



Uttlesford District Council

Chief Executive: Dawn French

Planning Policy Working Group

Date: Thursday, 14th December, 2017

Time: 6.00 pm

Venue: Council Chamber - Council Offices, London Road, Saffron Walden,
CB11 4ER

Chairman: Councillor H Rolfe

Members: Councillors S Barker, P Davies, A Dean, S Harris, P Lees, J Lodge,
J Loughlin, A Mills and E Oliver

AGENDA PART 1

Open to Public and Press

1 Apologies for Absence and Declarations of Interest

To receive apologies for absence and declarations of interest.

2 Minutes of the Previous Meeting 5 - 8

To consider the minutes of the meeting held on 17 October 2017.

3 Uttlesford Local Plan, Regulation 18 Draft Plan Consultation Responses 9 - 18

To consider the summary of responses received to the Regulation 18 Draft Local Plan and the areas where further work and consideration are required.

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To consider the draft Statement of Community Involvement.

5 Any Other Item Which the Chairman Considers to be Urgent

To consider any items which the Chairman considers to be urgent.

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**PLANNING POLICY WORKING GROUP held at COUNCIL OFFICES
LONDON ROAD SAFFRON WALDEN on 17 OCTOBER 2017 at 7.00pm**

Present: Councillor H Rolfe – Chairman
Councillors S Barker, P Davies, A Dean, P Lees, J Loughlin, A Mills.

Officers in attendance: A Bochel (Democratic Services Officer), P Bylo (Planning Policy Manager), G Glenday (Assistant Director – Planning), S Miles (Planning Policy Team Leader) and S Payne (Project Manager – Planning Policy).

Also Present: C Berry (Planning Policy Consultant – Troy Planning).

Public speakers: J Grey, S Merrifield and F Wilkinson.

PP1 APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST

Apologies for absence were received from Councillors Lodge and Oliver.

Councillor Barker declared an interest as a member of Essex County Council.

Councillor Dean declared an interest because his wife was a volunteer at, and a member of, the Trustees of the Gardens of Easton Lodge.

PP2 MINUTES OF THE PREVIOUS MEETING

The minutes of the meeting on 29 June 2017 were signed and approved as a correct record.

**PP3 UTTLESFORD LOCAL PLAN REGULATION 18 DRAFT PLAN
CONSULTATION RESPONSES – PLANNING AUTHORITIES AND OTHER
BODIES**

The Planning Policy Team Leader introduced the report. The regulation 18 consultation on the Local Plan had received just under 6000 representations. The purpose had been to ask for the views of the community, and it was important to note the plan was not a finished document. Because of the small period of time officers had had to review representations made, the selection of representations being brought before the working group were those from statutory consultees and other public bodies. The remaining representations would be reported at the next meeting of the group.

The Planning Policy Consultant said the report summarised the responses by bodies listed in the Duty to Cooperate and gave an overview of the representations made.

The Chairman thanked those who had responded to the consultation.

In response to a statement by Jane Grey, the Chairman said there was cross-party support for the provision of sports facilities and they would be key features of planned garden communities. The Planning Policy Team Leader said work had been commissioned to address the concerns of Sport England that the draft plan lacked a robust evidence base.

In response to statements read out by Fiona Wilkinson, the Chairman said if planning on potential new developments did not meet garden city principles then they would not get planning permission. The Council would not be rushed, and would take as long as was necessary for the regulation 19 consultation and submission for inspection. Transport was a big issue. The local plan would help to mitigate traffic problems, including those outside the area, in South Cambridgeshire. The Council was in close contact with the relevant bodies. The published evidence base would be continually updated, and the potential impact of traffic over time would be taken into consideration. It was unfair to expect all new development to happen in South Uttlesford.

The Planning Policy Officer said the Council was looking to commission further work on subjects such as archaeology and heritage, with the aim of resolving issues raised by public bodies.

Councillor Dean said it was reassuring to know work was ongoing and that it was not necessary to have all the answers now.

The Planning Policy Officer said the regulation 18 local plan was not meant to result in a finished document, and undertaking further work prior to the next round of consultation was not unusual. Both the Council and the inspector had to be convinced the final plan was sound. Representations submitted had raised significant issues, but the additional work was looking to resolve these issues.

In response to a question from Councillor Loughlin regarding how unmet housing need in other areas might affect Uttlesford's local plan, Councillor Barker said a paper responding to the government consultation on housing numbers was being put to Cabinet on 18 October. The draft Council response said the draft plan had been devised based on figures that the Council was advised to use, and that any alteration of these figures would require the Council to review its evidence base and would delay the production of the Local Plan.

The Chairman said the potential new formula for distributing houses which had been proposed by the government would increase pressure to build in the South East, and would considerably alter many of the original targets. He hoped this formula would be amended in due course.

In response to a question from Councillor Loughlin regarding comments in the report which proposed building on the green belt, Councillor Barker said Uttlesford had completed reviews of both the green belt and the countryside protection zone and deemed them fit for purpose. The Council was looking to preserve them, not to build on them.

In response to Councillor Dean's statement that sports planning should not be examined purely within the proposed new developments, the Chairman said sport would be looked at holistically and the Council were in communication with Active Essex.

Councillor Barker said sports centres and other facilities within schools in the district had not been well-used in the past. It was important to share such facilities in order to provide amenities for every community.

Councillor Dean said it was important to make a strong statement that the Council was prepared to make sure the developments happened in line with garden city principles. He had been on a tour of garden city developments and had come away with knowledge and inspiration for creating communities. Social infrastructure was important and it would be good to reassure parish councils. Councillor Lees said all members of the group were on the same page on this issue.

The Chairman said a possible issue could be what was considered to be good design. The Council would be working with experts to ensure good design was a factor in potential new developments.

In response to a point about the lack of specificity in more recent planning policy, the Assistant Director – Planning said he would take this away to look into further. Councillor Mills said he believed part of this policy had changed due to national legislation.

In response to a question from Councillor Dean, Councillor Barker said public transport in the Great Dunmow area was being examined, including to Stansted Airport and Bishops Stortford.

In response to questions from Councillor Lees regarding water provision and sewage, Councillor Barker said a new study had been commissioned and the policy on water in the final local plan had to be found to be sound. The Planning Policy Consultant said the Environment Agency had to be satisfied with the plans to ensure money would be released for new infrastructure. The Council was aiming to have a robust planning policy, taking into account the long-term needs of the communities in Uttlesford.

In response to a question from Councillor Lees, the Chairman said the Council had sufficient resources to do work on the plan.

Members said it was important to liaise with existing communities about potential new communities. It was important to try to anticipate the future.

The Chairman reaffirmed that all parties were committed to enforcing garden city principles in new developments.

Jane Grey and Fiona Wilkinson spoke on this issue. Gareth Bevans had been due to speak at the meeting but was unexpectedly detained. His statement was read out by Fiona Wilkinson. Copies of these statements are appended to these minutes

The Project Manager - Planning Policy said the report would be considered at Cabinet on 18 October, recommending approval to carry out a public consultation between November and January on a draft Issues and Options document for the proposed Garden Community. The document provided information on how the proposed new settlement would be developed around garden city principles. The Council would not accept poor quality design and was committed to achieve the principles. The result of the consultation would be reported back to the Working Group after consideration of representations on the Regulation 18 Local Plan. The consultation would in no way fetter the District Council on deciding its response to the Regulation 18 Local Plan, which was the primary planning document.

In response to a statement by Sandi Merrifield, the Project Manager – Planning Policy said it was important to get the document out for consultation. This was because Braintree District Council shared responsibility for the document, and it was important to the local plan process that consultation on the Issues and Options document had been completed before the start of the examination of the Braintree Local Plan which was expected in January 2018 .

In response to a question by Councillor Dean, the Project Manager – Planning Policy said he would strengthen wording to make it clear that the Council currently only supported the proposed Garden Community in principle, and he would ensure page 202 of the agenda pack included the objective of safety.

In response to the statement by Sandi Merrifield, members agreed to recommend to Cabinet that the fourth bullet point in question 13, on page 239 of the agenda pack, be deleted.

Sandi Merrifield spoke on this item. A copy of this statement is appended to these minutes.

The meeting ended at 9:00pm

Agenda Item 3

Committee:	Planning Policy Working Group	Date:	14 December 2017
Title:	Uttlesford Local Plan Regulation 18 Draft Plan Consultation Responses		
Report Author:	Stephen Miles, Planning Policy Team Leader	Item for decision:	No

Summary

1. This report summarises the responses received to the Regulation 18 Draft Local Plan and highlights where further work and consideration is required.

Recommendations

2. That Planning Policy Working Group notes the responses received to the Regulation 18 Draft Local Plan and the key issues for further work and consideration as set out in the report.

Financial Implications

3. The preparation of new and updated evidence to address the responses received to the Regulation 18 Draft Local Plan will be met from the planning budget.

Background Papers

4. Uttlesford Regulation 18 Draft Local Plan.

Impact

- 5.

Communication/Consultation	Consultation on the Regulation 18 Draft Local Plan took place between 12 July and 4 September 2017.
Community Safety	This is an underlying theme of the Local Plan.
Equalities	The Regulation 18 Local Plan was subject to an equalities impact assessment and this will be reviewed and updated for the Regulation 19 Local Plan.
Health and Safety	Health and safety matters are part of the Plan's content and are considered as part of the sustainability appraisal/ strategic environmental assessment of the Plan.

Human Rights/Legal Implications	The Local Plan will need to comply with human rights and planning legislation. Once adopted it will form part of the statutory development plan.
Sustainability	This is an underlying theme of the Local Plan e.g. ensuring homes and jobs are provided near to each other and minimising reliance on the private car. The Plan is subject to sustainability appraisal/ strategic environmental assessment throughout its preparation.
Ward-specific impacts	Some wards may be affected by site specific proposals but the overall spatial strategy for the Plan is a matter for all wards.
Workforce/Workplace	This will involve Councillors, officers from the Planning Policy Team and others as necessary.

Situation

6. Public consultation was held between 12 July and 4 September 2017 on the Regulation 18 Draft Local Plan. Nearly 6,000 representations have been received from over 2,000 individuals and organisations. These responses have all been uploaded onto the Council's consultation portal and are available to read [online](#).
7. A report was brought before PPWG on 17 October which summarised the reps and arising issues from other planning authorities, public bodies subject to the duty to cooperate and some Parish Councils nearby to the proposed Garden Communities.
8. Item 3a contains the overarching summary of representations for each policy and paragraph in the regulation 18 Draft Local Plan. Items 3b to 3o contain a more detailed summary of the representations by policy and paragraph. This more detailed summary provides:
 - The overarching summary of all the representations;
 - A more detailed summary of the representations from statutory consultees and bodies;
 - A more detailed summary of the representations from developers / landowners / site promoters;
 - A more detailed summary of the representations from individuals; and
 - A summary of the Sustainability Appraisal for the policy.
9. The Council also received a number of late representations. While the Council received these after the deadline and consequently they are not duly made

representations, they have been summarised and can be found in Item 3p. At the regulation 19 consultation the Council will not be able to consider representations that are not duly made.

10. The representations received cover a wide variety of issues from the strategy and objectively assessed housing need, to the Garden Communities, to detailed policy wording and site specific detail. These can be read in detail in Item 3a and in Items 3b to 3o. The overarching summaries for SP3, SP6, SP7 and SP8 are pulled out below:

SP3: The Scale and Distribution of Housing Development – Overarching Summary

- Highways England note that the development in Saffron Walden and Great Dunmow will have a severe effect on the road network, suggesting that Uttlesford District Council (UDC) should consider opportunities to link infrastructure to the airport and Easton Park.
- Thames Water consider that upgrades may be needed to the sewerage treatment works at Bishop Stortford.
- Essex County Council (ECC) suggest that it may be beneficial to allow some development in the Type A & B villages. ECC also suggest that clearer highway and transport mitigation measures are needed.
- Broxted, Great Chesterford and Stebbing Parish Councils suggest that the Objectively Assessed Housing Need (OAHN) has been over-estimated.
- A number of developers suggest that the OAHN has been underestimated, which undermines the evidence base of the plan.
- Campaign to Protect Rural Essex question the evidence base behind the new garden communities.
- Epping Forest District Council support the policy, as it is in accordance with the Memorandum of Understanding on OAHN.
- The Woodland Trust has concerns regarding the locations of the site allocations in proximity to ancient woodland.
- Hertfordshire County Council consider that ECC will provide new secondary schools to cope with the demand arising from new housing proposed in Uttlesford.
- A number of representations are concerned that UDC do not have a Memorandum of Understanding including Brentwood, which cannot meet its housing need.
- A number of developers suggest that more housing should be proposed for Type A and B villages to support sustainable development and help to ensure that there is not a housing shortfall in the District.
- A number of developers suggest that UDC will not be able to demonstrate a 5-year land supply of housing, as the Garden Communities will take longer to deliver than expected.
- Many individuals support the exclusion of NE Elsenham from the Plan.

- A number of individuals object to the Plan on the basis that new development will result in problems with traffic congestion.
- It is suggested that Stansted Mountfitchet should be allocated more development

SP6: Easton Park Garden Community – Overarching Summary

- Key issues amongst the statutory consultees are about addressing the evidence base in relation to Sports Provision, the need for a detailed Water Cycle Study and a full Historic Impact Assessment. Manchester Airport Group expressed concern about potential impacts on Stansted Airport. The need to work with our partners on the transport impacts of the Garden Community is recognised, including Essex County Council, Hertfordshire County Council and the Highways Agency.
- Local communities are concerned about the impact of the Garden Community on the surrounding area. The main planning reasons for objecting to the development are:
 - inadequate existing transport infrastructure, especially existing highways and public transport, and concern that new infrastructure will not be able to solve these problems;
 - Concern that there may only be one access into the development;
 - sensitive landscapes and impact on the countryside;
 - important historic buildings and assets that will be adversely affected, most notably the Gardens of Easton Lodge;
 - noise and safety impacts from Stansted Airport;
 - adverse impact on wildlife, SSSIs and ancient woodland;
 - loss of high quality agricultural land;
 - lack of existing infrastructure and problems in funding and delivering new infrastructure, including education, health and shops;
 - relative remoteness from existing jobs and likelihood this will result in increases in car commuting;
 - concerns relating to coalescence with existing communities;
 - concern that negotiations may delay the start date for development on the Garden Community; and
 - concern that other new homes in the area are not selling already.

SP7: North Uttlesford Garden Community – Overarching Summary

Of the government/national/Local Planning Authority bodies:

- Highways England consider this site probably has the least impact upon the SRN, although M11 J10 is a site of peak time congestion caused by capacity on the A505/not the junction itself. HE support the council in its requests to improve the A505 particularly between M11 J10 and the service area at the junction of the A1301.

