 2 scheme serve the Corridor reporting in Summer 2016. The Council may therefore wish to consider the potential growth opportunities arising from such improvements to the West Anglia Mainline.

Thames Water Utilities - Water companies investment programmes are based on a 5 year cycle - Asset Management Plan (AMP) process. AMP6 covers 2015 to 2020. As part of Thames Waters five year business plan they advise OFWAT on the funding required to accommodate planned growth. Thames Water base their investment programmes on a range of factors, including population projections and development plan allocations, which help to form the clearest picture of the future shape of the community.

Thames Water relies heavily on the planning system to ensure infrastructure upgrades are provided ahead of development. Insert paragraph /policy in the local plan:

Supporting text: The LPA will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers required to show adequate capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users in the form of internal and external sewer flooding, pollution of land and water courses and/or issues with water supply in the form of no or low water pressure. •

Policy: Planning permission will only be granted for developments which increase the demand for off-site water and wastewater infrastructure where: 1) Sufficient capacity already exists; or 2) Extra capacity can be provided in time to serve the development ensuring environment/ amenities of other users not adversely affected. When there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the appropriate infrastructure improvements will be completed prior to occupation of the development.

Where development is being proposed within 800m of a sewage treatment works, the developer or LPA should liaise with Thames Water to consider an odour impact assessment.

Anglian Water Services Ltd - UDC commissioned a Water Cycle Study to inform the preparation of the Draft Local Plan 2014. This study outlined the implications for water resources and supply infrastructure and wastewater treatment and sewer network. It is suggested that the findings of this study should be reviewed or updated to take account of any significant changes to the development strategy outlined in the Local Plan submitted to Government in July 2014. Anglian Water would welcome the opportunity to be involved as part of any review or update of this study.

Environment Agency - Important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion including Wastewater infrastructure NPPF177. Acknowledge section 2.4 p8 mentions improvement to utilities/infrastructure/expect some specifics around the existing water and wastewater infrastructure/capacity for planned

housing growth. Take account of phasing and adequacy of capacity/ impact on the growth strategy if delays to funding of infrastructure upgrades. Given existing WCS was completed recently, it may not be necessary to undertake a completely new study. Instead WCS refresh through provision of an addendum/ focus on new areas of search/increases in housing provision to settlements and consider the latest AMP plans.

Limited capacity at Thaxted and Dunmow/expect refreshed WCS to look at capacity matters. Majority of district is Drinking Water Protected Area (DrWPA) safeguard zone and Nitrate Vulnerable Zone (NVZ). Several wastewater treatment works (WwTWs) within catchment are at, or close to, their permitted flow/larger works at Saffron Walden, Great Chesterford and Newport. If significant development is connected into these WwTWs, revisions to the discharge permits will be required. Impact of proposed development on foul water infrastructure needs to be assessed if the numbers of dwellings in any given location is beyond that assessed in the existing Water Cycle Study (WCS). Impact of more foul water discharge on receiving rivers needs to be assessed if the numbers of dwellings in any given location is beyond that assessed in the WCS. Much work done on proposed Elsenham Eco-town/Issue with sewage treatment provision/present arrangement involves transfer of foul water to the Stansted WwTW. Limited scope to expand the transfer of foul water due to engineering constraints linked to the pipe network passing under the M11.

Local water supplies are already heavily used with additional supplies being imported from other parts of Hertfordshire and/or Cambridge Water. Local plans can help to ensure that water resources are protected and, where evidence justifies, that water efficiency measures are adopted. Water efficiency in new buildings is encouraged to reduce water use and cut domestic carbon emissions/water treatment. Where evidence justifies include policies requiring all new homes to minimise internal water use based on local pressures.

Essex County Council Environment, Sustainability and Highway - Need to provide infrastructure (via developer funding) as part of any new housing proposals. ECC needs to be satisfied with impact of the scale and distribution of growth on its areas of responsibility, or identify infrastructure/mitigation is required. Need delivery of a viable bus service - scale/proximity of growth to larger settlements may ensure an adequate bus service is provided. Development needs a bus service provided from start. Use Uttlesford Cycling Strategy (2014) identifying infrastructure deficits in cycling network/missing links on Fitch Way/strategic cycle link across the District. Use Highway Impact Assessment (2014) to identify key junctions that are at or approaching capacity/assist the identification of new infrastructure required. ECC need input into updated Assessment /highway mitigation.

No reference to Early Years and childcare/uptake of employment or training is often dependent on the ability to access childcare. Insufficient child care provision in UDC to enable parents to easily access free entitlement E.g. those without transport childcare is difficult to access. Growth needs to take this situation into account/plan for more demand. Dispersed nature of UDC means growth will lead to many children travelling to school, especially for secondary schools. Ensure/plan safe direct walking and cycling routes to school available. If standards cannot be achieved ECC seek contributions from developers towards providing transport to schools but these can never fully mitigate the impact once health, congestion, air quality and cost in perpetuity are considered. School travel plans/promote sustainable travel to school via location of new housing.

ECC is required to provide free transport for all pupils of compulsory school age/make transport arrangements for all children who cannot reasonably be expected to walk to nearest suitable school because the nature of the route is deemed unsafe to walk. The location of sites for new housing within UDC, together with the necessary infrastructure to support them, should seek to ensure, wherever possible, to minimise the distance and journey times between home and school and ensure that there are safe walking and cycling routes for pupils to use on their journey between home and school. UDC to consider sufficiency of school places for particular proposals. Commissioning School Places in Essex published annually with information including capacity of existing schools.

UDC Sustainability Appraisal states Surface water flooding risk highlighted in the modelling of surface water in Saffron Walden, Great Dunmow and Stansted Mountfitchet. Adopt proactive strategies to mitigate and adapt to climate change, taking account of flood risk, and water supply/demand. Plan for Flood storage areas around Towns AOS/Control SuDS.

Telecoms/Broadband provides economic and social benefit/needs to emphasis e.g. prosperous economy/attract new businesses and jobs to UDC; increase home/remote-working/reduce the demand on travel networks at peak periods.

Highways England - Need to consider impact upon the road infrastructure. Congestion is evident at, and on the approaches to junction 8 of the M11. Some junctions on the A120 are reaching capacity, notably Galleys Corner interchange. Whilst Galleys Corner is within Braintree District need to consider the transportation impact beyond UDC.

Essex Wildlife Trust - Address current deficit in publicly accessible green open spaces in UDC. Mapping and assessment of existing GI network across the district can identify opportunities for enhancement of existing designated sites, creation of new habitats and linkages joining up existing sites to create a landscape-scale green network. The aim should be to significantly enhance biodiversity, protect and enhance riverine corridors, and provide areas of accessible natural open space for public enjoyment. At a strategic level, effective local planning for GI requires a strong evidence base to understand both the risks to GI assets and opportunities for enhancement to enable resilient plans to be developed. Need to have access to baseline figures for biodiversity in their area - Essex Wildlife Trust Biological Records Centre and the Essex Biodiversity Action Plan. A principle of no net loss of GI should be used, with a general aim that a minimum of 40% of the total land should constitute GI. Where there are policies or designations that require greater green space provision (for example in Community Forests, where 30% woodland cover is required), these requirements should be provided as a minimum, as part of the GI plan. Existing biodiversity features of environmental, historical or cultural interest, such as habitats of principal importance, ancient woodland and hedgerows, the remains of previous settlements, open spaces, and routes long used by local communities, should all be conserved and integrated into the design. GI can be harnessed as a positive place-shaping tool, and where appropriate can be used to positively transform local character.

South Cambridgeshire District Council - The emerging Local Plan will need to give careful consideration to the appropriateness of a new settlement close to the boundary with South Cambridgeshire and its impacts on and relationship to the southern part of South Cambridgeshire. The A1301 and A1307 are heavily used towards Cambridge and the transport impacts of new developments in the northern part of UDC need to be fully

understood to inform decisions. The viability assessment of the emerging Local Plan and its policies should take account of need to mitigate transport impacts outside UDC along corridor towards Cambridge. Consideration should be given to the outcome of the emerging City Deal A1307 study.

Hertfordshire County Council - Infrastructure planning needs to consider the cross-boundary issues relating to the provision of school places mentioned in question 2.

Heritage England - It would seem that there are infrastructure issues in Saffron Walden, particularly in terms of the road network. With new development predominantly located on the east side of the town, but the major transport corridors (railway/motorway) located to the west, this has an impact on traffic movements through the town, particularly in the historic town centre. We would welcome the opportunity to discuss how the Local Plan might address such issues in Saffron Walden to conserve and enhance its historic environment. Elsewhere knock-on impacts from growth on the capacity of road infrastructure in some settlements, which could impact on the historic environment.

Essex Bridleways Association - No mention of rights of way is included within paragraph 2.4 relating to Infrastructure and we request that when the final document is drawn up that the protection and enhancement of the Rights of Way network is included within new development and related infrastructure planning. It is far more cost-effective to plan such infrastructure at the beginning of any development and have it included in the initial draft plans, and we request that such new rights of way and enhancements are written into the policy against which applications for new developments will be determined.

Hands Off Thaxted - Infrastructure in UDC is already operating beyond its capacity with congestion on the roads, overfull schools and health centres with waiting lists stretched beyond stated capacities. As an example in Thaxted further growth will involve busing children to other primary schools outside the village/wholly unacceptable for small children and would destroy the cohesion of the village. It is also on record that regular flooding with sewage on Thaxted's streets is as a result of an inadequate drainage system. All proposed new developments including any new settlements should be accompanied by a proper plan related to the development of the associated infrastructure to ensure that this is in place before new houses can be occupied. This is a fundamental principle of the NPPF.

We Are Residents - Difficult to know where to start with this question or what is expected? It is worth noting however that there has been a huge under-provision of any infrastructure in the last 10 years, and the policy of piecemeal development has undoubtedly contributed to it, as has UDCs refusal to move from S106s to CIL system. To state obvious, not enough school places have been provided, there has been very little open space provision (UDCs deficient Developer Contributions Policy); there has been almost no green transport infrastructure; drainage systems haven't been improved. This has been pointed out repeatedly, yet s.106 contributions have not been made. Main issue is lack of any proper infrastructure delivery plan and the lack of any co-ordinated or strategic delivery of infrastructure. UDC Infrastructure Delivery Plan failed to plan for almost any necessary infrastructure, had no detailed proposals and no costings. Rather than trying to list every single piece of infrastructure which might be provided, urge UDC to prepare a proper Infrastructure Delivery Plan. We would also once again urge UDC to move as quickly as

possible to a CIL (UDC failing even to get developers to make contributions to school places), ensuring developments big or small, contribute to infrastructure provision.

Sustainable Uttlesford -Particularly concerned about the timely provision of school places in light of the recent experience of poor planning causing the reopening of old primary school sites in Stansted Mountfitchet and Takeley. How will be the traditional cross border movement of pupils into Hertfordshire schools in the south west of the district be provided for when the 2,500 new homes allocated to Bishops Stortford area become occupied? Also in light of current planned changes in bus routes within the district especially serving some of the Type A villages we would want the maintenance of current public transport network in the District to be a factor in the decision making.

Great Dunmow Neighbourhood Plan Steering Group - The Infrastructure in Great Dunmow, the villages around are at full stretch. Children are being bussed to and fro to find places and the surgeries can barely cope. It is true that there will be more schools as a result of existing applications but there will be delays whilst houses are built before the new schools become operational. It is therefore unrealistic for the new Local Plan to consider adding to the problem. The Great Dunmow Neighbourhood Plan has considered this extensively and we would refer you to that document.

Stebbing Society - As stated above, any infrastructure planning must consider and incorporate proper provision for key issues such Education, Health and Transport (Public and Private) and associated Links, the scale of which has to be commensurate with and in proportion to the size of development. In our local area there are 1900 patients per doctor compared with 1700 nationally! All other infrastructure facilities are already bursting and really can't support any more. Stebbing Residents are very reliant on their cars, as are many other similar Type A villages. So a sound, coherent transport network system must be a crucial infrastructure priority. In this increasingly hi-tech environment, faster Broadband should now also be added to the more traditional infrastructure needs.

The Thaxted Society - Rural communication is essential to effective sustainability of a rural landscape. It is a greater need at the micro local level than the over supplied national and global. Therefore broadband provision should be seen as essential part of a future for rural living.

Essex Bridleways Association - No mention of rights of way is included within paragraph 2.4 relating to Infrastructure and we request that when the final document is drawn up that the protection and enhancement of the Rights of Way network is included within new development and related infrastructure planning. It is far more cost-effective to plan such infrastructure at the beginning of any development and have it included in the initial draft plans, and we request that such new rights of way and enhancements are written into the policy against which applications for new developments will be determined.

Essex Wildlife Trust Uttlesford Local Group - The Council is only making reference to built infrastructure and has completely ignored Green Infrastructure here. Planning guidance makes abundant reference to the integration of green infrastructure into development and plans, and its omission here makes the plan unsound. There is a current deficit in publicly accessible green open spaces in the district which urgently needs to be addressed/worse than London Borough of Haringey. Assessment of existing GI network across the district

carried out by Essex Wildlife Trust showed UDC to be deficient in Accessible Natural Greenspace at every level. Before additional development is accepted the existing deficiencies must be addressed. A proper GI assessment can identify opportunities for enhancement of existing designated sites, creation of new habitats and linkages joining up existing sites to create landscape scale green network. The aim should be to significantly enhance biodiversity, protect and enhance riverine corridors, and provide areas of accessible natural open space for public enjoyment.

Birchanger Wood Trust - The western A120 should be dual-carriageway up to Junction 8 on the M11/direct link to the A120 is essential for Elsenham and Henham/absurd to direct their traffic into the north of Stansted. The Cambridge Road/Silver Street, the B1383 is already full and has narrow impossible footways. The alternative routes, both North/south and east/west through Stansted village are also incapable of holding any more traffic.

The Theatres Trust - Important to protect/promote cultural infrastructure. A variety of community and cultural infrastructure are vital for their contribution to the life of residents and visitors. To support the NPPF include policy to resist the loss of existing community/cultural facilities unless replacement facilities are provided, or not needed. Criteria for encouraging new facilities to serve the District's growing population.

Friends of the Earth - Very little infrastructure has been provided in conjunction with recent housing developments. UDC needs to adopt a strategy that maximises infrastructure provision rather than losing it through piecemeal growth. The same applies to Question 7 - Open Spaces, etc.J, where again UDC have failed to require developers to make proper provision.

Helena Romaine Secondary School - The current HRS and sixth form will need to be re-provided to meet the growing demand on its facilities over the plan period and to maintain a high quality education environment for pupils. Significant work has been undertaken to demonstrate the feasibility of re-locating the school on land South of Stortford Road, and the adjacent land at Buttleys Lane, Great Dunmow, in combination with related site submissions. It is intended that these sites will provide enabling development for the provision of a new secondary school and sixth form, with greater pupil capacity. This enabling residential development would provide for a new secondary school on land adjacent to Buttleys Lane, a Health Centre, parking and ambulance pick up/drop off point on the site. Essex Commissioning School Places 2014-19 Forecasting Group 1 projects growth in secondary school places in Dunmow/with declining surplus of spaces up to 2019/ deficit of places by 2021-22. Additional demand is likely to arise from surrounding districts as set out in Question 2 of this response/ early allocation of land/enabling development securing a new secondary school/sixth form to meet demands. Expanded secondary school provision is essential to the delivery of sustainable growth in and around Great Dunmow. New modern facility superior to expansion of buildings on existing site - insufficient outdoor space.

Stansted Airport - Crucial that the road network, both strategic and local, is addressed. Need for high quality, efficient and reliable road connections to airports is recognised by the Aviation Policy Framework. The Airports Commission and the Transport Select Committee have recognised that surface access to airports is vital in unlocking existing airport capacity. Road connectivity to the airport has suffered over several years with piecemeal investment on key road junctions resulting in limited resilience, reliability and increased congestion,

particularly along key sections of the M11 to the north of the airport. Although Stansted has a robust surface access strategy in place and an active transport forum, the road infrastructure shortcomings limit the airports ability to reach its full potential for the economic benefit of the district and East of England. Welcome the partnership approach with the Council, Essex CC, Highways England and airport over last 18 months/must continue if a suitable solution is to be found to the capacity on the M11 and A120. There is agreed mitigation in place for a 35mppa airport, but fair and proportionate contributions from all development sectors need to be capable of being secured into the future.

G W Balaam & Son - Clavering should be able to support a larger primary school/possibly a new secondary school in time. Within Villages there should be more off street parking and a complete ban of on street parking, considering this a rural area and a large amount of food is grown in the area and large agricultural equipment and HGVs need to operate in the area.

Ridgeons - Need infrastructure improvements in the town to support additional growth/includes link roads and school extensions. The delivery of infrastructure enhancements will clearly need to be fully investigated as part of the Local Plan process. Regard should be given to sites that might be able to be brought forward without the need for significant infrastructure enhancements e.g. brownfield sites.

TOWN AND PARISH COUNCILS

Ickleton Parish Council - Careful consideration must to be given to the need to address the present limitations of the M11 motorway the absence of a northbound motorway access at J9 of the M11 and the absence of a southbound exit at the same junction. The combination of an inadequate local road network and inadequate connections to the M11 renders any proposal for significant new development in the north of the District unsustainable in present circumstances. Saffron Walden itself needs better access to the M11 a nearby junction, and new or improved means of accessing it.

Great Easton & Tilty Parish Council - Schools, doctors surgeries and community services must be built in tandem with growth not as an add on after the event. This area is already suffering from the increased population from on going development (e.g. surgeries are full, difficult to get early appointments, and schools are at capacity)

Elmdon & Wendens Lofts Parish Council - A new settlement at either AoS 1 or 2 would impact significantly on the road system. Essex CC currently unable to maintain our existing road system in satisfactory condition. Traffic from either new settlement going south on the B184 or B1382 would naturally impact on these already busy routes.

Clavering Parish Council - Any new development should incorporate the required infrastructure needs

Stebbing Parish Council - A transport network is a crucial infrastructure issue that needs great consideration. Residents of Stebbing are reliant on their cars. Broadband is an essential element for any development Infrastructure planning needs to consider Education and Health.

Saffron Walden/Great Dunmow Town Council - Existing spare capacity and the quality of the spare capacity; feasibility of increasing the existing capacity - financial cost and

associated likely phasing; and the social, economic and environmental consequences. The cumulative nature of the possible consequences clearly relate directly to the concept of sustainability. As such, they can have a fundamental impact upon the acceptability, or otherwise, of major development proposals. Must be a guarantee that either they will be delivered on schedule or, if they are not, development does not go ahead “ or, at least, does not become operational until they are in place and functioning. It would, as a half-way house, be easy to suggest the possible alternative of a contingency plan that is a short-term interim solution, to a less than fully acceptable standard but which might suffice for a short-term interim period. However such solutions, once in place, become permanent and the quality of life for residents declines.

The question is so open-ended not able to provide a detailed answer listing all necessary infrastructure. We would like to see a proper infrastructure plan from UDC setting out the infrastructure that they believe should be delivered as part of the plan, for us to comment on. Need a properly costed infrastructure plan both so that the feasibility and delivery of infrastructure can be tested, and Community Infrastructure Levy adopted but no mention of the CIL and it was omitted from the last plan. Believe that it is extremely important if infrastructure is to be delivered properly.

Elsenham/Henham/Ugley/Widdington Parish Councils - Any development in Area of Search 3 has no ready access to secondary schooling and that is unlikely to be remedied. The road system is wholly inadequate to serve major development as found by the Local Plan inspector either Hall Road or through Stansted Mountfitchet and the inspector noted that improvements were unlikely to be achievable in either case.

Little Chesterford Parish Council - If further development is to take place to the east and north-east of Saffron Walden some sort of ring road would be beneficial to prevent traffic from these developments going through the town centre to travel north or south. The ring road around Great Dunmow has been very successful in reducing traffic in that town.

Quendon&Rickling Parish Council - Very little is actually being done about it, despite all development is required by the NPPF to have necessary infrastructure. Often Highways make no objection to planning applications where local residents are at their wits end with frustration regarding their roads, speeding traffic, increased volume of traffic, large trucks travelling on single lane country roads etc. We see water companies having no objection to developments where many additional houses will be added to an antiquated drainage and sewage system that has locals extremely frustrated with blockages and poor functioning. Essex CC agrees to every development as long as they are paid their education contribution but this does not provide any additional schools or school places in the long term. E.g. Takeley 2014 where local children didn't get a place at Takeley Primary because it did not have the space to accommodate them having to go to either Hatfield Broad Oak or Elsenham. The predicted pupil forecasts issued by Essex County Council have not matched the amount of housing development that has taken place in the area and therefore the school was not built with the capacity to cope with the current demand. • Consultation with local residents and Parish Councils will easily identify ongoing problems with infrastructure. This is key reason for supporting two large new settlements rather than trying to meet enormous housing target by overburdening small towns and villages.

Great Canfield Parish Council - Constant housing development in the Great Dunmow and Takeley area, infrastructure is not keeping pace with these developments. There are currently no additional GP services and a lack of primary school places for the housing that have been built. There are no rail links and the roads are already busy with no planning for bus lanes. Private vehicle use is the main means of transport and this will not change. If further homes are added to the area between Dunmow and Takeley, it is essential consideration is given to ease traffic congestion, improve public transport and to provide suitable GP and education services without over stretching those already in existence still further.

Thaxted Parish Council - Public sector investment should be put in to delivering services with development following on from this as happens in London. Developer contributions should then follow on from this. There needs to be a proper costed infrastructure plan. More use should be made of CIL. Flooding, drainage and concretisation should be considered. The sense of community is dissipated by shipping children out to schools outside of the local area.

Birchanger Parish Council - Congestion at Junction 8, and surrounding road network/impact on rural lanes

Stansted Mountfitchet Parish Council - The road infrastructure to the southwest of the district is inadequate for present day transport demands and UDC needs to have strategy in place to improve the road network without causing irreparable damage to protected lanes or, destroying the character of smaller communities. A ring road around Stansted Airport, closer to the perimeter, could offer a means of reducing commuter traffic by drawing it away from bottle necks such as that created at Grove Hill in Stansted Mountfitchet. Consider extra junctions on the M11 to help alleviate inevitable further deterioration of main routes, eg B1383, through village centres. A sensible collaborative venture with developers at the 14 Cambridge Road site Stansted Mountfitchet needed to relieve the present chaos caused on the Cambridge Road and present impasse on planning.

Takeley Parish Council - M11 Jtn8 already operating at capacity at certain times of the day/week/not fit for purpose/no Highways Agency assessment/evidence for strategic planning? 2500 dwellings already approved for Bishop's Stortford. UDC must consider the impact of both East Herts & UDC development proposals on Jtn 8. It would be wrong to plan further housing development that would impact on Jtn 8. d.M11Jtn 9 has capacity & we suggest should be modified to provide a 4-way junction.

Rail capacity limited on main line to Liverpool Street (Bishop's Stortford). Poor access to rail service at Stansted Airport. As a rail destination fares are at premium rates (up to 33% more expensive than Bishop's Stortford). Stansted Airport is inaccessible via public transport as a commuter destination/ bus service is poor running hourly/no early am or evening services to accommodate commuters. Parking for commuters is too expensive at the Airport. In addition, there is no pedestrian access to the Airport despite request to MAG for pedestrian footway and cycle lane access.

Better road access & employment opportunities in the north of the district. Why is growth again concentrated in the south of the district? Of 5000 permitted most are in the south of district & impact on M11 Jtn 8. Education (Primary & Secondary): Essex CC recently

highlighted the shortfall in capacity of primary and secondary education places in the south of the district to meet future demand (June 2015). How will additional capacity be facilitated without new settlements? GP services: in the key settlements are stretched (Bishops' Stortford, Elsenham, Dunmow, Hatfield Broad Oak, Stansted)

Newport Parish Council - Our current infrastructure in Newport is not fit for purpose. Radical improvements are required to cope with the permissions which have already been granted. In Newport we can see no evidence for additional provision for the doctors surgery, schools, leisure facilities and foul water treatment facility (despite repeatedly reporting this as not fit for purpose). We have grave concerns relating to flooding issues/all our representations have been ignored.

Arkesden Parish Council - Need to consider ALL infrastructure issues, but transport in particular is vital to the success of any proposed development. Transport infrastructure could/should, be provided at outset of any developments, whilst schools, surgeries, shops, recreational areas etc. should be provided at an early stage.

Sewards End Parish Council - Sewards End have discussed the Local Plan and would prefer to have a single settlement with the appropriate infrastructure and schools.

Felsted Parish Council - Where major settlements proposed on/close to UDC borders a full assessment of the impact on UDC infrastructure must be carried out in particular the site identified on the Braintree Plan/UDCs area 9. Take more account of the impact of developments on historic villages, particularly the creation of rat runs through villages such as Felsted which have narrow and restricted roads/junctions. Developments such as Oakwood Park, Fritch Green, have a dramatic impact on adjacent villages. In October 2015 3914 vehicle movements in and around Felsted village centre were recorded in a two hour period. There is no opportunity to avoid the main crossroads junction in the village centre/unsustainable now and already struggle to find effective proposals to help ease the flow of traffic. While the A120 is quoted as offering road access the reality is that the short length of dual carriageway ends in a bottleneck at Braintree (Marks Farm roundabout) and has no Eastbound exit between Dunmow and Rayne, limiting its usability for Area 9. Braintree offers only limited rail access to London, with 1 train per hour/extremely limited parking. Hard even now to reach Braintree train station from the east due to road congestion. Access to Chelmsford mainline rail station (and planned north Chelmsford station), is also limited due to congestion during rush hour after the Great Leighs bypass. Some rat runs but these involve unacceptable traffic through small villages. The only realistic rail option for increased commuter traffic into London remains Stansted.

Consideration must be given to water and sewage system capacity (e.g. prolonged recent outages in Dunmow/Felsted; loss of Felsted school buildings to fire because of inadequate water pressure). Stansted takes its water from London. Where would supplies for 10,000 houses in Area 9 come from? The capacity of the M11 north of J8 must be considered in addition to Jn8 improvements. Broadband provision must also be reviewed and vastly improved for business and home use.

Wendens Ambo Parish Council - Roads: housing development should not be agreed without the appropriate provision and planning for new roads where needed. Sewerage: development in areas which are not connected to mains drainage should be limited and

should take proper account of potential damage to water courses/rivers etc. Water companies should be asked for more detailed explanations of why development is/is not acceptable and, if necessary, for appropriate work to be carried out by the water company to protect the natural environment. Public transport: development in villages with very little public transport should either be limited or not allowed without improvements to bus services. Doctors surgeries and other health provision: these should be included at an early stage when agreeing more residential development. UDC should also be thinking about whether Addenbrookes Hospital will be able to take patients from Uttlesford. Losing Addenbrookes as the local hospital for those in the north of the district could have a detrimental impact on the health of residents. Schools: extra school places and, if needed, new schools should be planned and keep pace with development.

Littlebury Parish Council - Littlebury PC have discussed the Local Plan and would prefer to have a single settlement with the appropriate infrastructure and schools

Rayne Parish Council - Making the assumption that transport includes road infrastructure it is important this is regarded as a key issue. The impact on roads over at least a 25-mile radius from the edge of any significant development should be considered. In terms of its knock-on effect, the decision by HMG to not allocate special funds to the A120 is highly disturbing. This has to receive special attention, in a public environment, before any major development begins or planning permission is given. - BDC considers the current poor road situation as a very significant risk to the success of its Local Plan. This should not be read as a reason not to address the risks around all classifications of infrastructure.

Strethall Parish Meeting - We are not familiar, in detail, with the southern area of the district so have no comment to make there. But Saffron Walden is 'our' market town just 3 miles distant. So poor public transport, unacceptable pressures on school places despite what the county council might say, slow broadband speeds, more GP's required, Saffron Walden desperately requires east/south ring/by pass road the town is a traffic nightmare as all the finished and proposed development has taken, or will take place, on the east and south of the town so all traffic has to pass through the old town centre to get anywhere. And with future development in place and suggested in this consultative plan such infrastructure as a new link road has to be put in place to avoid gridlock at all times, poor air quality for residents and a big disincentive to outsiders to visit the town; therefore impacting on local business and employment.

The Sampfords Parish Council - In considering locations for housing and employment development the availability of high speed broadband is an extremely important factor which does not seem to have been considered. The very poor connectivity speeds of locations to the east of Saffron Walden such as the Sampfords and Thaxted needs to be recognised as a limiting factor and a disadvantage.

Stansted Mountfitchet Parish Council/Stansted Neighbourhood Plan Steering Group - In Stansted Mountfitchet one of the major infrastructure issues is traffic congestion on Cambridge Road there are some possible solutions to this but they require the involvement of Essex Highways we would welcome the opportunity to engage with the UDC transport consultant to address these issues. Traffic congestion is also evident on Chapel Hill, Grove Hill and other roads in the village. Any development at Elsenham/Henham will exacerbate the traffic congestion on Grove Hill and Chapel Hill. This point was made in the recent Local

Plan examination and the road constraints in Stansted Mountfitchet must be taken into account when considering any developments at Elsenham/Henham.

DEVELOPERS, AGENTS AND LAND OWNERS

- Object/Delete the final sentence of paragraph 2.4 "Infrastructure provision is likely to have a major impact on the phasing and deliverability of development" as it is a repetition
- Recognise the reduced infrastructure needs offered by edge of town growth locations
- Sustainable growth best where existing infrastructure/cost effective expansion available.
- Locations needing extensive new infrastructure be secondary as carry a higher burden
- Expand the capacity of existing infrastructure by liaising with the relevant statutory providers before considering provision outside settlements including in SA
- Undertake the necessary work to ensure that the infrastructural demands of an increasing population are addressed
- Ensure infrastructure relating to roads is addressed at a very early stage of the plan
- Common knowledge that growth of Stansted Airport is expected to bring huge economic benefits to the district and the wider south east
- One way of delivering these infrastructure improvements is by the delivery of new housing/reduce commuting time for residents
- The levels of growth envisaged provide major opportunities to fund and improve infrastructure and community services and facilities
- Suggestion that Braintree station is suitable to serve a major development (Boxted Wood, Andrewsfield, and AOS 9) shows ignorance of the district
- Focus on the Liverpool Street/Cambridge main line and the M11 Motorway.
- Major east-west road serving commercial vehicles passing through is the A14 not A120
- The Council needs to build upon the transport and social infrastructure already in place by developing in accordance with the existing settlement hierarchy.
- Centres have been categorised according to the level of infrastructure in place
- Infrastructure improvements secured through new housing development will be distributed across the District and benefit a wide range of communities
- Ability to plan for incremental improvements to, for example local schools or healthcare often challenging and may be restricted by an ability to expand existing services.
- Alternatively, planning for growth on a strategic scale, through one or more new settlements allows for a comprehensive approach to be taken with required new infrastructure built-in to, and delivered for, the new community from the outset.
- Development Vision for a new Garden Village at Andrewsfield, provides for a comprehensive new development with associated infrastructure including primary schools/secondary school/country park with wetland / water sports area/ bus service serving entire Garden Village (including Boxted Wood)
- Little Dunmow is not large enough to sustain any meaningful infrastructure and much of that planned at Flitch Green over a decade ago has still not materialised.
- The Little Dunmow/Flitch Green are deficient in terms of local retail and service facilities, primary healthcare, education (beyond the already over-subscribed primary school in Flitch Green), employment and public open space.
- Provide for a variety of new local infrastructure elsewhere in the locality/Chelmer Mead will enhance the sustainability of this part of the district generally.