- The Environment Agency are generally supportive of the thrust of this policy although existing Uttlesford Water Cycle Study needs further detailed work (phase 2) prior to submission of the plan to be sound
- Anglian Water Services Ltd note reference to enhancements being made at Great Chesterford Water Recycling Centre in Anglian Water's ownership to accommodate the foul flows. Note role of Asset Management Plan (AMP) in provision/suggest amendment to take account of long term provision/enhancements/SUDs.
- Essex County Council notes NUGC is in north of Uttlesford/close proximity to Little Chesterford, and therefore seeks to strengthen the delivery and success of Chesterford Research Park. It supports London-Stansted-Cambridge Corridor, ensuring that skilled labour force in sectors have opportunity to locate in close proximity to employment. Need early delivery of a new secondary school. Need assessment of the historic environment/understand impacts such as on Roman Temple/its relationship to the Roman Town/conservation area.
- Cambridgeshire County Council object to NUGC on transport impacts/reliant on large-scale improvements to the A505/ no scheme identified/no firm timescales for study work to begin. Also comment: The proposals for a new garden village at North Uttlesford do not raise significant education concerns.
- Hertfordshire County Council is concerned over cumulative impact of development in and around Great Chesterford on the Hertfordshire network. In particular, the A505 runs to the north of the site providing east west connections to the A10 and A1. Junctions are already operating close to capacity in the Royston area and M11 junction 10 is a constraint.
- Natural England given the scale of development proposed in this area expects to see consideration of impacts on Hildersham Woods and other nearby SSSIs and for avoidance/mitigation measures to be included in the policy as recommended in the SA.
- Historic England welcomes the requirement for a Heritage Impact Assessment but Brief HIA (2017) already indicates site could not be developed without causing significant harm. It is unlikely that this can be satisfactorily mitigated/objection.
- Harlow District Council refers to Policy SP6.1 - delivery of 10,000 new dwellings, of which a minimum provision by 2033/corresponding sentences for SP7 and SP8 do not specify figures as minima.
- South Cambridgeshire District Council expressed concerns especially to the proposed North Uttlesford Garden Community regarding the sustainability of the proposal. The main issues are transport – impacts on A505/challenges to sustainable use, landscape, water supply, and ability to deliver facilities especially a secondary school

- National Trust not clear no provision for a new country park/proposed for the other two garden villages. A new Country Park would reduce pressures on Hatfield Forest.
- Most of the remaining bodies including Town/Parish Councils, developers, land owners and individuals consider North Uttlesford Garden Community as unsustainable and unsuitable, causing a number of concerns:
 - Size - considered too large, there are several objections to the suggestion that a development of 5,000 houses can be called a village. Its footprint is considered too large compared to other existing settlements.
 - Invalid basis for selecting NUGV location. The proposed location lacks any infrastructure to provide amenities within easy access and will instead require the need for cars. It is considered that the site will not going to meet the needs of Uttlesford residents as the site is on the northern edge of Uttlesford too far from the centres of employment in Uttlesford (Stansted and south towards Harlow).
 - Not aligned with Garden City principles.
 - Housing affordability.
 - Increased housing supply for commuters to London and Cambridge, which will benefit more than the current residents.
 - Not serving local employment needs.
 - Pressure on existing facilities and infrastructure (some of them already under significant pressure): schools, health services, rail stations, parking around stations, highway network. Surgeries are understaffed, and the doctors and nurses are overworked.
 - A1301/A505, M11/A505, and the A1307/Fourwentways, Junction 9 of M11/A11 require comprehensive study, and guaranteed financial commitment to the improvements.
 - It is considered unrealistic to achieve 50% non-vehicular travel in the proposed new development, given high car ownership, poor bus services and lack of well-connected cycling lanes in the rural area, and difficulties to cycling due to the topography.
 - Environmental impact: flooding risks, including flooding caused by building 5,000 new homes on the upper slopes of a hill, extra sewerage, air pollution caused by road congestion and light pollution. Impact on the existing aquifer.
 - Negative impact on existing landscape, wildlife, local rural character and heritage (particularly the Romano-Celtic Temple).
 - The impact of such a large-scale development on the water supply or whether there will be sufficient capacity to sustain supplies in the future. The water in this area is from an aquifer.
 - Loss of agricultural land.

- Poor parking provision for cars and bicycles around rail stations. The site is beyond reasonable walking distance from the station and there is no parking available there.
- The rural area has no proper cycle lanes, cycling is already hazardous and difficult due to the topography.
- Cooperation with South Cambs considered to be poor and ineffective.
- Potential conflict of interest of councillors: Uttlesford District Council is a 50% shareholder in Chesterford Research Park, and therefore it is considered that it has a vested interest in providing nearby housing and facilities to support and encourage the growth of the research park, and hence increase its return on investment
- More transparency is expected from Uttlesford DC. Some individuals consider that there is very limited information currently available to the public and the wider community directly affected by the proposed development is lacking and local residents are owed much greater detail in relation to detailed housing plans, environmental impact, funding, infrastructure and transport impact to be able to reasonably form a view of the viability of this new town. There are several concerns regarding the lack of a full and published Traffic Impact Assessment, released prior to the consultation period.
- Some concerns that the proposals would appear to be a hastily prepared submission with minimal time for consultation and reflection of the consequences. Some responders consider there has been an insufficient consultation period which took place over the summer holiday period when many people are away.
- Concerns are raised if UDC has complied with the Duty to Cooperate in terms of provision of housing to meet the strategic housing market areas and commitments on highway improvements with South Cambridgeshire City Council.
- Some representations propose reduction of scale of development and spread the development into established villages and small towns of the area near employment sites such as Chesterford Research Park and Stansted
- Some however noted that the north of the district was isolated for secondary schooling and that NUGC could assist in strategic provision/infrastructure
- Bidwells and Grosvenor Britain & Ireland are the main supporters of the policy.

SP8: West of Braintree Garden Community – Overarching Summary

- Key issues amongst the statutory consultees are about addressing the evidence base in relation to Sports Provision, the need for a detailed Water Cycle Study, a full Historic Impact Assessment and a Minerals

Resource Assessment. It is recognised that ongoing work with the County Council and Braintree District Council will be vital and the need for progressing issues and masterplanning jointly through the Development Plan Document process

- Consultees and respondents focus on a wide range of reasons to oppose the development. Many of the residents state that they moved to this part of the district for its rural quality and this would be lost when the Garden Community is developed. Main planning reasons for objecting to the development are:
 - inadequate transport infrastructure, especially existing highways and public transport;
 - deliverability given that the site straddles the district boundary and also includes a minerals site;
 - sensitive landscapes and impact on the countryside;
 - important historic buildings and assets that will be adversely affected;
 - loss of an important airfield of historic significance;
 - adverse impact on wildlife and ancient woodland;
 - loss of high quality agricultural land;
 - lack of infrastructure and problems in funding and delivering this, especially in relation to drainage.
 - existing constraints in education and health facilities;
 - relative remoteness from existing jobs and likelihood this will result in increases in car commuting; and
 - concerns about flood risks.

11. As discussed at PPWG in October, the Council is progressing updates to various pieces of evidence in order to address the technical issues that have arisen from the regulation 18 consultation over the summer. Updates to the evidence base to address these technical issues are ongoing for the following studies:

- Water Cycle Phase 2
- Transport update
- Archaeology study
- Full Historic Impact Assessment
- Sports and playing pitch facilities
- Updated employment study
- Retail update
- Consider impacts on Hatfield Forest & Epping Forest
- Infrastructure delivery plan update
- Whole Plan viability
- Garden communities viability
- Assessment of proposed and alternative sites
- Assessment of delivery rates on Garden Communities
- Sustainability Appraisal

12. The additional work to look at issues arising from representations and to ensure that we get the plan right, as well as sound and legally compliant, means that we are now looking at the need for a cabinet and full council in late spring. An updated Local Development Scheme will be brought before a future Cabinet to agree the new timetable.

Risk Analysis

13.

Risk	Likelihood	Impact	Mitigating actions
The Council fails to adopt a "sound" Plan	2 – Unlikely.	3 – Will result in the Local Plan being found unsound. Significant impact on planning policy and planning applications.	The Council has an adopted SHMA, undertaken a review of the evidence base, appraised the development scenarios and has undertaken a sustainability appraisal of allocations. Duty to Co-operate discussions are productive.

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.

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Uttlesford District Council Regulation 18 Local Plan Overarching Summaries of Representation

CHAPTER 1 – Introduction

- A number of responses express concerns over the traffic congestion that will result from the Garden Communities.
- Concern that the consultation period is undemocratic as it was undertaken in the school holidays.
- Concern that the SA does not consider reasonable alternatives.
- Concern that housing in the garden communities will not meet NPPF sustainability requirements.
- Questioning how housing targets have been reached due to the lack of a clear audit trail.
- Detailed comments on the SA in relation to Easton Park Garden Community proposal from Little Easton Parish Council.
- Some support for the Plan.
- The Plan should take into account emerging and adopted Neighbourhood plans.
- Questioning whether UDC has fulfilled Duty to Cooperate requirements, in particular with South Cambridgeshire District Council.
- It is noted that consultation was not held in the most convenient time (i.e. School summer holidays).
- The Reg 18 consultation only took into account written comments, rather than oral comments given at forums. This excludes certain groups of people.
- Concern that as the AMR has not been updated since 2014, and as such UDC does not properly understand housing supply and so risks a 5-year housing land supply shortfall.
- Concern over that the SA does not present a clear evidence trail in regard to the garden communities.
- A number of responses state that the Plan does not meet NPPF paragraphs 155 and 151.
- Concern is expressed that there are very few references to Neighbourhood Plans and that Neighbourhood Plans have not been taken into account in the process of preparing the Plan.
- Concern that there should be only one development plan document – the Local Plan.
- Request for clearer referencing and explanation of technical terms.
- Concerns that the Plan does not meet the tests of soundness including lack of evidence, inconsistent with national policy.
- Concern that consultation has been lip service only, contrary to the NPPF.
- Concern that the housing development is not required.
- Concern that the impact of the development proposed has not been considered.
- Belchamp's Lane, Rickling Green; and Land to the south-west of Brick Kiln Lane, Coney Acre, Rickling Green. The objectively assessed development needs (OAN) for the Local Plan period, between 2011 and 2033, includes 14,100 new homes (both

market and affordable). However, it is important that this figure should not be seen as a target, rather the minimum base line number of homes which the Local Plan will deliver over the plan period, with sufficient flexibility to adapt to rapid changes and ensure that the plan significantly boosts the supply of housing. Therefore, the Plan's ambition should be, to deliver significantly more than 14,100 homes.

- A number of representations question the validity of the SA and how it has been used to favour the garden community allocations. It is stated that a number of sites performed better in the SA than the garden community sites. Clarification is therefore sought as to why the garden community allocations were brought forward and other sites discounted.
- EA suggest that waste management should be included in the Plan to identify areas where significant improvements can be achieved.
- Concern is expressed over the sustainability of NUGC, in terms of vehicle usage, public transport links and employment offerings.
- Natural England are concerned that the Epping Forest SAC has been screened out of the HRA. They also have a number of other detailed comments in relation to the HRA.
- ECC recommend, among a number of suggestions, that UDC include a Recreational Disturbance Avoidance and Mitigation Strategy for recreational activities that will result from the garden communities.
- Concerns are raised as to why a number of sites are not included in the SA.
- It is suggested that the SA should be available for consultation.
- It is suggested that the development is needed in the north of the district where there is a demand for workers and housing, rather than the south of the district.
- The policies will destroy the district.
- Further details in the form of a summary are required of the policies to be replaced and the replacement policies.
- The reference to the Glossary is incorrect.
- Excessive and unsustainable development to the south of the district. Excessively deferential treatment of the north. Failure to engage with South Cambridgeshire, where there is a true demand for a highly qualified work force and additional housing.
- The Glossary is in Section 15, not 14.
- This statement is simply untrue. The policies will destroy the district. No attempt has been made to challenge the excessive and unreasonable house building numbers proposed.
- This section says policies written here will replace existing ones. Please can we have a summary of what is coming out or being significantly altered?

CHAPTER 2 – Spatial Portrait Vision and Objectives

- Representations note that the vision should mention travel and transport, as this is a key concern of residents.
- Concern is expressed over the lack of green space and sport facilities that are to be provided.

- Concern that the objectives and vision will not be realised due to a lack of proposals which ensure that infrastructure will be delivered.
- Concerns are expressed over the evidence base used to inform the plan.
- Biased, unsustainable objectives.
- There are a number of representations that ask for UDC to reference the population figure.
- A number of representations are concerned with the inaccuracies in the retail patterns of residents. The inaccuracies are outlined in the representations.
- A number of representations are concerned over the sustainability of the loss of agricultural land for development.
- Concerns that the garden communities will not be sustainable as they will rely on car usage which will increase already high pollution levels.
- Representations are concerned that many of the new residents of the garden communities will commute to work and add to the overcrowded trains.
- A number of representations question the notion that transport links are 'good'.
- Representations question whether employment opportunities are available for the residents of the new garden communities.
- Concerns are expressed over whether creating the garden communities supports the vision and the objective to conserve the natural environment.
- A number of representations question how sustainable transport will be provided for given the location of the garden communities, and lack of existing infrastructure.
- Representations support the aspirations for high quality design, however question how this will be ensured.
- Representations express the need for infrastructure (road, rail, broadband, water, sewage, hospitals and schools) to support existing and new communities.
- A number of comments on objective 2 question whether providing opportunities for employment at Stansted is a contradiction of UDC's position on objecting the second runway at Stansted.
- Concerns are expressed over whether creating the garden communities supports the vision and the objective to conserve the natural environment.
- Concerns that the delivery of timely and sufficient housing and affordable housing within the plan period via the proposed new strategic new settlement given the high infrastructure cost involved and the complexity of development.
- Concerns are expressed over the mechanism to deliver sustainable travel through different transportation options including vehicles, railway, cycling and bus.
- A number of representation expressed concerns over the provision of affordable housing for local people.

CHAPTER 3 – Spatial Strategy

Paragraphs 3.1 – 3.3

- The Plan is not ambitious enough – it should be a plan for the world in the 2020s. The garden communities provide the perfect opportunity for a sustainable local economy in the information age.

- The strategy is too focused on housing numbers at the expense of everything else.
- It is not clear when and where the houses are needed.
- Consider that a plan is needed, not a spatial portrait.
- The phrase garden communities conceals unpalatable truths.
- This plan is not sustainable due to the size and lack of infrastructure.
- The plan clearly does not respect the local character of Uttlesford and the villages to be directly affected by this plan, especially those nearby the West of Braintree site.

Presumption in favour of sustainable development

Paragraph 3.4 and Policy SP1

- Some support for Paragraph 3.4.
- Suggest include reference to making the efficient use of previously-developed (brownfield) land in accordance with national policy.
- Concern that there are no priorities between different goals which could lead to conflicts and negative impacts on Uttlesford.
- Concern that development should be accompanied by local business growth and sustainable transport.
- Clarification sought as to the definition of “sustainable development” and “presumption in favour of sustainable development” specifically for the local context. Suggestion that Policies S1 and S12 could be combined.
- Concerns raised regarding the following part of Policy SP1: ‘where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise’. The concern was that this position would undermine the Local Plan.
- Strong objections were expressed by Little Chesterford Parish Council, including assumptions for the stated housing numbers, the need to safeguard the separation of settlements, and the selection and delivery of the North Uttlesford Garden Village.
- Detailed wording changes suggested by a number of respondents.
- Concern that the audit trail for the Local Plan is incomplete particularly in relation to the Local Plan Sustainability Assessment process, including the transparency and availability of data, the interim SA Environment Report and some supporting decision-making evidence.
- Some support for the policy including from most of the landowners/ developers and Historic England.
- Some support for Paragraph 3.4.
- Suggest include reference to making the efficient use of previously-developed (brownfield) land in accordance with national policy.
- Concern that there are no priorities between different goals which could lead to conflicts and negative impacts on Uttlesford.
- Concern that development should be accompanied by local business growth and sustainable transport.

Spatial Strategy

Paragraphs 3.5-3.11

- Historic Environment suggests that archaeology should be included for in paragraph 3.8 to align with the NPPF.
- Taylor Wimpey are concerned that UDC will fall short of its stated annual housing requirement due to the complexity of the Garden Communities and the required infrastructure.
- Bloomhall suggest that the para. 3.6 be reworded to ensure sustainable development.
- Concern that the Countryside Protection Zone has previously been ignored by UDC. More assurance is sought on the sincerity of the CPZ.
- Concern that the rural character of the area has not been kept in regard to development.
- Concern that the West of Braintree development is being built on agricultural land.
- Concern that UDC is placing too much emphasis on Stansted Airport providing the majority of employment opportunities.
- Concern over the lack of transport infrastructure to support new developments.
- Suggestion that the Plan refer to more than just aircraft noise in relation to Aircraft Pollution.

Key Map

- West of Braintree Garden community is welcome by the site promoter, but the member of public raised concerns over the impacts on wildlife, Boxted Wood and historic Andrewfield airfield.
- A number of representation expressed concerns over the impacts of developments on the main highway including M11, A11, A120 given the increase in commuters.
- Some inconsistencies between the map and the policies in the plan are identified.
- Some representation suggested that brownfield should be developed, the Easton Park Garden Community should be smaller scale, and the developers should pay for the transport improvement scheme.

Settlement Hierarchy

Paragraphs 3.12-3.13

- Enodis Property Developments Ltd suggest that UDC should reconsider the settlement hierarchies so as that more development can occur in Type A Villages.
- Bloomhall also suggest that the Market Towns tier in the hierarchy is redefined to reflect the cross-boundary importance of Bishop's Stortford.
- Bloomhall are concerned that the Garden Communities will not be delivered on time and so there will be a housing shortfall.
- Thaxted Parish Council suggest para. 3.13 is amended to reflect that the Garden Communities are included in the Corporate Plan.
- Concern that the West of Braintree Development is not supported by strategic employment sites.
- Objection to Stebbing being included as a Type A Village
- Suggestion that Hatfield Heath is given a different classification.
- Clarification is sought on how new settlements will fit into the settlement hierarchy so as to aid development
- Concern that large developments do not fit in with the rural environment.

New Garden Communities

Paragraphs 3.14 – 3.15

- The ULP is not positively prepared and it does not meet development and infrastructure needs, and does not enable the delivery of sustainable development.
- Each proposed GC is in an unsustainable location and building all three within such close proximity will cause a detrimental impact to the area and associated amenities.
- There is a lack of road and rail infrastructure to support such settlements in these locations with no access to public transport
- There will be a detrimental impact caused to the countryside and rural landscape, wildlife, ancient woodlands, listed buildings, archaeology, surrounding villages setting and a loss of agricultural land
- The proposed locations will not allow for the provision of pedestrian or cycling routes due to their remoteness
- NUGC will not be served by adequate employment opportunities
- NUGC will be highly dependant on the car with a knock on effect caused to the already strained road network
- no evidence that the necessary transport, health, education or retail infrastructure will be provided, in place from the start & clearly planned for financially
- Rate of build needs to be increased
- support for 3 locations, considered to be only solution in these circumstances and will provide much added housing
- Duty to cooperate has not been fulfilled
- No proposed development adheres to the GC principles
- W.Braintree least sustainable of all three sites and loss of airfield is unacceptable

Market Towns – Saffron Walden and Great Dunmow

Paras. 3.16-3.17

- A new secondary school needs to be provided to meet the need of existing and future residents of the local area around Saffron Walden and Great Dunmow, and associated new developments.
- The proposed development to the east of Great Dunmow will dwarf the historic town and cause detrimental damage to its rural setting and market town feel.
- The time allocated to build the proposed housing developments as per the plan is unrealistic and will take many years to implement fully which is not sustainable or useful to the current situation.
- The provisions for infrastructure, including walking, cycling and public transport are not considered enough and the existing situation is not fully understood or accounted for.
- Unclear if new retail space is to be provided and if so what type and amount is planned for?
- Figures given in relation to Saffron Walden are not accurate and need to be recalculated or include recently granted permissions.

Villages

Paragraph 3.18-3.23

- Objections to a number of villages being classed as Type A villages: Quendon, Rickling, Great Chesterford, Stansted Mountfitchet, Takeley and Elsenham,
- Support for a number of village classifications: Great Canfield, High Easter, Thaxted, Newport, Elsenham, Hatfield Broad Oak and Stebbing.
- Suggestion that Felsted should be classed as a Type A Village.
- Suggestions that Wendons Ambo, Widdington, Felsted and Ugley should be allocated for more housing, due to having adequate services to support development.
- Suggestion that more development should be allocated in the villages instead of large developments, as this would support the rural population.
- Concern that Saffron Waldon does not have the services to support the West of Braintree garden community.
- Concern that the garden communities rely too heavily on the limited services in the villages.

The Countryside

Paragraph 3.24

- Great Chesterford Parish Council state that Great Chesterford should be considered to be countryside and development restricted to that which supports countryside uses.

Spatial Strategy Policy SP2 - Spatial Strategy 2011 - 2033

- The Local Plan appears to be overly-reliant on large strategic housing allocations which may not be deliverable within five years and which may not contribute positively to the Council's housing land supply;
- A clear need for additional sites to be identified for housing – sites that have the potential to deliver housing in the shorter / medium term. Small sites in established villages would be entirely deliverable in the short term.
- There is no provision for better infrastructure and the current roads (A120) will not withstand the increased traffic from 3 no. garden communities.
- The Garden Communities were not selected based on the evidence in the Sustainability Appraisal.
- A wider choice of type, size, location and design of properties should be spread across the district to give more choice to buyers and to allow for smaller house builders to develop sites.
- More employment sites should be allocated and in a range of locations.
- Many objections from individuals focus on concerns related to infrastructure provision for the new Garden Communities. Individuals are concerned that if rail links are not built to service the new developments then traffic congestion will become a problem.
- Individuals object to the Garden Communities as they feel that they will not be sensitive to the historic and natural environment in the rural area.
- There is an overwhelming amount of concern from individuals that the necessary infrastructure to service the new garden communities (such as schools, roads, sewage, water, health care) will not be provided for, especially by developers.

- Suggestions that infrastructure should be in place before the garden communities are built.
- Individuals are concerned that not enough affordable housing or bungalows will be built to meet local need.
- Individuals are concerned that there are not enough employment opportunities for the new residents of the communities.
- Many individuals think that the house prices will be too high, reflecting the demand from London commuters, not local residents who work at Stansted Airport on low income.
- There are concerns that the housing need projections for Uttlesford are too high.
- Individuals have suggested that Wendens Ambo could provide an appropriate location for development, given its proximity to existing rail links.
- Individuals have also suggested that Stansted Airport should not be allowed further growth beyond 35m passengers per annum until infrastructure improvements have been made. It is suggested that the plan reflects this.
- Many individuals support UDC's decision to remove Elsenham and Henham from the development proposals.
- Need identified to work across borders and through duty to cooperate.

Identifying and Meeting our Housing and Jobs Needs

Paragraphs 3.25 – 3.30

- Authorities in the West Essex and East Hertfordshire HMA should be required to set out in their Local Plans the necessary contingency measures should one authority be unable to meet their own needs within the Plan period.
- Whilst there has been co-operation in considering housing needs across the HMA the Councils need to further align their plans to provide greater certainty they will work together in meeting housing needs.
- The Objectively Assessed Needs identified within the recent SHMA show that unmet housing has been projected upwards. However, the DtC does not reflect this current position on housing distribution between the SHMA area authorities.
- There is no mention of Hertfordshire County Council as part of the Duty to Cooperate.
- Uttlesford needs to work extremely closely with the airport to ensure its issues are identified and addressed through the Local Plan so it can deliver its significant economic growth potential.
- Uttlesford is within the London Stansted Cambridge Corridor area and this should be noted in the plan.
- The proposal for North Uttlesford Garden Village lacks evidence of co-operation with S. Cambridgeshire and does not take account of the implications of their development plans for North Uttlesford.
- Uttlesford could adopt more of a leadership role with these adjacent authorities in the promotion of new business initiatives, modern networking to enable such development and high-tech hubs.

Vision for the London Stansted Cambridge Corridor Core Area

Paragraphs 3.31 – 3.34

- The Crossrail 2 will help to support the train services between Uttlesford and London.
- An integrated approach of rail-based public transport network within Uttlesford and Cambridgeshire is suggested, for instance Easton Park with Stanstead airport and North Uttlesford with Saffron Walden, Cambridge and Great Chesterford Stations via the proposed Cambridge-Haverhill railway.
- LSCC involvement in the preparation of plan may have conflict of conflict as it is funded by Stansted Airport.
- Any new development should ensure the provision of super-fast broadband.
- Some suggestions about wording and presentation were made.
- Additional housing allocation should be considered to take the London overflow on housing requirements in Uttlesford into account.

The West Essex and East Hertfordshire Strategic Housing Market and Functional Economic Market Area

Paragraphs 3.35 – 3.38

- Epping Forest District Council and Harlow District Council reminded that all three MOUs were signed in March 2017 already, and the latest joint evidence on FONH published in July 2017 should be referred.
- The council may risk a five-year housing supply shortfall of 737 dwellings and a plan period shortfall of 3,726 dwellings. Additional allocations should be considered.

Identifying the Housing Needs

Paragraphs 3.39 – 3.45

- A mechanism to review the housing needs is needed as unmet need of between 3,750 and 4,000 homes per annum may arise from the South Essex Housing Market Area (HMA).
- The discrepancy of housing needs between the (FOAN, July 2017) 13,332 and the housing target 14,100 in the draft local plan is not explained.
- The ten-year trend in relation to migration instead of the 5-year trend used by ONS in the Sub National Population Projections is not justified in the SHMA.
- 20% - 25% uplift should also be provided given the strong market demand. But a representation suggests that 10% is enough as supported by the inspector and similar figures from neighbouring councils.
- Concerned that the OAN of Uttlesford is more than one-fourth of the total housing needs of the West Essex and East Hertfordshire Strategic Housing Market.
- The total housing need should be 12,950 over the Plan period to 2033, using a stepped model which reflects the proper historical need.
- The SMHA does not take the effect of unmet housing demand in London given its proximity to London which has continued shortage of housing.
- The level of housing might reduce from 14,100 to 13,332 over the period of the Local Plan. Even lower need is likely because of reduction in migration due to Brexit and slower growth in Stansted Airport.
- Identification of housing needs should be specific to existing local people and the elderly.

Housing Supply

Paragraphs 3.46 – 3.49

- No explanation is given for the gross disparity between the number given to other key villages and the number for Hatfield Heath.
- Table 3.4: The Windfall Allowance row is titled incorrectly
- The methodology to then allocate the housing numbers to specific villages is based on data which remain in a high state of flux and needs reviewing.
- Great Chesterford's status as a key village must be removed unless NUGC is abandoned.
- The figures for Saffron Walden should be amended.
- If there are problems with housing delivery at the strategic sites then additional sites (small, medium and large) in a variety of sustainable locations should be identified to ensure that the housing target is met during the plan period.
- To prepare and publish a new and robust housing trajectory, amended to reflect realistic delivery rates at the strategic sites, to demonstrate that the proposed housing target can be met during the plan period.
- Realistic start dates and delivery rates are applied to these potential strategic development sites.
- The Council has failed to accommodate their own objectively assessed housing need.
- Windfall allowance too high over the plan period to be effective and is not consistent with the NPPF.
- The Spatial Strategy discriminates against small to medium sized builders by providing an insignificant supply of land for small schemes of 1-30 houses.
- Further and more up-to-date evidence on permission already granted needs to be evident within the plan.
- Many discrepancies within tables 3.5.

Policy SP3 - The Scale and Distribution of Housing Development

- Highways England note that the development in Saffron Walden and Great Dunmow will have a severe effect on the road network, suggesting that UDC should consider opportunities to link infrastructure to the airport and Easton Park.
- Thames Water consider that upgrades may be needed to the sewerage treatment works at Bishop Stortford.
- ECC suggest that it may be beneficial to allow some development in the Type A & B villages. ECC also suggest that clearer highway and transport mitigation measures are needed.
- Broxton, Great Chesterford and Stebbing Parish Councils suggest that the OAHN has been over-estimated.
- A number of developers suggest that the OAHN has been underestimated, which undermines the evidence base of the plan.
- CPRESsex question the evidence base behind the new garden communities.
- EFDC support the policy, as it is in accordance with the Memorandum of Understanding on OAHN.
- The Woodland Trust has concerns regarding the locations of the site allocations in proximity to ancient woodland.

- HCC consider that ECC will provide new secondary schools to cope with the demand arising from new housing proposed in Uttlesford.
- A number of representations are concerned that the Memorandum of Understanding does not include Brentwood, which cannot meet its housing need.
- A number of developers suggest that more housing should be proposed for Type A and B villages to support sustainable development and help to ensure that there is not a housing shortfall in the District.
- A number of developers suggest that UDC will not be able to demonstrate a 5-year land supply of housing, as the Garden Communities will take longer to deliver than expected.
- Many individuals support the exclusion of NE Elsenham from the Plan.
- A number of individuals object to the Plan on the basis that new development will result in problems with traffic congestion.
- It is suggested that Stansted Mountfitchet should be allocated more development.

Provision of Jobs and Employment Land

Paragraph 3.50-5.54 and Policy SP4

- The policy is supported by our SHMA partners
- Over reliance on a small number of allocations for employment land. A range of additional sites for employment development should be allocated
- Over reliance on Stansted Airport to deliver jobs
- Employment statistics not accepted
- Concern that policy will not reduce out commuting.

Garden Communities

Paragraph 3.55 – 3.58 and Policy SP5

- The principles of the TCPA for Garden Communities cannot be fulfilled or complied with for development of GCs in Uttlesford.
- The infrastructure which will need to be implemented to support each new settlement has not been forecast or planned for in anyway which will in turn put major strain on the existing infrastructure services.
- Due to the rural nature of the district and location of the proposed sites, there is no possibility for a reduction in car use, but instead there will be a significant increase due to typography, location, railway station locations and commuter nature of settlement inhibitors.
- Rail links should be included in the design of each new GC to alleviate the use of private car and connect the towns property to other areas of the district and country.
- Employment land to provide local jobs and attract skilled workers to the area should form part of the plan for each GC settlement.
- Clarification on the term 'community land value capture' and what this means/results in.
- Rural character and distinctive landscape of the district will be ruined and public open countryside. Will be sacrificed.
- The timescales of the plan and implementation of homes is unrealistic and undeliverable. The SPDs required as per the plan will take longer then envisaged to adopt and put into practice.