- Promote mixed use developments and deliver sufficient community and cultural facilities and services to meet local needs NPPF 38
- TFP promotes supporting retail, healthcare, transport, utilities e.g. a waste water treatment works community facilities alongside new homes/jobs North East of Elsenham.
- Address J8 of the M11 motorway/ limited capacity of this junction, interim solution provides headroom for growth up to mid-2020/ increasing pressure for growth in area likelihood capacity of the junction may be reached earlier
- TFP therefore consider that a comprehensive upgrade to J8 of the M11 is a fundamental infrastructure issue/opens up the potential for improvements to access arrangements to LSA, and new infrastructure opportunities to improve the local network
- Council has to consider how it can get the best use out of the existing infrastructure available. Where there are deficiencies, it has to look to see whether additional development can help to address and rectify these
- Housing should itself be considered as critical, necessary infrastructure so as not to stifle business needs for a growing workforce/planning to meet housing needs should not be suppressed on the basis of existing infrastructure deficiencies
- Wellcome Trust invested in transport improvements as part of Wellcome Campus/ aware further development will create the need for further investment/UDCs proposals to deliver new homes in the north of the District will also place pressure on infrastructure
- Highway capacity problems A1301/ A505 junction/ inability to use junction 9 to access the northbound carriageway of the M11 when travelling south on the A11
- Need new north bound entrance to the M11 from the A11 and south bound exit from the M11 to the A11. This would provide both a North and South side access to the Wellcome Genome Campus and help alleviate the A1301 bottleneck
- The A1301 transport corridor has generally suffered from underinvestment when compared with other corridors in the area, such as the A1307
- Investment from range of sources to improving bus and cycle facilities on the A1307/ similar focus should now seek investment to the A1301 corridor to Great Chesterford
- Wellcome Campus transports c800 staff daily on weekdays across nine privately funded bus routes into Cambridge and beyond and two to Saffron Walden/funded the cycle path between the Campus and the A505
- Great Chesterford and Whittlesford Parkway rail service/sustainable travel options/Trust might be able to make land available for a park and ride to the south of Campus
- To the North of Campus/North-South axis, need connection to Cambridge Biomedical Campus and Addenbrookes Hospital as well as to Cambridge City and North Cambridge
- New settlement offers potential to deliver community and transport infrastructure in a comprehensive way/large enough to meet a range of day-to-day needs maximise internal trips.
- Note Commissioning School Places in Essex 2012-2017 report set out significant capacity constraints at a number of existing primary and secondary schools in UDC
- AECOM has evidence of what new settlements can deliver and the 'trigger points' associated with providing new facilities.
- New development needs to be able to provide high quality access to and from the local road network at locations where suitable road links are available
- Extensive use of rural road links to connect with the wider area should be avoided, and this was for the DLP Inspector a significant constraint for growth at Elsenham/Henham

- In this context, the A120 corridor does appear to offer untapped access opportunities/ locate close to the strategic network to reduce potential impacts
- Able in association with external funding sources, to deliver or fund highway improvements or new infrastructure to facilitate access to the strategic highway network
- If the housing supply requirements are likely to tail off due to reduction in inward migration then it is quite possible that by careful position or dispersal of housing very little highway improvements are required.
- Larger developments can be high risk/ infrastructure requirements are prone to placing financial burdens on large scale developments that could affect their delivery/ requirement to keep a rolling 5 year land supply/smaller, less risky sites with provision of would assist in maintaining short term delivery
- Where significant new infrastructure is necessary, such developments should be appropriately phased to allow the District to grow at a steady rate and in particular deliver housing in locations which will help maintain a five-year housing land supply.
- The recent investment in new community facilities in Manuden should be regarded as an opportunity which can support further housing growth in the village and maximise the benefit of the investment which has already taken place
- Need to build upon transport and social infrastructure already in place by developing in accordance with the existing settlement hierarchy.
- Upgrade and lengthen both trains (carriage numbers) and platforms on the stations situated in UDC on London (Liverpool Street) Cambridge railway line, to increase capacity
- Where significant new infrastructure is necessary, such developments should be appropriately phased to allow the District to grow at a steady rate and in particular deliver housing in locations which will help maintain a five-year housing land supply
- Further growth can be justified where it is commensurate with that spatial hierarchy and to reinforce the role of individual settlements. Infrastructure improvement secured through new housing development will be distributed across the District and benefit a wide range of communities
- The key sustainable growth drivers, as identified on the plans pack produced by JTP should form the basis of future infrastructure planning
- Support growth in category A villages/primary schools which have the capacity to increase pupil intake.

COMMENTS BY INDIVIDUALS

- Many commented that infrastructure lagged behind growth with lack of public facilities such as doctors surgeries/school places and public transport/improvements needed upfront/ new settlement was best way of meeting infrastructure needs
- Need better local public transport needed between towns and transport hubs at Stansted and Chelmsford. Better cycle routes and cycle parking
- UDC has poor road network, particularly in Towns and villages/congestion, railway line only covering west UDC to Cambridge/London lack of Primary/Secondary Schools
- If focus is existing settlements huge growth necessary for such infrastructure
- fixed and mobile broadband access vital for modern living/small businesses
- Maintenance of existing facilities e.g. village halls
- School places in both primary and secondary schools

- Consider increased traffic flows that results from inappropriate siting of developments
- Use infrastructure in the west of the district/spend where growth arises
- Saffron Waldens roads not fit for purpose/even more so if planned developments proceed/long queues on Thaxted Road/Redwinter Road and the High Street
- East side growth of Saffron Walden without better access links to the west where most of the residents want to get to/Relief roads/inner by-passes are required to link: Tescos to Thaxted Road Ridgeons to Little Walden Road Little Walden Road to Windmill Hill
- Schools must be provided such that they are largely within walking distance of their pupils/ chaos at South Road/Ashdon Road by driving children to school by car
- One-way system causing Shire Hill traffic to come through the town is ill considered
- Proposed one way system for Thaxted Road will not work.
- Poor access to rail station in Saffron Walden
- Priority should be new roads and other services e.g. a ring road around the south, east, and north sides of Saffron Walden
- Insufficient to do infrastructure planning, it needs to be implemented
- Commuters using Newport station park outside residents houses instead of car park
- Audley End/Bishops Stortford stations poorly served - Elsenham crossing downtime
- Buses serving Audley End station should be low emission/ Hydrogen/electric
- Need Cycle paths/safe footpaths an integral part of growth
- Consult Transport providers planning matters/referring to good transport links
- Sustainable development relies on suitable infrastructure
- The water supply in the eastern side of the district is already over extracted
- Elsenham has 18 inch pipe feeding into 9 inch pipe in Station Road/big backup
- Don't expect small rural roads/medieval towns to absorb huge amounts of extra traffic
- Roads near M11, A120, A11, A505, A14 and A1301 already congested
- Victorian school buildings within a congested village/town quaint, but age and location may be holding back the schools potential/ new replacement schools on the edge of the village/town, alleviating school run congestion and allowing future expansion
- Improve winding country lanes with no formal footways
- Restore Haverhill to Shelford line to Granta Park/Sawston taking pressure of the roads
- Proper provision of open spaces and protection of existing ones/new woodlands
- Stop traffic using medieval streets Saffron Walden and Dunmow
- Needs strategy maximises infrastructure provision/not losing it in piece-meal growth
- Water and sewage can't cope/run-off/flooding on roads whenever there is heavy rain
- The "rat run" traffic through Ickleton to junction 10 is already chronic
- Takeley needs their own GP surgery/ Need for another superstore in the vicinity
- Relocate the Fire Station and/or Laundry sites as proposed
- Importance of A1060 beyond Chelmsford/need for a better link to the A414 and A12
- A120 congestion going both ways at Stebbing/Rayne –poor broadband/full school
- A1301/A505 junction(and Pampisford roundabout) overloaded at peak times/rat running
- Estates narrow pavements, inadequate off-road parking/width for buses
- M11/Cambridge to London railway pass through UDC but it is poorly served by them
- Number of private taxi companies in Saffron Walden indicates of lack of bus services
- Dunmow /Braintree no west-bound access to the A120/double back on B1256/ no employment/public transport /local road network/amenities in that area.

- No viable public transport connections to Braintree, Chelmsford, Stansted or Bishops Stortford railway stations/ A120 heavily congested at M11 and Gallows Corner/Freeport
- Restricted parking at Stansted Mountfitchet station
- key transport infrastructure planning/ ability to walk to a railway station/go to the airport/ major hubs (e.g. Stansted, safe cycling. Arterial roads/swift accessible/ less CO2 / NOX
- Bypass Ickleton/Duxford to avoid rat-run traffic accessing motorway at Jn 10
- Health in southern UDC. Hospitals are in north - Saffron and - west Bishops Stortford
- Re-open rail link from Braintree to Stortford, and the one to Thaxted
- Commute down the M11 15ys ago 45 minutes to Barking now 1h 30
- Infrastructure planning an iterative process during development of the Local Plan
- People will travel to nearest fast train station e.g. Audley End/not use a poor one
- Andrewsfield Aerodrome a local amenity/local employer
- Best rail links at Stansted Airport

Question 5

Employment

What should be the main influences on the employment strategy? Are there any locations which you feel would be suitable for employment.

This question was responded to by 378 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to <http://www.uttlesford.gov.uk/article/3038/Planning-Policy-Consultations>.

Overview summary

- Highways England suggest a sustainable transport strategy for employment sites
- Essex County Council emphasise travel to work patterns for employment
- South Cambridgeshire District Council require employment be considered if any new settlement subject to scale and location
- For location, employment growth locations/transport links or main settlements/villages were suggested in roughly equal numbers i.e. where market wants or where people live
- Some individuals suggest that employment needs be met in other LPAs
- Developers consider commuting patterns suggest more employment/housing needed within the district
- Stansted Airport support 18ha allocation/flexible approach to land use
- Wide range of respondents suggest relaxing restriction on airport-related growth ranging from modest/incremental changes suggested by County to allowing wide range of uses suggested by developers

STATUTORY BODIES AND OTHER GROUPS

Highways England - It would be useful to have a sustainable transport strategy for employment land.

Essex County Council Environment, Sustainability and Highways - Need to consider travel to work patterns/only 58% of working residents work within UDC including those residents employed at Stansted Airport. The major destinations in travel to work data include the City of London (10.9%), Cambridge (5.5%), and Harlow (2.3%). Issues to address include; predominance of small/medium scale employment stock/shortage of industrial space. Continue restrictions on non-aviation uses at Stansted Airport apart from North Side commercial area to enable a wider range of regional operators to locate close to the airport. Consider evidence for further dedicated research space to be developed outside of Chesterford Research Park. ECC supports employment centres within Stansted Airport and Great Chesterford Research Park/Start up space for Saffron Walden Stansted/Mountfitchet.

South Cambridgeshire District Council - If Plan includes new settlements should include appropriate provision for employment, scale/nature dependant on its location.

Stansted Airport - support allocation of 18ha area of North Side (Northern Ancillary Area) for non-aviation commercial development being suitable for employment provision/working towards a scheme for development. For the 18ha, issues remain that as airport has grown, a marked shift in land use patterns within it; namely core aviation uses to the south and

decreased reliance on land north of the runway for exclusive aviation purposes. The Inspector acknowledged general employment at this location was sound/this remains the case. Indeed emerging demand supports the airport being a business destination in its own right, underpinned by airports growth in passengers/cargo. Need to consider expanding employment allocation to the north side of the airport. Important that for any allocation a flexible approach to employment uses and development is achieved.

Birchanger Wood Trust - The main influence on the Uttlesford employment strategy will be further growth of Stansted Airport. The anticipated growth of Stansted will therefore clearly have a significant impact on the housing market area, including both Uttlesford (and Braintree) District. Land at Andrewsfield, falling between Uttlesford and Braintree Districts is located 16km east of Stansted Airport and is accessible via the A120 and local road network. Andrewsfield Garden Village will include a number of employment parks offering jobs for local people. The uses will range from B1 and B8. Other uses within Andrewsfield Garden Village such as the A1, and A2 and D1 such as schools and clinics will also generate jobs.

Essex Wildlife Trust Uttlesford Local Group - Sustainable locations for places of employment and availability of sustainable transport should be the principal considerations. The need to travel should be minimised. Currently the private motor vehicle is the default option for journeys from home to work, local employment sites have been given away to housing development, no part of the District has adequate public transport access. The existing retail employment locations are highly constrained and incapable of further growth.

G W Balaam & Son - Need provision for modern high spec office, warehouse / industrial style buildings which can allow smaller business to flourish which can provide key elements to larger settlements or the airport, whilst minimising commuting time for people to get to their places of employment.

Great Dunmow Neighbourhood Plan Steering Group - Stansted Airport may provide more opportunities for employment but by and large most of the newcomers to the area will be commuting by car and the A120 will overload Junction 8 of the M11, which in turn will be overloaded from traffic from a bigger Bishops Stortford, which suffers from inadequacies of the A120 West connecting to the A10. A single settlement option would carry a responsibility to provide employment in line with the number of working age people moving onto the site. Otherwise a dormitory settlement would be created. Clear policies are needed to minimise commuting which will result from the dispersal strategy.

Hands Off Thaxted - Limited opportunities in UDC for employment with pay rates high enough to finance the level of mortgage necessary to purchase the houses available. To earn salaries sufficient for house prices in the area people need to travel to London or Cambridge. Developments should therefore be located near the M11 and the nearby railway stations. The larger employers in Thaxted have relocated to Haverhill and Harlow where roads and other facilities are more suited to their needs.

Sustainable Uttlesford - New employment land in sustainable locations to compensate for land released for housing/main settlements. Locate employment land in areas that reduces the need to travel/encourages modal shift from private car to walking and cycling e.g. new settlement(s). Benefit from the job creation in the knowledge/hi-tech sectors adjoining regional/sub regional centres eg Cambridge and Chelmsford. Support for the current centres

of employment e.g. Stansted Airport by supporting a range of housing tenures that reflect the salary structure of the industry. Relaxing restrictions on airport related employment part of the Stansted Airport site.

The Thaxted Society - Local employment should derive in part from both local natural assets and history. Thaxted has had a waxing and waning relationship with small crafts and industry. Examples are potters, cutlers, weaving, metal works. At small scale encourage and welcome small craft and arts employment/resisting change of use from commercial to residential supports goal.

Stebbing Society - Locations should concentrate on the M11 corridor around Stansted Airport (major Employer) and further north to support employment needs in Cambridgeshire, both of which already have good rail link facilities. This would also help to accommodate present and future commuters into both London and Cambridge.

We Are Residents - Sensible to locate employment premises where employers actually want them to be. The Submission Plan located them without apparent regard for need/Saffron Walden/ much of UDC appears to be unattractive for employers because of the poor transport links. Most obvious locations for employment appear to be nearest to the best transportation links, and with connections to other services, whether inside or outside the district/Sustainability Appraisal. A much more holistic approach, in co-operation with other neighbouring LPAs, would be sensible. Need Employment led plan/employment strategy.

Helena Romaine Secondary School - HRS is an important employer within Great Dunmow and has a key role is educating/training part of future work force in UDC to sixth form level.

Ridgeons - Agree with the Council regard the changing modern economy. Future demands are going to extend beyond large expanses of employment sites restricted to traditional B Class uses. The marketing strategy for the commercial land at Ashdon Road supports this. In the 12 months+ commercial land has been marketed, interest limited but some has emerged in other sectors and these have an important role to play in satisfying future employment demands. Councils employment strategy be flexible given needs. If demand does not exist for a land use, sites should not be reserved in the long term/fulfil a useful purpose for alternative use/reduce demands on greenfield sites in less sustainable locations.

TOWN AND PARISH COUNCILS

Saffron Walden/Great Dunmow Town Councils - Retain existing employment land/buildings feasible (unless causing nuisance/ no other reasonable prospect); facilitate the development of new employment close to major new residential development provided that any proposed B2/B8 uses have ready access to a road junction on the M11/trunk road; where feasible, enable the development of new employment opportunities that are close to major new residential development in advance of the housing. Ensure workers have the opportunity to live near to their place of work when the housing becomes available. Optimum use should be made of the existing commercial premises at Stansted Airport/potential for future commercial growth regards taking future airport-related uses/amending airport-related restriction/exclude strategic warehousing.

Great Canfield Parish Council - New settlement would provide best for employment with links to Cambridge and London and connecting with the biotech centre that Cambridge has become. A major new shopping centre might be of some use for employment.

Great Chesterford Parish Council - Considers it is important to retain the existing employment uses in Great Chesterford and safeguard/retain Chesterford Research Park as a major employment area.

Birchanger Parish Council - Edges of main towns with good transport links and parking facilities.

Clavering Parish Council - The plan should encourage/ protect new and existing sites of small, local and start-up businesses in rural areas

Little Chesterford Parish Council - Locate new employment sites close to the transport network, particularly train and bus routes railway stations/within the towns close to housing so less reliance on the car. Stansted airport is well served by public transport, but Chesterford Research Park is in reality only accessible by car. A limiting factor for many small scale businesses in rural Uttlesford is lack of superfast broadband.

Little Easton Parish Council - Great Chesterford has excellent train links with London, Cambridge and important towns en-route Baldock/Royston. It is ideally located for the M11/ other major roads. Employment can be accessed in a wide range of locations north of the district with good road links to a series of science parks, starting at Little Chesterford/ in and around Cambridge. Need public transport strategy. Employment is primarily to the north of the district, with larger industrial estates and rail links to major employment centres. There is limited employment for local people or new residents at Stansted Airport due to the nature of the business/low pay. Some potential to locate a settlement along the A120 towards Braintree/better access to Chemsford for employment.

Quendon & Rickling Parish Council - Stansted airport is the obvious large provider of employment in the area and more could be done about offering work experience and apprenticeships for people who are looking to broaden their skills to enter into the work environment. Both road and rail links need to be improved as more houses means more commuters and the current facilities are below standard. Reference to working from home is taken lightly as many of the smaller villages/some towns are still forced to use extremely slow broadband and trying to run a business with this impossible.

Wimbish Parish Council - Our parish provides employment to about 150 people and we believe more could be done to foster employment opportunities in other villages.

Elsenham/Henham/Ugley/Widdington Parish Councils - Homes need to be close to employment. The main east west axis is centred on the A120 connecting to and from the M11 going south to London and north to Cambridge. Braintree (and Colchester) lies to the eastern end of this axis, Gt Dunmow in the middle and Bishops Stortford to the west. Stansted Airport is also at the western end of this axis. These towns and the airport are major centres of employment and should be given the opportunity for growth. Saffron Walden is the other major town in the District already with substantial employment, good road access to the M11 (and Cambridge) and rail access close by. It is also an obvious location to attract new employment.

Felsted Parish Council - Recent (and current) developments consist mainly of dormitory settlements for commuters employed outside the district (Cambridge, London and Chelmsford). Although Stansted Airport is the major local source of employment, many of its staff bussed-in from other districts with more affordable housing. The employment strategy must include a realistic attitude to future employment opportunities especial those to minimise the need for travel. Whilst any plan will include development of new enterprise opportunities and encouragement for home-based working, it must recognise that employment in line with those likely to live in the area will be largely provided by existing places of work (Cambridge, London, Chelmsford). Cannot assume work can be provided for thousands of people in a new area/more realistic that majority of residents will add to the transport demands into Cambridge, London, Chelmsford and Stansted.

Rayne Parish Council - Some centres of focus for employment already exist and these should be allowed to expand as business volumes grow. This will be incrementally spread over the timing of the plan and will be absorbed gradually without creating much issue. Any new proposed area of employment has to be examined in terms of the impact on all aspects of the infrastructure currently available. The impact of traffic will be significant but so will the ability to train for new skills, dependent upon the mix of new employment opportunities. Any proposed sites that offer employment have to be considered as a significant factor in any spatial strategy. Current indicators identified in AoS p12 shows a bias towards more significant development in the south of the District. This would place an unproportioned load onto the A120 which is already a highly utilised road with many issues. It is also a road that has not been selected for HMG funded improvement.

Stansted Mountfitchet Parish Council/Neighbourhood Plan Steering Group - Stansted Airport is the prime location for employment growth in Uttlesford with aviation support services. The M11 Link Business Park is one site where non-aviation related businesses are situated. Growth of businesses here, together with a direct link on to the A120/M11 junction, would enhance employment prospects for people in local the area.

Takeley Parish Council - Stansted Airport as a 'key' employer for Uttlesford is misleading. Many of the jobs are low paid/part time/employees cannot afford to live in UDC (only around 10% of its employees live in UDC). With dominance of low cost airlines this scenario is unlikely to change despite expansion plans of 35mppa/45mppa. In the north of the district there are opportunities for better paid highly skilled jobs. UDC should not put such emphasis on Stansted Airport as a major employer for UDC residents/needs a diverse economy.

Strethall Parish Meeting - Here again we concur with and refer you to Chris Woodhouses' (Catmere End) summation in his succinct answer to this question.

Stebbing Parish Council - Location should be to the west of the district around Stansted Airport with small to medium units Location should be to the north of the district to link with the hi-tech employment / industry over the boundary in Cambridgeshire. This consultation does not take into account the large number of commuters that live in this district who go to London/Cambridgeshire

Thaxted Parish Council - Industry should be built before houses so that worker's homes can be nearby. There should be more use of commercial premises and land near Stansted. Restrictions on buildings which could be put to business use around Stansted

should be removed. Need restrictions on change of use from shop to residential. New employment development needs to link with existing commercial centres which are already connected to a transport network. Need small scale incubator units/existing rural employment opportunities should be retained. A good public transport service is essential.

The Sampfords Parish Council - More emphasis on employment issues/ need to locate major housing development in areas with high levels of existing and potential employment. Need to build homes to the highest eco standards in order to minimise energy requirements for heating and lighting/promotion of 'Eco Town'. The hub of bio/scientific and research i.e. Babraham Institute, Genome Campus, Little Chesterford Research Park, Granta Park, Welding Institute located close together on boundary between UDC and South Cambridgeshire District/logical to consider a new settlement in this area.

Wendens Ambo Parish Council - A lot more work is needed by UDC to create any kind of 'vision' for employment in the district. Most new residents are essentially commuters to either London or Cambridge.

DEVELOPERS, AGENTS AND LAND OWNERS

- Locating homes/infrastructure in broadest sense - transport, schools, health care, sports leisure facilities close to major employment centres brings sustainability benefits
- take account of travel to work patterns/the relationship of the District to other settlements
- The employment stimulus of residential growth/focussing growth at Great Dunmow scope to revitalise the town centre retail/employment spin-off from the retail sector
- Successful established employment locations/housing to support essential workers
- Meet housing needs of UDC in the north to reflect the sustainability of this location and the existing commuter patterns but linked to its own housing needs
- Focussing growth at Stansted Mountfitchet to revitalise the retail centre offer
- Need to reduce the level of out-commuting by promoting much greater localised employment opportunities promoted in appropriate locations throughout the District
- Stansted Airport is the largest employer and apart from employment areas in the larger settlements UDC has large number of rural businesses/many people working at home
- Need greater flexibility to respond to current local market signals and economic needs as well as ability to adapt to rapid change/requirement for purposes substantially related to the Airport a disincentive to build out remaining units at Stansted 600
- Stansted Airport low cost carrier hub/little demand from airport-related users/ airlines spend little time on the ground/do not carry cargo/few catering or service contracts.
- Need a more flexible approach to uses within the airport boundary. No obligations placed on airport-related users and a number have acquired premises in places such as Bishops Stortford and Braintree.
- Airport-related industry sectors mapping shows there is a strong concentration of airport-related employment along the A120 corridor to Braintree. This highlights that airport-related users do not necessarily need to be located directly on Stansted Airport.
- Limited supply of suitable premises in the immediate vicinity of Stansted Airport and the M11/Junction 8. Increasing flexibility within the airport boundary is promoted for East Midlands Airports include tourist related and business uses including a range of B Class
- Redevelopment of employment sites with no loss of employment e.g. Riverside Brook
- Locate close to potential new housing/land south of Hales Farm, Great Dunmow

- Stansted Airport/ Chesterford Research Park attracts a significant number of in-commuters from outside the district /sufficient new housing provision needed within the district to ensure that workers are not forced to travel long distances/executive housing
- Opportunity to expand range/quality of employment provision within the market towns
- Recent highway improvements at Great Dunmow/ location off the A120, proximity to M11, means attractive location to employers/employment as part of AofS 12f
- Manuden is desirable place for commuters to live, this is not necessarily a bad thing, new homes will bring further investment in the community and strengthen the social role
- Redevelop existing employment sites poorly located impact on residential uses, or where they contain buildings that are outdated e.g. Warners Field Depot caused traffic problems along Copt Hall Lane partly used for unrestricted access to the depot
- London Stansted Cambridge Corridor Growth Commission tasked to raise the economic potential of the LSCC/ Oxford Economics (Economic Impact of Stansted Scenarios, November 2013), considered the potential economic impacts
- Councils Commercial Workspace Study (June 2015), notes opportunities for further stock at and around Stansted for regionally-focused market that ignores UDC
- These are strong qualitative justifications for a more robust and positive land use planning policy towards Stansted Airport
- Land east of Stansted Airport, strategically located near to the Airports Southern Ancillary Area, the M11 (J8), the A120/ a review of the CPZ would be necessary
- Takeley Street is a better employment location than Elsenham given its proximity and accessibility to the strategic transport network
- New employment development (circa 15ha) at Takeley Street logical given good connectivity to the M11 and Stanstead airport railway interchange

COMMENTS BY INDIVIDUALS

- Largest Settlement to Stansted is Bishops Stortford. If housing is to be provided for a growing Stansted then Bishop's Stortford should be the focus of employment
- Employment needs to be near new housing/west of district, around Stansted airport with direct rail links/road/north to link with high-tech employment in Cambridge/areas of employment density/UDCs educated workforce
- Although an essential to consider local employment needs. Realistically the majority of residents do commute a fair way/links to public transport vital. Having those on London weighted wage in the area can only bring more money to the area to allow existing businesses to expand
- Airport employment is a red herring. Cheap labour bussed in from London/ no large employer in Great Dunmow/build housing closer to employment - Bishops Stortford, Harlow, Braintree, Chelmsford
- More higher quality jobs needed in UDC to minimise commuting/make homes affordable
- land between Bury Lodge Lane and M11 north of airport parking or area surrounded by M11/ Round Coppice Road/B1256/A120 spur and airport parking for employment
- Employment opportunities should be encouraged throughout the whole area particularly north of the district towards Cambridge/Baldock
- Apart from Stansted Airport, Great Dunmow/Saffron Walden best employment locations
- Least costly will be best served by districts to the West of the M11/A120 full up/traffic

- Area of Search 2 does not provide any meaningful local employment/highly unlikely that significant commercial activities will be created in the immediate vicinity of the Area
- Areas close to Stansted or Braintree, where the road links A 120 are already in place
- Employment within new settlements cannot support the needs of the new residents
- Great Chesterford village/access to the railway station and M11 from there
- High tech industry require specialised skill sets/new settlements/long commutes,
- Stimulate employment that is locally or virtually based, reducing pressure on transport
- Creating jobs within towns such as saffron walden so do not become commuter towns
- Limited level of local work so main influence on the employment strategy is the ability for people to travel, in numbers and without too great a delay
- Development of Broadband through out the rural areas and villages
- Improved public transport links to Stansted Airport and Cambridge a pre- requisite
- Saffron hall recognised as a world class concert venue/needs appropriate hotel
- Employment is across the District/beyond/housing strategy follow same pattern
- Change of use of existing buildings for business use should be encouraged in appropriate settings particularly if this brings redundant buildings into use
- Employment strategy needs to be developed for local people and not simply provide jobs for people outside the district
- Conserve small/larger sustainable local employment centres/seed-beds
- Braintree town has at present a number of facilities enabling local residence to purchase virtually all their needs from clothing, food to DIY/new stores unlikely
- Encourage local shop owners and small businesses, especially in our town centres
- After transport encourage education vocational courses and apprenticeships
- Local services will follow the population growth without interference
- Good travel connectivity is essential but UDC mainly rural lacks a significant network of major roads. A120 runs east/west through district has advantage of serving Stansted Airport, Bishops Stortford and Great Dunmow/M11/ cities of Chelmsford & Colchester
- Great Dunmow and perhaps Takeley could provide more employment due to the excellent road links and the airport
- If a bypass was created in Saffron Walden more employment would be needed
- Houses in Uttlesford are expensive with limited well paid employment in the district
- aim should be local working/ reduction in the need to travel. Hardisty Jones optimistically concluded growth of Stansted Airport will create 41,700 jobs to 2033
- provide educational/training opportunities to encourage young people to look for local employment, rather than travel further afield or become unemployed
- If the Chesterford Research park is considered to offer employment opportunities then surely a site to the north of Uttlesford close to the Cambridgeshire border would reduce commute times. Whilst Stansted Airport is a considerable local employer,
- More jobs at the airport does not necessarily correlate into jobs for Uttlesford residents. many airport employees live outside of UDC Bishops Stortford, Harlow and Braintree
- the problem is not providing employment but finding applicants for jobs
- Focus on needs of commuters
- key routes viz: A1060, A1307, A11, A505 as well as A120 and M11
- Need proactive inward investment strategy that leverages UDC strengths
- Many able to get employment in London or Stansted Airport therefore the nearer the settlement is to London (or a fast train to London) or the Stansted area the better

- Accept UDC is just a commuter area
- Many employees at Chesterford Park travel long distances
- Potential for clusters of small scale craft/artisan workshops which support the rural character of the district and, in particular its small town.
- Shire hill needs a revamp/link road/facility to encourage start ups
- More examples like Chesterford Research Park should be encouraged.

Question 8

Natural Environment and Historic Environment

What do you think are the main issues the Council should consider in relation to the natural environment and the historic environment?

This question was responded to by 388 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to <http://www.uttlesford.gov.uk/article/3038/Planning-Policy-Consultations>.

STATUTORY BODIES AND OTHER GROUPS

Birchanger Wood Trust: Historic and natural environments once gone will never be regained. Both are a resource which should be treasured and protected and a heritage for our children to enjoy in every sense. Flooding, however, has to be addressed. There are remedies which can enhance an area making it a pleasure to access and an asset to residents. Ignoring the issue will lead to a reduction to existing businesses and an economic failure.

Environment Agency: We need more coherent and resilient ecological networks. Design of development should aim to reflect and enhance the area's locally distinctive character. - Any development should seek to increase an area's biodiversity assets. - Protection of existing high quality habitats i.e. unimproved grassland and irreplaceable habitats i.e. ancient woodlands should be prioritised over creating new habitats. - Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats. - Create and extensive viable network of green and blue corridors and natural habitat throughout the development which connects larger or more expansive open spaces for both people and wildlife. The Areas of Search 9 (West of Braintree) and 12 (around Gt. Dunmow) within our Essex, Norfolk & Suffolk Area potentially include land adjacent to the Rivers Chelmer and Ter and the Stebbing Brook.

Waste water treatment and the quality of the water environment should be addressed to ensure there is infrastructure to support sustainable growth and ensure there is no deterioration of water quality.

River corridors are particularly effective wildlife corridors in an increasingly fragmented countryside hence it is important that rivers are protected and where possible enhanced. We would recommend a 20m buffer zone in which no development should be permitted.

The Local Plan includes numerous references to the terrestrial environment, especially in the search areas, but does not mention the aquatic environment once. The NPPF states in paragraph 165 that River Basin Management Plans should be used as evidence on which to base planning decisions. This promotes the use of up-to-date information about the natural environment which should be useful to inform the action needed to improve water quality in Local Plans. All public bodies, including local authorities are required to have regard to the River Basin Management Plan and any supplementary plans in exercising their functions. It is strongly recommended that these form part of the evidence base included within this

section as the planning system offers significant opportunities to improve water quality and achieve WFD objectives. We would encourage equal regard for the aquatic environment as there currently is for the terrestrial environment. Obtained data should also inform the subsequent Sustainability Appraisal of the preferred options stage of the Local Plan.

Some of the areas identified are in Flood Zones 2 and 3 and we would expect to see development steered away from the areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. The plan should be supported by a Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

No mention has been made with respect to geology and hydrogeology in the plan area, and this should be considered further. Principal aquifers are geological strata that exhibit high permeability and provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. Secondary aquifers are often capable of supporting water supplies at a local scale and normally provide an important source of flow to some rivers. The use of groundwater in the area makes it vulnerable to pollution and it is likely that a large proportion of drinking water derives from groundwater sources. A number of licensed abstractions are present across the plan area. Significantly, the majority of the area is also designated as groundwater source protection zones (SPZs) i.e. comprising potable groundwater sources requiring protection identified by the Environment Agency. Private potable groundwater supplies would not be identified by us, but should be considered as part of the pre-application/planning process and will require a 50m de minimis radius protection zone. New activities need to be deterred in certain areas based on their intrinsic hazard to groundwater.