- Affordable housing has already been cut down and what will be don't to require developers to implement this as per the plan and TCPA principles?
- Who is accountable for the delivery of the garden cities and associated infrastructure delivery?
- The plan needs to be aligned with and seek engagement with/of neighbouring authorities.
- As the timeframe for implementing development is contested there should be more smaller sites included to provide shorter term housing provision and retain 5YHLS.
- Suggestion that smaller sites should also be considered to meet the OAN.
- Concerns about the effect of the new settlements on the road infrastructure.
- A number of responses from land owners suggest too greater a reliance on new settlements and that there should be a greater role for Key Villages and/ or Type A Villages.
- Some responses from landowners with potential sites for employment land.
- Concern that development frameworks may take too long to prepare, particularly in the form of a DPD due to the need for Examination.

Easton Park Garden Community

Paragraph 3.59 and Policy SP6

- Key issues amongst the statutory consultees are about addressing the evidence base in relation to Sports Provision, the need for a detailed Water Cycle Study and a full Historic Impact Assessment. Manchester Airport Group expressed concern about potential impacts on Stansted Airport. The need to work with our partners on the transport impacts of the Garden Community is recognised, including Essex County Council, Hertfordshire County Council and the Highways Agency.
- Local communities are concerned about the impact of the Garden Community on the surrounding area. The main planning reasons for objecting to the development are:
 - inadequate existing transport infrastructure, especially existing highways and public transport, and concern that new infrastructure will not be able to solve these problems;
 - Concern that there may only be one access into the development;
 - sensitive landscapes and impact on the countryside;
 - important historic buildings and assets that will be adversely affected, most notably the Gardens of Easton Lodge;
 - noise and safety impacts from Stansted Airport;
 - adverse impact on wildlife, SSSIs and ancient woodland;
 - loss of high quality agricultural land;
 - lack of existing infrastructure and problems in funding and delivering new infrastructure, including education, health and shops;
 - relative remoteness from existing jobs and likelihood this will result in increases in car commuting;
 - concerns relating to coalescence with existing communities;
 - concern that negotiations may delay the start date for development on the Garden Community; and
 - concern that other new homes in the area are not selling already.

North Uttlesford Garden Community

Paragraphs 3.60 and 3.61

- Great Chesterford Parish Council considers there is no evidence that the NUGC site has potential or capacity for up to 5,000 dwellings given the site constraints of landscape, transport and heritage.
- Concerns that the cap of 3,300 dwellings before the strategic highways improvements is implemented will undermine the ability for the new garden community to sustain services or to be self-sufficient. Also, the highways improvements should be implemented before the development takes place.
- Details of the strategic transport improvements should be included in the Local Plan.
- Concerns about the timing of development bearing in mind the lead-in time required to prepare technical evidence and the provision of infrastructure.
- The site is not considered suitable or necessary in this location as it far from the employment sites at Stansted Airport which is where the housing need originates. There are limited jobs at Great Chesterford Science Park.

Policy SP7 – North Uttlesford Garden Community

Of the government/national /Local Planning Authorities:

Highways England consider this site probably has the least impact upon the SRN, although M11 J10 is a site of peak time congestion caused by capacity on the A505/not the junction itself. HE support the council in its requests to improve the A505 particularly between M11 J10 and the service area at the junction of the A1301.

The Environment Agency are generally supportive of the thrust of this policy although existing Uttlesford Water Cycle Study needs further detailed work (phase 2) prior to submission of the plan to be sound

Anglian Water Services Ltd note reference to enhancements being made at Great Chesterford Water Recycling Centre in Anglian Water's ownership to accommodate the foul flows. Note role of Asset Management Plan (AMP) in provision/suggest amendment to take account of long term provision/enhancements/SUDs.

Essex County Council notes NUGC is in north of Uttlesford/close proximity to Little Chesterford, and therefore seeks to strengthen the delivery and success of Chesterford Research Park. It supports London-Stansted-Cambridge Corridor, ensuring that skilled labour force in sectors have opportunity to locate in close proximity to employment. Need early delivery of a new secondary school. Need assessment of the historic environment/understand impacts such as on Roman Temple/its relationship to the Roman Town/conservation area.

Cambridgeshire County Council object to NUGC on transport impacts/reliant on large-scale improvements to the A505/ no scheme identified/no firm timescales for study work to begin. Also comment: The proposals for a new garden village at North Uttlesford do not raise significant education concerns.

Hertfordshire County Council is concerned over cumulative impact of development in and around Great Chesterford on the Hertfordshire network. In particular, the A505 runs to the north of the site providing east west connections to the A10 and A1. Junctions are already operating close to capacity in the Royston area and M11 junction 10 is a constraint.

Natural England given the scale of development proposed in this area expects to see consideration of impacts on Hildersham Woods and other nearby SSSIs and for avoidance/mitigation measures to be included in the policy as recommended in the SA.

Historic England welcomes the requirement for a Heritage Impact Assessment but Brief HIA (2017) already indicates site could not be developed without causing significant harm. It is unlikely that this can be satisfactorily mitigated/objection.

Harlow District Council refers to Policy SP6.1 - delivery of 10,000 new dwellings, of which a minimum provision by 2033/corresponding sentences for SP7 and SP8 do not specify figures as minima.

South Cambridgeshire District Council expressed concerns specially to the proposed North Uttlesford Garden Community regarding the sustainability of the proposal. The main issues are transport – impacts on A505/challenges to sustainable use, landscape, water supply, and ability to deliver facilities especially a secondary school

National Trust not clear no provision for a new country park/proposed for the other two garden villages. A new Country Park would reduce pressures on Hatfield Forest.

Most of the remaining bodies including Town/Parish Councils, developers, land owners and individuals consider North Uttlesford Garden Community as unsustainable and unsuitable, causing a number of concerns:

- **Size** - considered too large, there are several objections to the suggestion that a development of 5,000 houses can be called a village. Its footprint is considered too large compared to other existing settlements.
- Invalid basis for selecting NUGV **location**. The proposed location lacks any infrastructure to provide amenities within easy access and will instead require the need for cars. It is considered that the site will not going to meet the needs of Uttlesford residents as the site is on the northern edge of Uttlesford too far from the centres of **employment** in Uttlesford (Stansted and south towards Harlow).
- Not aligned with **Garden City principles**.
- Housing **affordability**.
- Increased housing supply for **commuters to London and Cambridge**, which will benefit more than the current residents.
- **Not serving local employment needs**.
- **Pressure on existing facilities and infrastructure** (some of them already under significant pressure): schools, health services, rail stations, parking around stations, highway network. Surgeries are understaffed, and the doctors and nurses are overworked.
- A1301/A505, M11/A505, and the A1307/Fourwentways, Junction 9 of M11/A11 require comprehensive study, and guaranteed financial commitment to the improvements.
- It is considered unrealistic to achieve 50% non-vehicles travel in the proposed new development, given high car ownership, poor bus services and lack of well-connected cycling lanes in rural area, and difficulties to cycling due to the topography.

- **Environmental impact:** flooding risks, including flooding caused by building 5,000 new homes on the upper slopes of a hill, extra sewerage, air pollution caused by road congestion and light pollution. Impact on the existing aquifer.
- **Negative impact on existing landscape,** wildlife, local rural character and heritage (particularly the Romano-Celtic Temple).
- The impact of such a large-scale development on the **water supply** or whether there will be sufficient capacity to sustain supplies in the future. The water in this area is from an aquifer.
- **Loss of agricultural land.**
- **Poor parking** for cars and bicycles around rail stations. The site is beyond reasonable walking distance from the station and there is no parking available there.
- The rural area has **no proper cycle lanes**, cycling is already hazardous and difficult due to the topography.
- **Cooperation with South Cambs considered to be poor and ineffective.**
- **Potential conflict of interest of councillors:** Uttlesford District Council is a 50% shareholder in Chesterford Research Park, and therefore it is considered that it has a vested interest in providing nearby housing and facilities to support and encourage the growth of the research park, and hence increase its return on investment
- More **transparency** is expected from Uttlesford DC. Some individuals consider that there is **very limited information currently** available to the public and the wider community directly affected by the proposed development is lacking and local residents are owed much greater detail in relation to detailed housing plans, environmental impact, funding, infrastructure and transport impact to be able to reasonably form a view of the viability of this new town. There are several concerns regarding the lack of a full and published Traffic Impact Assessment, released prior to the consultation period.
- Some concerns that the proposals would appear to be a hastily prepared submission with **minimal time for consultation** and reflection of the consequences. Some responders consider there has been an **insufficient consultation** period which took place over the summer holiday period when many people are away.

West of Braintree Garden Community

Paragraph 3.63 and Policy SP8

- Key issues amongst the statutory consultees are about addressing the evidence base in relation to Sports Provision, the need for a detailed Water Cycle Study, a full Historic Impact Assessment and a Minerals Resource Assessment. It is recognised that ongoing work with the County Council and Braintree District Council will be vital and the need for progressing issues and masterplanning jointly through the Development Plan Document process
- Consultees and respondents focus on a wide range of reasons to oppose the development. Many of the residents state that they moved to this part of the district for its rural quality and this would be lost when the Garden Community is developed. Main planning reasons for objecting to the development are:

- inadequate transport infrastructure, especially existing highways and public transport;
- deliverability given that the site straddles the district boundary and also includes a minerals site;
- sensitive landscapes and impact on the countryside;
- important historic buildings and assets that will be adversely affected;
- loss of an important airfield of historic significance;
- adverse impact on wildlife and ancient woodland;
- loss of high quality agricultural land;
- lack of infrastructure and problems in funding and delivering this, especially in relation to drainage.
- existing constraints in education and health facilities;
- relative remoteness from existing jobs and likelihood this will result in increases in car commuting; and
- concerns about flood risks.

Development Limits

Paragraph 3.63 and Policy SP9

- Overall support for policy
- Additional criteria suggested covering impacts on natural environment; historic environment; air quality; infrastructure.
- Developers are seeking a relaxation in the policy to allow greater flexibility as this can lead to sustainable development.

Development in the Countryside

Paragraphs 3.64 - 3.74 and Policy SP10

- Recognition of importance of best and most versatile agricultural land welcome
- Reference biodiversity in separate bullet point for clarity
- Requirement for development to protect and enhance the countryside and landscape character is welcome
- Requirement to clarify the pressures referred to in the policy regarding Stansted Airport
- Continued Countryside Protection Zone (CPZ) designation is supported
- Concern raised over future of CPZ due to the proposed Easton Park development
- Inadvertent alteration of the substance of place through unplanned growth will be impossible to mitigate
- North Uttlesford Garden Community (NUGC) will significantly damage the countryside
- Development of NUGC is contrary to SP10 principles
- Retention of the Green Belt is important for the preservation of character and essence of Birchanger

- Amalgamation of three policies i.e. (Saved Policy S6 (Metropolitan Green Belt), Policy S7 (The Countryside) and Policy S8 (Countryside Protection Zone) weakens the longstanding Policy 8
- Classification of agricultural land as Class 2 underestimates subtleties of individual areas of marginal land
- Concern was raised about UDC's rigid adherence to MGB and CPZ historic boundaries
- Metropolitan Green Belt not delineated in accordance with NPPF paragraph 85 stating the LPA "should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."
- SP10 deemed a protection policy that resists development unless certain criteria are met
- Due to restrictiveness SP10 certain sustainable development opportunities classed as "countryside and protected."
- SP10 protects land for its intrinsic character and beauty whilst NPPF paragraph 17 requires LPA to "recognise" the intrinsic character and beauty of the countryside
- Difficult to locate Policies Map on website
- Querying existence of Policies Map
- Reference to Development Limits should be replaced with a broad definition of settlements beyond which land is considered to be Countryside (approach being followed by other LPAs)
- SP10 considered not effective and not positively prepared as it seeks to hinder potentially sustainable sites in the countryside
- Conflict between protecting agricultural land and supporting biodiversity
- Need to support biodiversity should be prioritised
- Objection to omission of reference to Countryside Protection Zone (CPZ) after "MGB" in penultimate sentence in paragraph 3.74.
- Countryside Protection Zone's integrity compromised by development of 300 dwellings and an additional smaller site allowed on appeal
- Land south of A120 should be released from Green Belt to employment uses as it does not currently fulfil Green Belt purposes
- Request to undertake a Metropolitan Green Belt Review with Limekiln Lane as a firm southern boundary.
- Inflexibility of approach to Green Belt release regarded as hindering release of land that could contribute to vitality of Type A Villages such as Leaden Roding.
- Clarification required on who is responsible for identification of need to infill
- Development of Garden Communities on rural land seen as contradictory to the protection of countryside assets
- Scale of new settlement development does not respect quality or character of area
- Need to provide bridleways

**London Stansted Airport
Paragraphs 3.75 – 3.88 and Policy SP11**

'Of the 125 comments received on the policy, there were 77 'standard' comments stating the Policy should be amended in line with Objective 2c. The remaining 48 comments were on different aspects of Policy SP11.

'Standard' comment

- Policy SP11 (Stansted) should be amended in line with Objective 2c "Plans should not allow any further growth beyond the 35 million passengers per annum approved limit.

Sustainable Development Principles Paragraphs 3.89 – 3.94 and Policy SP12

- Support for the policy in principle and specific elements of the policy. Suggestions made for amending wording to ensure consistency with national policy, clarity and to address inconsistencies with other policies proposed in the Regulation 18 Draft Local Plan. Concern that the use of the term sustainable development in the policy is not inclusive of all aspects of sustainability.
- Irreversible loss of assets such as greenfield land and agricultural land (e.g. new garden communities) are considered contrary not only to this policy but also the National Planning Policy Framework and Core Planning principles.
- Definition of previously developed land and the criteria for under-used land should be consistent with the NPPF and included in supporting text to make policy more robust.
- Clarity required in relation to development at risk of flooding.
- Support for greater emphasis on reducing energy demand and including specific and clear energy efficiency targets, air pollution targets and emissions targets to make the policy stronger.
- Suggest merge Policy SP1 and SP12.
- Suggest a sequential approach to new development.
- Concern that the content of Policy GEN4 in the Adopted Local Plan will not be adequately replaced by Policy SP12.

CHAPTER 4 HOUSING

- Concern over policy approach to size, type and tenure of houses
- Concern over policy approach to meeting accommodation needs of gypsy and travellers

Policy 1- Housing - Density

- Densities are too high and do not reflect character of Uttlesford
- Policy should be more flexible
- Make reference to density policies in Neighbourhood Plans

Policy 2 - Housing Mix

- Greater need for smaller properties.

Policy H3 - Subdivision of Dwellings

- Ensuring sufficient off street parking

Policy H4 - Residential Extensions and Replacement Dwellings

- Concern over consistency of policy with national guidance.

Policy H5 - Residential Development in Settlements without Development Limits

- Reference should be made to Essex Design Guide and garden sizes

Policy H6 - Affordable Housing

- Include reference to Independent Living
- Include reference to Neighbourhood Plan policies
- Set out and justify number of affordable houses to be delivered
- Explain how viability of individual sites will be assessed.