We consider that an Environmental Quality policy should be included to give emphasis to the need for protection and improvement of the water environment where pollution and other adverse effects on the local and natural environment should be minimized, in line with NPPF policies. The policy should be added to ensure that the water quality of receiving watercourses and aquifers is protected and improved to enhance the biodiversity and chemical status to meet the objectives of the WFD and River Basin Management Plans (RBMP). It should, also, ensure that land contamination, protection and enhancement of the water environment are appropriately dealt with via the planning regime. Proposals for new development or redevelopment should promote sustainable design, incorporate mitigation measures, account for climate change, and protect and enhance the water environment. Developers should be encouraged to develop on brownfield/contaminated sites and less on Greenfield sites and be able to incorporate Sustainable Urban Drainage Systems (SuDS) in their design. Reference and gravity should be given to NPPF paragraphs 109,120 and 121.

Any development proposed on landfill will require a Preliminary Risk Assessment followed by intrusive site investigation, detailed quantitative risk assessment to assess whether remediation can be undertaken to ensure the protection of the water environment. Any Local Plan flood risk policy that includes surface water management, could also seek to address pollution prevention aspects of discharges to watercourses. Such aspects are pertinent in

the context of preventing deterioration of water quality under the WFD. Alternatively, the Environmental Quality policy discussed above could include wording on the requirement to address water quality for pollution prevention purposes where infiltration techniques are proposed. Because the use of deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction), we would expect an Environmental Quality policy to address such techniques.

Essex Bridleways Association: We request that the protection and enhancement of the local Rights of Way network are fully catered for within the new Plan which will benefit the local area for the reasons outlined in our response to question 7.

Essex County Council: Should consider the setting of the heritage assets. Some of the proposed locations for future development would break up areas of existing historic landscape intruding between historic parklands. In some instances the visibility between designed landscapes is important for maintaining their historic significance, or it may break the link between historic settlement cores and the wide countryside that forms their setting. A specific example of this is the area of 10g which lies within the area between Shortgrove Park and Audley End. ECC has prepared recommended biodiversity policies that may be considered for inclusions within the development management policies in local plans. The policies should assist UDC in meeting their obligations under Section 11 of the NPPF and achieve no net loss of biodiversity. The policies cover every aspect of ecology that must be considered in the development management process. The policies are outlined in their entirety in appendix 3 of this response.

Essex Wildlife Trust: Uttlesford's ecological evidence base is currently inadequate and out of date, rendering it unfit for purpose. The Local Wildlife Site review urgently needs updating. Targets for monitoring sustainability objectives should include biodiversity monitoring. The NPPF emphasises the importance of a robust evidence base to inform successful local plan policies on the natural environment. Evidence-gathering should include an assessment of existing and potential components of ecological networks. GI and biodiversity should be core considerations in the preparation of Local Plans. Over the last hundred years there has been an unprecedented change in the UK countryside, resulting in habitat loss and dramatic adverse impacts on the populations of many species. In securing sustainable development, the planning system aims to achieve a net gain for biodiversity, which means a sustained increase in abundance, quality and extent of all species and habitats that support healthy ecosystems. Any development should seek to increase an area's biodiversity assets while guarding against the loss of priority and irreplaceable habitats. It is good practice for a local plan to include specific measurable targets that can be monitored.

Comprehensive evidence-gathering will help to inform decisions on the type and location of green space required to complement existing GI, fill gaps, mitigate adverse impacts, and provide additional compensatory measures to ensure a net gain in biodiversity assets and GI. It is good practice to carry out context studies to establish where existing or potential GI exists. Local authorities should have access to baseline figures for biodiversity in their area. This information can then be broken down to a more local level to inform developers about site-specific biodiversity issues within a development. The Essex Wildlife Trust Biological Records Centre acts as a key source of evidence and the Council is urged to consider the benefits of a Service Level Agreement to enable access to ecological data and site records

(see below). Targets can be set to link fragmented habitats and landscape features to increase species viability, by restoring degraded sites and habitats and by providing new spaces for recreation to reduce human impact on sensitive sites. Recreational disturbance of vulnerable habitats can lead to a loss of vegetation, disturbance of ground-nesting birds (affecting their breeding and survival), and increased predation of birds and wild mammals by domestic cats. These sensitive areas should be protected from human disturbance. By providing additional “suitable accessible natural green space” (SANGS), local authorities can help to divert visitors away from sites that are sensitive to recreational disturbance. Natural England has produced useful guidance and a checklist for the creation of SANGS in the Thames Basin Heaths Planning Zone, and many of the principles will apply to the creation of SANGS elsewhere (although they may not be suitable for all locations and habitats).

Designated sites (including local wildlife sites) and areas of priority habitat, should be robustly protected from development in strict accordance with the mitigation hierarchy, as outlined in the NPPF, paragraph 118. Compliance with the requirements of the NERC Act can only be achieved if local authorities have access to up to date information from Biological Records Centres, and there is a system in place for monitoring and recording species and their habitats. In order to ensure compliance with the requirements of the NERC Act, local authorities should ideally sign up to a data exchange agreement with EWT Biological Records Centre. This will ensure ease of access to the most up to date species records and other biological data. The maintenance of a register of important wildlife sites with up to date information about them as a robust evidence base is a NPPF requirement. In order to maintain a robust evidence base into the future, an on-going Local Wildlife Site review programme is recommended, which engages the relevant land owners in managing their sites in an economically viable way that remains sensitive to the important wildlife they support. This review should periodically refresh the information held about LoWS and their nature conservation merits. It is recommended that local wildlife site reviews are conducted at least every 5 years. It should also be stressed that the role of a Local Authority should not be restricted to minimising or preventing environmental degradation through the planning process. The NPPF (para. 109) refers to the planning system providing net gains in biodiversity, thereby contributing to enhancement of the natural environment. This responsibility can be dispensed at the largest scale of strategic planning across an entire borough, by embracing Essex Wildlife Trust’s Living Landscapes ethos.

Essex Wildlife Trust: Uttlesford Local Group: Uttlesford may have once been blessed in the past with a rich natural environment, but available evidence shows that species have gone locally extinct, woodlands are in a very poor condition due to lack of management and the browsing pressure from the excessive population of wild deer, roadside verges and village greens have lost practically all of their wildflowers. Wildflower rich grassland is virtually non-existent in the District, rivers are in poor condition, habitats have been fragmented by new roads and development, and even the nature reserves owned and managed by Essex Wildlife Trust have suffered damage from excessive public use, as in many places they are the only public open space available to residents and are used as the local dogwalk, instead of being treasured for their wildlife. Local Wildlife Sites, though valuable in principle, in practice have no legal protection and are in badly degraded condition for wildlife. Green Infrastructure Networks MUST (not may) be provided as part of the design of development and MUST connect to the wider world. The Council MUST designate on

maps the land that will be the Green Infrastructure Network, as a land use allocation, and policies MUST promote the change of use of land within those corridors to ecologically rich and enhanced condition.

Friends of The Flich Way: The Council could issue a conservation order in regard to the protection of the natural environment represented by the preservation of the Flich Way, to enable all future planning decisions taken to consider the preservation of this unique and historic asset.

Great Dunmow Neighbourhood Steering Group: The best way to preserve these assets is to let the towns and villages grow at a slow pace and introduce new settlements in areas of beauty that are currently only available to the few. This subject is covered extensively in the Great Dunmow Neighbourhood Plan.

Hands Off Thaxted: The prime consideration must be to protect the natural and built form of Uttlesford. Our landscape and our heritage are particularly important. All proposed developments must be carefully scrutinised to ensure there is no adverse impact on the natural landscape or on historic buildings. Any further developments around the towns of Dunmow and Saffron Walden should be resisted to avoid further damage to the fabric and character of these historic towns. In Thaxted the irreparable harm caused to the views of the Grade1 listed church by an ill-considered planning approval in Sampford Road should not be allowed to recur.

Historic England: The NPPF states that local plans should include a positive strategy for the conservation and enjoyment of the historic environment, and that local plans should include strategic policies to deliver the protection and enhancement of the historic environment (paragraph 156) and should identify land where development is inappropriate because of its environmental or historic significance (paragraph 157). In terms of the evidence base, Paragraph 169 requires local plans to have up to date evidence about the historic environment in their area. Advise an audit of existing evidence to identify potential gaps or out-of-date information.

We recommend that the Historic Settlement Character Assessments are reviewed and updated where needed to reflect recent developments. The existing Historic Environment Characterisation report should also be reviewed, along with conservation area appraisals. Specific heritage impact assessments may need to be produced to understand the potential impact of new development on heritage assets. The local plan as a whole should be able to demonstrate that it sets out a positive strategy for the historic environment. This means that, on balance, the local plan has a positive effect on the historic environment and heritage assets. Different sections of the Local Plan should form part of the overall positive strategy, such as proposals for housing, regeneration, town centres or employment development. Policies throughout the local plan should help deliver the conservation of the historic environment with appropriate references where necessary. At the same time, a specific historic environment policy is encouraged as it helps to emphasise and implement the positive strategy required by the NPPF. In the withdrawn Local Plan, we broadly welcomed the inclusion of a strategic policy relating to the historic environment along with detailed policies on heritage asset types, although we required some amendments to specific wording. We would support the development of policies relating delivering high

quality design, and also advocate policies that set out the Council's approach to the overall management of the historic environment, in terms of both designated and non-designated heritage assets (including archaeology).

Consideration should be given in the emerging Local Plan as to whether it is appropriate to propose any policies specific to addressing the matter of Heritage at Risk, either collectively or targeted at specific assets on the at risk register. We would also ask that a policy approach is included in the plan to afford an appropriate level of protection to non-designated heritage assets.

The Hundred Parishes Society: Any developments should be sensitive and sympathetic to their natural and historic environment. With sensitive planning, it should be possible to continue the process of evolution, enhancing our environment and creating heritage for the future. The special character of Uttlesford is largely due to its exceptional depth of architectural heritage, yet owners of listed buildings are charged a fee for pre-application advice for listed building consent. Some local authorities offer this advice free. We encourage the Council to scrap this fee.

The Ickleton Society: It is important that new housing should blend into the landscape and not harm the natural and historic environment. Good quality agricultural land (Grade 1 and 2) should be preserved for agricultural use. As far as possible, development should be on brown field sites.

National Trust: Recognition that Hatfield Forest is an area of national significant historically and ecologically, has significant recreation value, and that it is currently being damaged by an unsustainable increase in visitors responsible in part to increase in local development. Consider that Areas of Search 5 and 6 are inappropriate locations for future development and are a threat to Hatfield Forest, the heritage and ecological value of which should be highly protected. Emphasise the importance of a Green Infrastructure Strategy, which should be addressed as a specific topic within the body of the draft plan.

Natural England: Refer to the requirements of i) the Conservation of Habitats and Species Regulations 2010 (as amended); ii) the Wildlife and Countryside Act 1981 (as amended); iii) Paragraph 118 of the NPPF; iv) Section 40 of the Natural Environment and Rural Communities Act 2006. Also refer to answers to questions 4, 7, 11, 13 & 14.

Stansted Neighbourhood Plan Steering Group: See comments of Stansted Mountfitchet Parish Council.

Stebbing Society: Historic landscapes, woodlands, conservation areas and listed buildings should all be protected and not swallowed up and destroyed by new development. This would apply throughout the District and also to all sizes of historic sites. We agree with the CPRE stance that environmental appraisals of house building targets should be undertaken before finalising regional plans. This would surely provide a more appropriate and natural, instead of imposed, development blueprint and ensure that the Local Plan is more realistic, achievable and economically viable and capable of being integrated into the local communities with as little damage as possible to the environment and existing infrastructure. The East of England Plan, as stated in paragraph 3.21 of the London Arc East Report, has a specific Policy (LA1) in relation to this sub-area which emphasises a focus on Greenbelt

restraint. This is also the policy of CPRE not to release greenfield land for development and is also supported by ECC who recognise the importance of safeguarding greenbelt land.

Sustainable Uttlesford: Attach great importance to maintaining bio-diversity in the district. Greatly disappointed to have been ignored when a number of recent development proposals have been given approval. Any locations chosen for development should seek to maintain the district's biodiversity and protect special verges.

Thaxted Society: These two factors are the greatest contributors to well-being, quality of life and eventual sustainability. They both have a very large cumulative influence on the area. They should be a priority at all stages in order to aggressively maintain the appropriate balance, maintaining the area's critical uniqueness and "best place to live" status.

Trustees of Gardens of Easton Lodge: These are the only Grade 2 listed gardens in Uttlesford. They are of historical importance, having been designed by the renowned landscape architect, Harold Peto for the Countess of Warwick. Features of the original garden remain, including the sunken Italian Garden, which is a very fine example of Peto's work. The Gardens are in two ownerships, the owners of Warwick House and Land Securities. They are at present open to the public on nine Sundays a year and weekdays for group visits. Area of Search 7 would border the Gardens, Areas 8 and 9 are close by, and there are several Areas of Search within and around Great Dunmow. The Land Securities owned part of the Gardens should remain open to the general public for informal leisure activities. The Gardens are of national importance and attract visitors from a wide area, not just from within Uttlesford. They should be accessible not only for their value for recreation and for their historical importance, but because they also attract visitors to Uttlesford.

TOWN AND PARISH COUNCILS

Arkesden Parish Council: The natural and historic nature of the district must be protected. It is precisely the quality of the rural landscape and the historic assets within it that make Uttlesford such a popular place to live. Any development must be sensitive to these issues and in particular seek local opinion on protection of these assets. UDC has already carried out numerous Landscape Character Assessments as part of its background studies. The recommendations in these studies should be strictly adhered to during the planning process.

Birchanger Parish Council: Preservation of village envelopes and character.

Clavering Parish Council: As per NPPF. High regard should be placed on protecting the natural and historic environment.

Elmdon and Wendens Lofts Parish Council: Either Area of Search 1 or 2 would have significant impact on the natural environment, but particularly site 2 which in view of the contours of the land would be impossible to blend into the landscape. Both are on prime agricultural land that should be preserved for the production of food. AoS 2 includes, as far as one can tell, the Coploe Hill nature reserve.

Elsenham Parish Council: The technical studies have failed to map environmental constraints in the Area of Search 3 (NE Elsenham). Map 1C only extends to the settlement

of Elsenham in its north-east corner, whereas AoS 3 extends out to Henham. Is this deliberate or a mistake? Without that information it is impossible to comment on the impact of environmental constraints in AoS 3. Clearly the main issues are to weigh the protection of natural environment and the historic features against the need for growth and the general sustainability of new sites and areas.

Felsted Parish Council: Section 11 of the NPPF must be adhered to. Specifically Section 112, - local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. Area of Search 9, for example, includes a high proportion of Grade 2 agricultural land. This should be protected. The assessment process must maintain realism in reviewing routes residents will take to reach key transport hubs, to ensure that historic sites and villages do not become rat runs from any new housing area, as people seek to avoid rush hour congestion on recognised main routes. A requirement of any development must be the sympathetic incorporation of the very large number of listed buildings, archaeological sites, conservation areas, and undesignated historic assets. If this cannot be achieved then the site is not appropriate for use.

Great Canfield Parish Council: Uttlesford, including Great Canfield has a very high proportion of listed buildings, SSIs and conservation areas and these should be protected. This is a rural part of Essex and should be protected as such. Uttlesford is consistently named as one of the most desirable places to live in England. Consideration must be given to protect areas of historical interest to avoid destroying what is special about this area

Great Chesterford Parish Council: No comment.

Great Dunmow Town Council: This is a topic that is very much secondary to the amount of housing and its location. Sufficient work has already been done to enable the specific issues and features that need to be conserved and enhanced to be identified.

Henham Parish Council: See comments of Elsenham PC.

Ickleton Parish Council: New housing, especially on substantial sites, should conform to the existing pattern of development in the locality. For instance, where settlements have developed over time in river valleys and are well screened in the landscape, it would be inappropriate to develop on higher ground where the development would be highly visible for miles around, and the impact on the natural and historic environment of such intrusion on the existing landscape would be unacceptable. It would be good to see more emphasis on brown field sites in considering locations for development. Good quality agricultural land should remain in agricultural use.

Little Chesterford Parish Council: Where possible development should be restricted to sites that are brownfield. Class 1 and 2 agricultural land should not be utilised for building as it is a national resource that should be preserved for food production. If the Council is considering a new development that combines a mixture of housing with excellent design incorporating local wildlife sites, coppices and woods I suggest they look at the current Whiteley development in Hampshire, and the proposed associated North Whiteley development (Winchester District Council). This is certainly one of the best new stand-alone developments I have seen in recent years.

Little Easton Parish Council: The natural environment has better protection by the more specific wording in proposed policies and the technical studies to identify why they are important. The new policies are deficient when trying to protect wildlife sites, particularly because the wildlife corridors are not mentioned in the wording. Landscape areas should be specifically referred to, giving added protection to areas such as the Upper Chelmer Valley. New policy wording should be added so that local wildlife sites are protected and not isolated and degraded. Wildlife corridors are where wildlife actually migrate between sheltered areas such as woodland and can travel beyond the immediate vicinity of the new development. Developers cannot be allowed choose the location of wildlife corridors based on convenient gaps in or around their development and expect that the wildlife will use them. Wildlife corridors should be green, uninterrupted corridors and cannot be dissected by roads. Policy wording should protect specific styles and character of the historic environment by referring to historical or architectural studies to clearly state why they are important.

Newport Parish Council: The current standards should be maintained and consideration to building design styles that are consistent with the historical make up of Newport.

Quendon Parish Council: The natural and historic character of Uttlesford is its defining feature. This is a huge part of why Uttlesford has been voted one of the top places to live in the UK for the past few years and why people love living here. If this should ever be lost or diminished in any way through mass development of the area, it can NEVER be replaced. Development should not, under any circumstances, be at the expense of historic assets, SSSIs, local wildlife and the greenbelt. It should also not be done on prime agricultural land. Other options must be sought.

Rayne Parish Council: All existing facilities have to be maintained and where needed preserved or protected.

Saffron Walden Town Council: This is a topic that is very much secondary to the amount of housing and its location. Sufficient work has already been done to enable the specific issues and features that need to be conserved and enhanced to be identified. Having identified the issues however, the plan needs to provide properly for them, and the housing and other strategic plans need properly to take them into account. We do not believe that, for example, the previous spatial strategy took any proper account of the effect of proposed housing development on the historic environment of Saffron Walden.

The Sampfords Parish Council: Sufficiently covered in Section 2.8 of the consultation document.

Stansted Mountfitchet Parish Council: Direct and indirect impacts on features of natural or heritage value would be an erosion of the rich environment valued by many people. The landscape/townscape character of Stansted Mountfitchet is unique within the district. It is centred on the boundary of the chalk hills and clay plateau which creates steeply sided valleys with views across the Bourne, Ugley and Stansted Brooks. No other town or village in Uttlesford has this character and we think the natural and historic elements which contribute to this uniqueness should be respected. Again a Blue and Green Infrastructure should be the backbone of residential development. We should ensure all sites of woodland are preserved and nature reserves safeguarded from being declassified. One example is that of Ailsa Wood which was declassified as an SSSI when the M11 was built but which still

holds the important habitat for the Cowslip. UDC should be supporting Elsenham and Stansted Mountfitchet's application for its reclassification to SSSI. Stansted Park is of historical importance and should be protected.

Stebbing Parish Council: Historic landscapes, woodlands, conservation areas, listed buildings and surroundings should be protected and not destroyed by new developments. This applies equally throughout the district and not to just one particular area. Small historic sites should be afforded the same protection as larger areas i.e. Audley End estate. There are interesting historic sites throughout the district. Overbuilding / development leads to loss of wildlife, flowers, birds etc.

Strethall Parish Meeting: Protect, improve, maintain and enhance. How will a new settlement in open countryside away from infrastructure sustain and achieve these criteria? Strethall is generally believed to be the smallest civil parish in England. Its boundaries have remained essentially unchanged since before Domesday. The Grade I Listed Saxon church celebrated its millenium in 2010AD. The even older Ickniel Way traverses the heart of Area of Search 2. These are exactly the sort of historic assets that should and must be cherished and protected from development.

Thaxted Parish Council: The benefits of any development must outweigh the impact on the historic environment. In Thaxted, traffic generated by development is detrimental to the historic core of the town. The outcome of the offsetting pilot should be evaluated.

Ugley Parish Council: See comments of Elsenham PC

Wendens Ambo Parish Council: UDC should formulate a plan to preserve the rural nature of most of the district. It would be good to see an end to the creeping urbanisation, which results in too much signage. UDC should consider how it could better protect its roadside verges and hedges - the current arrangement with ECC is not at all satisfactory and in some instances is a waste of taxpayers' money. The historic worth of Saffron Walden has already been damaged by housing development of poor design - the architectural quality of new developments in the town is very poor indeed and should not be allowed to continue. Pollution and traffic: any Local Plan should include measures to reduce road congestion and the pollution in Saffron Walden.

Widdington Parish Council: See comments of Elsenham PC

DEVELOPERS / AGENTS

- Recent development and the large number of planning consents that are yet to be implemented or fully built-out will impact the south of the district. It is considered important that the Council considers the impacts of such continued concentrations against their Local Plan Vision, in particular the objective to retain settlements as separate entities with green space between them.
- Concern at UDC relying on the Historic Settlement Character Assessment of 2007 in preparing the withdrawn plan. Up-to-date assessment has been provided for the call for Sites submission west of School Lane, Newport.
- Developing greenfield sites will open up countryside access opportunities.

- Both the natural and historic environment are a significant characteristic and asset of the district, and should be safeguarded.
- Sites within Stansted Mountfitchet can be developed without any visual impact.
- Promotes Andrewsfield Garden Village.
- Promotes Chelmer Mead.
- Promotes Takeley Green. The Council accepts the need to review the Countryside Protection Zone – not realistic to maintain its current extent in the next Plan period.
- Promotes land west of Braintree – long views are limited.
- Land west of Great Dunmow is less sensitive than the more exposed areas to the north (Chelmer Valley).
- The status of existing features should be taken into account and then the benefits arising from the proposal be weighed against any harm arising. Do not include policies that introduce a presumption against development unless the status of the land specifically warrants such an approach.
- The historic environment within existing towns and villages is important and further justifies the vision of a new settlement within the District providing the best solution for the long term housing and employment needs. In terms of natural environment, the green belt within the District is of key importance and should be protected.
- The natural environment of Uttlesford will be protected by delivering housing through a large number of generally smaller developments, within and adjoining the existing settlements. This scale of development will allow the new housing to be more easily related to the existing form of settlements and where necessary pay due regard to their historic or intrinsic character.
- The Council should view the Green Belt, as an opportunity to mould the future sustainable growth of the District, allowing growth to be located in the most sustainable locations whilst providing for the re-allocation of new Green Belt around the market towns to manage their future growth.
- Paragraphs 165-168 of the NPPF confirm the need to ensure that policies and decisions are based on up to date natural environment information, whilst ensuring that a sustainability appraisal should be an integral part of the development process.
- Paragraphs 169-170 of the NPPF reinforce the need for an up to date assessment in respect of the historic environment.
- Flood plains cannot be ignored.
- Need a robust, comprehensive evidence base to judge whether the need for new housing outweighs the adverse impacts of the loss of local environmental designations. Protection and enhancement policies should be established in the light of the NPPF, especially Paragraphs 109-125. Inspectors have queried whether green gap or similar policies are NPPF-compliant.

COMMENTS BY INDIVIDUALS

A summary of these is set out below. Many merely stated that they wished to be associated with the views of Elsenham / Henham / Takeley / Ugley and Widdington Parish Councils.

- House building should not damage historic town cores by damaging views and increasing traffic.

- Essential to preserve the rural natural approaches to settlements. Market towns are set in irreplaceable rural locations.
- Every year, more of the natural and historic environment disappears. Need to preserve for our children and grandchildren. Uttlesford is a place people want to live because of the quality of life it affords them.
- Single settlement option should be considered, with these requirements planned in. A new settlement should be of its time and place. Needs to be near motorway and rail links.
- Any single settlement or major extension would have detrimental and irreversible effects.
- Avoid infilling. Avoid building new roads.
- Build ring roads and locate big buildings / warehouses there.
- Sensitively planned small scale additions to existing settlements across the district would lessen the impact. Developments need to be small, sustainable and contain sufficient affordable housing so that young people can remain in their communities.
- Careful low density housing, even in single development greenfield sites.
- Don't need a sea of soulless housing estates. Very little infrastructure has been provided with recent developments.
- Countryside must be protected. Uttlesford is scenically very important. We live in a beautiful unspoilt area with rolling hills and amazing wildlife. Noise and light pollution are low.
- Surrounding countryside is important to the settings of conservation areas.
- Designated sites cannot be considered in isolation from the environment of which they are part.
- Work with statutory bodies and parishes on long term enhancement plans. Surveys required.
- Frequency of recreational use should be taken into account when considering potential development sites. Public Rights of Way should be preserved. Protected lanes should be backed up with signs.
- Safeguard open space, historic woodlands, conservation areas, listed buildings, trees, hedges and agricultural land. Reference to Section 11 of the NPPF. Establish country parks. TPO groups of trees. All ancient woodlands should be mapped.
- Preserve the Green Belt.
- Protect country lanes for pedestrians and cyclists. Oppose industry and warehousing in the countryside.
- Green infrastructure is vital to sustainable development.
- Future development should be on brownfield sites, or using neglected town centre properties.
- Develop greenfield sites on the edge of towns.
- Future development must be sympathetic to its surroundings. Some of the town houses built in saffron Walden in the last 20 years are quite a good example.
- Reduce car use – houses should be centred on good public transport links. Historic streets are ruined by traffic. Rat-running on rural roads. Need 20mph speed limits.
- Improvements needed to Saffron Walden's road network. Current ECC plans will not cope with existing traffic. Need a ring road. Need a solution to school-run traffic.

- Change should be gradual – a few new houses can enhance a village, but building a thousand or so is not acceptable.
- Wildlife is being destroyed and /or fragmented. Need wildlife corridors and bat tiles etc. Preserve tree lines for connectivity purposes.
- Effect on landscape considerable.
- Risks of building on good agricultural land re population increase and food security.
- Historic buildings and sites should be protected at all costs. Uttlesford has the highest density of pre-1700 listed buildings outside cities than anywhere else.
- Give high priority to preservation of hedgerows.
- Pollution levels in some areas already too high.
- National policy already established a range of constraints.
- Use eco materials and mixed natural environments. Community hubs and play areas.
- Offsetting is a way of getting around legislation, and should not be allowed.
- Expand tree planting to absorb CO², improve health and ameliorate noise. Plant fruit trees rather than evergreens.
- What sustainable energy methods are proposed? Not much wind or wave power in UDC + solar farms look ugly.
- Need to be more self-sufficient and produce more food.
- Views of elected parish councils and residents groups should be given more weight. Should be possible to veto large greenfield developments on inappropriate sites.
- Need to cater for archaeological investigation and publication.
- Make use of vacant spaces above shops.
- Concerned about the Nimbyism from the market towns and larger villages.
- Encourage community support for the countryside – rubbish clearing groups, school projects etc.
- Accessing information on historic sites in Essex seems to be difficult.
- Build houses with larger gardens and force planting of trees and shrubs. Hedges preferable to fence panels.
- Need to use up to date data.
- Eliminate excessive night lighting, reduce road sign clutter. Enforce noise restrictions.
- UDC should not charge for pre-application advice on listed buildings. UDC no longer offers listed building grants.
- Must allow listed buildings to use double glazing. No point preserving buildings that are subsequently too expensive to run.
- UDC has done a good job establishing and refreshing its conservation areas.
- Should ask whether new development proposals be viewed in a Century or so as meriting conservation? Use information boards and plaques to help raise understanding.
- Need a dark night sky.
- Need to ensure an adequate water supply.

Some individual comments relate to specific places:

- Retain Andrewsfield and Boxted Wood as sites of historical importance.
- Protect historic environments of Saffron Walden, Great Dunmow and Thaxted. Recent development in Saffron Walden – filling in the gaps and edges – has contributed little. Need bold plans to determine what is best for the town. Views across Saffron Walden are stunning.
- Problem of “samey” development everywhere. Respect local distinctiveness.
- Some good new housing on Thaxted Road, Saffron Walden, taking in Georgian elements from Market Square.
- Turn Saffron Walden Market Square into a thriving space rather than a car park.
- Maintain the natural landscape around Audley End.
- Roman settlements around Great Chesterford area should not be disturbed. Effect of building huge settlements nearby.
- Area of Search 9 would also impact on many listed buildings in and around Stebbing. Also consider space, views and traffic.
- Effect on already occurring flooding in Radwinter Road, Saffron Walden.
- Land NE of Elsenham should be dropped from further consideration. Concern about the amount of development already approved in the area without infrastructure improvements.
- South of the district has large herds of deer and many badgers which are being forced into smaller habitats. Need to do more than preserve great crested newts.
- In Elmdon, the proposed development would destroy habitats, including those that are protected.
- Thaxted centre suffers from significant high speed traffic. Development at Bellrope Meadow negatively impacts on the approach.
- Traffic pollution in Saffron Walden – poor air quality, vibration and noise.
- Congestion in Saffron Walden is a fraction of what occurs elsewhere.
- Should confirm that upland views will be protected – area around Newport mentioned.
- Damage being done in Whiteditch Lane, Newport – flooding and verges.
- Protect the Gardens of Easton Lodge. Areas of Search 7, 8 and 9 border / are close by.
- Sealed-off developments such as Flich Green (or other dead-end developments) should be discouraged as an obstacle to the integration of new inhabitants into existing communities.
- Hatfield Forest under significant pressure from pollution associated with Stansted Airport, the M11 and other roads.
- Need to avoid building between Stansted Mountfitchet, Birchanger and Bishop’s Stortford. No more building around Stansted Mountfitchet.
- National Cycle Network Route 11 passes through Area of Search 2. Also the Icknield Way. Strethall Church is an Anglo Saxon rarity. Surrounding countryside is home to deer, badgers and bird breeding grounds.
- New housing in Great Chesterford looks like anywhere else. Infilling in Trumpington and Shelford are in keeping without copying the past.
- New cycle route to Audley End diverts traffic over an already weak bridge.
- Make better use of the Castle site in Saffron Walden.
- Walden and Dunmow are just dormitory towns.

Question 8: Natural Environment and Historic Environment

- Welcomes UDC support for Thaxted Festival, Saffron Walden Museum etc.
- Recent degrading of natural environment around Great Dunmow – Highwood Quarry in particular. Noise from water pumps. Loss of brown hares and deer. Increased traffic and loss of green space.
- Dozens of trees felled at Alsa Leys, Elsenham to build 6 houses. 60 trees lost at Elsenham Nursery. Need to be aware of Policies S7 and ENV3 of the existing Local Plan.

Question 11

New Settlement Areas of Search

What issues and evidence should the Council consider when assessing the potential for a new settlement at Areas of Search 1-9. Please reference any specific areas of search in your response.

This question was responded to by 458 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to <http://www.uttlesford.gov.uk/article/3038/Planning-Policy-Consultations>.

STATUTORY BODIES AND OTHER GROUPS

Natural England In assessing the potential for one or more new settlements (Areas of Search 1-9), the Council should include consideration of the potential increase in recreational pressure on the Hatfield Forest SSSI and NNR and also the potential impacts of traffic-derived air pollution upon nearby designated sites.

Historic England The historic environment and impact on heritage assets is relevant to every area of search, and there may be a need for specific heritage impact assessments depending on the location and its potential for affecting heritage assets.

Environment Agency The developers must work with the sewerage providers/water companies ahead of the preferred options so as to ensure there is a feasible and viable solution, including any necessary permit requirements for new works or upgrades, prior to any allocation under the Local Plan.

Anglian Water Services Ltd The need for new and improved infrastructure to serve a new settlement would be dependent upon its location and its proximity to existing foul sewerage network and the available capacity of the foul sewerage network and water recycling centres.

Braintree District Council Any proposal will be carefully assessed across a range of areas and must provide the necessary infrastructure both on site and off site if it is to be considered as an appropriate option through the Local Plan process.

East Hertfordshire District Council East Herts Council supports the principle of undertaking a high level options assessment. However neither the consultation document nor the Sustainability Appraisal (SA) provide information on how the options presented at this stage have been chosen over other locations.

South Cambridgeshire District Council Deliverability is a key consideration with respect to the relative merits of different new settlement options.

Essex County Council Environment, Sustainability and Highways Transportation ECC recommends that consideration be given to the transportation network when assessing the potential for a new settlement(s). Historic Environment ECC recommends that the cumulative impact of development on heritage assets, including historic landscapes, be considered as part of any decision. ECC recommends the preparation of an updated Strategic Flood Risk Assessment (SFRA) to cover the sites of the potential new

settlement(s). ECC recommends that UDC considers the availability of school places at existing primary and secondary schools in the New Settlement areas of search.

Hertfordshire County Council All areas adjacent to Bishop's Stortford need to provide sufficient primary and secondary school places to meet the needs arising from the developments.

Stansted Neighbourhood Plan Steering Group Any area of new settlement should be very close to and easily accessible to good road and rail links.

Essex Wildlife Trust New settlement areas of search should reference the designated Living Landscapes in the district. Comprehensive evidence-gathering will help to inform decisions on the type and location of green space required to complement existing GI, fill gaps, mitigate adverse impacts, and provide additional compensatory measures to ensure a net gain in biodiversity assets and GI.

Gt Saling Action Group Search Area 9 The proposed urban sprawl concerns me greatly.

Hands Off Thaxted Liaison/co-operation with East Herts and South Cambridgeshire to identify their plans. Evaluate existing infrastructure provision.

Herts and Essex School I am interested, therefore, in whether 10 acres of the development area could be apportioned to secondary education, in return for which we could increase the number of students we could take in to the school.

National Trust The Trust would draw the Council's attention to Areas of Search 5 & 6. The direct impact on the Forest and its wealth of ecological and heritage assets would be severe.

Stebbing Society Areas of Search 7,8 and 9 are already heavily developed, with other developments under construction or approved. Consequently any further development here would simply overload this area and therefore be inappropriate and should therefore be removed from the Plan.

Sustainable Uttlesford The factors to consider are (1) Accessibility of location in relation to strategic transport network (2) The impact on the Green Belt. (3) The location vis a vis current employment centres (4) Potential to encourage modal shift away from private car (5) Past decisions by Planning Inspectorate about the viability of location for major development (6) Potential for cross border collaboration.

The Hundred Parishes Society High priority should be given to working with, respecting and, where possible, enhancing the historic environment, especially historic settlements and areas of ancient countryside.

The Ickleton Society Area of Search 1 In our view this area is not a good location for a new settlement

We Are Residents UDC should consider all material issues and all material evidence.

Bishop's Stortford Civic Federation We strongly object to the inclusion of sites 11a and b in the areas of search.

TOWN AND PARISH COUNCILS

Birchanger Parish Council To maintain no coalescence principle between villages, towns and county boundaries.

Broxted Parish Council If a new settlement is required my Council feels it should be to the north of the District.

Clavering Parish Council A new settlement must address all infrastructure needs with provision for future expansion.

Elmdon & Wendens Lofts Parish Council Area of search 1. In our view this area is not a good location for a new settlement. Area of Search 2. In our view this area is entirely unsuitable for a new settlement.

Elsenham Parish Council AoS 3 Elsenham area. I have severe concerns about the justification for this proposal. Great Chesterford areas 1 and 2 well served by road system which gives good access to the surrounding area.

Felsted Parish Council Object to Area 9 on grounds of ribbon development and coalescence of settlements.

Great Chesterford Parish Council Object to Areas of Search 1 and 2 on various grounds.

Great Canfield Parish Council Area of Search Number 8 The Parish Council is opposed to this option and of the view that to put 20,000+ houses into this area would destroy a historical part of Uttlesford. The effect would be to increase the Urban sprawl that would join Takeley and Great Dunmow into one large town.

Great Dunmow Town Council None have been identified.

Henham Parish Council Refer to Inspector's concerns about Area of Search 3.

High Easter Parish Council Experience across the country has shown (e.g. Ebbsfleet, Cambourne) that new settlements require very significant funding to provide all the required infrastructure to develop an extensive greenfield site on this scale, and that such funding cannot always be met through development levys and section 106 contributions alone.

Ickleton Parish Council Area of Search 1 is not a suitable location for a new settlement. Impact on the landscape would be unacceptable, since the new development would not conform to the established pattern of development in the locality.

Little Chesterford Parish Council For both AOS1 and AOS2 , Little Chesterford Parish Council agrees with the points made in the sustainability appraisal that the location is not well related to large existing settlements, and that developments would give rise to a large amount of commuting outside the district.

Little Dunmow Parish Council The Area of Search 9 appears to be too widely drawn.

Little Easton Parish Council Areas of Search 1-9: 1&2. A new settlement should be promoted in either or both of these locations. Railway stations at Great Chesterford and Whittlesford are both under-utilised. Access to major road networks (M11, A11, A1301,

A14) and areas of good quality employment and growth are better than anywhere else in the district.

Newport Parish Council Current infrastructure and evidence of sustainability.

Rayne Parish Council These are complex issue and it is thought unreasonable to expect members of the public to have a formulated an effective response to such.

Saffron Walden Town Council None have been identified.

Stansted Mountfitchet Parish Council On a general perspective any new settlement should be in keeping with the District's Vision statement to ensure there is green space between sites and therefore to avoid amalgamation. It must also be clear that access on to a main road network, whether new or established, is a necessary condition.

Stebbing Parish Council Areas 7, 8 and 9 are totally inappropriate for this already heavily developed or permissioned part of the district.

Strethall Parish Meeting Sustainability, social benefit and economic viability.

Takeley Parish Council

AoS 1&2 M11 Junction 9: - Believe to be sustainable - employment opportunities.

AoS 3 Elsenham: - No direct access to M11 - Poor road access.

AoS 4 M11 Jtn 8 North West: - This is within Green Belt!

AoS 5 M11 Jtn 8 south east: - Directly under Stansted Airport flight (landing corridor) - Proximity to Hatfield Forest SSS1.

AoS 6 West Takeley, south of A120 & north of Hatfield Forest: - TPC has serious concerns.

AoS 7 North of A120, west of Dunmow - Partially in CPZ.

AoS 8 South of A120: - Site is isolated.

AoS 9 west of Braintree: - Pressure on M11 Jtn 8 would be unsustainable.

Thaxted Parish Council Good quality architecture; Road layout; Power including opportunities to achieve energy efficiency; Traffic; Employment; Facilities; Relationship to neighbouring settlement; Public sector investment.

The Sampfords Parish Council New Town Areas 1 and 2 (Figure 1) adjacent to Great Chesterford appear to offer the best opportunity to establish a new and sustainable community. Locations 4, 5 and 6 suggest an undersirable suburb to Bishop's Stortford, and loctions 7, 8 and 9 similarly to great Dunmow.

Ugley Parish Council Refer to Inspectors concerns about Area of Search 3.

Widdington Parish Council Refer to Inspector's concerns about Area of Search 3.

DEVELOPERS, AGENTS AND LAND OWNERS

Growth in this rural district should be widely dispersed across numerous sites that relate to the established settlement hierarchy and take account of existing transport and social infrastructure network.

The issues and evidence that the Council should consider when assessing the potential for one or more new settlements at Areas of Search 1-9 should include deliverability, achievability and availability of land to meet the required housing requirements. Social, economic and environmental impacts for potential sites should also be assessed vigorously.

The SA undertakes a very high level assessment of the AoS and identifies issues with each of the proposed AoS such as proximity to SSSI, moderate to high landscape sensitivity to change, poor road and rail access and flood risk. These are seemingly balanced against very generic possible benefits of each of the areas.

Conservation areas should be protected.

It is reasonable to assume that the potential scale of development should provide opportunities for the delivery of services and infrastructure to support the development (education, healthcare etc.) and alleviate any impacts associated with expansion of existing settlements i.e. pressure on services, impact of cultural heritage etc

Centred on a main line railway and station. Direct access to the M11 motorway. The prospect of high grade employment, which would enhance the perception of the county.

The Council should consider the role, function and location of the key sustainability drivers when considering locations for growth. Relative distance from strategic infrastructure and its accessibility; the need for significant new infrastructure; transport routing; access to main centres of employment; and access to social and community facilities and services.

Airport noise should be a consideration.

Any new settlement should preferably be built somewhere that has the space to accommodate 12,000 houses if required (and not right on top of existing villages impacting on their infrastructure)

COMMENTS BY INDIVIDUALS

General comments made by individuals relate to:-

- The importance of transport links; links to A120, M11, A11, rail line; potential for new transport methods such as guided buses or tramways.
- Infrastructure – provision of schools, doctors, shops, green space, sports pitches, planning for walking/cycling, broadband.
- Site needs good access to areas of employment
- New settlements being sustainable and self-contained
- Viability and timescale of supporting infrastructure
- The importance of retaining the character of existing villages
- Maintaining as much high grade agricultural land as possible
- New settlement should be net contributor to District and not a drain on its resources.
- In accordance with paragraph 52 of NPPF any new settlement should be designed and built in compliance with Garden City Principles.
- Await Secretary of State's decision on appeals by Fairfield and Land Securities in relation to land at Elsenham and West of Great Dunmow respectively.

Comments specific to Areas of Search are listed below:-

Area of Search 1 and 2

- Supported as it will avoid the congestion by developing in Saffron Walden.
- Support as access to railway network
- Area has excellent road and rail connections. It is also within an area of high tech and other business developments around Cambridge and along the M11 corridor so has excellent job opportunities locally.
- A large settlement in the north will have a massive transport problem during rush hours when all the new traffic plus existing traffic moving north will join the A11/A1301 (Stumps Cross roundabouts) junction. This will be similar to the significant delays that occur daily at A505/A1301 roundabout and along to M11/A505 junction.
- Create environmental issues due to sitting traffic as well as Great/Little Chesterford/Ickleton all becoming rat runs as people go to work. This will create safety issues within the villages.
- AoS 2 - unsuitable for more than very limited development due to rural road network, limited employment, loss of agricultural land and no easy access to railway station.
- M11 junction 9 has only south facing slip roads.
- AoS 2 – M11 acts as barrier
- No fast train from Great Chesterford, no station carpark. Increase pressure on roads and villages to Audley End Station and on station carpark.
- Impact on woodlands and area of ecological value
- Impact on smaller villages to west. New settlement would be unrelated to existing pattern of settlements
- Impact on scheduled ancient monuments.
- on a slope and development would be highly visible.
- Loss of agricultural land.
- Impact on chalk aquifer and runoff would exacerbate flood risk at Great Chesterford.
- Increase traffic congestion in service centre of Saffron Walden. Existing facilities in Great Chesterford could not meet needs during site's development.
- Impact on Icknield Way and National Cycle route.
- Coalescence with Great Chesterford
- Would not meet local need as would attract people from outside the district who wish to work in Cambridge or London but cannot afford to live there. Would not serve District as whole.
- Planning Application for a crematorium
- Impact of planned expansion of Genome Campus and associated housing
- Little previous development in area – suited to development as separate development.
- Would broaden range of services and facilities available in the area.

Area of Search 3

- Not suitable due to rural nature of roads
- Rejected by Local Plan Inspector
- Should be considered equally with all other options
- Capacity of J8 M11
- Coalescence of Henham and Elsenham
- Railway line acts as barrier between existing and proposed village

- Limited services and facilities
- Water stressed area and some areas subject to flooding

Area of Search 4 and 5

- Support as access to railway network
- Proximity to transportation links and connections to areas of major employment within the District and further afield.
- Areas around Bishops Stortford would be close to the Stansted Flight Path and would increase pressure on an already overburdened M11 junction.
- Area 5 too close to Hatfield Forest
- Area 5 too close to Stansted Airport
- Difficult to expand beyond 2033
- Impact on Bishop's Stortford
- Benefit of helping stop further expansion of the airport as aircraft noise would be intolerable.
- Least destructive site as close to M11, urban spread of Bishop's Stortford and Stansted.
- Area 4 – lies within the Green Belt;
- Area 4 - no long views of the site;
- Area 5 – intrudes into Public Safety Zone

Area of Search 6

- Proximity to transportation links and connections to areas of major employment within the District and further afield.
- The area along the A120 has already had considerable development particularly around Takeley
- Too close to Hatfield Forest
- Too close to Stansted Airport
- Difficult to expand beyond 2033
- Capacity of A120 and J8 M11

Area of Search 7

- Maintains adequate separation from nearby established settlements and does not engulf them.
- Not feasible due to size (far too big.) resulting in use of precious green land in the district and least favourable transport links or access to main employment areas.
- Proximity to transportation links and connections to areas of major employment within the District and further afield.
- The area along the A120 has already had considerable development particularly around Takeley
- Great Dunmow has already had its fair share of new development and is in danger of losing its identity.
- Lack of infrastructure and location of historical sites.
- Capacity of A120 and J8 M11
- Would create urban sprawl between Great Dunmow and Little Canfield/Takeley and Little Easton

- Access to A120 and M11;
- scope for self-containment; accommodate environmental assets and avoid significant impacts

Area of Search 8

- Object as would blight rural area
- Maintains adequate separation from nearby established settlements and does not to engulf them.
- Proximity to transportation links and connections to areas of major employment within the District and further afield.
- The area along the A120 has already had considerable development particularly around Takeley
- Great Dunmow has already had its fair share of new development and is in danger of losing its identity.
- Too close to Hatfield Forest.
- Capacity of A120 and J8 M11
- Would create urban sprawl between Great Dunmow and Little Canfield/Takeley

Area of Search 9

- Maintains adequate separation from nearby established settlements and does not to engulf them.
- Would need improved junction on to A120
- Proximity to transportation links and connections to areas of major employment within the District and further afield.
- Object to detrimental impact on countryside, increased traffic, air, noise and light pollution.
- Andrewsfield is in the middle of nowhere.
- Area is less well connected than other areas to London and Cambridge.
- Area will increase the already significant flood risk in Stebbing Green and in other areas upstream along the River Ter and its tributaries, especially because the whole area is flat and low lying.
- There is very little or no public transport (train or bus) and also no west-bound access to the nearby A120.
- Join up Great Dunmow and Braintree
- Close to Felsted which has a range of services which would be useful in early stages of development.
- Large enough to be self-contained; large enough to expand beyond 2033.
- Felsted, for instance benefits from an hourly bus service to Great Dunmow (16 minutes), Braintree (20 minutes), and Stansted Airport and at least four buses a day to both Chelmsford and Colchester. A rail connection is available from Braintree, which has a direct hourly service to Liverpool Street (one hour one minute, only five minutes more than Elsenham).
- Impact on Ancient Woodland of Bosted Wood
- Development would not serve local people but London commuters
- Detrimental impact on character of Stebbing, would lead to coalescence between Stebbing and Rayne

- Loss of historic World War 2 airfield.
- Could infrastructure provided to serve new settlement such as gas, sewerage, high speed broadband be extended to existing settlements, dwellings?
- Capacity of A120 and J8 M11
- No spare capacity at Braintree Railway Station.
- Potentially under a flight path
- The site has poor drainage and is susceptible to flooding and rising water table
- Proximity to gravel extraction site.

Question 8

Natural Environment and Historic Environment

What do you think are the main issues the Council should consider in relation to the natural environment and the historic environment?

This question was responded to by 388 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to <http://www.uttlesford.gov.uk/article/3038/Planning-Policy-Consultations>.

STATUTORY BODIES AND OTHER GROUPS

Birchanger Wood Trust: Historic and natural environments once gone will never be regained. Both are a resource which should be treasured and protected and a heritage for our children to enjoy in every sense. Flooding, however, has to be addressed. There are remedies which can enhance an area making it a pleasure to access and an asset to residents. Ignoring the issue will lead to a reduction to existing businesses and an economic failure.

Environment Agency: We need more coherent and resilient ecological networks. Design of development should aim to reflect and enhance the area's locally distinctive character. - Any development should seek to increase an area's biodiversity assets. - Protection of existing high quality habitats i.e. unimproved grassland and irreplaceable habitats i.e. ancient woodlands should be prioritised over creating new habitats. - Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats. - Create and extensive viable network of green and blue corridors and natural habitat throughout the development which connects larger or more expansive open spaces for both people and wildlife. The Areas of Search 9 (West of Braintree) and 12 (around Gt. Dunmow) within our Essex, Norfolk & Suffolk Area potentially include land adjacent to the Rivers Chelmer and Ter and the Stebbing Brook.

Waste water treatment and the quality of the water environment should be addressed to ensure there is infrastructure to support sustainable growth and ensure there is no deterioration of water quality.

River corridors are particularly effective wildlife corridors in an increasingly fragmented countryside hence it is important that rivers are protected and where possible enhanced. We would recommend a 20m buffer zone in which no development should be permitted.

The Local Plan includes numerous references to the terrestrial environment, especially in the search areas, but does not mention the aquatic environment once. The NPPF states in paragraph 165 that River Basin Management Plans should be used as evidence on which to base planning decisions. This promotes the use of up-to-date information about the natural environment which should be useful to inform the action needed to improve water quality in Local Plans. All public bodies, including local authorities are required to have regard to the River Basin Management Plan and any supplementary plans in exercising their functions. It is strongly recommended that these form part of the evidence base included within this

section as the planning system offers significant opportunities to improve water quality and achieve WFD objectives. We would encourage equal regard for the aquatic environment as there currently is for the terrestrial environment. Obtained data should also inform the subsequent Sustainability Appraisal of the preferred options stage of the Local Plan.

Some of the areas identified are in Flood Zones 2 and 3 and we would expect to see development steered away from the areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. The plan should be supported by a Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

No mention has been made with respect to geology and hydrogeology in the plan area, and this should be considered further. Principal aquifers are geological strata that exhibit high permeability and provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. Secondary aquifers are often capable of supporting water supplies at a local scale and normally provide an important source of flow to some rivers. The use of groundwater in the area makes it vulnerable to pollution and it is likely that a large proportion of drinking water derives from groundwater sources. A number of licensed abstractions are present across the plan area. Significantly, the majority of the area is also designated as groundwater source protection zones (SPZs) i.e. comprising potable groundwater sources requiring protection identified by the Environment Agency. Private potable groundwater supplies would not be identified by us, but should be considered as part of the pre-application/planning process and will require a 50m de minimis radius protection zone. New activities need to be deterred in certain areas based on their intrinsic hazard to groundwater.

We consider that an Environmental Quality policy should be included to give emphasis to the need for protection and improvement of the water environment where pollution and other adverse effects on the local and natural environment should be minimized, in line with NPPF policies. The policy should be added to ensure that the water quality of receiving watercourses and aquifers is protected and improved to enhance the biodiversity and chemical status to meet the objectives of the WFD and River Basin Management Plans (RBMP). It should, also, ensure that land contamination, protection and enhancement of the water environment are appropriately dealt with via the planning regime. Proposals for new development or redevelopment should promote sustainable design, incorporate mitigation measures, account for climate change, and protect and enhance the water environment. Developers should be encouraged to develop on brownfield/contaminated sites and less on Greenfield sites and be able to incorporate Sustainable Urban Drainage Systems (SuDS) in their design. Reference and gravity should be given to NPPF paragraphs 109,120 and 121.

Any development proposed on landfill will require a Preliminary Risk Assessment followed by intrusive site investigation, detailed quantitative risk assessment to assess whether remediation can be undertaken to ensure the protection of the water environment. Any Local Plan flood risk policy that includes surface water management, could also seek to address pollution prevention aspects of discharges to watercourses. Such aspects are pertinent in

the context of preventing deterioration of water quality under the WFD. Alternatively, the Environmental Quality policy discussed above could include wording on the requirement to address water quality for pollution prevention purposes where infiltration techniques are proposed. Because the use of deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction), we would expect an Environmental Quality policy to address such techniques.

Essex Bridleways Association: We request that the protection and enhancement of the local Rights of Way network are fully catered for within the new Plan which will benefit the local area for the reasons outlined in our response to question 7.

Essex County Council: Should consider the setting of the heritage assets. Some of the proposed locations for future development would break up areas of existing historic landscape intruding between historic parklands. In some instances the visibility between designed landscapes is important for maintaining their historic significance, or it may break the link between historic settlement cores and the wide countryside that forms their setting. A specific example of this is the area of 10g which lies within the area between Shortgrove Park and Audley End. ECC has prepared recommended biodiversity policies that may be considered for inclusions within the development management policies in local plans. The policies should assist UDC in meeting their obligations under Section 11 of the NPPF and achieve no net loss of biodiversity. The policies cover every aspect of ecology that must be considered in the development management process. The policies are outlined in their entirety in appendix 3 of this response.

Essex Wildlife Trust: Uttlesford's ecological evidence base is currently inadequate and out of date, rendering it unfit for purpose. The Local Wildlife Site review urgently needs updating. Targets for monitoring sustainability objectives should include biodiversity monitoring. The NPPF emphasises the importance of a robust evidence base to inform successful local plan policies on the natural environment. Evidence-gathering should include an assessment of existing and potential components of ecological networks. GI and biodiversity should be core considerations in the preparation of Local Plans. Over the last hundred years there has been an unprecedented change in the UK countryside, resulting in habitat loss and dramatic adverse impacts on the populations of many species. In securing sustainable development, the planning system aims to achieve a net gain for biodiversity, which means a sustained increase in abundance, quality and extent of all species and habitats that support healthy ecosystems. Any development should seek to increase an area's biodiversity assets while guarding against the loss of priority and irreplaceable habitats. It is good practice for a local plan to include specific measurable targets that can be monitored.

Comprehensive evidence-gathering will help to inform decisions on the type and location of green space required to complement existing GI, fill gaps, mitigate adverse impacts, and provide additional compensatory measures to ensure a net gain in biodiversity assets and GI. It is good practice to carry out context studies to establish where existing or potential GI exists. Local authorities should have access to baseline figures for biodiversity in their area. This information can then be broken down to a more local level to inform developers about site-specific biodiversity issues within a development. The Essex Wildlife Trust Biological Records Centre acts as a key source of evidence and the Council is urged to consider the benefits of a Service Level Agreement to enable access to ecological data and site records

(see below). Targets can be set to link fragmented habitats and landscape features to increase species viability, by restoring degraded sites and habitats and by providing new spaces for recreation to reduce human impact on sensitive sites. Recreational disturbance of vulnerable habitats can lead to a loss of vegetation, disturbance of ground-nesting birds (affecting their breeding and survival), and increased predation of birds and wild mammals by domestic cats. These sensitive areas should be protected from human disturbance. By providing additional "suitable accessible natural green space" (SANGS), local authorities can help to divert visitors away from sites that are sensitive to recreational disturbance. Natural England has produced useful guidance and a checklist for the creation of SANGS in the Thames Basin Heaths Planning Zone, and many of the principles will apply to the creation of SANGS elsewhere (although they may not be suitable for all locations and habitats).

Designated sites (including local wildlife sites) and areas of priority habitat, should be robustly protected from development in strict accordance with the mitigation hierarchy, as outlined in the NPPF, paragraph 118. Compliance with the requirements of the NERC Act can only be achieved if local authorities have access to up to date information from Biological Records Centres, and there is a system in place for monitoring and recording species and their habitats. In order to ensure compliance with the requirements of the NERC Act, local authorities should ideally sign up to a data exchange agreement with EWT Biological Records Centre. This will ensure ease of access to the most up to date species records and other biological data. The maintenance of a register of important wildlife sites with up to date information about them as a robust evidence base is a NPPF requirement. In order to maintain a robust evidence base into the future, an on-going Local Wildlife Site review programme is recommended, which engages the relevant land owners in managing their sites in an economically viable way that remains sensitive to the important wildlife they support. This review should periodically refresh the information held about LoWS and their nature conservation merits. It is recommended that local wildlife site reviews are conducted at least every 5 years. It should also be stressed that the role of a Local Authority should not be restricted to minimising or preventing environmental degradation through the planning process. The NPPF (para. 109) refers to the planning system providing net gains in biodiversity, thereby contributing to enhancement of the natural environment. This responsibility can be dispensed at the largest scale of strategic planning across an entire borough, by embracing Essex Wildlife Trust's Living Landscapes ethos.

Essex Wildlife Trust: Uttlesford Local Group: Uttlesford may have once been blessed in the past with a rich natural environment, but available evidence shows that species have gone locally extinct, woodlands are in a very poor condition due to lack of management and the browsing pressure from the excessive population of wild deer, roadside verges and village greens have lost practically all of their wildflowers. Wildflower rich grassland is virtually non-existent in the District, rivers are in poor condition, habitats have been fragmented by new roads and development, and even the nature reserves owned and managed by Essex Wildlife Trust have suffered damage from excessive public use, as in many places they are the only public open space available to residents and are used as the local dogwalk, instead of being treasured for their wildlife. Local Wildlife Sites, though valuable in principle, in practice have no legal protection and are in badly degraded condition for wildlife. Green Infrastructure Networks MUST (not may) be provided as part of the design of development and MUST connect to the wider world. The Council MUST designate on

maps the land that will be the Green Infrastructure Network, as a land use allocation, and policies MUST promote the change of use of land within those corridors to ecologically rich and enhanced condition.

Friends of The Flich Way: The Council could issue a conservation order in regard to the protection of the natural environment represented by the preservation of the Flich Way, to enable all future planning decisions taken to consider the preservation of this unique and historic asset.

Great Dunmow Neighbourhood Steering Group: The best way to preserve these assets is to let the towns and villages grow at a slow pace and introduce new settlements in areas of beauty that are currently only available to the few. This subject is covered extensively in the Great Dunmow Neighbourhood Plan.

Hands Off Thaxted: The prime consideration must be to protect the natural and built form of Uttlesford. Our landscape and our heritage are particularly important. All proposed developments must be carefully scrutinised to ensure there is no adverse impact on the natural landscape or on historic buildings. Any further developments around the towns of Dunmow and Saffron Walden should be resisted to avoid further damage to the fabric and character of these historic towns. In Thaxted the irreparable harm caused to the views of the Grade1 listed church by an ill-considered planning approval in Sampford Road should not be allowed to recur.

Historic England: The NPPF states that local plans should include a positive strategy for the conservation and enjoyment of the historic environment, and that local plans should include strategic policies to deliver the protection and enhancement of the historic environment (paragraph 156) and should identify land where development is inappropriate because of its environmental or historic significance (paragraph 157). In terms of the evidence base, Paragraph 169 requires local plans to have up to date evidence about the historic environment in their area. Advise an audit of existing evidence to identify potential gaps or out-of-date information.

We recommend that the Historic Settlement Character Assessments are reviewed and updated where needed to reflect recent developments. The existing Historic Environment Characterisation report should also be reviewed, along with conservation area appraisals. Specific heritage impact assessments may need to be produced to understand the potential impact of new development on heritage assets. The local plan as a whole should be able to demonstrate that it sets out a positive strategy for the historic environment. This means that, on balance, the local plan has a positive effect on the historic environment and heritage assets. Different sections of the Local Plan should form part of the overall positive strategy, such as proposals for housing, regeneration, town centres or employment development. Policies throughout the local plan should help deliver the conservation of the historic environment with appropriate references where necessary. At the same time, a specific historic environment policy is encouraged as it helps to emphasise and implement the positive strategy required by the NPPF. In the withdrawn Local Plan, we broadly welcomed the inclusion of a strategic policy relating to the historic environment along with detailed policies on heritage asset types, although we required some amendments to specific wording. We would support the development of policies relating delivering high

quality design, and also advocate policies that set out the Council's approach to the overall management of the historic environment, in terms of both designated and non-designated heritage assets (including archaeology).

Consideration should be given in the emerging Local Plan as to whether it is appropriate to propose any policies specific to addressing the matter of Heritage at Risk, either collectively or targeted at specific assets on the at risk register. We would also ask that a policy approach is included in the plan to afford an appropriate level of protection to non-designated heritage assets.

The Hundred Parishes Society: Any developments should be sensitive and sympathetic to their natural and historic environment. With sensitive planning, it should be possible to continue the process of evolution, enhancing our environment and creating heritage for the future. The special character of Uttlesford is largely due to its exceptional depth of architectural heritage, yet owners of listed buildings are charged a fee for pre-application advice for listed building consent. Some local authorities offer this advice free. We encourage the Council to scrap this fee.

The Ickleton Society: It is important that new housing should blend into the landscape and not harm the natural and historic environment. Good quality agricultural land (Grade 1 and 2) should be preserved for agricultural use. As far as possible, development should be on brown field sites.

National Trust: Recognition that Hatfield Forest is an area of national significant historically and ecologically, has significant recreation value, and that it is currently being damaged by an unsustainable increase in visitors responsible in part to increase in local development. Consider that Areas of Search 5 and 6 are inappropriate locations for future development and are a threat to Hatfield Forest, the heritage and ecological value of which should be highly protected. Emphasise the importance of a Green Infrastructure Strategy, which should be addressed as a specific topic within the body of the draft plan.

Natural England: Refer to the requirements of i) the Conservation of Habitats and Species Regulations 2010 (as amended); ii) the Wildlife and Countryside Act 1981 (as amended); iii) Paragraph 118 of the NPPF; iv) Section 40 of the Natural Environment and Rural Communities Act 2006. Also refer to answers to questions 4, 7, 11, 13 & 14.

Stansted Neighbourhood Plan Steering Group: See comments of Stansted Mountfitchet Parish Council.

Stebbing Society: Historic landscapes, woodlands, conservation areas and listed buildings should all be protected and not swallowed up and destroyed by new development. This would apply throughout the District and also to all sizes of historic sites. We agree with the CPRE stance that environmental appraisals of house building targets should be undertaken before finalising regional plans. This would surely provide a more appropriate and natural, instead of imposed, development blueprint and ensure that the Local Plan is more realistic, achievable and economically viable and capable of being integrated into the local communities with as little damage as possible to the environment and existing infrastructure. The East of England Plan, as stated in paragraph 3.21 of the London Arc East Report, has a specific Policy (LA1) in relation to this sub-area which emphasises a focus on Greenbelt

restraint. This is also the policy of CPRE not to release greenfield land for development and is also supported by ECC who recognise the importance of safeguarding greenbelt land.

Sustainable Uttlesford: Attach great importance to maintaining bio-diversity in the district. Greatly disappointed to have been ignored when a number of recent development proposals have been given approval. Any locations chosen for development should seek to maintain the district's biodiversity and protect special verges.

Thaxted Society: These two factors are the greatest contributors to well-being, quality of life and eventual sustainability. They both have a very large cumulative influence on the area. They should be a priority at all stages in order to aggressively maintain the appropriate balance, maintaining the area's critical uniqueness and "best place to live" status.

Trustees of Gardens of Easton Lodge: These are the only Grade 2 listed gardens in Uttlesford. They are of historical importance, having been designed by the renowned landscape architect, Harold Peto for the Countess of Warwick. Features of the original garden remain, including the sunken Italian Garden, which is a very fine example of Peto's work. The Gardens are in two ownerships, the owners of Warwick House and Land Securities. They are at present open to the public on nine Sundays a year and weekdays for group visits. Area of Search 7 would border the Gardens, Areas 8 and 9 are close by, and there are several Areas of Search within and around Great Dunmow. The Land Securities owned part of the Gardens should remain open to the general public for informal leisure activities. The Gardens are of national importance and attract visitors from a wide area, not just from within Uttlesford. They should be accessible not only for their value for recreation and for their historical importance, but because they also attract visitors to Uttlesford.

TOWN AND PARISH COUNCILS

Arkesden Parish Council: The natural and historic nature of the district must be protected. It is precisely the quality of the rural landscape and the historic assets within it that make Uttlesford such a popular place to live. Any development must be sensitive to these issues and in particular seek local opinion on protection of these assets. UDC has already carried out numerous Landscape Character Assessments as part of its background studies. The recommendations in these studies should be strictly adhered to during the planning process.

Birchanger Parish Council: Preservation of village envelopes and character.

Clavering Parish Council: As per NPPF. High regard should be placed on protecting the natural and historic environment.

Elmdon and Wendens Lofts Parish Council: Either Area of Search 1 or 2 would have significant impact on the natural environment, but particularly site 2 which in view of the contours of the land would be impossible to blend into the landscape. Both are on prime agricultural land that should be preserved for the production of food. AoS 2 includes, as far as one can tell, the Coploe Hill nature reserve.