Policy H7 - Affordable Housing on Exception Sites

- Make reference to working with parish councils and Neighbourhood Plans
- Ensure policy is not unreasonably restrictive or too flexible.

Policy H8 - Self Build and Custom Build Housing

- How will policy be implemented in practice
- Policy should identify other factors which will be taken into account.

Policy H9 - Accommodation for Gypsies, Travellers and Travelling Showpeople

- Policy should refer to means of disposal of foul effluent.
- Need to clearly identify what the needs are and is approach of criteria policy sound.
- Need for further evidence on needs of those who no longer meet definition for planning policy purposes.
- Formally requested to evaluate evidence to determine whether there is the potential to assist in meeting the unmet need in Basildon for Traveller pitches prior to progressing Local Plan to Regulation 19.

Policy H10 - Accessible Homes and Housing for Older People Paragraphs 4.40 – 4.41 and Policy H10

- Include reference to Independent Living
- Consider increasing the types of sites the policy applies to.
- Evidence supporting the policy is required.
- Policy for delivery of C2 class uses and specialist housing required.

CHAPTER 5 EMPLOYMENT

- Development of a large town centre at West Of Braintree Garden Community will adversely affect the viability of Braintree
- Aspiration to achieve one job per dwelling is quite ambitious and no evidence that this target can be met
- Only airport related business should be allowed at Stansted Airport
- There should be an oversupply of industrial space to depress land values and to keep rents low
- The Local Plan must be revised to reinforce a commitment to B1(c) and B2 businesses in all three garden villages
- Greater effort required to increase local employment opportunities to reduce long commutes
- Objection to over-reliance on Stansted Airport as a driver for job creation
- No sound assessments to evidence commercial viability of creating employment and retail investment and opportunities for residents of the new settlements that would prevent them from commuting and shopping in existing urban centres and thereby exacerbating already crowded streets and parking, and in Saffron Walden exacerbating illegal air quality hot spots
- Rather than "in association with new garden communities", this should read "as an integral part of new garden communities". This would seem to be a basic requirement of GC principals and would also contribute to sustainability of GCs; and
- Not enough local business or employment opportunities to match the proposed housing. Job shortfall.
- This requires good transport links to the enterprise areas.
- The policy of settling 3 new garden communities in this area and attracting the amount of high skilled and high paid work to sustain this vast volume of people to the area is not borne out based on the council's current track record, where it appears to be a hugely reliant on commuting for the current residents. More towns are not the answer but a cohesive policy to attract good quality companies and work to the area to service the current growing communities and to relieve the need for commuting and the pressures on the transport infrastructure. Basically to make us competitive to attract jobs, rather than build these new commuter towns in inappropriate locations increasing current North Essex issues!
- I am very concerned to see that projected employment numbers at Stansted Airport, which have previously been quoted as the raison d'etre for the new housing developments in Harlow, are now being recycled and reused as 'evidence' that the Easton Park development will also supply these same employees/jobs with housing.
- The draft Plan focuses discussion of employment largely on Stansted Airport and Chesterford Park. Many new employment sites identified are small. Identifying larger potential employment sites should be a priority to attract larger businesses and a greater range of employment. The plan relies heavily on residents of new settlements working locally to achieve sustainable communities, but there is little detail on how this will be achieved. In North Uttlesford, there is the opportunity to bring in large numbers of high skill and ancillary jobs by attracting high tech companies from Cambridge, as we understand that some are now unable to find single sites there of sufficient size for their long term needs.
- This statement is the 'Aim' as laid out in the development strategy relating to Thaxted. It is detailed on page 12 of the strategy under the heading 'Town Centres' Query: What is tangible? How is this to be achieved in a market town with diminishing industry and agricultural land being utilised for new homes.

Employment Land Requirements

- Please state where the Employment Land Review Update 2017 can be found.
- As currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMP1 and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains 'unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Para 5.4 - Revise to include the following sentence after the fifth bullet point: It is also acknowledged that other appropriate sui-generis and complementary employment generating uses may be permitted within employment areas as guided by EMP1 and EMP2.
- The ELR seems to be based upon a direct link between population growth and employment requirement - this takes no account of the expansion requirements of existing business or inward migration (e.g. from NE London or Harlow) of businesses looking to locate in the District. Local and highly respected commercial agents, Coke Gearing has advised the respondents that it is their experience through the many enquiries they receive that urgent provision of sites is needed now to meet a known demand.
- Timeframes for the delivery of the floorspace figures quoted under Paragraph 5.7 should be specified, given that UDC has a vested interest in the delivery of the site.
- Predicted 900 jobs at Great Chesterford Research Park should not be used as a justification for the allocation of North Uttlesford Garden Village (NUGV).
- Whether the risk posed by Brexit and the impact this will have on employment and housing need has been considered.

Jobs Growth

- The difference of 10 JPA between the Medium and High Growth scenario's is doubtful;
- The number of new jobs does not equal the number of houses proposed;
- Significant numbers of extra jobs will need to be provided throughout the district to avoid the planned additional housing simply increasing out commuting;
- The figures provided are broad assumptions without evidence;
- Concerns that growth is based on unreliable figures of employment. The STAL projection provided in its G2 application of 15,300 jobs looks more accurate.
- The figures provided are broad assumptions without evidence.
- Where can the BRES be found?

Office Floorspace Requirements

- Where can the ELR and Employment Land Monitoring be found?

Industrial Land Requirements

- There is a surplus of vacant new warehousing space at London Stansted Airport. Takeley PC does not believe that new warehousing should be built elsewhere within

its parish and that there is a suitable area within the airport to provide for ancillary businesses of the airport.

- Local Plan should make provision to encourage occupation of these units. Perhaps reduced rates for a period of time? Offer business incentive? Policy should reflect the commercial market need.
- Local Plan should provision alternative sites for office accommodation for SW. Industrial/warehouses should be converted to office accommodation to reflect market need.
- Need to identify appropriate mitigation measures to improve the capacity of the junction 8 of the M11 to take account of the cumulative impacts of growth from residential and airport related development, including aspiration for 'strategic' warehouse and distribution depots
- Saffron Walden is blighted by failure of successive administrations to address the traffic flow and pollution issues through the town. There is poor access for commercial vehicles leading to loss of retail opportunities, and poor facilities for visitors to the centre.
- The difficulty of accessing the M11 from Saffron Walden suggests that efforts be made to secure a junction nearer the town. But, it could be argued that not having a junction close to the town eases development pressures.

Opportunities within Existing 'Clusters' assessed in the ELR

- Note that the Printpack factory is a safeguarded employment site as per Appendix 6;
- Saffron Walden Business Centre not shown as an existing employment site on the Saffron Walden inset map, whilst it is shown as an Existing Employment Site in Appendix 6 (Site 18);
- The boundary of the Business Centre should be expanded to include the Homebase store.

Existing Commitments

- Where is the latest monitoring data?
- Great Chesterford Research Park (GCRP) and land at London Stansted Airport is not suitable for larger shed development. GCRP the site is not suitable for larger shed development and land at the airport is subject to significant constraint.

Saffron Walden

- What information is there on the number of people working from home and how this maybe supported, as this can help reduce traffic.

Gaunts End, Elsenham

- What information is there on the number of people working from home and how this maybe supported, as this can help reduce traffic?

Start Hill, Great Hallingbury

- Given that Start Hill has now been fully developed, the 'Vision Stansted' site (Land west of Bedlar's Green, Great Hallingbury) should be allocated for employment purposes.

Proposed Sites for Additional Employment Allocations

- There has been no consideration of employment opportunities at all in Thaxted e.g. retail, office.

Garden Communities

- Paragraph seems to re-interpret and understand Garden Community Principle 5 (GCP5) as stated in Appendix 5. Paragraph 5.35 should be closer intertwined with GCP5 should have a clear objective to meet GCP5, reducing the need to travel and provide no less than one job per household;
- Unlikely that genuine employment will materialise in developer-led artificial settlement as suggested;
- Delivery of employment will be long after delivery of housing and infrastructure.
- Nature of employment development will be small scale and largely retail/ service sector related. Are employment requirements now which are not been met due to lack of supply of available land.

London Stansted Airport (Northern Ancillary Area)

- The Northern Ancillary Area site is subject to a number of constraints both physical, legal and in terms of servicing and access;
- These issues mean that securing land for employment development is very difficult in the short to medium term;
- Understood a significant area of this site is soon to be the subject to a planning application for a large single user; will significantly reduce the availability of land for localised SME led demand in this area.
- Any supply is subject to the operational needs of the airport operator, who is currently consulting on further expansion of the airport, which will inevitably have an impact on the appetite for non-core activities and puts a further question mark over the reliance on this site, as providing a supply of readily available land to meet the local and migratory needs of businesses.

Chesterford Research Park

- There is a conflict of interest with Uttlesford District Council having purchased a 50% share of the holding of the site and the site has subsequently been allocated as an employment site.

Training

- Local Plan does not mention proposed further education college/a new site for Harlow College at Stansted Airport. This is an essential vocational college, in particular to meet the needs of the airport area that will offer courses from engineering to customer service.

Electronic Infrastructure

- Although the Plan refers to the need for broadband to be improved, it is not ambitious enough.
- The stated target of 10Mb/s is the minimum that a modern family home needs today. This will be totally inadequate to in the future, for either domestic needs as broadcast TV gives way to on demand streamed services and home working becomes more common.

- The target should be at least 100Mb/s with technology that can be upgraded to 1GB/s as needed.
- Technologies exist to deliver these speeds in dispersed rural areas without the limitations of radio and satellite referred to and should be implemented quickly to maintain the competitiveness of the District.

Tourism

- The reference to the role that built heritage has to play in the tourism industry, this is welcomed;
- Tourism seems an obvious area of major employment potential that is neglected in this plan. What about provision for increased tourist accommodation? Support for local tourist, catering and entertainment industries?

Policy EMP1 - Employment Strategy

- Suggestion that larger business sites include space for 'incubator/new businesses'.
- We should be about proactively encouraging employment opportunities in the Garden Communities, not just supporting.
- There is no provision for new employment land outside of the Garden Communities and Stansted.
- We should explicitly support the intensification/ expansion of the Principal Employment Areas.
- The wording of EMP1 is excessively restrictive with regard to supporting (non B-class) uses.
- Concern related to permitting non airport related uses on 43 ha of land at Bury Lodge Lane. Lifting the airport restriction could have consequences for accommodating airport related growth in the future.
- Additional land should be allocated adjacent to existing employment sites in the Green Belt to allow expansion. With no provision to allow the expansion/ growth of new/ existing business and employment sites, existing firms won't be able to expand their current premises, so will need to relocate.
- We should place greater emphasis on supporting high-tech industries.
- We should support its Chesterford Research Park's further expansion to assist meeting the overall employment need.
- We should add greater focus and measures to specifically support the construction industry.

Existing Employment Areas

- How does this EMP2 work with permitted rights to change from business to residential if you don't change the external appearance? Great Chesterford already has around 10 dwellings created in this way in Station Rd, Great Chesterford which is included in your employments sites schedule; more are likely to follow.
- Policy, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. Para 5.46 - Revise to read as follows: (new text underlined, deleted text strike through) The policy recognises that there is a significant amount of employment generated by appropriate sui-generis and other complementary uses, e.g. builders merchants and car showrooms, which may be permitted as part of the overall employment strategy.

Policy EMP2 - Existing and Proposed Employment Areas

- Concerns around the level of interest for employment land in the district.
- The NPPF states that 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.'
- Policy does not acknowledge important role of supporting (non B-class) uses in establishing successful business parks.
- We should clearly support the intensification of Principal Employment Areas.
- Employment sites in the Green Belt should be reviewed so as to allow reasonable expansion of existing employment sites.
- Allocations for future employment land being placed in just two locations (Chesterford and MAG Northern Ancillary Area) does not assist businesses seeking land that is available now, for non-office related employment development.
- We should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.
- The plan should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.
- Concerns over the marketing period suggested in the policy, either being too long or too short.
- Conversion to residential should not be encouraged.

Policy EMP3 - Non-Estate Employment Uses

- EMP3: As before with improved enforcement criteria for evidence base Appendix 5;
- Again, why invite change of use?
- Change of use should not be encouraged beyond what is already permitted development. To note Saffron Walden Business Centre (map18) is not shown on Saffron Walden inset map "is not shown as employment area. Proposed Change: Note error on map which needs to be amended
- To be commended - Support policy

Existing Employment Areas

- Accepting that rural economy needs protecting, maybe, 1% of housing stock could be released on an agricultural tenancy, therefore giving low paid farmworkers a home.

Policy EMP4 - Rural Economy

- Broadly in support of this policy, as recent experience has shown that re-allocation of vacant farm buildings and agricultural use to full scale employment use provides a welcome supply of new accommodation and a sensible re-use of otherwise redundant buildings.
- Support wholeheartedly. Examples are both imaginative and visionary. Re-use and adaptation should be the bywords for rural commercial development and the Society's policy of encouraging a revival in crafts and making fits well with this policy.
- Support the Policy. Please ensure more bridleways are provided that link up to the existing network.
- The plan abuses the local environment.
- Rural Economy - No mention of sustainability.
- Saffron Walden also needs a hotel badly as Cambridge cannot meet current demand. Saffron Hall is limited in its offering as rooms are needed for orchestras etc.

- Schemes should be encouraged to generate their own energy and to minimise use of the car.
- Welcome requirements within this policy for development proposals to respect landscape character. Request that a similar level of protection is added for the wider historic environment.
- The policy seeks to encourage tourism and therefore it would be pertinent to refer to the potential that developments of tourist and leisure facilities may have in enhancing, better revealing and providing access to the historic environment.

CHAPTER 6 - Retail

Retail

- Retail and commercial units on the edge of towns
- Support retail in smaller towns
- Provide support to local shops
- Better explanation of terms
- Section not consistent, Not capturing all the main food shopping
- Where does the local plan address loss of Village services
- Is there costing for maintaining health and well-being in small communities with such services compared with no services

Retail Strategy

- Out of Town retail cannot be encouraged at NUGC to the detriment of Saffron Walden.
- Traffic consequences will be significant and adverse.
- Whether it would be appropriate for retail provision in the proposed neighbourhood centres to be restricted to just a supermarket and small convenience shops for a settlement of this size.

Policy RET1 Town and Local Centre Strategy

- Saffron Walden NP note no mention of increasing SW town centre retail area with a need to support independent shops in Saffron Walden to maintain character of town
- Saffron Walden Town Council support policy noting hierarchy of Saffron Walden/do not support out of town retail
- Littlebury Parish Council consider the growth of on line shopping/impact not addressed
- Stansted Mountfitchet NP consider 30 minutes of free parking needed Grafton/Lower Street
- Braintree District welcome inclusion of local centre for West of Braintree/consider likely that the size of the West of Braintree garden community may require a town centre in the long term
- Thaxted Society support with improved compliance
- Thaxted Parish support
- Individuals note new developments need to be sustainable, doubt that the Garden Communities will reach the size/pace necessary to support local retail services, travelling to Saffron Walden requires a car, retail outside of Saffron Walden only where not viable in the town centre

- Developers consider West of Braintree Garden Community provide local centres for day to day needs, within walking or cycling distance
- Switch from A1 retail to a range of service uses including A3/A4 and D1 and D2.
- The new communities should provide retail floor space in order to meet the day-to-day needs of the new settlements residents and to create a vibrant centre in order to encourage social interaction and a sense of community.
- New retail opportunities are supported in Thaxted village to ensure its longer term vitality and viability.
- Important that daily retail needs are met at the outset to minimise traffic movements and develop the community.