Elsenham Parish Council: The technical studies have failed to map environmental constraints in the Area of Search 3 (NE Elsenham). Map 1C only extends to the settlement

of Elsenham in its north-east corner, whereas AoS 3 extends out to Henham. Is this deliberate or a mistake? Without that information it is impossible to comment on the impact of environmental constraints in AoS 3. Clearly the main issues are to weigh the protection of natural environment and the historic features against the need for growth and the general sustainability of new sites and areas.

Felsted Parish Council: Section 11 of the NPPF must be adhered to. Specifically Section 112, - local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. Area of Search 9, for example, includes a high proportion of Grade 2 agricultural land. This should be protected. The assessment process must maintain realism in reviewing routes residents will take to reach key transport hubs, to ensure that historic sites and villages do not become rat runs from any new housing area, as people seek to avoid rush hour congestion on recognised main routes. A requirement of any development must be the sympathetic incorporation of the very large number of listed buildings, archaeological sites, conservation areas, and undesignated historic assets. If this cannot be achieved then the site is not appropriate for use.

Great Canfield Parish Council: Uttlesford, including Great Canfield has a very high proportion of listed buildings, SSIs and conservation areas and these should be protected. This is a rural part of Essex and should be protected as such. Uttlesford is consistently named as one of the most desirable places to live in England. Consideration must be given to protect areas of historical interest to avoid destroying what is special about this area

Great Chesterford Parish Council: No comment.

Great Dunmow Town Council: This is a topic that is very much secondary to the amount of housing and its location. Sufficient work has already been done to enable the specific issues and features that need to be conserved and enhanced to be identified.

Henham Parish Council: See comments of Elsenham PC.

Ickleton Parish Council: New housing, especially on substantial sites, should conform to the existing pattern of development in the locality. For instance, where settlements have developed over time in river valleys and are well screened in the landscape, it would be inappropriate to develop on higher ground where the development would be highly visible for miles around, and the impact on the natural and historic environment of such intrusion on the existing landscape would be unacceptable. It would be good to see more emphasis on brown field sites in considering locations for development. Good quality agricultural land should remain in agricultural use.

Little Chesterford Parish Council: Where possible development should be restricted to sites that are brownfield. Class 1 and 2 agricultural land should not be utilised for building as it is a national resource that should be preserved for food production. If the Council is considering a new development that combines a mixture of housing with excellent design incorporating local wildlife sites, coppices and woods I suggest they look at the current Whiteley development in Hampshire, and the proposed associated North Whiteley development (Winchester District Council). This is certainly one of the best new stand-alone developments I have seen in recent years.

Little Easton Parish Council: The natural environment has better protection by the more specific wording in proposed policies and the technical studies to identify why they are important. The new policies are deficient when trying to protect wildlife sites, particularly because the wildlife corridors are not mentioned in the wording. Landscape areas should be specifically referred to, giving added protection to areas such as the Upper Chelmer Valley. New policy wording should be added so that local wildlife sites are protected and not isolated and degraded. Wildlife corridors are where wildlife actually migrate between sheltered areas such as woodland and can travel beyond the immediate vicinity of the new development. Developers cannot be allowed choose the location of wildlife corridors based on convenient gaps in or around their development and expect that the wildlife will use them. Wildlife corridors should be green, uninterrupted corridors and cannot be dissected by roads. Policy wording should protect specific styles and character of the historic environment by referring to historical or architectural studies to clearly state why they are important.

Newport Parish Council: The current standards should be maintained and consideration to building design styles that are consistent with the historical make up of Newport.

Quendon Parish Council: The natural and historic character of Uttlesford is its defining feature. This is a huge part of why Uttlesford has been voted one of the top places to live in the UK for the past few years and why people love living here. If this should ever be lost or diminished in any way through mass development of the area, it can NEVER be replaced. Development should not, under any circumstances, be at the expense of historic assets, SSSIs, local wildlife and the greenbelt. It should also not be done on prime agricultural land. Other options must be sought.

Rayne Parish Council: All existing facilities have to be maintained and where needed preserved or protected.

Saffron Walden Town Council: This is a topic that is very much secondary to the amount of housing and its location. Sufficient work has already been done to enable the specific issues and features that need to be conserved and enhanced to be identified. Having identified the issues however, the plan needs to provide properly for them, and the housing and other strategic plans need properly to take them into account. We do not believe that, for example, the previous spatial strategy took any proper account of the effect of proposed housing development on the historic environment of Saffron Walden.

The Sampfords Parish Council: Sufficiently covered in Section 2.8 of the consultation document.

Stansted Mountfitchet Parish Council: Direct and indirect impacts on features of natural or heritage value would be an erosion of the rich environment valued by many people. The landscape/townscape character of Stansted Mountfitchet is unique within the district. It is centred on the boundary of the chalk hills and clay plateau which creates steeply sided valleys with views across the Bourne, Ugley and Stansted Brooks. No other town or village in Uttlesford has this character and we think the natural and historic elements which contribute to this uniqueness should be respected. Again a Blue and Green Infrastructure should be the backbone of residential development. We should ensure all sites of woodland are preserved and nature reserves safeguarded from being declassified. One example is that of Ailsa Wood which was declassified as an SSSI when the M11 was built but which still

holds the important habitat for the Cowslip. UDC should be supporting Elsenham and Stansted Mountfitchet's application for its reclassification to SSSI. Stansted Park is of historical importance and should be protected.

Stebbing Parish Council: Historic landscapes, woodlands, conservation areas, listed buildings and surroundings should be protected and not destroyed by new developments. This applies equally throughout the district and not to just one particular area. Small historic sites should be afforded the same protection as larger areas i.e. Audley End estate. There are interesting historic sites throughout the district. Overbuilding / development leads to loss of wildlife, flowers, birds etc.

Strethall Parish Meeting: Protect, improve, maintain and enhance. How will a new settlement in open countryside away from infrastructure sustain and achieve these criteria? Strethall is generally believed to be the smallest civil parish in England. Its boundaries have remained essentially unchanged since before Domesday. The Grade I Listed Saxon church celebrated its millenium in 2010AD. The even older Icknield Way traverses the heart of Area of Search 2. These are exactly the sort of historic assets that should and must be cherished and protected from development.

Thaxted Parish Council: The benefits of any development must outweigh the impact on the historic environment. In Thaxted, traffic generated by development is detrimental to the historic core of the town. The outcome of the offsetting pilot should be evaluated.

Ugley Parish Council: See comments of Elsenham PC

Wendens Ambo Parish Council: UDC should formulate a plan to preserve the rural nature of most of the district. It would be good to see an end to the creeping urbanisation, which results in too much signage. UDC should consider how it could better protect its roadside verges and hedges - the current arrangement with ECC is not at all satisfactory and in some instances is a waste of taxpayers' money. The historic worth of Saffron Walden has already been damaged by housing development of poor design - the architectural quality of new developments in the town is very poor indeed and should not be allowed to continue. Pollution and traffic: any Local Plan should include measures to reduce road congestion and the pollution in Saffron Walden.

Widdington Parish Council: See comments of Elsenham PC

DEVELOPERS / AGENTS

- Recent development and the large number of planning consents that are yet to be implemented or fully built-out will impact the south of the district. It is considered important that the Council considers the impacts of such continued concentrations against their Local Plan Vision, in particular the objective to retain settlements as separate entities with green space between them.
- Concern at UDC relying on the Historic Settlement Character Assessment of 2007 in preparing the withdrawn plan. Up-to-date assessment has been provided for the call for Sites submission west of School Lane, Newport.
- Developing greenfield sites will open up countryside access opportunities.

- Both the natural and historic environment are a significant characteristic and asset of the district, and should be safeguarded.
- Sites within Stansted Mountfitchet can be developed without any visual impact.
- Promotes Andrewsfield Garden Village.
- Promotes Chelmer Mead.
- Promotes Takeley Green. The Council accepts the need to review the Countryside Protection Zone – not realistic to maintain its current extent in the next Plan period.
- Promotes land west of Braintree – long views are limited.
- Land west of Great Dunmow is less sensitive than the more exposed areas to the north (Chelmer Valley).
- The status of existing features should be taken into account and then the benefits arising from the proposal be weighed against any harm arising. Do not include policies that introduce a presumption against development unless the status of the land specifically warrants such an approach.
- The historic environment within existing towns and villages is important and further justifies the vision of a new settlement within the District providing the best solution for the long term housing and employment needs. In terms of natural environment, the green belt within the District is of key importance and should be protected.
- The natural environment of Uttlesford will be protected by delivering housing through a large number of generally smaller developments, within and adjoining the existing settlements. This scale of development will allow the new housing to be more easily related to the existing form of settlements and where necessary pay due regard to their historic or intrinsic character.
- The Council should view the Green Belt, as an opportunity to mould the future sustainable growth of the District, allowing growth to be located in the most sustainable locations whilst providing for the re-allocation of new Green Belt around the market towns to manage their future growth.
- Paragraphs 165-168 of the NPPF confirm the need to ensure that policies and decisions are based on up to date natural environment information, whilst ensuring that a sustainability appraisal should be an integral part of the development process.
- Paragraphs 169-170 of the NPPF reinforce the need for an up to date assessment in respect of the historic environment.
- Flood plains cannot be ignored.
- Need a robust, comprehensive evidence base to judge whether the need for new housing outweighs the adverse impacts of the loss of local environmental designations. Protection and enhancement policies should be established in the light of the NPPF, especially Paragraphs 109-125. Inspectors have queried whether green gap or similar policies are NPPF-compliant.

COMMENTS BY INDIVIDUALS

A summary of these is set out below. Many merely stated that they wished to be associated with the views of Elsenham / Henham / Takeley / Ugley and Widdington Parish Councils.

- House building should not damage historic town cores by damaging views and increasing traffic.

- Essential to preserve the rural natural approaches to settlements. Market towns are set in irreplaceable rural locations.
- Every year, more of the natural and historic environment disappears. Need to preserve for our children and grandchildren. Uttlesford is a place people want to live because of the quality of life it affords them.
- Single settlement option should be considered, with these requirements planned in. A new settlement should be of its time and place. Needs to be near motorway and rail links.
- Any single settlement or major extension would have detrimental and irreversible effects.
- Avoid infilling. Avoid building new roads.
- Build ring roads and locate big buildings / warehouses there.
- Sensitively planned small scale additions to existing settlements across the district would lessen the impact. Developments need to be small, sustainable and contain sufficient affordable housing so that young people can remain in their communities.
- Careful low density housing, even in single development greenfield sites.
- Don't need a sea of soulless housing estates. Very little infrastructure has been provided with recent developments.
- Countryside must be protected. Uttlesford is scenically very important. We live in a beautiful unspoilt area with rolling hills and amazing wildlife. Noise and light pollution are low.
- Surrounding countryside is important to the settings of conservation areas.
- Designated sites cannot be considered in isolation from the environment of which they are part.
- Work with statutory bodies and parishes on long term enhancement plans. Surveys required.
- Frequency of recreational use should be taken into account when considering potential development sites. Public Rights of Way should be preserved. Protected lanes should be backed up with signs.
- Safeguard open space, historic woodlands, conservation areas, listed buildings, trees, hedges and agricultural land. Reference to Section 11 of the NPPF. Establish country parks. TPO groups of trees. All ancient woodlands should be mapped.
- Preserve the Green Belt.
- Protect country lanes for pedestrians and cyclists. Oppose industry and warehousing in the countryside.
- Green infrastructure is vital to sustainable development.
- Future development should be on brownfield sites, or using neglected town centre properties.
- Develop greenfield sites on the edge of towns.
- Future development must be sympathetic to its surroundings. Some of the town houses built in saffron Walden in the last 20 years are quite a good example.
- Reduce car use – houses should be centred on good public transport links. Historic streets are ruined by traffic. Rat-running on rural roads. Need 20mph speed limits.
- Improvements needed to Saffron Walden's road network. Current ECC plans will not cope with existing traffic. Need a ring road. Need a solution to school-run traffic.

- Change should be gradual – a few new houses can enhance a village, but building a thousand or so is not acceptable.
- Wildlife is being destroyed and /or fragmented. Need wildlife corridors and bat tiles etc. Preserve tree lines for connectivity purposes.
- Effect on landscape considerable.
- Risks of building on good agricultural land re population increase and food security.
- Historic buildings and sites should be protected at all costs. Uttlesford has the highest density of pre-1700 listed buildings outside cities than anywhere else.
- Give high priority to preservation of hedgerows.
- Pollution levels in some areas already too high.
- National policy already established a range of constraints.
- Use eco materials and mixed natural environments. Community hubs and play areas.
- Offsetting is a way of getting around legislation, and should not be allowed.
- Expand tree planting to absorb CO², improve health and ameliorate noise. Plant fruit trees rather than evergreens.
- What sustainable energy methods are proposed? Not much wind or wave power in UDC + solar farms look ugly.
- Need to be more self-sufficient and produce more food.
- Views of elected parish councils and residents groups should be given more weight. Should be possible to veto large greenfield developments on inappropriate sites.
- Need to cater for archaeological investigation and publication.
- Make use of vacant spaces above shops.
- Concerned about the Nimbyism from the market towns and larger villages.
- Encourage community support for the countryside – rubbish clearing groups, school projects etc.
- Accessing information on historic sites in Essex seems to be difficult.
- Build houses with larger gardens and force planting of trees and shrubs. Hedges preferable to fence panels.
- Need to use up to date data.
- Eliminate excessive night lighting, reduce road sign clutter. Enforce noise restrictions.
- UDC should not charge for pre-application advice on listed buildings. UDC no longer offers listed building grants.
- Must allow listed buildings to use double glazing. No point preserving buildings that are subsequently too expensive to run.
- UDC has done a good job establishing and refreshing its conservation areas.
- Should ask whether new development proposals be viewed in a Century or so as meriting conservation? Use information boards and plaques to help raise understanding.
- Need a dark night sky.
- Need to ensure an adequate water supply.

Some individual comments relate to specific places:

- Retain Andrewsfield and Boxted Wood as sites of historical importance.
- Protect historic environments of Saffron Walden, Great Dunmow and Thaxted. Recent development in Saffron Walden – filling in the gaps and edges – has contributed little. Need bold plans to determine what is best for the town. Views across Saffron Walden are stunning.
- Problem of “samey” development everywhere. Respect local distinctiveness.
- Some good new housing on Thaxted Road, Saffron Walden, taking in Georgian elements from Market Square.
- Turn Saffron Walden Market Square into a thriving space rather than a car park.
- Maintain the natural landscape around Audley End.
- Roman settlements around Great Chesterford area should not be disturbed. Effect of building huge settlements nearby.
- Area of Search 9 would also impact on many listed buildings in and around Stebbing. Also consider space, views and traffic.
- Effect on already occurring flooding in Radwinter Road, Saffron Walden.
- Land NE of Elsenham should be dropped from further consideration. Concern about the amount of development already approved in the area without infrastructure improvements.
- South of the district has large herds of deer and many badgers which are being forced into smaller habitats. Need to do more than preserve great crested newts.
- In Elmdon, the proposed development would destroy habitats, including those that are protected.
- Thaxted centre suffers from significant high speed traffic. Development at Bellrope Meadow negatively impacts on the approach.
- Traffic pollution in Saffron Walden – poor air quality, vibration and noise.
- Congestion in Saffron Walden is a fraction of what occurs elsewhere.
- Should confirm that upland views will be protected – area around Newport mentioned.
- Damage being done in Whiteditch Lane, Newport – flooding and verges.
- Protect the Gardens of Easton Lodge. Areas of Search 7, 8 and 9 border / are close by.
- Sealed-off developments such as Flich Green (or other dead-end developments) should be discouraged as an obstacle to the integration of new inhabitants into existing communities.
- Hatfield Forest under significant pressure from pollution associated with Stansted Airport, the M11 and other roads.
- Need to avoid building between Stansted Mountfitchet, Birchanger and Bishop’s Stortford. No more building around Stansted Mountfitchet.
- National Cycle Network Route 11 passes through Area of Search 2. Also the Icknield Way. Strethall Church is an Anglo Saxon rarity. Surrounding countryside is home to deer, badgers and bird breeding grounds.
- New housing in Great Chesterford looks like anywhere else. Infilling in Trumpington and Shelford are in keeping without copying the past.
- New cycle route to Audley End diverts traffic over an already weak bridge.
- Make better use of the Castle site in Saffron Walden.
- Walden and Dunmow are just dormitory towns.

- Welcomes UDC support for Thaxted Festival, Saffron Walden Museum etc.
- Recent degrading of natural environment around Great Dunmow – Highwood Quarry in particular. Noise from water pumps. Loss of brown hares and deer. Increased traffic and loss of green space.
- Dozens of trees felled at Alsa Leys, Elsenham to build 6 houses. 60 trees lost at Elsenham Nursery. Need to be aware of Policies S7 and ENV3 of the existing Local Plan.

Question 15

Villages

What issues and evidence should the Council consider when assessing the potential for development in the villages? Please reference any specific villages in your response.

This question was responded to by 416 people/organisations. The following is a summary of the key points raised by the representations. To read all the representations in full please go to <http://www.uttlesford.gov.uk/article/3038/Planning-Policy-Consultations>.

STATUTORY BODIES AND OTHER GROUPS

Essex County Council – they express concerns about development at Elsenham and the impact it may have on the rural road network. They recommend that consideration be given to the scale and quantum of growth than can be delivered within the village locations; it is more challenging to deliver alternative sustainable travel modes.

The gradual encircling of development within village locations may have detrimental impact of the historic cores. It may impact the setting or significance or force inappropriate development within the village cores. The scale and type of development should be controlled in villages with significant historic cores such as Thaxted, Newport and Gt Chesterford.

ECC recommends that the evidence base for surface water flood risk in the SA incorporates the most up to date source of information for surface water flood risk.

UDC should work with ECC to ensure the availability of school places is considered, whether schools are capable of expansion, whether schools are capable of expansion; whether the scale of development warrants the expansion of existing school or new school provisions and ensure the delivery of safe travel routes.

Early years child care provision needs to be considered.

Historic England – the Council should consider the possible impacts on the significance of heritage assets including impact on their setting. Updating the Historic Settlement Character Assessments should be carried out to help inform the process.

Anglian Water Services Ltd – the Council should consider the implication of additional development at the identified villages for water recycling centres and the foul sewerage network within Anglian Waters area of responsibility.

Sustainable Uttlesford supports incremental development in any village ie maximum 10%.

Hands off Thaxted – the Council should consider the effect on the historic setting and landscape views. Evidence should include the effect of new housing on the capacity of schools and health centres.

The Hundred Parishes Society – high priority should be given to working with, respecting and where possible, enhancing the historic environment.

National Federation of Gypsy Liaison Groups – the issue of whether traveller sites should be accommodated within or on the edge of settlements

Stebbing Society – oppose scenario A. any development should be matched with a corresponding improvement in associated infrastructure. Type A villages should have smaller groups of development to ensure community cohesion.

Thaxted Society – Thaxted's quality of life and sustainability is bound up in both its setting and history and these two important benchmarks are lost to creeping urbanisation.

Essex Wildlife Trust Uttlesford Local Group – if any settlement is not sustainably located then how can further development there be considered sustainable? Housing development for local needs as low cost housing may be acceptable but nothing else.

The Ickleton Society – there is no car park at Gt Chesterford rail station, no northbound access to or southbound exit from the M11.

Birchanger Wood Trust – add on housing is not a sensible or sustainable plan. It does no good to the existing residential population and does not provide the necessary infrastructure or integration for new comers.

TOWN AND PARISH COUNCILS

Stansted Mountfitchet Parish Council and Stansted Neighbourhood Plan Group the scale of development in type A villages should take account of existing infrastructure strains. The road infrastructure in and around Stansted is suffering from wear and tear caused by heavy traffic. The hill top of Silver Street is barely wide enough for two lorries to pass. Cambridge Road has poor layout and suffers from on street parking. Grove Hill is a cause of congestion.

Strethall Parish Meeting villages with excellent facilities will inevitably take more new housing than those with less as the council must still apply sustainability, social benefit and economic viability to its decision when looking at development in the villages.

Saffron Walden Town Council – two policies should be drawn up, one should set out the criteria against which proposals to develop housing in or adjacent to villages would be assessed. The other would be an exceptions policy setting out the criteria that proposals for affordable housing would have to meet.

Felsted Parish Council It is important that the character of the villages be maintained. The village plan is very relevant and should be taken into account. A Neighbourhood Plan is being written and should be considered.

Little Dunmow Parish Council Fritch Green has reached its limit and further expansion would risk coalescence with Little Dunmow or Felsted. The primary school is oversubscribed and roads are not suitable. Fritch Green should not be considered a Type A village.

Henham, Elsenham, Widdington and Ugley Parish Councils there is limited capacity to accommodate any more than a small extra quantum of growth in the villages. The withdrawn plan made substantial allocations in Elsenham and Henham and these have been converted in permissions. These are significant figures given the size of the settlements and

constraints and will take some time to absorb them so no further allocations are needed or justified.

Wendens Ambo Parish Council some villages may have a primary school but there are not sustainable locations for expansion given their rural location and lack of infrastructure. UDC should ensure most effective use of UDC or ECC land.

Newport Parish Council in Newport the existing infrastructure has been totally disregarded despite bringing this to the attention of UDC officers. UDC should demonstrate listening and reacting to the comments and proposals of Newport PC.

Stansted Mountfitchet Parish Council The road infrastructure around Stansted Mountfitchet is suffering from the wear and tear caused by heavy traffic flow. Cambridge Road is suffering from poor layout and on street parking. There is increased congestion on Lower Street.

Birchanger Parish Council – preserve the character of village highway issues. Can the nature of the roads cope with more traffic. Infilling only within village envelope.

Little Easton Parish Council Great Chesterford has the potential for further development without harm to its character. Elsenham has the potential for substantial development without harm to its character and is well located for employment and services. Care should be taken not to harm the character of Henham. Type A villages should consider extending their development boundaries to include additional development that will complement the existing village.

Great Chesterford Parish Council the location of SAM should be taken into account, Gt Chesterford is constrained by river tributaries which could lead to potential flood risk, low population size compared to other key villages, historic core and CA, sensitive landscape, development already accepted and the emerging NP should be considered.

Little Chesterford Parish Council – in relation to Little Chesterford the location of SAM and the historic cores of the village and hamlet should be taken into consideration as should the sensitive surrounding landscape and flood plains of the River Cam. The NP goes into more detail and should be taken into consideration.

Great Canfield Parish Council – Traveller policies do not appear to have been included within the issues and options for development of villages.

Thaxted Parish Council – the capacity of the village in terms of services and infrastructure, the character of the natural landscape, access to education, transport and health services all need to be considered. Thaxted is a tourist destination and its attraction is the historic buildings – this should be preserved.

Quendon and Rickling Parish Council the villages cannot offer the infrastructure that is required. New development changes the character and environment of the villages. Many have had an unfairly high percentage increase in the number of new houses with no new infrastructure provision. The Quendon and Rickling parish Plan has been left off the list of parish plans considered. NP are expensive and it is unrealistic for smaller Parishes to achieve.

Great Dunmow Town Council – given the scale of growth proposed, development in the villages will not be able to make any significant contribution towards its delivery without changing both their scale and character drastically. Two policies should be drawn up, one should set out the criteria against which proposals to develop housing in or adjacent to villages would be assessed. The other would be an exceptions policy setting out the criteria that proposals for affordable housing would have to meet

Stebbing Parish Council – development in type A villages should not be in estates but rather in small areas of 6-10 houses. This has been proven in Stebbing to contribute to community cohesion. Large estates tend to be inward looking and integrate less well into traditional village life. At present there are planning permissions for 36 houses in Stebbing.

Great Easton and Tilty Parish Council – there are already three large areas of search immediately around the Great Dunmow area. Currently there is an appeal in process for 700 houses at Little Easton and also a potential application from Land Securities. This development is in our neighbouring parish, but would without doubt have a direct effect on the parish of Great Easton

Elmdon and Wendens Lofts Parish Council – additional housing in Chrishall will create increased traffic through Elmdon and along the B1039. Increased traffic bound for the M11 is likely to go via Elmdon and Duxford as this option allows easier access into the A505.

Clavering Parish Council – sustainability of transport links to access rail links, health care and employment. Clavering lacks facilities for further expansion.

DEVELOPERS, AGENTS AND LAND OWNERS

- The majority of the villages are remote from services and facilities.
- Stansted Mountfitchet is a good location for growth as it has a number of facilities
- land owner promoting site in Birchanger (Call for Sites reference number 01Bir15)
- UDC should apply the SA and SEA objectives to the key villages. Villages that have fewer adverse impacts when assessed against the objectives should be allocated a greater proportion of development.
- An assessment needs to be made regarding the scope of existing services to grow
- Land owner promoting site in Mole Hill Green. Promoting a proportionate approach to ensure villages have a level of organic growth
- Land owner promoting site at Great Chesterford (Call for Sites reference number
- The ongoing viability and vitality of villages should be considered.
- Increasing the number of sites across the District with allocations for residential development will increase the rate of housing completions
- Land owner promoting a site at Sion House (Call for Sites reference number 02Bir15)
- Development based on the existing hierarchy will distribute growth to all areas
- Development needs to be provided in the villages in order to meet the housing need in the early years of the plan.
- Land owner promoting a site at Pines Hill Stansted (Call for Sites reference number 02SSa15)
- Land owner promoting site west of School Lane Newport (Call for Sites reference 05New15)

- The hierarchy approach to villages requires further analysis on a village by village basis
- Landowner promoting land at Hatfield Heath (Call for Sites reference number 03HHea15)
- The sites put forward under the Call for Sites should be used as the starting point for allocating land
-

COMMENTS BY INDIVIDUALS

Associated with the response from Henham/Elsenham/Ugley/Widdington Parish Councils

- Infrastructure at capacity – schools and health facilities at capacity
- Local roads cannot cope
- The Council needs to spell out a clear hierarchy when it selects sites
- Villages should only take developer proportionate to their size
- New settlement is more sustainable than village growth
- Villages natural and built environments should be protected
- Villages have had more than their share of growth
- Road access to villages needs to be considered
- Extra parking spaces would be required due to car dependency
- The Council should consider the views of residents
- Affordable homes in villages are needed
- Avoid coalescence with neighbouring villages and towns
- Type B villages should have minimal development in order to retain their contribution to the beauty of the area
- Villages have sensitive surrounding landscapes
- Development should be controlled to prevent speculative applications
- Local housing need should be established using housing need surveys
- Homes for older people should be provided
- Controlled increases in housing stock make for better community cohesion
- In fill development only
- Key villages are better equipped to take additional housing
- Development should be sensitive to its surroundings
- Existing planning permissions must be taken into consideration
- Some Type A villages are more constrained than others – each village should be considered in relation to its sensitivities
- Limited public transport in some villages
- The selection of villages in the hierarchy categories is poorly thought through.
- Consideration should be given to traffic flows on junction 8 M11
- Preservation of village character is important
- Train links are important
- Key villages should take some development so long as it is sensitive to its surroundings

Question 16

Development at 580 dwellings per year

What do you think the implications of development under scenarios A to D would be, at around 580 dwellings per year.

This question was responded to by 385 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to <http://www.uttlesford.gov.uk/article/3038/Planning-Policy-Consultations>.

STATUTORY BODIES AND OTHER GROUPS

Historic England consider scenario;

- A. Positive and/or negative impacts depending on its location and how it alleviates pressure for growth in existing settlements.
- B. Implications for many of the district's historic villages, although the edge of Bishop's Stortford is less constrained in terms of heritage assets.
- C. Diminish the sense of place and local distinctiveness of Saffron Walden and Great Dunmow plus impact on transport movements, although it would depend on site locations
- D. Mixture of the above effects

Anglian Water Services is the sewerage undertaker for part of Uttlesford District including Great Dunmow and Saffron Walden and a number of the key villages and Type A villages. All development sites located within Anglian Water's area will require a connection to the foul sewerage network. The need for new and improved infrastructure will be dependent upon the proposed connection point(s) to the network. The following comments are made on the 4 scenarios

- A. The implications of this scenario would be dependent upon the location of any new settlement. Therefore we are unable to comment further at this stage.
- B. This would have a greater impact on Water Recycling Centres which serve villages within Anglian Water's area of responsibility than Scenarios A, C and D.
- C. This would have a greater impact on Saffron Walden and Great Dunmow Water Recycling Centres than Scenarios A, B and D.
- D. This would have a greater impact on Water Recycling Centres which serve villages within Anglian Water's area of responsibility than Scenarios A and C.

Essex County Council makes the following comments on the first 4 scenarios

- A. A new settlement is considered sustainable as it enables the infrastructure necessary to support a new community to be delivered effectively;
- B. ECC is concerned that this scenario would promote greater volumes of traffic growth on the district's rural road network; detailed considerations needs to be given to the availability of school places at the existing primary schools, whether the scale of development is sufficient to warrant a new school, whether the development would enable children to walk or cycle to school.

- C. In Saffron Walden this would generate sufficient demand for a new primary school. In relation to secondary schooling in Saffron Walden, in the long term this would lead to fewer pupils from outside the school's priority admissions area but in the medium term is likely to lead to the displacement of some pupils from within the priority admission area. Any children displaced from SWCHS would need to be accommodated at The Joyce Frankland Academy.
- In Great Dunmow this would generate sufficient demand for a new primary school. In relation to secondary schooling in Great Dunmow, if the existing school is relocated as previously proposed, work would need to be undertaken to ascertain if it could accommodate additional pupils or whether any adjustments to the school's paa could lead to another new school accommodating some of the additional pupils that would be generated by the additional housing.
- D. From a highways and transportation perspective this is the least sustainable option, as it would make the deliverability of sustainable transportation challenging, and also accommodating development within the more remote rural locations throughout UDC would require intervention. It is also the least sustainable for delivery of future education services and facilities as relatively small scale housing development is unlikely to fund anything other than the expansion of an existing school which can be difficult and/or expensive.

South Cambridgeshire District Council state that it is important that Uttlesford plans to meet its full objectively assessed housing and employment needs, taking account of the need for a measure of flexibility. Close working under the duty to cooperate is necessary in regard to housing, employment and transport matters. The boundary between the two councils is also the boundary between two housing market areas and the relationship between the two should be considered.

Hertfordshire County Council comment that development on the edge of Bishop's Stortford included in scenarios B and Dequate to a need for an additional 1FE of both primary and secondary school places which would be in addition to any additional school requirements arising out of development in East Hertfordshire.

The **Great Dunmow Neighbourhood Plan Steering Group** do not accept the figures fed into the Objective Housing Needs Assessment as they concentrate on national need rather than local need, so we reject all scenarios.

Stansted Neighbourhood Plan Steering Group consider that Scenarios A and D seem more likely to be achievable without significant damage to the intrinsic character and appeal of Uttlesford's towns and villages. Scenarios B and C would probably inflict significant harm on the existing towns and villages.

Essex Wildlife Trust refers to their responses in earlier questions. **The Local Group of the Trust** refers to their answer to question 12 and consider that only a New Town based adjacent to Saffron Walden could ever be considered sustainable; all other options are just bolting-on housing in dribs and drabs, exacerbating existing infrastructure shortfalls.

Sustainable Uttlesford's first preference is for the allocation of housing in the plan period is to a single settlement but they are concerned about the deliverability and viability of the developing a new settlement within a single local plan period. They therefore consider that

the council should develop a 30 year strategy to ensure the viability and deliverability of a new settlement.

We Are Residents believe that the effects of this level of development under any of scenarios B to D would be unsustainable and would drastically change the nature of the existing settlements. We do not see how 1,500 new homes can possibly be accommodated in Saffron Walden sustainably.

The Stebbing Society considers that the figure cannot be applied generally particularly where Type A villages are concerned and each location must be considered on its own merits. Under Scenario A there is a danger that this rate cannot be met anyway and hence the 5 year plan could not be met., The Society note the Parish's response and would have to be guided by them.

The Ickleton Society considers that for Areas of Search 1 and 2, this number of houses and rate of build would not justify the provision of a school, health centre and other facilities for several years and it is difficult to see that existing services in Great Chesterford could absorb the additional pressure on their resources in the meantime.

The Thaxted Society considers that figures set out for housebuilding nationally, either by government or by the planning inspector locally, are those against which we consider Thaxted's contribution. They are therefore broadly supportive of the inspector's figure of 580 houses per year.

Birchanger Wood Trust considers that this level of construction has never yet been achieved but consider it a challenge which could be met by defining a designated new village somewhere in the District.

Bishop's Stortford Civic Federation consider that all scenarios should have 500 dwellings on the edge of Bishop's Stortford removed from them with the number being reallocated to other settlements.

Hands off Thaxted make the following comments on the scenarios

- A. the most sustainable option if the new settlement is located near to the M11 and main line railway stations with the proviso that the settlement is well away from the A120 and Bishops Stortford .
- B. not sustainable in respect of the villages. Further congestion will be generated in Bishops Stortford which will be exacerbated by the planned major developments in Braintree which will feed more traffic going west onto the A120 into Bishops Stortford and the planned developments around Bishop's Stortford by East Herts.
- C. will cause further degradation of Dunmow and Saffron Walden
- D. A new settlement of 500 units is a large housing estate not a settlement. Appropriate infrastructure could not be funded from a development of this size and it would therefore need to be bolted onto an existing settlement

Essex Bridleways Association has no comment

TOWN AND PARISH COUNCILS

Arkesden Parish Council is concerned that the scenarios only consider a 15 year period and do not reflect the full plan period from 2011 to 2033.

Birchanger Parish Council consider this is too high a number and probably not achievable.

Chrishall Parish Council supports scenarios D and E. 750 dwelling spread across the district is NOT supported. The parish council suggest that the Local Plan inspector recommended at least one new settlement.

Clavering Parish Council considers that all future developments must be sustainable with complete infrastructure being provided.

Elmdon&Wendens Lofts Parish Council are concerned that scenario A in respect to Areas of Search 1 and 2 would impact the surrounding local communities with the need to increase infrastructure.

The Parish Councils of Elsenham, Henham, Ugley and Widdington object to the use of 750dpa for the scenarios and it does not reflect the SHMA. This would result in a smaller housing requirement which although still a substantial number could be accommodated by growth at Saffron Walden and Great Dunmow or a single new settlement.

Felsted Parish Council consider that scenario

- A. Raises objection in principle because it will cause the most negative impact on nearby towns and villages, and will require significant infrastructure modification. It removes the ability to respond to smaller local development needs in sensitive ways.
- B. Would have a too greater impact on villages
- C. would need substantial enhancement to the roads, utilities and facilities of the towns
- D. Is the most equitable solution as it gives maximum flexibility for villages of all sizes to respond to their own development needs to deliver sustainable growth, although the capacity of roads in and between the settlements and the strategic transport network would need to be extensively reviewed, together with the capacity of utilities and of bus services etc.

Great Canfield Parish Council makes the following comments on the Scenarios

- A. Would have the best outcome for employment, housing mix and leisure and open spaces.
- B. Concerned that the correct levels of infrastructure, employment, housing mix, leisure facilities and open space could be provided with this form of development.
- C. That there is no evidence to show that towns can grow sustainably to accommodate further homes, particularly on road and rail infrastructure.
- D. Concerned that the correct levels of infrastructure, employment, housing mix, leisure facilities and open space could be provided with this form of development.

Great Chesterford Parish Council considers that the housing requirement should reflect the SHMA and the existing supply include the windfall allowance. The following comments are made for each of the scenarios

- A. Not considered to be deliverable in the plan period

- B. Not a sustainable strategy as this does not provide development in the two main towns of Uttlesford with the best range of services and facilities, and does not provide any significant infrastructure improvements due to piecemeal development.
- C. Their Preferred Option. This is considered the most sustainable strategy as it concentrates development in the two main towns and can provide the necessary infrastructure required to mitigate any impact of development due to the proposed scale of proposals.
- D. Considered too piecemeal with no provision of significant infrastructure.

Great Dunmow Town Council and Saffron Walden Town Council consider the annual rate could well be higher and it is therefore appropriate to plan for a possible 'worst case scenario' so as to minimise the prospect of an eventual annual growth figure being higher than anticipated and resulting in the development strategy for the plan having to be revisited. Given the need to plan for beyond 580/yr, scenarios B and D are therefore not feasible. Scenario C is not feasible because of the detrimental impact on character and setting of the towns and they do not have the requisite infrastructure and delivery of the infrastructure in a cost-effective manner would result in the scope for much greater development the delivery of which would thus change their character even more. If it is accepted that it is appropriate and, indeed, prudent to not be limited to 580/yr then scenarios A and E emerge as the only feasible option. Given the long lead-in time for a new settlement, the issue then becomes how is it possible to ensure that sufficient new dwellings are delivered in the interim, which is considered in response to question 10.

Little Chesterford Parish Council considers that the numbers of homes that a village has already contributed needs to be taken into account. Although the numbers in Little Chesterford are small, they have a proportionally larger impact in such a small village. The emerging Neighbourhood plan needs to be a consideration for future development.

Little Easton Parish Council consider that suitable development in existing towns and key villages should be combined with new settlement villages in a balanced way.

Newport Parish Council have grave reservations about delivery of 580 dwellings per year without advance infrastructure improvements.

Quendon and Rickling Parish Council consider that Options A-D all fall significantly short of the 12500 homes target and options B&D place too much pressure on smaller communities that do not have the infrastructure to cope with this level of development.

Stansted Mountfitchet Parish Council considers that scenarios A and D seem more likely to be achievable without significant damage to the intrinsic character and appeal of Uttlesford's towns and villages. Scenarios B and C would probably inflict significant harm on the existing towns and villages.

Stebbing Parish Council considers that these scenarios present an 'All or nothing' for Type A villages which is not acceptable. These scenarios are unjust and obviously biased towards a new settlement. The other scenarios appear to be designed to set the different areas against each other.

Strethall Parish Meeting consider that this is just achievable, but not in the form of one development 'dumped' in the middle of open countryside for all of the powerful reasons

given i.e. unsustainable, socially negative and divisive and completely economically unviable.

The Sampfords Parish Council prefer Scenario A

Thaxted Parish Council makes the following comments on the scenarios;

- A. This has the least impact on the environment;
- B. This puts too much pressure on Bishop's Stortford;
- C. This would be impossible for Saffron Walden and Great Dunmow;
- D. Great Dunmow and Saffron Walden are less likely to be damaged. This would be better than developing the villages.

Ickleton Parish Council in South Cambridgeshire consider that as far as new settlements in either Areas of Search 1 and 2 are concerned, this rate of build would not release enough funding at early enough stages to secure the provision of educational, health and other facilities at the time necessary for these communities to function in a cohesive way, and existing services in Great Chesterford or other settlements nearby would not be able to cope with the demand from residents in the new settlements. .

DEVELOPERS, AGENTS AND LAND OWNERS

A number of developers consider that the Council should plan for higher levels of growth to allow people to be properly housed; and to address affordability issues. Some developers also emphasised the need for flexible options that produce a 5 year land supply going forward.

The table below summarises the main points made in objection to or support of the 4 Scenarios A to D.

	Objection	Support
A	<ul style="list-style-type: none"> • Slow delivery on new settlement site • Unable to demonstrate 5 year land supply • Vulnerable on deliverability • Deprives remainder of district from sustainable growth • Scale of infrastructure required 	<ul style="list-style-type: none"> • Preserves character of District's towns • Critical mass to support infrastructure delivery
B	<ul style="list-style-type: none"> • Would disperse growth thinly across a number of relatively unsustainable locations. • Includes less sustainable locations and excludes more sustainable locations such as the towns • Unlikely to support new infrastructure. 	<ul style="list-style-type: none"> • Greater spread of options • Proportional growth of the villages • Sustain existing services and facilities • Makes good use of existing infrastructure. • Early delivery of sites
C	<ul style="list-style-type: none"> • Would cause serious detriment to the character and integrity of these market towns • Would not meet needs of rural areas 	<ul style="list-style-type: none"> • Towns are sustainable locations

D	<ul style="list-style-type: none"> • Will not deliver the same critical mass as a large new settlement • May not deliver infrastructure 	<ul style="list-style-type: none"> • Greater spread of options • Proportional growth of the villages • Meet different needs • Provide variety of development types
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COMMENTS BY INDIVIDUALS

A number of individuals consider the scale of growth (580dpa) too great and would have a detrimental impact on the character of the district and its infrastructure. The most frequent comment relates to infrastructure/ lack of or the need for new infrastructure to support new housing.

	Objection	Support
A	<ul style="list-style-type: none"> • Slow delivery • Impacts on nearby settlements/villages character and services especially if infrastructure not timely • More out commuting • Not compatible with character of district • Lack of choice in where to live • Out of keeping with rural character of the area 	<ul style="list-style-type: none"> • Sustainability/best planned/optimize opportunities for public transport • Minimise urban sprawl • Avoids piecemeal development • Comprehensive delivery of infrastructure • Provision of new Secondary school • Less impact given constraints in towns and villages especially in Saffron Walden • Needs to be accompanied by offsetting allocations in early years
B	<ul style="list-style-type: none"> • Too much for villages to absorb/huge scale of increase • Detrimental impact on villages/heritage • Lack of infrastructure education/health • Pressure on Bishop's Stortford • Too general 	<ul style="list-style-type: none"> • More finely grained settlement hierarchy for smaller villages might assist/towns take more • B and C logical to ensure enough growth to occurs in next 5 years
C	<ul style="list-style-type: none"> • Limitations of towns for edge of town growth –impact on heritage/transport • Already significant commitments • Lack of infrastructure - transport • Too general 	<ul style="list-style-type: none"> • Focus on towns/access to services, facilities and infrastructure • B and C logical to ensure enough growth occurs in next 5 years • Lack of infrastructure in villages • Spread between the major towns along the M11 corridor • If take account of poor road infrastructure in Saffron Walden
D	<ul style="list-style-type: none"> • Scale of new settlement too small • May not deliver infrastructure • Detrimental impact on villages • Too general/too much a compromise 	<ul style="list-style-type: none"> • Spreads development around district fairest option • Fairest if takes account of recent completions • Potential for organic growth • May be a better option with say 2 smaller new settlements

Villages

What issues and evidence should the Council consider when assessing the potential for development in the villages? Please reference any specific villages in your response.

This question was responded to by 416 people/organisations. The following is a summary of the key points raised by the representations. To read all the representations in full please go to <http://www.uttlesford.gov.uk/article/3038/Planning-Policy-Consultations>.

STATUTORY BODIES AND OTHER GROUPS

Essex County Council – they express concerns about development at Elsenham and the impact it may have on the rural road network. They recommend that consideration be given to the scale and quantum of growth than can be delivered within the village locations; it is more challenging to deliver alternative sustainable travel modes.

The gradual encircling of development within village locations may have detrimental impact of the historic cores. It may impact the setting or significance or force inappropriate development within the village cores. They scale and type of development should be controlled in villages with significant historic cores such as Thaxted, Newport and Gt Chesterford.

ECC recommends that the evidence base for surface water flood risk in the SA incorporates the most up to date source of information for surface water flood risk.

UDC should work with ECC to ensure the availability of school places is considered, whether schools are capable of expansion, whether schools are capable of expansion; whether the scale of development warrants the expansion of existing school or new school provisions and ensure the delivery of safe travel routes.

Early years child care provision needs to be considered.

Historic England – the Council should consider the possible impacts on the significance of heritage assets including impact on their setting. Updating the Historic Settlement Character Assessments should be carried out to help inform the process.

Anglian Water Services Ltd – the Council should consider the implication of additional development at the identified villages for water recycling centres and the foul sewerage network within Anglian Waters area of responsibility.

Sustainable Uttlesford supports incremental development in any village ie maximum 10%.

Hands off Thaxted – the Council should consider the effect on the historic setting and landscape views. Evidence should include the effect of new housing on the capacity of schools and health centres.

The Hundred Parishes Society – high priority should be given to working with, respecting and where possible, enhancing the historic environment.

National Federation of Gypsy Liaison Groups – the issue of whether traveller sites should be accommodated within or on the edge of settlements

Stebbing Society – oppose scenario A. any development should be matched with a corresponding improvement in associated infrastructure. Type A villages should have smaller groups of development to ensure community cohesion.

Thaxted Society – Thaxted's quality of life and sustainability is bound up in both its setting and history and these two important benchmarks are lost to creeping urbanisation.

Essex Wildlife Trust Uttlesford Local Group – if any settlement is not sustainably located then how can further development there be considered sustainable? Housing development for local needs as low cost housing may be acceptable but nothing else.

The Ickleton Society – there is no car park at Gt Chesterford rail station, no northbound access to or southbound exit from the M11.

Birchanger Wood Trust – add on housing is not a sensible or sustainable plan. It does no good to the existing residential population and does not provide the necessary infrastructure or integration for new comers.

TOWN AND PARISH COUNCILS

Stansted Mountfitchet Parish Council and Stansted Neighbourhood Plan Group the scale of development in type A villages should take account of existing infrastructure strains. The road infrastructure in and around Stansted is suffering from wear and tear caused by heavy traffic. The hill top of Silver Street is barely wide enough for two lorries to pass. Cambridge Road has poor layout and suffers from on street parking. Grove Hill is a cause of congestion.

Strethall Parish Meeting villages with excellent facilities will inevitably take more new housing than those with less as the council must still apply sustainability, social benefit and economic viability to its decision when looking at development in the villages.

Saffron Walden Town Council – two policies should be drawn up, one should set out the criteria against which proposals to develop housing in or adjacent to villages would be assessed. The other would be an exceptions policy setting out the criteria that proposals for affordable housing would have to meet.

Felsted Parish Council It is important that the character of the villages be maintained. The village plan is very relevant and should be taken into account. A Neighbourhood Plan is being written and should be considered.

Little Dunmow Parish Council Flich Green has reached its limit and further expansion would risk coalescence with Little Dunmow or Felsted. The primary school is oversubscribed and roads are not suitable. Flich Green should not be considered a Type A village.

Henham, Elsenham, Widdington and Ugley Parish Councils there is limited capacity to accommodate any more than a small extra quantum of growth in the villages. The withdrawn plan made substantial allocations in Elsenham and Henham and these have been converted in permissions. These are significant figures given the size of the settlements and constraints and will take some time to absorb them so no further allocations are needed or justified.

Wendens Ambo Parish Council some villages may have a primary school but there are not sustainable locations for expansion given their rural location and lack of infrastructure. UDC should ensure most effective use of UDC or ECC land.

Newport Parish Council in Newport the existing infrastructure has been totally disregarded despite bringing this to the attention of UDC officers. UDC should demonstrate listening and reacting to the comments and proposals of Newport PC.

Stansted Mountfitchet Parish Council The road infrastructure around Stansted Mountfitchet is suffering from the wear and tear caused by heavy traffic flow. Cambridge Road is suffering from poor layout and on street parking. There is increased congestion on Lower Street.

Birchanger Parish Council – preserve the character of village highway issues. Can the nature of the roads cope with more traffic. Infilling only within village envelope.

Little Easton Parish Council Great Chesterford has the potential for further development without harm to its character. Elsenham has the potential for substantial development without harm to its character and is well located for employment and services. Care should be taken not to harm the character of Henham. Type A villages should consider extending their development boundaries to include additional development that will complement the existing village.

Great Chesterford Parish Council the location of SAM should be taken into account, Gt Chesterford is constrained by river tributaries which could lead to potential flood risk, low population size compared to other key villages, historic core and CA, sensitive landscape, development already accepted and the emerging NP should be considered.

Little Chesterford Parish Council – in relation to Little Chesterford the location of SAM and the historic cores of the village and hamlet should be taken into consideration as should the sensitive surrounding landscape and flood plains of the River Cam. The NP goes into more detail and should be taken into consideration.

Great Canfield Parish Council – Traveller policies do not appear to have been included within the issues and options for development of villages.

Thaxted Parish Council – the capacity of the village in terms of services and infrastructure, the character of the natural landscape, access to education, transport and health services all need to be considered. Thaxted is a tourist destination and its attraction is the historic buildings – this should be preserved.

Quendon and Rickling Parish Council the villages cannot offer the infrastructure that is required. New development changes the character and environment of the villages. Many have had an unfairly high percentage increase in the number of new houses with no new infrastructure provision. The Quendon and Rickling parish Plan has been left off the list of parish plans considered. NP are expensive and it is unrealistic for smaller Parishes to achieve.

Great Dunmow Town Council – given the scale of growth proposed, development in the villages will not be able to make any significant contribution towards its delivery without changing both their scale and character drastically. Two policies should be drawn up, one

should set out the criteria against which proposals to develop housing in or adjacent to villages would be assessed. The other would be an exceptions policy setting out the criteria that proposals for affordable housing would have to meet

Stebbing Parish Council – development in type A villages should not be in estates but rather in small areas of 6-10 houses. This has been proven in Stebbing to contribute to community cohesion. Large estates tend to be inward looking and integrate less well into traditional village life. At present there are planning permissions for 36 houses in Stebbing.

Great Easton and Tilty Parish Council – there are already three large areas of search immediately around the Great Dunmow area. Currently there is an appeal in process for 700 houses at Little Easton and also a potential application from Land Securities. This development is in our neighbouring parish, but would without doubt have a direct effect on the parish of Great Easton

Elmdon and Wendens Lofts Parish Council – additional housing in Chrishall will create increased traffic through Elmdon and along the B1039. Increased traffic bound for the M11 is likely to go via Elmdon and Duxford as this option allows easier access into the A505.

Clavering Parish Council – sustainability of transport links to access rail links, health care and employment. Clavering lacks facilities for further expansion.

DEVELOPERS, AGENTS AND LAND OWNERS

- The majority of the villages are remote from services and facilities.
- Stansted Mountfitchet is a good location for growth as it has a number of facilities
- land owner promoting site in Birchanger (Call for Sites reference number 01Bir15)
- UDC should apply the SA and SEA objectives to the key villages. Villages that have fewer adverse impacts when assessed against the objectives should be allocated a greater proportion of development.
- An assessment needs to be made regarding the scope of existing services to grow
- Land owner promoting site in Mole Hill Green. Promoting a proportionate approach to ensure villages have a level of organic growth
- Land owner promoting site at Great Chesterford (Call for Sites reference number
- The ongoing viability and vitality of villages should be considered.
- Increasing the number of sites across the District with allocations for residential development will increase the rate of housing completions
- Land owner promoting a site at Sion House (Call for Sites reference number 02Bir15)
- Development based on the existing hierarchy will distribute growth to all areas
- Development needs to be provided in the villages in order to meet the housing need in the early years of the plan.
- Land owner promoting a site at Pines Hill Stansted (Call for Sites reference number 02SSa15)
- Land owner promoting site west of School Lane Newport (Call for Sites reference 05New15)
- The hierarchy approach to villages requires further analysis on a village by village basis
- Landowner promoting land at Hatfield Heath (Call for Sites reference number 03HHea15)

- The sites put forward under the Call for Sites should be used as the starting point for allocating land
-

COMMENTS BY INDIVIDUALS

Associated with the response from Henham/Elsenham/Ugley/Widdington Parish Councils

- Infrastructure at capacity – schools and health facilities at capacity
- Local roads cannot cope
- The Council needs to spell out a clear hierarchy when it selects sites
- Villages should only take developer proportionate to their size
- New settlement is more sustainable than village growth
- Villages natural and built environments should be protected
- Villages have had more than their share of growth
- Road access to villages needs to be considered
- Extra parking spaces would be required due to car dependency
- The Council should consider the views of residents
- Affordable homes in villages are needed
- Avoid coalescence with neighbouring villages and towns
- Type B villages should have minimal development in order to retain their contribution to the beauty of the area
- Villages have sensitive surrounding landscapes
- Development should be controlled to prevent speculative applications
- Local housing need should be established using housing need surveys
- Homes for older people should be provided
- Controlled increases in housing stock make for better community cohesion
- In fill development only
- Key villages are better equipped to take additional housing
- Development should be sensitive to its surroundings
- Existing planning permissions must be taken into consideration
- Some Type A villages are more constrained than others – each village should be considered in relation to its sensitivities
- Limited public transport in some villages
- The selection of villages in the hierarchy categories is poorly thought through.
- Consideration should be given to traffic flows on junction 8 M11
- Preservation of village character is important
- Train links are important
- Key villages should take some development so long as it is sensitive to its surroundings

Question 17

Development at 750 dwellings per year

What do you think the implications of development under scenarios E to G would be, at around 750 dwellings per year.

This question was responded to by 361 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to <http://www.uttlesford.gov.uk/article/3038/Planning-Policy-Consultations>.

STATUTORY BODIES AND OTHER GROUPS

Greater London Authority Testing a range of development scenarios including some that exceed the levels recommended by Inspector is considered appropriate. The use of population projections based on 10 year migration trends in the joint Strategic Housing Market Assessment is also welcome and over the future development of your local plan we would like to be kept informed on how the Council is seeking to reconcile housing supply and need in terms of NPPF requirements.

Historic England Note 750 dpa has implications for the historic environment/note the findings of the SA and makes the following comments on the scenarios

E) Could have positive and/or negative impacts depending on its location and how it alleviates pressure for growth in existing settlements. It would seem harder to locate two new settlements without some degree of harm to the historic environment, given the richness and geographical spread of heritage assets within the district.

F) Potential negative implications for the historic environment depending on location.

G) Mixture of the above effects, albeit with the potential for greater impacts than Scenario D as more housing would have to be delivered.

Anglian Water Services makes the following comments on the scenarios;

E) depends on location of any new settlements/unable to comment more this stage.

F) greater impact on Saffron Walden/Great Dunmow Water Recycling Centres and water recycling centres which serve villages within Anglian Waters area of responsibility than Scenarios E and G.

G) greater impact on Saffron Walden and Great Dunmow Water Recycling Centres and water recycling centres which serve villages within Anglian Waters area of responsibility than Scenarios E and G.

Essex County Council makes the following comments on the scenarios

E) Enables delivery of necessary infrastructure in planned way to support the new community. The larger settlement proposal would facilitate transport mitigation. Size important for secondary school/plans for growth beyond plan period.

F) Concern about growth being spread throughout UDC as may not facilitate appropriate highway mitigation. For education considers that F) is an amalgamation of Scenario B and C, therefore see the response to question 16.

G) Least sustainable in transportation terms making delivery of sustainable transportation challenging while rural road network in UDC may also be an issue requiring intervention. Also is likely to make the provision of additional school places more difficult to deliver and expensive/unlikely to fund anything other than the expansion of an existing school.

Hertfordshire County Council comment as per Q16 that development on the edge of Bishop's Stortford equate to a need for an additional 1FE of both primary and secondary school places which would be in addition to any additional school requirements arising out of development in East Hertfordshire. Regards E Herts identified a potential requirement for a new 2FE primary school and a new 6FE secondary school to meet the future need in the town the additional housing located on the edge of Bishop's Stortford within UDC has not been included within those identified requirements.

Birchanger Wood Trust Upon analysis of earlier years, this scenario is not possible to achieve.

Bishop's Stortford Civic Federation All scenarios should have 500 dwellings on the edge of Bishop's Stortford removed from them with the number being reallocated to other settlements.

Essex Wildlife Trust refers to their responses in earlier questions.

Essex Wildlife Trust Local Group only a New Town adjacent to Saffron Walden could ever be considered sustainable; all other options are just bolting-on housing in dribs, exacerbating infrastructure shortfalls. None of these scenarios is worthy of consideration.

Hands Off Thaxted Implication is further destruction of UDC landscape and its historic towns and villages. Others are increased road chaos with commuters heading for the M11 and main line railway stations via narrow country roads and lanes, lack of education places at primary schools in most villages and reduced service at health centres.

Helena Romaine Secondary School NPPF clear on significantly boosting supply of housing/option of providing 750 dwellings per annum should be favoured. If plan delivers 750 dpa this widens choice of high quality homes/opportunities for home ownership. It increases opportunities to create sustainable, provides inclusive and mixed communities, and better placesplan to account for changing circumstances. Also beneficial economic and social impacts, delivery of development at a scale within Great Dunmow capable of part-funding the replacement of HRS on the proposed site with a newer facility, which is imperative for the long term sustainability of Great Dunmow. Question SA/SEA for scenario suggest 750 dwellings would inevitably, result in significant impacts on a number of environmental sustainability objectives, including biodiversity as not clear how this

conclusion reached/would not inevitably encroach into areas that are protected for their ecological value, or result a negative impacts on such areas. Development has the potential for ecological enhancements/overall biodiversity gain. Also, question SA/SEA on intrinsic harm to landscape character. For a new settlement option recognise potential negative environmental, social and economic impacts for SA/SEA in response to Q 10.

The Stebbing Society No justification to go beyond the identified objective need for 580dpa. There is no justification to accommodate growth from neighbouring authorities. It is completely unsustainable that Uttlesford could deliver that amount of housing per year.

G W Balaam & Son Scenario G would be of the greatest benefit to the residents of Uttlesford since it would allow all the individual settlements to expand. This would provide unique settlements to provide for very differing needs and you will not tend to get the Taylor Wimpey (or any other large scale house building company) effect of homogenised homes that could be built anywhere in the country.

Ridgeons We do not have any specific observations other than a growth strategy that is heavily reliant on 2 new settlements only has deliverability question marks.

Stansted Neighbourhood Plan Steering Group If this level of development proves to be necessary then Scenarios E and G appear to be the only tenable ones to us. Scenario F would, we believe, run the risk of destroying the intrinsic character of Uttlesfords towns and villages, which make it such a pleasant and desirable place to live.

The Crown Estate: Object to two New Settlements would compound the infrastructure and funding issues as discussed in response to Question 10. The Crown Estate considers the delivery of 300 dwellings per year could be optimistic and questions if UDC will be able to maintain a 5 year housing supply of land in the early years of the plan period with this scenario.

F)The Crown Estate supports this approach as given the rural nature of the district, it is necessary for housing development to be directed to Key Villages and Type A Villages to meet the housing need arising. The Crown Estate considers this to be best option for a steady supply of new housing, and land west of Station Road, Elsenham, and land north of Stansted, Elsenham, are available and suitable, and could deliver 80-100, and to 40 residential dwellings, respectively.

G) Support - provides a more even distribution of housing across the district to a variety of different sized settlements. This is a less risky approach to housing delivery, as it assumes housing will be delivered on a number of different sites providing a more effective buffer to maintain a five year supply of housing, should one site not come forward for housing.

The Thaxted Society We welcome the consideration of 750 dwelling per year as in our experience build out rates are normally significantly slower than housing trajectories indicate with the size and complexity of schemes and local market factors playing a big role in deliverability. As set out in Q10/Q16 examples of build out rates for larger schemes in the district have historically been less than 150 dwellings per annum. By increasing the number, variety and location of development sites, the build out rate can be maximised resulting in a more robust and realistic 5 year housing supply. The issues set out in Q16 above apply to the development of 750 dwellings. In any event an increase in the number of dwellings per

year will not result in a corresponding increase in deliverability of housing within a two new settlement scenario as this will always be restricted by its complexity, size and local market competition from other sites. It would therefore be necessary to consider increasing the proportion of new development on other sites around existing settlements to make up the shortfall. Likewise as outlined above the constraints associated with the smaller villages and Bishops Stortford make these in our view unviable options at the levels proposed. The only practical solution is to concentrate the majority of development on sites in existing key villages (including Hatfield Heath) and the market towns.

We Are Residents We believe the effects of this level of development under any of scenarios from B) would be unsustainable and would drastically change the nature of the existing settlements. We do not see how 1,500 new homes can possibly be accommodated in Saffron Walden sustainably. Again, without being told where the 5,000 committed new homes are to be located we cannot comment fully on the other scenarios, but they do not appear to us to be likely to be sustainable. Scenario E appears to be the only one which might be sustainable.

TOWN AND PARISH COUNCILS

Birchanger Parish Council Impossible. Must take into account nature of the area, which is rural. People from urban communities not keen to come here. Poor rail service for people now trains already overcrowded.

Clavering Parish Council two specific new settlements would accommodate better infrastructure and protect the countryside and also maintain character of existing historic market towns and villages in the long term.

The Parish Councils of Elsenham, Henham, Widdington, Ugley This level of housing is way above the carefully justified and calculated ORS report covering the whole HMA - 750 is 32% higher than the agreed figure of 568pa. (itself 32% higher than the last adopted development plan figure of 430pa) 750 pa is so unacceptable and unsupported.

Felsted Parish Council For reasons similar to those in response to Q16, Scenario G would be the least objectionable, but it still includes aspects already rejected above in scenarios A-C so do not support any of these scenarios. Should this option be further explored due to requests to take housing build from adjoining districts then this specific point should be independently reviewed/offered for referendum before agreement as impact so significant.

Ickleton Parish Council As far as new settlements in either Areas of Search 1 and 2 are concerned, this rate of build would not release enough funding at early enough stages to secure the provision of educational, health and other facilities at the time necessary for these communities to function in a cohesive way, and existing services in Great Chesterford or other settlements nearby would not be able to cope with the demand from residents in the new settlements. In consequence, the locations are not viable for new settlements.

Great Chesterford Parish Council The Examination Inspector was clear on his findings in relation to a higher housing provision "An increase in provision of about one third would bring provision to about 700 p.a., or an additional 3,500 dwellings - I find no convincing evidence to support an increase on that substantial scale" para 1.10. The Joint SHMA (July 2015) and agreed by Uttlesford in September 2015 provides robust evidence for an annual requirement

of 568 dwellings. The Parish Council considers it is unnecessary to provide an analysis of development at 750 dwellings per year.

Great Dunmow Town Council and Saffron Walden Town Council consider Q16 and Q17 to be linked. Consider the annual rate could be higher and it is appropriate to plan for a possible 'worst case scenario' so as to minimise the prospect of an undershoot resulting in the development strategy having to be revisited. Given the need to plan for beyond 580/yr, scenarios B and D are therefore not feasible. That means scenario F (focus on towns) is not feasible as it comprises scenarios B and C) nor is G (hybrid 2 - because it is similar to F plus a new settlement). Also (as per C) detrimental impact on character and setting of the towns and they do not have the requisite infrastructure and delivery of the infrastructure in a cost-effective manner would result in the scope for much greater development the delivery of which would thus change their character even more. Scenarios A and E emerge as the only feasible option if accepted go beyond 580/yr. There is a need to plan beyond the plan period for new settlements. Given the long lead-in time for a new settlement, the issue is how is to ensure sufficient new dwellings are delivered in the interim/see response to question 10.

Little Chesterford Parish Council is unable to see any compelling evidence that this increased provision is required.

Little Easton Parish Council are doubtful that there will be consumer demand to actually achieve the delivery 750 dwellings per year but, even if it could be achieved, it would totally destroy the character of the district.

Newport Parish Council has grave reservations about delivery of 580 dwellings per year without advance infrastructure improvements. To progress without these could lead to total traffic chaos, and overload of all services particularly sewerage.

Quendon & Rickling Parish Council preference is for Option E - we see it as the only way to provide long term development to achieve the required target of 12500 homes by 2033. It is also the only way to ensure that the necessary infrastructure is provided alongside the huge number of houses required.

Rayne Parish Council- Various suggestions were made in the Consultation supported by information in the Sustainability document. - These are complex issue and it is thought unreasonable to expect members of the public to have a formulated and effective response.

Stansted Mountfitchet Parish Council If this level of development proves to be necessary then Scenarios E and G appear to be the only tenable ones. Scenario F would, we believe, run the risk of destroying the intrinsic character of UDCs towns and villages, which make it such a pleasant and desirable place to live.

Stebbing Parish Council There is no justification to go beyond the identified objective that answers the need for 580dpa. There is no justification to accommodate growth from neighbouring authorities. It is completely unsustainable that UDC could deliver that amount of housing per year.

Strethall Parish Meeting Realistically, our opinion is that it is impossible to achieve and also not necessary. But if attempted the only real chance is for the majority to be smaller homes spread over the district because of the greater density that can be achieved.

Thaxted Parish Council This increased number of dwellings arises from UDC considering taking on another authority's development shortfall and is completely unacceptable.UDC should not entertain accepting need from neighbouring authority areas. F & G would cause significant damage to the villages as the infrastructure is not in place to cope with these volumes. Arguably, Saffron Walden and Great Dunmow could cope better. A new settlement is favoured.

The Sampfords Parish Council prefers scenario A, with the New Settlement taking the addition development brought about by the increase in the construction ratio to 750dpa.