Policy RET 2 The Location and Impact of New Retail Development

- Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council add out of town retail only if no town centre site/convenience stores are needed on developments more than 500m from retail centres
- Harlow Council welcome recognition of retail hierarchy/future retail floor space for each garden community could be linked to Retail Impact Assessment threshold in Policy RET2 (1000m2).
- The Thaxted Society support with improved compliance
- Developer considers threshold in proposed Policy RET2 is not based on any empirical evidence/ should be 750sqm for out of centre retail development
- Individual want out of centre applications to show they will provide a net increase in jobs

Policy RET3 Town and Local Centres and Shopping Frontages

- Saffron Walden Town Council query if prevents A3 uses in the town centre/reduces protection
- Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council consider reduces protection/ prioritise primary shopping frontages to remain so, especially in Saffron Walden, not allow change of use from A1
- The Thaxted Society opposes any change of use from retail/considers the encouragement of revived crafts and arts to fulfil both retail growth and tourist attraction.

Policy RET4 Loss of Shops and Other Facilities

- Thaxted Society consider criteria for viability in Appendix 5 be strengthened and then enforced
- Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council request policy to prevent pubs from becoming Express stores under permitted development rights.

Policy RET5 New Shops in Rural Areas

- Saffron Walden Town Council supports with requirement on foot/cycle paths
- The Thaxted Society concerned over new retail beyond development Limits/protect centre

- Thaxted Parish Council requires footpaths cycle paths to access such development
- Saffron Walden/Stansted Neighbourhood Plan Steering Group requires policy to support all community facilities, e.g. churches, pubs, schools, halls, museums etc

Chapter 5 – Transport

Paragraphs 7.1

- Repetition causing confusion should be addressed for clarity.

Paragraph 7.2

- Insufficient detail on transport impacts/mitigation
- Lack of public transport/effective IDP/ employment provision for NUGC
- 22500 dwellings proposed between Rayne and Braintree on A120/limited assessment
- Rat running via Stebbing, Felsted, and Dunmow

Paragraph 7.3

- Bridleway network is fragmented, inadequate and requires improvement
- Non-motorised multi user paths instead of shared pedestrian/cycling paths that damage bridleway network
- Such paths available to widest group of users as possible for North Uttlesford Garden Community design
- Paths to be correctly designated either bridleway or restricted byway
- The A120 is already saturated several times a day
- Some repetition/remove

Paragraph 7.4

- Often no reliable alternatives to car travel/lack of a good public transport network. What is planned?

Paragraph 7.5

- NUGC creates dormitory town for South Cambridgeshire research parks employees/shoppers in Saffron Walden
- Additional policies needed to improve public transport
- Need cycle way from Latchmore Bank A1060 into Bishops Stortford
- Acknowledge role Bishop's Stortford plays in delivering services and transport to UDC
- The dominant mode of travel in Uttlesford is the car/ GCs located where need to travel will be minimised/ but rail, as the most sustainable means of transport, does not feature
- The walking network in Saffron Walden is not "well connected"/one pedestrian crossing

Paragraph 7.6

- Consider electric bikes
- Implement existing cycling strategy
- Lack of public transport network
- Include equestrians on cycle routes
- Lack of detailed transport assessment

- Complete the Flitch Way Bridle path from Takeley to Dunmow South roundabout
- All new developments should be made to include safe cycle routes to the nearest transport hub.

Paragraph 7.7

- No modelling has been carried out to consider the impact of NUGC on Saffron Walden
- The proposed alternative route to avoid the SW town centre still passes through the AQMA
- What will happen if the Peasland Road TRO is not implemented
- Saffron Walden traffic solutions must not to encourage more heavy traffic through Thaxted

Paragraph 7.8

- No solution has been found to address unacceptable traffic impacts in Saffron Walden
- Need southern ring road for Saffron Walden

Paragraph 7.9

- Add future and existing Section 106
- Points to NUGC being car-reliant
- Needs a reference to Air Quality
- Query plans for the Kier site/150 homes
- The proposal for full transport and air pollution studies of Saffron Walden is sound

Paragraph 7.10

- Easton Park GC can only make traffic congestion considerably worse in Great Dunmow
- Travelling from NUGC to Audley End for London trains
- Most sustainable transport impact small-scale, incremental development, following historic and natural growth of rural towns and villages
- For NUGC what public transport, how will it be paid for and who will have control?
- Even if NUGC is considered to have the least traffic impact, very substantial trip movements, mostly by car

Paragraph 7.11

- Allocate Beldham's Lane for housing on fringe of Bishops Stortford given services
- Recognise the importance of Bishop's Stortford in providing UDC services
- Reflect high car ownership in parking provision for new developments
- Seems realistic/cycling as a leisure activity also attracts tourism, if investment in good cycle paths

Paragraph 7.12

- Welcomed but failure to recognise importance of Bishop's Stortford
- Not only improve existing services but improve where possible to encourage use of public transport.
- The local press has recently reported that bus services are to be or have been reduced.

Paragraph 7.13

- Equestrians should be included on all Multi User paths unless it is not possible to do so, following consultation with the BHS.

- Existing facilities mentioned are insufficient for existing use - so growth equals over demand/there needs to be effective planning of new facilities.
- Must be rigidly enforced when planning applications are made. Multiuser paths are not the safest way to proceed. Cycle routes should be separated from footways.
- Be radical and provide cycle paths generating electricity.

Paragraph 7.14

- Omits that Flitch Way is mostly a definitive Bridleway, not a cycleway/mention of equestrian users
- Flitch Way is a country park is for leisure activity not be viewed as an alternative Cycle highway

Paragraph 7.15

- Need more ambitious modal shift for garden communities/step change
- Travel plans must be supported by a robust series of measures, infrastructure and incentives/penalties
- Locate growth in areas where need to travel minimised/ maximise use of sustainable transport modes
- Creating a self-contained garden village/serving life sciences defeated by topography and location
- NUGC selection is incompatible with creating a self-contained garden village
- Destinations for employment, education and social centre walkable or within 5 to 15 minutes easy cycling distance.
- Residents will have to travel long distances by road for employment by the evidence in this Plan

Paragraph 7.16

- Take account of on-demand services/car sharing/spaces for community vehicles

Paragraph 7.18

- Saffron Walden is choked with traffic already/need by pass to reduce traffic in the town
- Need more than culture change/Improve access to rail
- need plan for electric car infrastructure
- no safe walking/cycle routes to key facilities or school
- Innovation needed- community run services/ speed up local journeys or journeys to railway hubs.

Paragraph 7.19

- Henham 7/7a bus service service is running at a loss but is essential
- Travel Plan too vague, urgent need for better public transport, area is isolated, no bus connection between Great Dunmow and Bishops Stortford, re-establish a rail service/better bus services for Great Dunmow

Policy T1 – Accessible Development

- Uttlesford Futures [education] note getting to work relies on car, lower use of cars not possible in isolated villages, key public transport role of Stansted/its limitations, encourage buses to call at GCs/employment sites - Genome/Stansted excellent, improve cycle and footpaths to existing and new sites, wider political pressure needed to draw in resources

- Clare College consider NUGC not located where it can be linked to services by a range of transport options/cycle routes will be problematic/ train station too far away
- Little Easton Parish Council consider TA1 incompatible with Vision - SP2 due to Easton Park GC given high reliance on car and presence of M11 J8 that is close to capacity, only aspiration for employment/highway measures, reliance on rail improvements that are not programmed
- Little Chesterford Parish Council consider NUGC not located where it can be linked to services and facilities, cycle routes problematic, train station too far away and too much gradient to be used, aspirational accessibility and integration, impacts on A505 untested
- Little Chesterford Parish Council consider NUGC does not meet aims of the policy with no access plans/reliance on B184/Saffron Walden, A505 already at capacity
- Chrishall Parish Council state new growth should be linked to existing facilities by cycle paths/footpaths/roads dangerous/reduce pollution/needed prior to commencement
- Essex County Council note Travel Plans and Transport Assessments/Statements are very different
- Essex Bridleways/Cambs Horse Society want all opportunities taken to enhance the off road network so accessible to all users including equestrians
- The Thaxted Society supports policy that reduces car use/journeys/public transport limited/avoid bridge to nowhere/lobby government for sustainable transport
- Saffron Walden Town Council support policy but need definition of appropriate and safe network
- Saffron Walden/Stansted Mountfitchet NPs want towns and garden villages linked with cycle paths with opportunity for NPs to go into more detail
- Coke Gearing concerned too aspirational, too car reliant, no account of reality/need to expand existing car parking facilities around railway stations e.g. Stansted Mountfitchet, Elsenham, Chesterford
- Requested more comprehensive study for NUGC/A505 at capacity/two GC option better impact
- Great Dunmow lack rail link/frequent bus service
- No need to be negative about reducing car use, given the rural nature of our area
- Mitigation proposed will not cope with growth/too aspirational
- Car sharing sensible as an option but cannot legislate to force people down this path
- Travel Plans for major developments should be defined/exempting specialised housing for older people as a low traffic generator
- Support Council ambition to reduce need to travel by car/increase the use of public transport/ should be located in locations which are sustainable

Policy T2 – Sustainable Transport

- Uttlesford Futures acknowledge ageing population/rural isolation recognise essential bus services, community travel, Dart scheme wanting encouragement of buses to call at employment sites,
- Highways England Support plan policies aimed at reducing need to travel by private car, such as improved walking, cycling public transport infrastructure, and broadband

- Essex Bridleways Association/Essex & Cambs Horse Society welcome mention of equestrian access but want proactive approach to enhancement of network from new growth
- Sustainable Uttlesford want a more strategic approach to link all the new expanded settlements to nearest service centres e.g. A120 Bishops Stortford/Braintree, objective to minimise car journeys/NUGC assisting this by providing housing for knowledge economy
- Network Rail supports increasing rail patronage/measures subject to business case
- The Thaxted Society supports policy that reduces car use/journeys/public transport limited/avoid bridge to nowhere/lobby government for sustainable transport
- Saffron Walden Town Council Supports this policy/seeks definition of appropriate/safe network
- Saffron Walden Neighbourhood/Stansted Plan Steering Groups request Rights of Way, cycling, pedestrian Towns and garden villages should be linked with cycle paths/Opportunity for NP to go into more detail
- Littlebury Parish Council all new developments must be connected by safe walking and cycling routes to the local facilities they will use/design of new settlements should incorporate a comprehensive network
- Clerk Little Easton Parish Council concerned Easton Park would be relatively isolated and motor transport will be the only realistic mode for residents
- Essex County Council welcomes improving sustainable transportation connectivity between Braintree Stansted and Bishop Stortford/ amend bullet point 1 reference to multi-users/as it is noted that not all routes can accommodate multi users
- Individuals_note; Rail is most sustainable form of transport, In UDC no route to the Wellcome Institute, no safe route from Great Chesterford to Saffron Walden.or Saffron Walden to Chesterford Research Park or Thaxted to either Great Dunmow or Saffron Walden. Need a critical mass of people on bikes/supporting infrastructure/cycle and pedestrian-only routes from settlements to places of work/essential services
- Require; Investment in the existing public transport across region/detailed plan for links for the proposed developments, Cycle/pedestrian routes meander not sustainable unless to wider network, Cycling got to be easy, appealing and safe.

Policy TA3 – Provision of electric Charging Points for Vehicles

- Need policy on Electric Charging provision that is not in new development
- Government anticipates all new vehicles must be hybrid or electric by 2040
- Why not insist on charging facilities for development with no get outs
- Developers free to design developments without charging facilities/claim 'impractical' Why not insist.
- Para 7.22 In the second line, the phrase in new development is repeated.
- East Herts Council supports approach to encouraging modal shift and making provision for electric charging points but thresholds need to be clarified/10% minimum provision
- Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council support policy but request higher thresholds/20% for flats/min 7Kw
- The Thaxted Society support with greater number of charging points required

- Littlebury Parish Council request every new house/apartment have capability/substantial numbers in the public realm/existing settlements
- Essex County Council note flats provision too low/ need to future proof provisions in this policy
- Individuals support charging point provision/straightforward to put in new buildings/assist AQMA/use higher targets
- Developers request test of electric charging(a home charge point is £1400) /broadband via Whole Plan Viability Assessment/ensure do not threaten growth delivery

Policy TA4 – Vehicle Parking Standards

- Elsenham Parish Council concerned Residential Parking Standards document was last updated in February 2013 - two parking spaces for each three bedroom house inadequate
- Saffron Walden Town Council refer to as identified within the local Neighbourhood Plan
- Saffron Walden/ Neighbourhood Plan Steering Group Neighbourhood Plan Steering Group request referring to locally agreed standards/any such policy identified within the local Neighbourhood Plans
- Littlebury Parish Council - Garages should be of adequate size for modern cars, to maximise the use of off street parking.
- Little Easton Parish Council note policy should go further and support car parking initiatives away from new development that can be accommodated in balance with policy TA2.
- Elsenham Parish Council concerned Residential Parking Standards document was last updated in February 2013, and it is overdue for review.
- Thaxted Parish Council Comment: To add as identified within the local Neighbourhood Plans/Development Management should not allow discounting
- Essex County Council note Essex Vehicle Parking Standards have been updated in Essex Design Guide
- Developer supports policy subject to review of relevant parking standards when published
- Individuals want increased car parking capacity is needed for local people at railway hubs, including Stansted Airport, no new development without parking space for at least two vehicles

Policy TA5 – New Transport Infrastructure or Measures

- Highways England recognise that large parts of the district are rural/access for public transport difficult/SRN close to capacity with most concern over M11 J8 and Galleys Corner in Braintree/Careful planning to ensure growth in right place with facilities/steep change in public transport/GCs of size to internalise trips/coordinate timing of facilities and jobs
- Braintree support inclusion in policy of reference to Braintree Branch line
- Essex Bridleways Association request amend policy to Multi-user route improvements enhance multi-user connectivity with definitive Bridleway/No cycle links to Flich Way