Wicken Bonhunt Parish Meeting support scenario E Two new settlements providing UDC manages the developments ensuring that the facilities, infrastructure and employment opportunities meet the needs of the residents.

DEVELOPERS, AGENTS AND LAND OWNERS

A number of developers consider that the Council should plan for higher levels of growth to allow for greater economic growth, make-up historic shortfall, enable people to be properly housed, and to address the affordability issues. Some developers also emphasised the need for flexible options that produce a 5 year land supply going forward.

The table below summarises the main points made objecting to or in support of the 3 Scenarios E to G.

	Objection	Support
E	<ul style="list-style-type: none"> • Slow delivery on new settlement site • Unable to show 5year land supply • Vulnerable on deliverability • Deprives remainder of district from sustainable growth • Scale of infrastructure required/phasing needed 	<ul style="list-style-type: none"> • Preserves character of District/historic towns and villages e.g. visual appearance • Critical mass to support infrastructure delivery • Provision of secondary school, primary schools, country park, GI, Biodiversity, shops, employment, public transport provision • Provides large scale growth in line with NPPF • Opportunities for well planned growth/ garden city design principles
F	<ul style="list-style-type: none"> • Would disperse growth thinly across a number of relatively unsustainable locations • Would cause serious detriment to the character and integrity of market towns • Includes less sustainable locations and excludes more sustainable locations such as the towns • Unlikely to support new infrastructure. • Would not meet needs of rural areas 	<ul style="list-style-type: none"> • Towns/larger villages are sustainable locations for growth • Qualify above regards Saffron and Great Dunmow infrastructure • Could refine approach/ reduce dispersal • Less reliance/risk on just one or two sites that have potential to stall • Proportional growth of the villages • Sustain existing services and facilities • Makes good use of existing infrastructure. • Early delivery of sites/deliver 5 year supply

		<ul style="list-style-type: none"> • Would meet needs of rural areas
G	<ul style="list-style-type: none"> • Will not deliver the same critical mass for benefits as a large new settlement • May not deliver key infrastructure such as a secondary school • Unacceptable environmental impacts on market towns and villages 	<ul style="list-style-type: none"> • Greater spread of options • Proportional growth of the villages • Meet different needs • Provide variety of development types

COMMENTS BY INDIVIDUALS

A number of individuals consider scale of growth (750dpa) is too great/relates poorly to evidence and impact on the district too detrimental. The most frequent comment relates to detrimental impacts on character especially heritage and impacts on infrastructure especially transport and schools.

	Objection	Support
E	<ul style="list-style-type: none"> • Slow delivery • Not compatible with settlement pattern/in open countryside • Impact on neighbouring settlements e.g. traffic/schools/health • Lack of choice in where to live • Potentially more expensive than a single new settlement 	<ul style="list-style-type: none"> • Argument for new settlement more acute than for scenario A-D • Sustainable avoiding development in more damaging locations e.g. constrained towns and villages • Avoids piecemeal development • Comprehensive delivery of infrastructure • Provision of new Secondary school
F	<ul style="list-style-type: none"> • Too much for towns/villages to absorb • Detrimental impact on traffic, schooling, health, other facilities • Lack of infrastructure • Pressure on Bishop's Stortford • Limitations of towns for edge of town development • Already significant commitments • Lack of infrastructure 	<ul style="list-style-type: none"> • All take a share of the growth/lessens impacts fairest solution • Comments made for B & C that are applicable for F
G	<ul style="list-style-type: none"> • Scale of new settlement too small • May not deliver infrastructure • Detrimental impact on villages • Lack of infrastructure 	<ul style="list-style-type: none"> • If dispersal strategy proves essential no need for new settlements • Comments made for D that are applicable for G

Question 18

Other Scenarios

Are there any other potential scenarios not shown which should be assessed by the council?

This question was responded to by 242 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to <http://www.uttlesford.gov.uk/article/3038/Planning-Policy-Consultations>.

STATUTORY BODIES AND OTHER GROUPS

Birchanger Wood Trust Maybe, the District can join with others in Essex, or even Hertfordshire or South Cambs to look to providing a solution across borders?

Essex County Council Environment, Sustainability, Highways welcomes discussions with UDC on any alternative scenarios that are considered following this consultation.

Essex Wildlife Trust Uttlesford Local Group The Council should assess a classic New Town beside Saffron Walden based on Audley End railway station. See answer to Q12.

Hands Off Thaxted A scenario of say 400 dwellings per year on the basis that adjoining districts to the south, west and north could accommodate any shortfalls from Uttlesford. These would probably be more sustainable as there are better communication links with London and Cambridge where employment opportunities are far greater than those in UDC.

TOWN AND PARISH COUNCILS

Elsenham, Henham, Ugley, Widdington Parish Councils A new settlement of only 3000 dwellings is the wrong number. If it is to have any chance of being self-contained, it would need to be twice that number even to have its own secondary school. There is no need to seriously consider Bishops Stortford (no indication that East Herts DC would agree to town extension); or to consider the villages. Therefore none of the scenarios are realistic there are really only two: a single new settlement of up to 7000 homes urban extensions to Saffron Walden (3850) and Gt Dunmow (3360) - some 50% of the option sites identified. This report finds either scenario is realistic and deliverable. However, of all the new settlement options (based on inspectors findings AoS 3 Elsenham is a non-starter), the land securities proposals for Easton Park (AoS7) stand out as suitable, sustainable and deliverable. For full response please see attached document.

Felsted Parish Council House building over the last 10 years has been close to the annual rate identified as required over the new plan period. A scenario should be developed that replicates this (or is identified from the existing scenarios). What has worked over the last 10 years is likely to offer a good option to learn from and build upon for future needs. Consider area west of Audley End. There are no radical new ideas being considered. Where, for example, is an idea to build based on an M11 spur, with an appropriate rail link delivering road and rail access designed for purpose?

Great Dunmow and Saffron Walden Town Councils

Other potential scenarios may emerge from combining elements of those existing if this proves necessary to ensure continuous delivery. All scenarios to be considered will, however, need to be the subject of rigorous and objective testing through a Sustainability Appraisal to ensure the prospect of sustainable development and be capable of satisfying the local plan Inspector accordingly.

Little Easton Parish Council Co-operation with Braintree and South Cambs Districts would provide the potential for new settlements that can have early-phase delivery of homes in Uttlesford, the required infrastructure to support the new settlements and carefully planned expansion of existing settlements in a balanced way.

Newport Parish Council The provision of better junctions and surfaces to all roads with particular attention to difficult junctions such as the junction at the bottom of Sparrows End Hill. Potential expansion of Stansted Airport should not be overlooked/widening of the M11.

Stebbing Parish Council and Stebbing Society Hybrid of B and C that considers proportionate size of towns and all types of villages (including those not at present) to spread the number of houses for each place.

Strethall Parish Meeting Come away from "one new settlement solves all" scenario and particularly the idea of 'dumping' it in an area of unspoilt countryside. Share the load throughout the district on the grounds we have previously outlined that is the fairest option for all residents who live in this lovely part of the world.

Thaxted Parish Council The inspector criticised UDC for not working with Braintree to increase development in this area. Braintree has a station/established commercial centre.

The Sampfords Parish Council None have been identified by the Parish Council.

The Thaxted Society We consider vision and imagination to be imperative in providing for a sustainable future. Whilst house building currently provides an income stream for local government it is very hard to disentangle this bonus from any vision and as a consequence the vision to 2033 is broadly marred.

DEVELOPERS, AGENTS AND LAND OWNERS

- A number of developers argue for a higher housing need target e.g. uplift of 20% based on the household projections/housing market signals/lack of affordability
- More comprehensive scenario testing for the above including jobs based scenario
- Some developers considered that no further scenarios were needed or should not be radically different to those identified
- Optimum scenario to guide the future growth levels and locations should be based on an assessment of the existing key sustainable growth drivers
- Sustainable growth at Villages where such growth will support and enhance the role as service centres/ Great Chesterford
- Need hybrid scenario with most growth targeted at new settlements but allowing for sustainable growth at Towns/Villages to support their roles as service centres targeted at settlements with specific opportunities to enhance facilities
- Hybrid scenario with more emphasis on growth in the key villages/larger villages

- Hybrid scenario with a more emphasis on sites in the villages as most realistic option to achieve build out rates/deliverability - emphasis on the expansion of existing settlements;
- Based on Scenario G Hybrid 2, Stansted Mountfitchet should be identified as an area of growth in its own right for 1000 dwellings
- Focus growth widely throughout District/existing settlements in preference to new ones
- Focus on the southern half of Stansted Mountfitchet to deliver strategic housing
- None of the options consider an approach based on settlement hierarchy with towns and key villages absorbing most of the growth excluding new settlements
- recognise new settlement only yields a small number of new houses within the latter stages of the plan period/significant alternative provision to meet the shortfall
- Stansted Mountfitchet should be separated out from the Key Villages category and attributed a level of growth that is commensurate with its development potential

COMMENTS BY INDIVIDUALS

- A number reiterated support for new settlement e.g. twice the size of Saffron Walden
- New Settlement along with Great Dunmow and Saffron Walden and to a lesser extent the Key Villages on top of the Existing Planning Permissions
- Maximise the use of brownfield sites/always think about transport implications
- Sponsor growth over the border in Cambridgeshire, because that is the county where economic growth is occurring, and the county border irrelevant
- Developing new villages of say 500-1000 dwellings
- To build 1 or 2 new towns along the M11 corridor whilst widening
- Where is reference to Saffron Walden By Pass in coming years/its traffic pollution
- Not accept two new settlements/ huge detrimental impact on the district
- Stating that the District is full and that our shortfall should be passed to Harlow
- No new development where cars have to be parked in the roadway
- Avoid travel through the narrow streets of Saffron Walden
- Second runway/reinstate dunmow - stortford railway/new settlement
- One larger settlement which would provide the bulk of the housing
- Expanding existing towns and villages would be an option if road networks were improved e.g. ring road round Saffron Walden/south of town
- No settlement of say 10 or more houses should be considered 'off limits' for some modest expansion/consider Local Parish Plan
- There should be a mix of development - a new smaller scale development but also development in key villages. A hybrid to spread the development of B & C
- position of UDC in wider sub-regional focussing on travel-to-work patterns/role of towns outside UDC, increasing sustainability of districts settlements/discourage commuting
- focus on locations linked to Cambridge, Bishops Stortford, Chelmsford ,Haverhill and access to regional highways notably A414/A12, A11/A505, M11/A14 and A1307/A134
- Adopt CIL/ work with local communities to establish priorities for infrastructure provision
- No scenario for a lower housing need than 568 dpa forecast in the SHMA
- The elephant in the room is Stansted Airport
- Hybrid of Scenario D spreading 500 from the new settlement between Saffron Walden and Great Dunmow or 500 equally amongst all five locations

- A mix of small scale development in 7 key villages up to 50 houses (not all on one site) dependant on size/ infrastructure, 350 new homes, development in the 20 type A villages of up to 20 houses giving 400, some extension to the towns of Saffron Walden and Great Dunmow - 600 houses in each and then 2 small new settlements of 550 houses,
- The LP should be flexible enough to take a distribution of housing around existing settlements with no new additional settlement
- Proximity to sources of employment when determining areas for development
- Two stage build strategy/ Phase 1 up to 2033 - distribution of development around existing settlements and no new settlement i.e. option D but remove the new settlement. Phase 2 2033 onwards to properly plan with the consultation of residents the district future housing / employment requirements maybe incorporating a new major settlement.
- Spread load across region/invigorate communities ease pain for people living here
- potential scenario no longer financial incentive from central government for new housing
- imbalance across the district/ bias to impose major development along the southerly border that lacks the infrastructure and with little development in north of district
- Any village can easily take 4-6 new homes
- A detailed option should be developed to illustrate continuation of existing build rate
- Negotiate with another LPA for them to take some of UDC requirements e.g. Braintree
- Need new green belt around any new settlement

Question 19**Other Points**

Are there any other points you wish to make which do not relate to the questions above.

This question was responded to by 237 people. The following is a summary of the key points raised by the representations. To read all the representations in full please go to <http://www.uttlesford.gov.uk/article/3038/Planning-Policy-Consultations>.

STATUTORY BODIES AND OTHER GROUPS

Office of Rail Regulation The Office of Rail and Road has no comment to make on this particular document.

Oil Pipeline Agency Ltd Please see attached plan of clients apparatus. We would ask that you contact us if any works are in the vicinity of the CLHPS pipeline.

North Hertfordshire District Council The intention stated in the document to meet your objectively assessed need is supported and whilst the wide ranging approach taken to identifying locations for development is understood, there doesn't appear to be any consideration of deliverability which therefore raises some questions of whether the options could accurately be described as 'reasonable alternatives'. However considering these options to rule them out on the basis of deliverability is a logical approach to site selection.

Environment Agency Waste does not appear to have been considered. Improved waste management can contribute to reducing greenhouse gas emissions and can also provide a boost to economic growth in material recovery and recycling. However, care should be taken in the location of these operations and policies should steer higher risk waste disposal and treatment facilities away from sensitive receptors such as housing and communities.

Essex County Council

Need reference to cycling. Existing levels of bus services cannot be relied upon long-term/ include considerations for accessibility to services from the onset/accessibility should be addressed in the plan. Need to reference The Essex Minerals Local Plan e.g. Policy S8 / emerging plan, the Waste Local Plan and the work of ECC in Plan. Include the principle of Mineral Safeguarding Areas and Mineral Consultation Areas. Ensure mineral considerations to be factored into their proposed growth location assessments. Put Mineral Consultation Areas and Mineral Consultation Zones on the final Policy Maps at the district level. Waste Consultation Zones will continue to be a feature of the Waste Local Plan as it moves towards adoption. In a similar manner to Mineral Consultation Areas, this policy tool does not act to automatically preclude development, rather they act to ensure that the operation of waste management facilities are not compromised by non-waste development. Whilst there is not the expectation that these are included on a district level Policies Map, ECC intend to periodically send GIS layers to each Local Planning Authority which detail the spatial extent of these Waste Consultation Zones. Help deliver the Waste Hierarchy/integrate local waste management in new development considering likely impact of proposed, non-waste related

development on existing waste management sites and on sites allocated for waste management promoting sound management of waste from any proposed development.

Suitable previously-developed land, including industrial land, provides opportunities for new waste facilities and priority should be given to reuse of these sites. It is important for waste to be considered alongside other land uses when looking at development opportunities. Ensure non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises.

Essex Wildlife Trust Sites for development should be selected on the basis that there will be no adverse impacts on existing designated wildlife sites; this includes increased recreational pressure and severance of important wildlife corridors.eg The model of "Living Landscapes" should be fully integrated into strategic planning. Local authority planners should create "green infrastructure" masterplans which aim to enhance linkages between and habitat "buffers" around existing local wildlife sites. Such masterplans should be developed in advance of plans for the built development and their primary focus should be on protecting and enhancing biodiversity.

Select sites on the basis that there will be no adverse impacts on existing designated wildlife sites; this includes increased recreational pressure and severance of important wildlife corridors. Currently designated sites do not exist in isolation, and are dependent on viable and functional wildlife corridors that create a permeable landscape and allow the migration and movement of species between areas of high quality habitat. Fully integrate the model of Living Landscapes into plans. This will be achieved through the creation of "green infrastructure" masterplans which aim to enhance linkages between and habitat "buffers" around existing local wildlife sites. Such masterplans should be developed in advance of plans for the built development and their primary focus should be on protecting and enhancing biodiversity. An important consideration for these areas is that such Living Landscapes are also beneficial to local people and communities and foster a flourishing local economy.

Chelmsford City Council formally respond that the Council has no observations to make at this stage of your local plan process.

Birchanger Wood Trust Houses upon houses is a remedy for disaster, not a solution

Bishop's Stortford Civic Federation While not residents of Uttlesford our members could clearly be severely adversely affected by the possible development to be included in your local plan. I should therefore be obliged if you would ensure that I am included in any further rounds of consultation or decision making so that we may have the chance to make representations about matters which may affect us.

Fritch Way Action Group Great Dunmow Fritch Way Link Proposed Bridleway to Re-Connect the Fritch Way around Great Dunmow. The purpose of the proposed Bridleway is to form part of a viable and safe route for cycling, walking and horse riding to link the East and West sections of the Fritch Way and to provide access to these routes from the town. This link project is also the key component to create a multi user off road path to provide a continuous definitive bridleway from Rayne to Bishops Stortford. This link route will add to

the existing range of footpaths bridleways and byways. This link will bring benefits to health and quality of life. The Flitch Way represents one of the best and longest off-the-road cycle paths in the UK and has been nationally recognized as part of a long distance cycle route. For this reason it has more visitors per hectare than any other Essex country park. However, its value is diminished by being severed into two sections e.g. original A120 bypass (B1256) through the Dunmow Cutting/the new A120. The present route for cycling between the two is Sustrans National Cycle Network route 16; uses busy roads through the congested town centre. This is not viable or safe for novice cyclists or families with young children; these are the majority of cyclists using the Flitch Way and are also the category most encouraged to use it. The Great Dunmow NP Policy GA1 and GA2 clearly enable the project and it is integrated in the Core Footpath and Bridleway Network shown on page 114. A policy is needed to support this link/continuous bridleway from Rayne to Bishops Stortford/improve condition of Byway 57 that deters many from using the Flitch Way from Hoblongs Bridge.

Forestry Commission Impacts on Ancient Woodland using just one of the proposals impacted AoS Edge of Bishops Stortford, encompasses parts of Birchanger Wood/ancient semi natural woodland of high environmental historical/cultural value. It has had several English Woodland Grant Scheme contracts for public access works and continuing the coppice with standards management in the woodland and is a valuable asset to the community. Ancient woodlands are widely regarded as irreplaceable with great value because they have a long history of woodland cover, with many features remaining undisturbed. Note SA did not consider the requirements for access to greenspace in its assessments, nor the deliverability although may be considered later in process. These comments are based on a desk study of the case, including the Ancient Woodland Inventory and our general knowledge of the area.

G W Balaam & Son All development must be sympathetic to the current local surroundings and must not harm, but enhance what is currently here.

Pulse Flexible Packaging Ltd The current Pulse site at Radwinter Road arguably represents a non-conforming use in a predominantly residential area. The business is constrained on its existing site and its processes and vehicle trip generation characteristics are not conducive to a residential neighbourhood. The character of Radwinter Road is changing with development of brownfield sites, high density residential close to eastern site boundary/further residential to the west/north opposite side of Radwinter Road. This brown field site offers potential for around 80 houses/density 40 per hectare. This would remove the non-conforming use, provide a significant number of homes, contribute to housing choice and mix and help meet housing targets/5 year housing supply.

Great Dunmow Neighbourhood Plan Steering Group Have full regard of the Great Dunmow Neighbourhood Plan and other emerging NPs in the district as they are being produced with the full co-operation and support of their communities and contain local and true evidence.

Hands Off Thaxted In view of the importance of this consultation all residents should have been given the opportunity to comment. Many residents do not have access to IT. A questionnaire should have been delivered to every address in Uttlesford. The windfall allowance of 50 units/year over the district seems low, has this figure been verified? Previous planning mistakes should be analysed and measures taken to ensure that

unsustainable and inappropriate developments such as Sampford Road, Thaxted never happen again.

Helena Romaine Secondary School would like to emphasise its commitment to providing an attractive and successful education environment for pupils in the future, which will be beneficial to the long term success of Great Dunmow. We would also emphasise the limitations of the existing school site to meet the projected demands in the longer term. HRS has undertaken a significant level of feasibility work and demonstrated that the proposed development and site allocations would be appropriate and a practical response to meeting the projected demands and improving the school environment. We sincerely trust that the previous representations will also be considered when determining the appropriate options for growth in UDC and Dunmow.

National Federation of Gypsy Liaison Groups refer to previous comments

National Trust Please see attached for full response on SA - Green Infrastructure. In addition to the above references to the accompanying Sustainability Appraisal, there is no mention of green infrastructure in the consideration of issues (Table 2) or among the 15 sustainability objectives (Table 3). As it is these overarching principles that underpin the development of the Local Plan, this omission is considered to be unacceptable. The benefits of Green Infrastructure are wide-ranging, spanning the environmental, social and economic spectrum of sustainable development, and will help to create a more sustainable environment for UDC residents and visitors.

Stebbing Society Since RSS stance and therefore our current responses have altered little regarding the Areas of Search along the A120 corridor, especially AOS 9. In addition, we are curious as to how Figure 1 has been conceived, bearing in mind the loading of Areas of Search which have been shown in the southern part of the District along the A120 corridor, as opposed to those AOS along the M11 corridor and further north in the District. We firmly believe that it unfairly favours the north of the District against the south and certainly isn't an equitable basis to start from. For the various reasons set out in our responses above, we are strongly opposed to this principle and feel that it creates an unfair bias in the Plan which is supposed to be neutral until all representations are received and fairly analysed. For these reasons we cannot reiterate strongly enough our arguments submitted in this response and which in general, support the views already submitted by the Stebbing Parish Council.

The Hundred Parishes Society The Hundred Parishes Society aims include advancing awareness of the character and history of The Hundred Parishes and promoting the conservation, protection and improvement of the areas physical and natural environment, especially its features of historic, architectural and wildlife interest. The Hundred Parishes area includes most of UDC. Ask plan reference the The Hundred Parishes/reasoning behind Society's initiative to highlight what is special and distinctive about The Hundred Parishes. It is an area that Oliver Rackham has called Ancient Countryside, with its winding lanes, village greens and ancient hedgerows and woods. It is also an area that is rich in listed buildings around half dating back to before 1700.

The Ickleton Society is a village society with an open subscription membership committed to good planning, protection of the environment and the village community. We are

responding to this consultation as some of the proposals could, we believe, have significant impacts on South Cambridgeshire and Ickleton, in particular.

The Thaxted Society The fundamental question has to be how much, of what makes rural Essex special, we need to maintain this uniqueness? How much of our rural community needs protection in order to deliver this uniqueness? People chose a UDC way of life for particular reasons. Those qualities need to be protected and saved to fulfill those expectations. The Thaxted Society has a breadth of historical background and knowledge as well as developed current thinking on the re modelling of a rural community for the future. We have a certain degree of success in impacting new building design and detail welcome the opportunity to work with UDC in developing a sustainable/vibrant future for rural UDC.

TOWN AND PARISH COUNCILS

Elsenham Parish Council wishes to highlight the following issues.UDC Parking Standards for residential developments should be revised to provide a more practicable strategy to address residential parking within the District reflect the modern habits of households living in a largely rural area. It is suggested that UDC re-examines its parking strategy, as a part of its new Local Plan; and in particular e.g. a minimum of three spaces per dwelling. Regards provision of bungalows within housing mix increase the minimum requirement. Include Affordable Housing / Key Worker Housing in housing strategy/ key worker housing within housing allocations. Existing recreation and sports facilities offer little or no opportunity for expansion in the future but land on village boundaries are used for new housing developments or has developer/landowner options in place for possible future housing. Need land for a new cemetery to be found locally within the Parish of Elsenham.

Great Dunmow Town Council Important to have full and proper regard to the neighbourhood plans being produced across the district when preparing their local plan. While, as stated in Planning Practice Guidance.....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 the converse may also apply. That is because the neighbourhood plans that have been through the process will have done so having gathered evidence by way of public opinion and incorporated it into policy. A new local plan offers the scope for UDC to introduce the Community Infrastructure Levy. This presents a major opportunity for UDC to:- maximise the possible income associated with new development; provide monies to be directed to appropriate schemes across the district rather than it being limited to the needs generated by a particular proposal. This is particularly important if the plan is based on the strategy of a new settlement where the greater part of the development of the district would be concentrated in one area; and secure monies for local councils to be able to allocate to schemes to improve the local area for the benefit of existing and future residents. Do not understand why the consultation is in relation to 3000 new homes only/not an additional 4700. Also note no allocations of the 5,000 new homes permitted/not built without which not possible to give fully informed answers to the questions posed.

High Easter Parish Council Since it is likely that sites on the edge of the market towns and key villages will still come forward for major development in the future (approach delivered in the past), High Easter Parish Council would express a strong preference for either Scenario B (villages and edge of Bishops Stortford), Scenario C (towns), and to a lesser extent

Scenario D (hybrid) - depending on the location of any smaller new settlement, and object strongly to Scenario A (new settlement).

Little Easton Parish Council The wording and "corporate" approach to this consultation has meant that the general public have taken a minimal role in shaping their future built environment. The next consultation should be split into 2, with a detailed one aimed at councils and developers and a simplified version to encourage the involvement of the general public.

Newport Parish Council It is imperative that Planning Committee familiar with the local areas/expectancy familiar with all details appertaining to the application sites in Newport and these should not be restricted to the immediate area or the particular application. Water disposal infrastructure is beyond capacity at present, this was confirmed in the Hyder Report carried out in October 2009. This appears to have been totally overlooked.

Rayne Parish Council Hope commitment from UDC for transparency is seen through to fruition. One of the key aspects of demonstrating that commitment is to ensure that responses to this consultation exercise are fully and properly considered.

Stansted Mountfitchet Parish Council Consideration should be paid to the sites already given planning consent but where building has not commenced. How will proposing new additional development on top of those not commenced be planned with due diligence? What if those already approved create unforeseen local issues? In the case of Stansted Mountfitchet, apart from the 212 houses due to be built within its boundary, it is due to have 2,600 houses built north of Bishops Stortford plus 500 in Elsenham. It would seem more prudent to support the building of homes elsewhere where the infrastructure is newer and more capable of coping with the extra traffic flows. However, it is understood that sustainable growth will have to be achieved but the emphasis must be placed on providing step up towards home ownership via the provision of affordable housing. If UDC serious about sponsoring improved employment prospects then attention should be made to having good road signage in and around the District e.g. only signs showing "Stansted" relate solely to the existence of Stansted Airport thus leaving businesses in and around Stansted Mountfitchet at a distinct disadvantage.

Stebbing Parish Council These proposed new settlements will no doubt be subject to long, expensive and demanding legal battles. This will lead to UDC in the interim period needing to give planning consents just to feed the quota rendering the need for any new settlements unnecessary. While we realise that this LDP is a government-imposed requirement we strongly feel that suggested AOSs for new settlements are not placed fairly or equitably around the district. As stated in Question 10 SPC question the validity of this consultation because of the way some villages have been presented i.e.(Stebbing) on the AoS maps in terms of their actual size and what UDC are presenting as the areas that are affected.

Takeley Parish Council In conclusion TPC believes that major development in the south of the district is unsustainable. The infrastructure for health and education is overstretched. M11 Jtn is at capacity. There is a lack of capacity on Liverpool Street main line & poor access to Bishop's Stortford station (via Jtn 8) & Stansted Airport rail service (see above). In addition, it is important to protect the existing countryside and recreational spaces for the current and planned homes/residents. We accept that some towns and villages want/need

small scale development to sustain schools, shops & existing facilities however tpc opposes further development in/around Takeley.

Thaxted Parish Council It will be important for UDC to have full and proper regard to the neighbourhood plans being produced across the District when preparing its local plan. That is because the neighbourhood plans that have been through the process will have done so having gathered evidence by way of public opinion and incorporated it into policy. A new local plan offers the scope for UDC to introduce the Community Infrastructure Levy. This presents a major opportunity for UDC to:- -maximise the possible income associated with new development; -provide monies to be directed to appropriate schemes across the District rather than it being limited to the needs generated by a particular proposal. This would be particularly important if the Plan were to be based on the strategy of a new settlement where the greater part of the development of the District would be concentrated in one area; and - secure monies for local councils to be able to allocate to schemes to improve the local area for the benefit of existing and future residents.

Sampfords Parish Council in January 2012 commented on two potential sites in the village put forward for consideration by land owners/developers. GtSAM1 comprised Land between Sparepenny Lane North and Moor End/not favoured by the Parish Council because of access/visibility of the development on the approach to the village from Thaxted. GtSAM2 comprised Land adjoining Snowdop Cottage, Great Sampford/ not favour this site given its extension of development into open countryside, access, and poor standard of junction at Parsonage Farm Lane/Sparepenny Lane South/B1053.

Wendens Ambo Parish Council general comment about this questionnaire: It is hard to believe that much weight will be given to responses from the general public and local organisations. In particular, asking for comments on seven different scenarios, asking for comments to be referenced etc., is likely to put off many people. It is surprising to see that UDC continues to be wedded to the idea of large scale development in Elsenham - a very pretty rural area with very poor road transport - and in the face of the Inspector's comments on the previous failed plan.

DEVELOPERS, AGENTS AND LAND OWNERS

- Add reference to natural/built environment. New housing should be built in a form complementing/compatible existing settlements/houses, appropriate density, massing (height/storeys), design (materials etc.) and layout (with verges, greens, and open spaces) reflective of and similar to existing settlements
- There needs to be an understanding of how different form of development and the various options impact on carbon consumption/embodied energy for road and utility construction embodied energy for community buildings, shops, for heating/hot water
- Research to determine if people in different locations and differing population densities consume more or less energy to travel/ widely assumed people in towns use less
- seek to have discussion with landowners, land agents and developers to determine the deliverability of sites put forward at the Call for Sites stage
- Further, unmet need in London/HMA means OAN at least at the upper end of 750 dpa can be accessed off Park Road, Little Easton/opportunity for a direct access to Woodside Way, opposite the Woodlands Park development/Bovis Homes recent permissions Great Dunmow area, changing at a rapid pace to the west of the Great

Dunmow western bypass development will be located in an area of Dunmow where key facilities exist within close walking distance, well screened by existing trees

- Undertake Green Belt study to identify areas of release e.g. Stansted Mountfitchet.
- Land south of Beldams Lane, Bishop's Stortford provides a sustainable location to deliver quickly 180 dwellings within walking distance of town centre/services/facilities
- Land southwest of Bentfield End, behind Bentfield Causeway and Bentfield Green Farmhouse 40ha west Stansted Mountfitchet, railway station within walking distance with regular rail access to Stansted Airport, Bishops Stortford, Cambridge and London
- Land at Bran End, Stebbing (STE10 plan) 5 dwellings permitted for Brick Kiln Lane frontage / 4 proposed but 50 as alternative to New Settlement/non-strategic growth, open space Stebbing Brook/village park, footpath/bridleway to village
- Land west of Station Road, Elsenham 3.9 ha on western edge, to south land has permission for 155 C3/Extra Care unit, capacity 80- 100 dwellings, open space, access off Stansted Road via new spine road as part of BDW development, in walking distance of Elsenham facilities good public transport links to larger settlements, available
- Land north of Stansted Road, Elsenham 3.1 ha north of Stansted Road permission for 40 dwellings adj Elsenham Nurseries, capacity up to 30, open space/allotments, potential employment, access from Stansted Road, logical small-scale infill, available
- Land to the rear of Hales Farm, Little Canfield, Dunmow west of Winfresh UK Ltd Ripening Centre, close to B1256/A120, employment units High Cross Lane East with capacity for 4 ha employment, logical expansion of existing employment, next to major centres of population from where future employees can be drawn
- Land off Brocks Mead, Great Easton 2.8 ha up to 40 dwellings, development at Brocks Mead, logical small scale expansion, careful master-planning for setting of listed buildings, access next to 8 Brocks Mead/pedestrian access/public rights of way, located in heart of village, close to Swan Public House/Church, hidden from view
- Land off B1256, Little Canfield, Dunmow 7.9 ha site suitable for potential employment uses, relatively flat, access either directly off the B1256 or Stortford Road, trees along site boundary help screen site rather than constrain it, potential for roadside services given close to A120
- Land at Wood Field, Woodside Way, Great Dunmow 5 ha/140 dwellings part previously proposed Great Dunmow Policy 1 opposite from Sectors II/ III of Woodlands Park, well located, mixed community including provision of a local centre community centre/sports hall, new primary school a range of open space uses
- Land north side of Braintree Road, Great Dunmow for inclusion within AoS 12c
- Land northern side of Brick Kiln Lane at Bran End, Stebbing 1.89 hectares access off wide Brick Kiln Lane frontage, 50 dwellings, western edge suitably landscaped, 2ha for community open space/natural extension to village playing field, dedicate 2.9 ha woodland/wetland as local nature reserve with managed public access
- Land on northern side of Stansted Mountfitchet, north of the Catholic Church on the west side of High Lane 1.2ha and on the east side of High Lane and Cambridge Road 3.4ha, permission west of Cambridge Road (B1383) extends village to the north/logical expansion, safe access/roundabout at Cambridge Road junction, landscaping and open space, avoid incursion into Green Belt, easy access to range of facilities/jobs, available
- Land at the rear of 238 Birchanger Lane, Birchanger? no history of flooding or contamination, openness not be unacceptably impacted, proximity to Stansted Airport an aging village population/ensure homes for downsize to free up larger houses.