- Birchanger Parish Council concerns that any new development at Stebbing/Little Easton/Dunmow only exacerbate the situation/any new development at Junction 8 should be routed underground
- Saffron Walden Town Council request major revision/mention of the Cambridge to Haverhill Light Railway. Need new cycle paths/M11 new junctions north of Junctions 8/8A and improvements to Junction 9
- Saffron Walden Neighbourhood Plan Steering Group requests mention of B1383/Cambridge to Haverhill light railway/ new paths, e.g. Walden to Hinxton and Wimbish/a strategy to improve the M11
- Stansted Neighbourhood Plan Steering Group request mention of B1383/strategy to improve the M11 with air quality monitoring in Stansted Mountfitchet
- The Thaxted Society Support. However where Saffron Walden has problems with through traffic and its mitigation it follows, a priori, so does Thaxted.
- Littlebury Parish Council request garages should be of adequate size for modern cars, to maximise the use of off street parking.
- Little Easton Parish Council concerned over limitation of district council planning for large scale urban development/ flawed by the absence of binding commitments from delivery bodies
- Littlebury Parish Council requests plan set targets for traffic reduction, to reduce congestion and emissions, and take account of technology/change over to electric cars
- Developers; Support proposed transport measures in Saffron Walden/movement across town/need for Eastern Distributor Road/plan for future expansion/agree development must be supported by infrastructure, services and facilities/role of providers and Council
- Individuals; Spatial vision needs more than cooperation/actual investment, need relief roads to take traffic away from Saffron Walden centre, mention improvements impact on roads in and around Saffron Walden/Public Transport Provision/Walking and cycling improvements should be expanded where appropriate to include horse riding/Flich Way improvements/bridleway and the linking route will have bridleway status/ new junction on the M11 after Junction 8a to effectively give a bypass

Chapter 8 Infrastructure

Policy INF1 – Infrastructure Delivery

- The Environment Agency generally concurs with the issues raised with regard to water infrastructure although notes impacts on rivers/need for detailed water cycle strategy
- The Skills agency supports the policy/add reference to key education documents would assist it
- Sport England Welcome the policy in principle and its intention regards making provision although note that a robust evidence base needs to support it
- The national trust consider that a green infrastructure study is required
- Natural England pleased to see Green Infrastructure included/ need for a Green Infrastructure policy that applies generally to development

- Historic England note infrastructure should consider impacts on heritage assets and their setting, as well as archaeological potential
- Saffron Academy Trust support allocations enable the expansion of the primary school site so that Saffron Primary School can have two forms of entry
- West Essex Clinical Commissioning Group note existing GP practices in the area do not have capacity to accommodate significant growth although begun to address capacity issues
- Uttlesford Citizens Advice Bureau issues are access to services and cost of public transport
- Wendens Ambo Parish Council note that the provision of facilities are outside the control of UDC
- Clerk Elsenham Parish Council note substantial growth here on a piecemeal but basis, with concerted and imaginative attempt to correct it
- Takeley Parish Council notes liaison with Braintree District Council and East Herts District Council and others remain a priority/cumulative impact adequately assessed/health care provision in the accident & emergency site needed
- Rayne Parish Council notes this section of the plan most critical in terms of what it could do to ease opposition to the West of Braintree site
- Thaxted society support policy but “Delivery in a timely manner” needs clarification i.e. loophole
- Great Chesterford Parish Council note timely delivery of infrastructure cannot be achieved until infrastructure requirements properly assessed/costed with potentially crippling costs

Policy INF2 – Protection and Provision of Open Space , Sports Facilities and Playing Pitches

- Sport England require provision of natural and semi natural green space
- The National Trust considers that ideally a specific Green Infrastructure Strategy is required/standards needed in the policy on semi natural/natural green space
- Essex County Council recommends clarification is required to ensure does not apply to schools/ surplus school fund better education facilities/need for school to expand including on playfields
- East Herts Council consider policy is unclear what the standards for sports provision/facilities
- Saffron Walden Town Council note protection of allotment land/cannot simply dispose of allotment land/improve standards
- Saffron Walden/Stansted Mountfitchet Neighbourhood Plans note standards not enough/gardens becoming smaller
- Wendens Ambo Parish Council note provision of facilities outside the control of UDC/ no guarantees
- Takeley Parish Council notes concerned square footage per person for amenity space is too low/easier for parish to get play facilities via grant than land
- Thaxted society support policy note Future obligations must be tied to enforcement mechanisms
- Thaxted Parish Council note allotments are protected/with duty to protect/amend policy
- Littlebury Parish Council note provision is far below other LPAs

- Dunmow and District Chamber of Trade and Commerce consider better car parking needed
- Individuals concerned standards too low/lacking teeth, over use of management companies/held to ransom/enforcement of standards poor
- Developers consider most open space standards too onerous/ease thresholds

Policy INF3 – Health Impact Assessments

- Biggest health issue is lack of hospital beds
- Extra stress on services/residents
- ECC recommends paragraph 8.15 includes reference to the Uttlesford Health and Wellbeing Strategy, which also includes specific health targets
- Paragraph 8.15 Health and Well-being should mention places of worship to be compliant with section 171 of the NPPF
- Implies wrongly no improvements to walking/cycling
- Improve access to documents
- Health benefits of horse riding/exercise associated with the care of horses well documented/need more specific requirements for the provision of bridleways/NMUs
- This needs to be made much stronger. Liaison is inadequate- experience has shown that the health facilities are not expanded in line with demand. There should be a clause in developments that nothing can be occupied until such time as the infrastructure is in place. So Surgery provision etc. should be available as soon as new residents arrive, not some years later as happened at Stansted
- Health and Well-being should mention places of worship to be compliant with section 171 NPPF
- No evidence of how these aspirations will be delivered
- Sport England welcome the principle of this policy but require HIAs include an assessment of design/promotes physical activity, embeds active design principles/how design promotes activity
- The Thaxted Society regard wellbeing as cornerstone to society policy
- Wendens Ambo Parish Council believe UDC has little or no control over these issues
- East Hertfordshire District Council commends requiring a HIA but require other aspects such as design included
- Saffron Walden Neighbourhood Plan Steering Group want a requirement that HIA be carried out/threshold of 10 units
- Stansted Neighbourhood Plan Steering Group want HIA threshold of 10 units
- Saffron Walden Town Council want HIA threshold of 10 units
- The Thaxted Society support/established policy
- Essex County Council seeks clarification as to who UDC sees advising the HIA once submitted/ECC lead on reviewing/requires further details of process
- Thaxted Parish Council want HIA threshold reduced
- Landowners/developers/retailers concerned policy not justified by evidence, better focused on design of all types of built development at the site
- Individuals concerned over obesity/wish to strictly control fast food outlets

Policy INF4 – High Quality Communications Infrastructure and Superfast Broadband

- Support this
- Communities should be community (singular)
- Overhead fibre cables possible/cheaper to do this than to install the same cables in underground conduit
- Provide good broadband to some existing areas first
- Wendens Ambo Parish Council considers UDC have little or no control over provision/little priority being given by ECC on basics The Thaxted Society considers high level technological provision bedrock of expansion in a rural area/correct provision of broadband needed Saffron Walden Town Council broadly support Essex County Council acknowledges requirement for high speed broadband/recognises that district's rural nature means alternatives Thaxted Parish Council broadly support The Thaxted Society Support/considers high level technology bedrock of expansion in a rural area
- Saffron Walden Neighbourhood Plan Steering Group considers most broadband should be fibre based
- Stansted Neighbourhood Plan Steering Group want fibre based/free Wi-Fi in commercial centres
- Individuals want high speed broad extended out of towns/Villages to more rural locations, address existing deficiencies, essential for all premises
- Developers consider supportive in behaviour change, precondition for business, should not prevent development where no connection possible, whole plan viability testing needed,

Chapter 9 - Design

- Importance of design in adequate parking
- Wording of policies considered not 'woolly' and not assertive
- Policy wording considered 'unrealistic' as evidenced by West of Braintree Village plans
- No support for parking courts

Policy D1 High Quality Design

- The policy should refer to Secured by Design (SBD) and criteria for accreditation
- Silver Accreditation should be requisite minimum standard for street lighting
- The 'historic environment' should be used and not heritage assets as in text
- Developments should be designed to encourage healthy and active lifestyles
- Policy should reference Sport England's and Public Health England's 'Active Design' guidance
- Policy to specify garden sizes e.g. 50sq m. for 2 bed and 100sq m. for 3-bedhouses
- Nationally described space standards to apply to all new development
- Evidence is required to support implementation and adoption of internal space standards
- Considerations when imposing internal space standards:
 - Need – evidence on size and type of dwellings being built in UDC and consideration of impact on starter homes;
 - Viability – impact adopting standards to be part of viability assessment taking into account potential impact of larger buildings on land supply as well as affordability of larger homes

- Time – transitional period required to allow developers to factor in new policy on space standards
- Space standards requirement should be deleted as it is not evidenced
- “Good Design” criteria is highly subjective so it needs to be codified
- Policy D1 fails to make provision for the following criteria in Saved Policy GEN 2

Policy D2 – Car Parking Design

- Policy should include provision for cycle parking in residential developments
- Paragraph 9.8, second sentence to read to be amended to read, ‘If it is provided in the right place **or of sufficient quantity**, it is unlikely to be used properly’
- Omission of parking provision for bikes, motorbikes, buses or visitors, carer and delivery vehicles
- On-street parking only a design option where street widths are more than adequate
- Parking courts should be avoided
- Further discussion recommended by Essex County Council Environment, Sustainability and Highways to ensure consistency with the SUDs/Flood Risk Strategy with regards to permeable car parking courts
- Electric charging points should be provided within property curtilages

Policy D3 – Small Scale Development / Householder Extensions

- Policy should be amended to read *“Proposals for small scale development, including extensions to existing buildings, must be of a high standard of design, responding to or improving the site and surrounding area and not have a detrimental impact on flood risk”*.
- Requirement for a specific consideration of the historic environment within design policies
- Policy supported

Policy D4 – Development Frameworks and Codes

- Major developments required at minimum to provide a sports facility plan/strategy as part of green infrastructure plans
- Query on what constitutes ‘large development’ and ‘strategic development’
- Town and parish councils should be involved in strategic and major developments
Suggestion to amend paragraph 9.14 to read ‘Particular regard and consideration must be afforded to the delivery of local community or shopping centres and school provision. Early delivery of these facilities will ensure provisions for the 1st / 2nd cohort of residents’
- The policy should stipulate a trigger point for provision of facilities
- Building for Life 12 Assessments should apply to all developments of 50+houses not just new settlements
- An adopted Masterplan for Easton Park should be annexed to SP6 at the Regulation 19 consultation stage
- 4th bullet point in Policy D4 be amended to – *“A green infrastructure plan setting out the network and typology of green spaces, links, flood mitigation areas and areas of ecological importance”* (page 115).

- Wording of the 3rd paragraph in Policy D4 is amended to read –“*Development frameworks should be informed by best practice landscape and urban design principles. Applications.....*”
- The fifth bullet point (Policy text) should be amended to read ‘*A green infrastructure plan setting out the network and typology of green spaces, links and areas of ecological importance and opportunities for the creation of sustainable drainage schemes including attenuation ponds/ infiltration basins and swales.*’
- Policy should include reference to the historic environment
- The West of Braintree Garden Community development approach merits a separate section in the policy which can be built on in a site specific DPD
- Detailed code should be specified
- Policy is supported on condition that enforcement will be proactive and effective
- Equestrians should be mentioned and included in Policy D4
- Definition of “strategic” needs clarification to ensure that Plan is effective
- Requirement of Development Frameworks is regarded as an additional phase in the planning decision making process and is unjustified, not effective and not supported by national policy
- The policy considered overly onerous and does not specify when the policy will be applied
- Not clear whether the policy refers specifically to Garden Communities and strategic sites allocated through the Local Plan
- Area Design Codes are considered more appropriate for a 10,000 unit Garden Community at Easton Park to be built over 20 years
- Clarification is required on whether Policy D4 expects outline or reserved matters submissions to be accompanied by the Building for Life Assessment
- Unclear whether framework is to be adopted as SPD or approved by the Council as guidance. SPD adoption will add to delivery timetable and cause delay
- Proposed rewording of Paragraph 9.10, “*Proposals for strategic development sites (500+ dwellings or 50,000 sq. m) large scale development, including the new garden communities, major and strategic development sites, should be informed by a masterplan that comprises part of a development framework for the site. This should place the site in its wider context and avoid narrowly looking at landownership boundaries.*”
- UDC should develop its own Design Code, consult on it and ensure rigorous compliance once adopted
- Design codes can provide greater certainty and control over design quality in long term
- Design code to cover, building heights, depths and widths, street typologies, landscape treatments as well as façade treatments
- New large settlements (estates) are not appropriate for the district
- Large settlements are artificial and ignore historic structure of area

Policy D5 – Design Review

- The size and complexity of West of Braintree development requires a site specific solution and policy may be too restrictive
- All major development should be subject to a Design Review
- All major schemes should not be subject to a Design Review

- Design should be in accordance with an adopted Neighbourhood Plan requirements as well as complementing the area
- Local Town and Parish Councils should be consulted and included in discussions on design
 - Where a Neighbourhood Plan adopts a design guide as part of its Heritage and Character Assessment, this should be used.
- Application of the Essex Design Guide to new settlements regarded as inappropriate as development should reflect the age they being are planned
- All projects should be subject to design review regardless of size or being “in important and/or sensitive” locations
- Clarification required on whether “emerging schemes” refers to emerging reserved matters submissions
- Referral of all strategic and major developments is not proportionate
- Requirement for a design review assessment is too onerous, restrictive and the Policy encourage and not require
- Policy D5 needs to clarify a development threshold to trigger the Design Review process
- Policy D5 has the potential to frustrate delivery by using a Design Review Panel operated by Shape East
- Suggested rewording of Policy “*Where necessary the Council will require emerging schemes for the new garden communities, strategic and major development sites to be assessed through design review. Equally, smaller sites in important and or sensitive locations will also be subject to design review. The Council may seek to refer schemes to the East of England Design Review Panel operated by Shape East an independent review panel where it may be helpful in reaching an appropriate design solution. The Council encourages design review to take place early in the process to allow scope for input into the emerging design. The final scheme submitted to the Council should include a report on the design review process and how the scheme has responded to this.*

Policy D6 – Innovation and Variety

- Avoidance off-the –shelf house designs is supported
- Delete last sentence as considered unenforceable and unmanageable
- Query on how and who will judge the design competitions
- New houses should complement the local area

Policy D7 – Design for Self and Custom-build Homes

- Larger sites to provide 5% of self-build land
- Suggested that all sites of 150 or more homes should provide 5% self-build land
- Designs should be in accordance with specific requirements in Neighbourhood Plans
- Queries on how self-build will be identified, how those registered will be notified, and how appropriateness of design will be determined
- Plot passports should include all matters and not leave it to plot owner to decide
- Flexibility should be adopted to allow self-build beyond development limits
- Small plots of land outside villages and conservation areas should be available for development

- Hamlets should be allowed to expand rather than barn conversions that are not in keeping with surrounding housing style