COMMENTS BY INDIVIDUALS

- Many reiterated support for new settlements as only way that the infrastructure needs of such met/market towns unable to without damage
- A number reiterated objection to new settlement preferring dispersal
- A number considered the plan was meeting a lot more than its fair share
- Realistic and acceptable plan? resubmission of earlier plan with little strategic thinking
- Once final plans are available, have full consultation in all places named in the plan
- Any development near Great Chesterford should be built around the railway station near the the M11 to make the station more central to the village.
- Cycles paths need to be more widespread because we have such few road and busy people are put off cycling on them as they are not safe
- target retired to downsize/known shortage of Flats/Apartments in Town Centre
- move Saffron Fire Station to Thaxted Rd near Aldi and build 6 or 8 story Apartments
- Like it or not we are going to get/need a lot more housing - properly plan for long term
- Take guidance from the responses to this consultation/avoid tick-box exercise
- Safety should be top of the list of any new development - twenty is plenty
- Make scenarios for 750 dwellings a year is to take any shortfall among its neighbours
- Especially in Search Area 2, there is the potential to totally destroy the unique quality of the villages and countryside surrounding them
- Maps not easy to read/spell checker needed
- Avoid a flood zone/an area of poor road links
- This generation caretakers for the next/must preserve beauty/character of surroundings
- Infrastructure led housing developments needed
- In Saffron Walden avoid removing trees and bushes
- In general I think this document is well considered in extremely difficult circumstances
- Need development but we must try to retain the uniqueness and beauty of the area
- Search area 2. beautiful countryside with rolling hills, hedgerows/wild life, unique villages many footpaths and walks and cycling opportunities down quiet country lanes
- New settlements will not achieve short term requirement so spread the development
- SHMA poorly evidenced
- Key worker housing should be a significant part of the plan
- Youth Services apart from provision of playing fields
- Clavering Parish Plan is now an adopted UDC planning document
- No further housing to the East of Saffron Walden
- AoS 3 is non-starter/Elsenham has already been allocated proportionally more houses than other key village and cannot be a candidate for more
- Need open mind and listen to the views of local people
- Enforce appropriate living space for health and safety reasons
- AoS 9 shows Stebbing much smaller omits conservation area/St Mary's Church
- Stumps cross has a little used motorway junction and a train station, avoid dispersal
- If there is real need for these housing numbers there must be a regional solution
- challenge the assumption that UDC requires this level of housing development
- more emphasis on legal contracts with developers to ensure timely delivery
- Saffron Walden needs a ring road with direct connection to M11
- preserve area by having small additions rather than one vast area

- defined sustainability has not formed part of these considerations
- opportunity for self-build and custom-build
- Andrewsfield airfield is busy and is a valuable asset to the community
- effect of your LP and expansion on the neighbouring areas, especially your traffic issues
- unfairly favours the north of the District against the south
- Agree with lower cost housing for local people the Catons Lane/Little Walden Road
- 50% Council Tax premium for empty properties to buildings that are listed and undergoing long-term renovation should be abolished
- UDC is recommending a greater provision of new housing than adjacent authorities
- representatives should take responsibility for the long term benefit of the area
- SA Summary Energy consumption - target renewable share for the plan period?
- The evidence is clear that developing on the basis of perceived potential of existing infrastructure is a trap. Cf. congestion on A120 at Galleys Corner
- Dunmow, area 9, , Felstead, Stebbing, Great Saling, Rayne and Braintree will be 1!
- Braintree and Harlow Councils planning to grow their towns see Stansted Airport and its associated UDC hinterland as a major driver of their growth
- No questions about encouraging growth in employment
- Water is not mentioned new dwellings need to be highly water efficient
- Problems, traffic, school places, pedestrians safety, flooding are being ignored
- Expansion of the Genome centre the possible siting of an Agriculture development centre fronting the A505 near Pampisford will mean Urbanisation
- Uttlesford should not need provide expensive dormitory accommodation for London
- Refer to neighbourhood plans, village design statements and appeals
- Developers in Takeley changed plans to not provide benefit in agreed
- Need accurate 5 year supply position to stop development
- Minimum level of growth compelled to protect fields, woods, and hedgerows
- Growth needs to be a visual asset/of high quality with integrated renewable energy
- Stebbing falls into the category of being a Stansted flight path/unacceptable to build
- Overall effect of LPAs proposals on the whole infrastructure needs an overview
- ensure that ground levels of new developments are levelled to that of neighbouring properties to prevent future flooding
- Need strategies on transport and prioritise habitats/landscape
- new settlement really should not be on the edge of an existing settlement
- Encourage environmentally sustainable solutions, for energy, transport, water and waste management, as well as for innovative design and inclusive, friendly communities
- Reiterate the potential, as yet unacknowledged, of Saffron hall
- Build where sustainable wages so they can contribute to the country's economy
- Incorporate Bishop's Stortford into UDC/Essex as it is the central hub in the area
- Protect our communities form developments detrimental to well-being and heritage
- Plan period for the next 20 years/base on self-contained towns
- Keep green lung' between UDC and Braintree
- AOS for railway link from Stansted through Newport and Audley End, NE of Saffron Walden, SE of Great Chesterford, and east of Elsenham
- Have some development round the villages to help keep the local facilities alive
- Great Dunmow not seen concerted effort to develop business opportunities and established business/skilled jobs forced to relocate losing jobs for area – Boddingtons

- When we agreed a solution for a business park which would have supported the shortage of recreation land "Smiths Farm" ignored for speculative purposes
- Concerned at the settlement hierarchy/major growth for the smaller settlements

Committee: Planning Policy Working Group

Agenda Item

Date: 23 March 2016

9

Title: Duty to Cooperate

Author: Andrew Taylor, Assistant Director Planning and Building Control

Summary

1. This report updates members on the Duty to Cooperate work.

Recommendations

2. To note the report.

Financial Implications

3. None

Background Papers

4. None

Impact

- 5.

Communication/Consultation	Communication and consultation form the bedrock of cooperating. This paper is published on the website.
Community Safety	The Duty to Cooperate will include all factors.
Equalities	The Duty to Cooperate will include all factors.
Health and Safety	The Duty to Cooperate will include all factors.
Human Rights/Legal Implications	The Duty to Cooperate will include all factors. Failure to comply would result in the Local Plan being found unsound.
Sustainability	The Duty to Cooperate will include all factors.
Ward-specific impacts	Affects all wards equally.
Workforce/Workplace	This will involve Councillors, officers from the Planning Policy Team and others as necessary.

Situation

1. This report seeks to update members on the Duty to Cooperate which forms part of Section 110 of the Localism Act 2011. The Duty requires local planning authorities, public bodies and others to engage constructively, actively and on an ongoing basis in relation to the planning of sustainable development. An assessment of compliance with the Duty will form part of the Examination of the Local Development Framework (LDF) in due course.
2. The National Planning Policy Framework (NPPF) states in paragraph 178 that 'public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities...(and) the government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities'.

Update

3. The **SHMA Officers Group** met on 25 February 2016 to discuss the spatial options for development and the drafting of a Memorandum of Understanding for the area.
4. The Assistant Director attended the **West Anglia Taskforce** business meeting in Cambridge on 26 February. This engagement with the business community is vital to delivering the cross border infrastructure which is needed for our area.
5. The Assistant Director attended the **LSCC task and finish group** set up to consider and produce a vision for the Core area (Broxbourne, East Herts, Epping Forest, Harlow and Uttlesford).
6. The **Cooperation for Sustainable Board** met on Monday 7 March. The agenda and minutes are attached at Appendix A of this report.
7. The Assistant Director attended a meeting of the **West Anglia Taskforce – Working Group** on 8 March 2016 as part of the launch of the interim findings of the Taskforce and also the LSCC Growth Commission report. The minutes of the meeting from 23 February are attached as Appendix B.
8. The Assistant Director attended the **LSCC Board** meeting on 9 March. The Board discussed. The minutes of the previous meeting held on 4 December 2015 are attached as Appendix C.
9. The Assistant Director attended the recent meeting of the **Strategic Spatial Planning Officer Liaison Group** (SSPOLG) and attended the recent meeting on 5 February 2016. This meeting discussed the second Wider South East Summit and the membership of the new Political Steering Group (Appendix D). The meeting also discussed the work being undertaken as part of the London Plan review and the need for a common understanding of evidence.

Conclusion

10. Work with other Councils and organisations continues as part of the integrated work of the Planning Policy Team. As part of the development of the revised plan there are some important Duty to Cooperate meetings to be held and decision to be made. Councillors will be aware that some of these decisions will be difficult and involve a significant amount of discussion and negotiation before an outcome can be secured.

Risk Analysis

Risk	Likelihood	Impact	Mitigating actions
Failure to comply with and demonstrate the Duty to Cooperate	2 – Some Council's have been found lacking in this Duty by Inspectors. Therefore need to ensure that we capture as many groups, issues and outcomes as possible to present a full picture of our work.	3 – Will result in the Local Plan being found unsound. Significant impact on planning policy and planning applications.	Cooperate closely with current organisations and continue to do this through the plan making process. Identify any gaps in cooperation and work closely with those bodies to rectify situation.

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.

LSCC

London. Stansted. Cambridge. Consortium

Notes of the Board Friday 27th November at the White Water Centre

Attendees

Greg Clark	Chairman, LSCC		
Cllr Helen Coombs	LB Redbridge	Del Goddard	Vibrant Partnerships
Cllr Kevin Bentley	Essex CC	John Houston	Epping Forest DC
Cllr Linda Haysey	East Herts DC	Gavin Redman	LB Enfield
Cllr Katherine Chibah	LB Enfield	Greg MacDonald	Broxbourne BC
Cllr Susan Barker	Uttlesford DC	Stephen Wilkinson	Lee Valley RPA
Cllr Paul Osborn	Lee Valley RPA	Simon Payne	Cambridge CC
Cllr Jim Metcalfe	Broxbourne BC	Nick Harding	Peterborough CC
John Keddie	Harlow EZ	Chris Wiggan	Stansted Airport
Andrew Gould	Genr8/LSCC dep chair	Andrew Taylor	Uttlesford DC
Shaun Dawson	Lee Valley RPA	Joel John	Essex CC
Jan Hayes-Griffin	Herts CC		
Karen Spencer	Harlow College/FE Network		

Secretariat

John McGill	LSCC	Stephen King	LSCC
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Apologies

Cllr Joe Goldberg	LB Haringey
Cllr Alan Sitkin	LB Enfield
Cllr David Williams	Herts CC
Cllr Guy Nicholson	LB Hackney

1. Welcome and introductions

Cllr Jim Metcalfe welcomed the meeting to the Borough of Broxbourne.

2. Presentation by Cllr Paul Osborn, chair of the Lee Valley Regional Park Authority

Welcomed the board to the Lee Valley Whitewater Centre which is owned by the Park Authority, built for the London 2012 Olympics with £20 million investment from the Olympic Development Agency matched by £20 million from the Park Authority to ensure it has real legacy value. He said that the Park had secured £240 million investment of which 10% from the LVRPA's capital. The contribution from council taxpayers in London, Herts and Essex had reduced as a proportion from 70% to 50% of the revenue budget.

Paul also highlighted the Authority's approach to creating 'nodes' of activity which would rely on good transport links and the synergy with the LSCC's approach to supporting the livability agenda.

Presentation by Del Goddard, chair of Vibrant Partnerships

Set out the background to the creation of Vibrant Partnerships by the Authority and the challenges of managing a portfolio of facilities which are covering the range from international venues to some which have a much more local focus, although all have a local impact. Reinforcing the Authority's vision, Vibrant Partnerships will focus on creating destinations which have a broader appeal than the sporting focus of the specific facility.

Comments:

AG the importance of the livability agenda which needs to be at the core of the LSCC narrative;

JH referred to the City of London Corporation's Epping Forest visitor offer which, with the Lee Valley attracts 13 million visitors into the area.

Presentation by Cllr Jim Metcalfe, deputy leader Broxbourne Borough Council

Outlined the approach to Ambition Broxbourne to be more active in supporting businesses to start and grow within the borough; the borough's determination to protect employment land and to resist the change of use to residential; and the council's strong support for Crossrail 2 coming to the borough.

Comments

SW said that the LVRPA is prepared to discuss how it can play a stronger 'enabling' role with partners.

AG suggested that this discussion would be of great interest to the Consortium's investment and development group.

Harlow

John Keddie, chair of the Harlow Enterprise Zone updated the board on the progress in Harlow building on the announcement of relocation of Public Health England including £400 million investment to consolidate Porton Down and Collindale facilities. This will result in an additional 1,000 mainly technical level jobs.

LSCC Three Year Plan

Greg Clark introduced this report advising the board that he was seeking views on the overall approach and, if confirmed, will invite detailed comments prior to the March board meeting where a final version will be submitted for approval.

Comments:

SW asked for the livability elements within the work plan be strengthened

DG suggested that broadband be included under the infrastructure workstreams

West Anglia Taskforce

The board was advised on the recent work of the taskforce: its meeting with the prospective train operating companies; the growth plan (strategic case) for investment; and the joint approach (GLA, TfL, LSCC, LEP and local authorities) on communication.

Crossrail 2 Growth Commission

The board also heard about the work of the CR2 Commission which had been very active in arranging meetings with LSCC members to understand their appetite and support for the route. The board was also advised on the impact of this level of investment (£27 billion) on the whole corridor because of the additional frequencies, train capacity and connections via the proposed tunnel through central London.

Comments

ML advised the board on the importance of the interchange of Crossrail 2 with the original Crossrail at Tottenham Court Road

KB commended the LSCC role in joining up counties, LEPs, GLA

SP suggested that thought should be given to how rail and other public transport can be better integrated

DG advised on how surprisingly high the latest ONS population projections are

JH-G commented on the cumulative effect of projected population growth and, in the absence of regional planning, the importance of properly engaging with counties.

Strategic Highways Summit

Cllr Kevin Bentley introduced this report which was agreed but the board wished to stress that this proposal for a summit would be built on collaboration with counties and LEPs.

LSCC Growth Commission

The board received an update on the Commission, its initial internal meeting and forthcoming enquiry events during January, February, April and May. Board members were urged to attend and submit evidence where possible.

Inward Investment

Cllr Helen Coomb introduced the report which was agreed.

SB advised the board that changes to retention of business rates have raised the importance of business retention and location in each local authority area

GM advised the board of Hertfordshire's review of inward investment and suggested that Tim Burton at Herts LEP be contacted.

Communications Protocol

This report was agreed.

Growth Spaces

Andrew Gould introduced the paper stressing the importance of refining the corridor 'story' and to improve the penetration of the messaging with investors. The board noted the report and the need to seek further sponsorship.

Comments

LH suggested that some more radical thinking is needed to anticipate how people will live and work including travel in the coming decades

DG suggested that the narrative should be sharper and suggested that this would be part of the LSCC Growth Commission's role.

DRAFT

Working Group

14.00- 15.30 23 February 2016

Room F, London Fire Brigade
Headquarters, 169 Union Street,
London, SE1 0LL



**WEST
ANGLIA
TASKFORCE**

Attendees:

Fiona Fletcher-Smith
[Chair]
Geoff Hobbs
Alastair Southgate*
Alf Cuffaro**
Chris Curtis

Chris Wiggan
Laura Welham-Halstead
Liz McDonald
Jonathan Tiley
Ian Davis
Andrew Taylor

Dan Hawthorne***
John McGill
Chris Moores
Leigh Greenhalgh
Margaret Kalaugher
Gillian Robinson

*substitute for Dominic Collins

**substitute for Jeff Stack

***substitute for Lyn Garner

Apologies:

Bob Menzies, Jeff Stack, Dominic Collins, Jo Mills, Adrian Cannard, Lyn Garner, Jonathan Pugh

MINUTES

8 March Event & Prospectus

- A copy of the draft prospectus was discussed and the group has been asked to send comments by Thursday.
- Group members are to check the housing and job numbers on pages 6 and 7. John McGill to check that final numbers match those in the LSCC interim report.
- Some members of the group are not happy that the reference to journey time improvements in the graphic on pages 8 and 9 of the prospectus has been dropped.

Taskforce business meeting at 11 Downing Street

- The Chancellor and Sir Peter Hendy both stated that Network Rail's CP6 prioritisation process is likely to be based on local investment including private sector funding.
- Sir Peter Hendy also made it clear he was seeking development funding in CP5 from local investment including private sector contributions
- The Taskforce needs to understand what amount of local investment funding will make a difference, how to engage with business and other organisations along the corridor to seek local investment, what mechanism could be employed to collect contributions and which organisations would be best placed to coordinate this work.
- The Working Group will hold a workshop to discuss this and address other funding questions as addressed in the funding update below.

Funding Update

- Currently hard to gather contributions from local investment especially where there is no mechanism to do this along the corridor, eg no provision for CIL outside London.
- Some potential ways to collect funding were discussed: Business Rates reforms could assist as could devolution; Local LEPs could be used to gather contributions from local companies by increasing business rates; Enterprise Zone receipts could also be used.
- The Taskforce is in a unique position building the case for a scheme that benefits both an area with Mayoral powers (London) and an area currently without Mayoral powers (Hertfordshire, Essex and Cambridgeshire) and it may be competing with schemes

across the rest of the UK which exist entirely inside a Mayoral boundary (eg schemes within Liverpool and Manchester).

- Funding mechanisms from Crossrail 2 may ease some of these issues.
- The Working Group needs to examine options and governance mechanisms and help may be required from Government to design a process.

Growth Plan update

- Work is continuing on the growth plan and there are a number of workshops set up to engage with businesses along the corridor.

Business Case progress update

- So far the analysis shows that there is a case for four-tracking as a standalone scheme but it has a stronger case with future commitment to Crossrail 2.
- Journey time improvements need further investigation to look at what is and isn't possible with or without four-tracking.
- The team needs to understand further the timing and phasing of the benefits gained and what businesses in the area would lose without four-tracking
- The work must include how increased or decreased reliability impacts the cost/benefit analysis. It should be looked at as a passenger benefit to which a value can be assigned.

Housing Case Studies

- The group reviewed TfL's draft development assessment figures and commented that there needs to be a collective decision on the scale of development potential that should be presented at each location and justification for the figures should be included. It was also discussed that the red dots on the map would be better placed next to the area rather than on the line as this could be misleading.

Update from Network Rail and DfT

- Network Rail
 - The Anglia Route study will be published in March.
 - Discussions have been taking place with local councils about the level crossings on the line. Network Rail is waiting for the Spring budget announcement on 16th March before determining which schemes will go ahead.
- DfT
 - Stuart White and Elizabeth Truss are meeting with Richard Schofield (MD, Anglia Route, Network Rail) regarding opportunities at Ely North Junction on 26th February.

Comms update

- The Chair asked each member organisation to contribute a maximum of £2000 to a comms fund to cover work done by the group as there is currently no pot of funding for comms work and the Comms Subgroup has so far been reliant on a few organisations funding events to date.
- All local MPs, peers and relevant ministers have been invited to the launch event on 8 March and will receive a copy of the prospectus in the post with a letter if they can't attend the launch.
- A twitter account has been set up which all members have been asked to follow and retweet.
- Liz McDonald advised that the GEML Taskforce MPs have kept their Taskforce's work high on the Government's agenda and it would be worth meeting with them to understand their methods of working

ACTIONS

Ref		Item	Lead	Due
1	8 March Event & prospectus	Group to send comments on the prospectus to Chris Moores	All	DONE
2		Group to check housing and jobs figures for their area in the prospectus and provide any comments to Chris Moores	All	DONE
3		Ensure figures in the prospectus match those in the LSCC interim report	John McGill	DONE
4		Investigate adding journey time improvements back into the prospectus on pages 8 & 9. [post meeting note: this has been added back in to the prospectus]	Mags Kalaugher	DONE
5	11 Downing Street meeting & Funding	Set up a workshop to help brainstorm mechanisms for funding and come up with a figure [post meeting note: TfL has agreed to arrange the workshop]	Mags Kalaugher / Chris Moores	After Spring budget announcement
6	Business Case	Investigate journey time improvements further and investigate what is and isn't possible with or without four-tracking	Chris Curtis	15.04.2016
7		Investigate a way to present the timing and phasing of the benefits gained and what businesses in the area would lose without four-tracking	Chris Moores	15.04.2016
		Update the Benefit Cost Ratio with increased or decreased reliability impacts, looking at it as a passenger benefit to which a value can be assigned	Chris Moores	15.04.2016
8		Present updated development assessment figures at the next meeting having discussed them with Working Group members and included justification for them. Amend the map to move the red dots off the train line	Chris Moores	15.04.2016
9	Comms	All members to seek to commit to a contribution of a maximum of £2000 to the comms fund (except GLA, Stansted Airport and TfL who have already provided funding)	All	ASAP
10		All to follow the Taskforce's Twitter account @WestAngliaTF and retweet where possible	All	Ongoing
11		Make contact with Great Eastern Main Line (GEML) Taskforce members to understand their methods of working and keeping up the Taskforce's profile	Mags Kalaugher / Leigh Greenhalgh	ASAP

EAST OF ENGLAND

Name	Responsibility	Council	Political Group
Cllr Jason Ablewhite	EELGA Chairman and Leader	Huntingdonshire DC	Conservative
Cllr Linda Haysey	Leader	East Hertfordshire DC	Conservative
Cllr Graham Butland	Leader	Braintree DC	Conservative
Cllr Robin Howe (sub)	Deputy Leader	Huntingdonshire DC	Conservative
Cllr James Waters (sub)	Leader	Forest Heath DC	Conservative
Cllr Roy Davis	Leader's Representative	Luton BC	Labour
Cllr John Gardner (sub)	Deputy Leader	Stevenage BC	Labour
Mayor Dave Hodgson	Leader	Bedford BC	Liberal Democrat
Cllr Aidan Van de Weyer (sub)	Member	South Cambridgeshire DC	Liberal Democrat

SOUTH EAST

Name	Responsibility	Council	Political Group
Cllr Nicholas Heslop	SEEC Chairman and Leader	Tonbridge and Malling BC	Conservative
Cllr Peter Martin	Deputy Leader	Surrey CC	Conservative
Cllr David Burbage	Leader	RB Windsor & Maidenhead	Conservative
Cllr Carole Paternoster	Cabinet member	Aylesbury Vale DC	Conservative
Cllr Ann Newton (sub)		Wealdon DC	Conservative
Cllr Tony Page	Deputy Leader	Reading BC	Labour

LONDON

Name	Responsibility	Council	Political Group
Sir Ed Lister	Deputy Mayor of London	Greater London Authority	Conservative
Sir Harvey McGrath	Deputy Chairman	London Enterprise Panel	N/A
Cllr Claire Kober	London Councils' Portfolio Holder for Infrastructure and Regeneration, and Leader	Haringey BC	Labour
Cllr Kevin Davis	Leader	RB Kingston	Conservative
Cllr Stephen Alambritis	Leader	Merton BC	Labour

Agenda – Co-operation for Sustainable Development Member Board

7 March 2016 – 6.30pm
([Civic Centre, Harlow](#))

AGENDA

1. Apologies
2. Draft notes of meeting of 4 December 2015 – including review of action points
3. Strategic OAN Options – report on process, timetable and options for testing through sustainability appraisal (presentation by Steve Smith)
4. Strategic Transport – update on modelling (David Sprunt)
5. Strategic Sites Coordinator – programme of work (Philip James – paper to follow)
6. Development of a Memorandum of Understanding – spatial distribution of growth and agreed approach
7. LSCC – report from task and finish group (John McGill)
8. Update on Green Belt reviews (Harlow, Uttlesford, Epping Forest, East Herts and Broxbourne)
9. A.O.B.
10. Dates of next meetings (already booked):
 - 19 April 2016 - 6.30 p.m. Harlow DC
 - 6 June 2016 - 6.30 p.m. Harlow DC
 - 18 July 2016 – 6.30 p.m. Harlow DC

Co-operation for Sustainable Development Member Board

4 December 2015 5pm-6pm
([Civic Centre, Harlow](#))

Note of meeting

Attendance

Members	Officers	Representing
Cllr Richard Bassett (chair) Cllr John Philip	Derek Macnab Amanda Thorn	Epping Forest DC
Cllr Susan Barker	Andrew Taylor	Uttlesford DC
Cllr Kay Twitchen	David Sprunt Zhanine Smith	Essex CC
Cllr Helen Coomb		LB Redbridge
Cllr Linda Haysey	Liz West Kevin Steptoe Claire Sime	East Herts DC
Cllr John Clempner Cllr Danny Purton	Graeme Bloomer	Harlow DC
Cllr Jim Metcalf	Martin Paine	Broxbourne BC
	Roger Flowerday	Herts CC
	John McGill	LSCC

1. Apologies

Cllr Derrick Ashley Herts CC
Cllr Chris Whitbread Epping Forest DC

2. Draft notes of meeting of 26 October 2015 – including review of action points

Agreed. Further update provided on J7/J7a/J8 of the M11 later in the meeting.

3. Report back from LSCC Visioning Workshop on 2 December 2015 and follow up

Overall there was good attendance from Districts, Counties and the Herts Local Enterprise Partnership, and this proved to be a good forum for initial strategic discussions.

There was common agreement on the key elements that could form a vision for the broad area, including the “big ticket” infrastructure items. This debated previously known issues around road and rail infrastructure, and an acceptance that these matters can and should be considered in a wider context. There was a recognition that a joint strategic vision was likely to be useful, but that any such vision work must not cause any delay to preparation of Local Plans.

The LSCC have undertaken to prepare a short narrative to provide a strategic overview of Local Plan work, and help set a context for future visioning and potentially lobbying for additional funding.

Councillors commented that it may be appropriate to focus on areas of potential economic development, but this must recognise the differences between areas e.g. Broxbourne and East Herts areas are characterised by small/medium enterprises, whereas Harlow has an active Enterprise Zone. There will be a need to commit to growth in employment and housing when making a case for funding for large scale infrastructure. Whilst recognising the benefits of coordinated approaches to such matters, it is clear this cannot be allowed to cause any delay to emerging Local Plans.

A key point was made that a consistent group of Members which meet to discuss the cross boundary planning and infrastructure issues is important to ensure any momentum is not lost, and consensus may be more easily achieved.

It was reflected that Broxbourne BC & Harlow DC have some commonalities, and it may be that a case could be made that Crossrail 2 could extend to Harlow or even Stansted Airport, to spread the benefits of new rail infrastructure. More joined up thinking is to be welcomed, as it opens up new options.

Three key questions were introduced at the workshop:

- First, how do we strengthen and achieve buy-in on *a vision for the economic potential of the wider area which reflects the key priorities for each of the districts but also the give and take needed to make this work for a larger area*;
- Second can we *get real value from that vision in gearing up shared planning work looking at growth options, serious work on infrastructure involving the counties*, and that will help you manage the issues which are already evident in your local plan work;
- Thirdly *what governance is needed to make this type of partnership work* so that each member's position is safeguarded while creating *an alliance* that will be far more effective than each trying to influence the agenda individually.

Action LSCC to prepare and circulate a draft note of the meeting in early January 2016. The LSCC will continue to offer support in matters of strategic infrastructure and growth delivery matters.

4. Potential for joint response on Crossrail 2 consultation

The current consultation on Crossrail 2 is open until 8 January 2016
(<http://crossrail2.co.uk/consultation/>)

A discussion at the recent Officer meeting of the group considered whether there was any merit in preparing a joint response that may carry more weight. It is accepted there are some areas of differing opinion, but Members of the Board are asked to consider whether they would support a statement of common themes being submitted on behalf of the Board.

It was considered that there may be areas of common ground, particularly relating to support for four tracking of the West Anglia line, overall improved access to sustainable transport modes and improved frequency of service.

Action EFDC officers to take an overview of individual organisation responses, and consider whether there may be merit in an additional joint response (noting the short deadline following Christmas)

5. Enfield NGAP Baseline Study and engagement with Co-op Board

The Northern Gateway Access Package (NGAP) project is being pursued by LB Enfield. This is a package of measures intended to alleviate congestion in Brimsdown, a key employment area in the north east of LB Enfield. There have been previous proposals for a Northern Gateway Access Road (NGAR) linking north east Enfield and Waltham Abbey (EF District), which have previously been refused planning permission following lengthy public inquiries. More recently, LB Enfield have sought to reintroduce the possibility of a new road link as part of a package of measures, as part of their North East Enfield Area Action Plan. Following objection by Essex CC, Epping Forest DC, the City of London Corporation and others, the reference has been removed. Objections were made on the

basis that any evidence base to support the possibility of a new road link had not been prepared, and such a reference was inappropriate and premature. Transport modelling work, including consideration of accessibility to public transport and options to improve this, is currently underway.

There is a concern that LB Enfield are not engaging fully on a strategic cross boundary matter, which has potential implications on the M25 and A10, and possibly further afield. LB Enfield are part of the core Cooperation for Sustainable Development group, but have shown some reluctance to attend.

It was agreed that Glen Chipp, as chair of the officer group, would write to LB Enfield to express concern around this matter and encourage attendance.

Action Copy of letter sent to be circulated to Members.

6. Highways update/Transport modelling

ECC officers provided an update on transport modelling matters relating to the M11.

A further meeting has been arranged between ECC and Highways England in January 2016 to progress modelling and planning for improvements to J7.

A first model run testing J7a has been completed. This has tested initially at a growth rate of 10,000 homes in and around Harlow over the period to 2033, although accepting that to meet the OAN shown by the SHMA that higher growth rates (up to approximately 15,000) may need to be tested. This initial model run has identified a significant issue at J8, which has proved to be more congested than anticipated. Growth inputs take into account recent forecasts for passenger growth at Stansted Airport, up to the limit of the planning permission in place (35 million passengers per annum). These forecasts indicate more growth in peak hour travel to Stansted than had been previously forecast, which suggests that J8 will be significantly over capacity much sooner than expected.

ECC are now considering the full programme of further testing, and have established a further team to resource Local Plan preparation.

Queries were raised around the likelihood of funding being secured in the short to medium term for substantial improvements to J7 and J8, in addition to a new junction at J7a.

Up to £50m is currently available through Highways England RIS1 for J7. An indicative total for J7a could be around £65m, although this figure can only be an estimate at this stage. Interim improvements at J8 have been identified that would cost around £5m, but it is possible a much more substantial intervention will be needed in due course. Further sensitivity testing is needed around phasing of junction improvements i.e. it may be possible that not all improvements are required at the same time, which could then feed into further RIS cycles.

It was queried whether Manchester Airports Group (owners of Stansted Airport) could be expected to fund some further improvements. It may be possible, but it is also likely that the scale of improvements that would be needed in the long are beyond what could be expected of MAG. Central government funding is likely to be needed.

There is a perception that access to the service station area is a key problem. Uttlesford DC has previously refused a planning application for an additional access to the rear of the services. It may be this matter could be considered again, depending on the outcome of the Green Belt Reviews in both Uttlesford DC and East Herts DC. Essex CC have met recently with the operators of the service area, and it appears there could be a technical solution to creating a further link to the rear of the service to access the roundabout at the junction of the A120 and A1250 (Birchanger roundabout) solely for use by HGVs, coaches and other large vehicles. If any further planning application were

made in the coming months, this would need to be assessed in accordance with current planning policy.

Herts CC are currently preparing a county wide model, which is due to be ready for use in February 2016. This is not the same type of model as the Essex CC model, but the two counties are working together to ensure compatibility of outputs.

7. A.O.B.

None

8. Dates of next meetings (already booked):

- 18 January 2016 - 6.30 p.m. Harlow DC
- 7 March 2016 - 6.30 p.m. Harlow DC
- 19 April 2016 - 6.30 p.m. Harlow DC