Policy D8 – Sustainable Design and Construction

- Wording of the 4th paragraph of Policy D8 be amended to read, *“Waste, recycling and storage areas should be provided. Equally, a system that reduces water consumption and allow for the reuse of grey water is encouraged. Development should not increase flood risk on or off site.”* (page 118).
- Policy wording seen as unambitious and too loose
- Policy should be amended to include waste access
- Green roofs should be encouraged
- Policy needs to be more specific on provision of waste areas for flats.
- Policy needs clarification as it might be misinterpreted as applying to all developments of all scales
- The policy makes no specific reference to the historic environment or to visual impact and setting
- Policy D8 is not in line with PPG and Ministerial Statement of July 2015 stating that improvements in technical build standards are to be delivered through Building Regulations
- Use of BREEAM Standards and Home Quality Mark is an unnecessary financial burden on developers
- Both BREEAM standards and Home Quality Mark have not undergone a formal public consultation and UDC should not allow the Building Research Establishment Ltd. to dominate assessment of Sustainable Design and Construction
- New builds should exceed BREEAM standards and current Building Regulations

Policy D9 – Minimising Carbon Dioxide Emissions

- Phrases such as “allow latitude” and “subject to viability” perceived as weak and undermining UDC’s stance on climate change
- Query on location of Planning Practice Guidance
- The paragraph (9.26) is considered a lack of massive support for energy reduction measures
- No specific reference to historic environment or visual impact and setting
- Historic England invites a specific policy relating to inclusion of renewable technologies in Conservation Areas with regard to historic buildings and wider historic landscape
- Proposed 30% improvements on Building Regulations is too high
- Policy D9’s Energy Requirement places rigid expectation on all development and may make schemes unviable
- Policy sets requirement beyond scope of national technical standards for energy efficiency
- Policy D9 is not consistent with National Policy and guidance and should be deleted
- Policy D9 first sentence should be amended to read, *“Development proposals for both commercial and residential buildings should demonstrate that they have applied the Energy Hierarchy, as set out in the Local Plan and, in doing so, have achieved a Dwelling Emission Rate (DER) which is 30% 10% lower than the Target Emission Rate (TER) required by Building Regulations Part L 2013 Edition.”*

- 30% lower than TER considered a very a very weak target. A wealthy, well-resourced district like Uttlesford should be taking a far stronger lead!
- The get out clauses here: 'as far as practical,' 'where it is feasible', and worse of all, 'economic' mean: let's get it cheap now – let future generations pay.... These phrases should be removed.
- PASSIV houses should be given priority

Policy D10 – Highly Energy Efficient Buildings

- Extent to which planning system has in delivery of additional technical building standards is clarified in Ministerial Statement (July 2015) and PPG paras 56-001 – 56-023
- Energy demands and carbon dioxide emissions are required to accord with Part L of the Building Regulations
- Standards for energy efficient buildings considered low
- All new housing should be built with solar panels
- PASSIV housing standard should apply to all social housing delivered by the Local Plan
- All new housing stock should include SMART and green technologies especially superfast or subsequent generations broad band

Chapter 10 – Environment

- Concern raised over lack of environmental assessments on site allocations
- No assessments of effects on historic environment attributable to additional traffic from developments
- Local Plan has to commit to provision of substantial green spaces in proposed Garden Communities
- Failure to implement adequate sustainable travel infrastructure whilst developing east of Saffron Walden will exacerbate already illegal pollution levels of the Saffron Walden AQMA.
- New development contributes to loss of habitats and small green spaces do not mitigate large scale development
- Population increase will mean more carbon emissions form additional traffic
- Light pollution in a 'dark area'
- Much of the evidence remains the same as at 2015
- Specific Brief Heritage Impact Assessments (HIA) considered insufficient
- Full HIAs recommended for each of the three Garden Communities
- All potential sites need to be appraised against historic impacts
- Policy concern with renewable energy is why make specific provisions when out of date 2008 evidence identified a gap in provision and not obstructions to installation
- No need to include problematic provisions for renewable energy in policy

Policy EN1 – Protecting the Historic Environment

- Policy specifically addressing Heritage at Risk is welcome
- Strengthen policy by outlining proactive approach to addressing Heritage at Risk

- Policy should be consistent with NPPF wording and legislation and should not contradict, add to or take away from NPPF or Legislation
- The term historic environment should be used instead of heritage assets
- Historic landscape characterisation should be included in the Plan
- No policy on shopfronts in either Design or Environment Chapters
- Recommendation to reference Neighbourhood Plans where appropriate
- Policy EN1 regarded as contradictory to SP6 (Easton Park Garden Community) as EN1 principles cannot be demonstrate in proposed development
- North Uttlesford Garden Community (NUGC) does not protect or enhance the significance of heritage assets both on-site and in Great Chesterford.
- Policy regarded as ambiguous and not providing sufficient protection to historic assets
- All heritage assets should be safeguarded
- Development at West of Braintree Garden Community (WoBGC) contradicts Government policy on ancient woodlands and urges consideration of viable alternative sites
- New towns should be sited near major employment opportunities and not as in the case of UDC proposals

Policy EN2 – Design of Development within Conservation Areas

- Word ‘essential’ should be deleted as it implies less stringent test than by obligatory consideration in statutory provisions
- Character and appearance of conservative area should be considered whether it is essential or not
- Remove the word ‘overall’ in Bullet Point 3
- Historic England would welcome the provision of any future designation of conservation areas within Uttlesford
- Village Design Statements regarded as vital to the preservation of important characteristics and historic significance of villages
- Non-consideration of outline planning applications in conservation areas supported
- What constitutes substantial pollution?
 - Policy EN2 not in conformity with NPPF guidance para 132-134 because NPPF states that if harm is deemed substantial then the proposal needs to achieve substantial benefits to outweigh that harm.
- Paras 132-134 relate specifically to designated heritage assets i.e. the more important the asset the more weight attached to it
- Policy to be amended to reflect guidance

Policy EN3 - Protecting the Significance of Conservation Areas

- Policy supported
- Developments resulting in increased traffic and pollution within Conservation areas will not be permitted
- Policy conflicts with SP6 (Easton Park) as it does not conserve or enhance the character of the conservation area
- NUGC will be damaging to the character, appearance and significance of the Conservation Area within Great Chesterford.
- UDC not proactive in countryside preservation enforcement

- EN3 contrary to NPPF advice which requires balancing exercise between harm to asset and public benefits.
- Detrimental effect of increased air traffic at Stansted Airport on setting of conservation areas to be taken into account
- This policy considered to require more detail or an SPD

Policy EN4 - Development affecting Listed Buildings

- Policy appears to prioritise renewable energy provision over protection and enhancement of historic environment
- As drafted policy seeks to apply less stringent test contrary to NPPF paragraph 132
- Policy currently conflicts with NPPF in affording greater weight to the provision of renewable energy equipment
- Delete entire Policy paragraph 3 and associated bullets points
- Should locally listed buildings be referenced in conservation area appraisals?
- Proposals for works on locally listed buildings to be accompanied by structural surveys if not referenced in conservation area appraisals
- Should be case-by-case examination of applications supported by meaningful enforcement
- UDC regarded as lax and slow in enforcement in countryside as evidenced by damage to hedgerows, and at 'risk buildings'
- An embargo on development based on visual impact on an asset is contrary to NPPF guidance
- Policy should be amended to reflect NPPF guidance
- Paragraph is considered misleading to readers
- Wording to be amended to align with NPPF para 128 regarding significance and not reasons for listing
- An embargo on development based on visual impact on an asset is contrary to NPPF guidance
- More information required for a listed building application than indicated in para 10.14
- Policy criteria contradicts statutory obligations as it does not ensure preservation of a building's special interest
- Support for sympathetic treatment of applications seeking restoration to reveal significance of heritage asset

Policy EN5 - Scheduled Monuments and Sites of Archaeological Importance

- Policy title should be changed to Archaeology
- Seeking preservation in situ could be strengthened if supporting text elaborates how this could be achieved
- No terms of reference provided to what would constitute a need that would outweigh the importance of an asset
- Significance of a designated asset should be given greater weight to that asset's conservation (NPPF paragraph 132)
- Draft policy does not accord with NPPF paragraphs 132-135
- Application of NPPF paragraphs 131-135 test on identification of harm

- Objective of first paragraph not clear and could be interpreted to say that even if preservation in situ was possible it would not be necessary if development is considered to outweigh importance of the asset
- Second paragraph, Heritage England object on the basis that NPPF paragraph 128 requires applicants to provide a description of any heritage assets affected including contribution made by the asset
- Paragraph 4 wording, does not indicate requirement for actual excavation, investigation and recording but only a provision to be made
- No reasoned justification for inclusion of a renewable energy provision regarding scheduled monuments and sites of archaeological importance.
- Objection to prioritisation of renewable energy provision over protection and enhancement of the historic environment by seeking to apply a less stringent test.
- Heritage England requests removal of entire fourth paragraph and its associated bullet points from the policy.
- Policy as currently drafted fails to secure conservation of scheduled monuments
- West of Braintree Garden Community will significantly affect Andrewsfield
- Impact NUGV would not meet the Policy criterion of impact being reversible
- Historic Environment Assessment for Great Chesterford and Little Chesterford (July 2016) identifies topography as making major positive contribution to setting of Heritage assets
- SA Environment Report (July 2017) acknowledges that it is not known whether mitigation could be achieved

Policy EN6 Historic Parks and Gardens

- Correct Register title to Register of Parks and Gardens of Special Historic Interest
- Delete third sentence as it appears to imply a distinction in considerations between Audley End and Bridge End gardens from other sites of national importance albeit not Grade 11* listed.
- Essex Garden Trust's Historic Designed Landscapes of Essex: Handbook Part 3 constitutes a local list
- Applications to be accompanied by a statement of significance and assessment of proposed development's impact on significance
- Issue is not reasons for designation but asset's significance
- Amend to read Historic England and not English Heritage
- Proposed addition to text, "...in identification of the significance of the asset and the need to explain the impact of the proposals on the significance of the asset in a Historic Impact Assessment."
- Policy should refer to settings of historic parks and gardens
- Impacts to views to be added to list in policy
- No development should be permitted
- Development integral to function of park to be permitted subject to planning conditions
- Historic Parks and Gardens are subject to the same NPPF considerations as listed buildings, conservation areas and scheduled monuments
- Historic England concerned about reference to 'material harm'
- Ancient and veteran trees to be afforded highest protection and to be lost to development in exceptional circumstances

- Policy should not place any embargo on all development causing an impact but should undertake a balancing exercise on harm and benefits

Policy EN7 – Non-designated Heritage Assets of Local Importance

- Policy considered clear and accords with NPPF guidance
- Separate policy for non-designated heritage assets is welcome
- Stronger policies and enforcement action on countryside preservation and buildings at risk required from UDC
- Query on location of Local List of Heritage Assets in Local Plan Document
- Delete sentence re- paragraph 10.22 as UDC cannot be identify new heritage assets on an ad hoc basis
- Policy supported

Policy EN8- Natural Environment

- Incorrect cross-reference to NE1 instead of EN9
- An SPD and clearer forms required
- Policy and paragraph 10.24 supporting text fail to demonstrate a distinction between hierarchy of sites as required by NPPF paragraph 113 therefore policy is **unsound** as drafted as not in accordance with NPPF paragraph 113
- More detail required on how UDC intends to, “optimise conditions for wildlife and habitats to improve biodiversity and tackle habitat loss and fragmentation
- Easton Park development cannot demonstrate EN8 principles
- S106 contributions should be used to promote woodland cover, extend and create new meadows
- The proposed Flich Way Local Nature Reserve should be mentioned and supported in the Local Plan
- Visitor pressure on Hatfield Forest should be acknowledged as well as the impact of population and visitor growth from cumulative developments

Policy EN9 – Protecting the Natural Environment

- The Local Plan should acknowledge existing problems and additional pressures on Hatfield Forest arising from housing developments
- Requirement of a policy required in Local Plan to protect Hatfield Forest
- Reference to Hatfield Forest in Chapter 3 of the Local Plan should be with regards to protection of the environment and not about promoting growth.
- Paragraph 3.31 should be amended by removing Hatfield Forest from 3rd and moving it to the 4th bullet point.
- Query on whether Local Geological Sites (LoGS) are shown as Geological Sites on Policies Map Key
- Environmental protection of Boxted Wood will be impossible with the proposed development of West of Braintree Garden Community
- Paragraph 10.29 wording would be more effective if included in Policy EN8 wording
- Paragraph 10.29 objective is not included in Policy EN9
- Sites such as Hatfield Forest and Aubrey Buxton are under threat because of failure by new development to provide enough amenity space for local need

- Policy should reference the creation of additional parks and sites as currently it is about protecting existing sites rather than creation of new space.
- Automatic refusal of planning permission due to a reduction in biodiversity and geodiversity value is not an approach in accordance with NPPF guidance
- Paragraph 3 of concern as it allows significant harm to biodiversity and geodiversity
- Requirement of a biosecurity protocol method statement is recommended

Policy EN10 – Traditional Open Spaces and Trees

- Definition of traditional open space which policy seeks to protect is not provided
- Designation of open space to be based on a robust comprehensive evidence base that clearly sets out value of space and reasons for its protection
- Policy needs redrafting to refer to planning balance exercise where only when harm significantly and demonstrably outweighs the benefits will a proposal be refused
- Policy should be more flexible
- Policy to state historic role or importance in townscape open space
- Development sites required to undertake Arboriculture Surveys and Arboriculture Impact Assessments
- Policy insufficient as it should seek to increase traditional open space, trees
- Policy should include creation of new spaces
- Tree survey to accompany planning applications
- Hedgerows to be included in policy
- Policy appears to imply that need for development outweighs amenity value
- Requirement to provide definition of amenity value

Policy EN11 – Minimising Flood Risk

- Supporting text not consistent with national policy on Guidance for Flood Risk and Coastal Change
- Recommended paragraph amendments provided
- Text to reflect that Essex County Council Environment, Sustainability and Highways is the s Lead Local Flood Authority and statutory consultee for surface water flood management
- Most up-to-date references should be used and appropriately referenced
- Flooding will continue to be a problem
- Funding mechanisms (e.g. S106 agreements) should be included
- Recommendation to further consider whether surface water flooding is a risk in the district
- No development should be permitted in Flood Zone 3
- Recommendation to amend paragraph 10.34 as follows: *“All development should be located in areas at low risk of all forms of flooding. The main risk in the District is from river or fluvial flooding. Development in certain locations can cause flood risk elsewhere as a result of increased runoff. Surface water run-off from new development should be controlled as near to the source as possible and ideally within the boundary of the development. Just over 96% of the District lies within Flood Zone 1 where there is a low probability of fluvial and tidal flooding. The scale of development required in the Local Plan period can be provided on land which is at the lowest risk of fluvial and tidal flooding and all new built development is expected to be located in this zone. When*

locating development and placing development within a site, all forms of flooding should be considered. The sequential test will be used to ensure new development takes place in the areas with the lowest probability of all forms of flooding and, where necessary, the exception test will be used. Full details of the sequential and exception tests are set out in the National Planning Practice Guidance” (paragraph 10.34, page 132).”

- Recommendation to amend paragraph 10.34 as follows: “A site-specific flood risk assessment will be required for new development sites in accordance with the Environment Agency’s Standing Advice. All major development should include a drainage strategy which should be submitted for review for the Lead Local Flood Authority which is in line with their requirements. The Council will work with developers, the Environment Agency and the Lead Local Flood Authority to achieve sustainable local flood mitigation measures as part of development. Any residual risk should be able to be safely managed with safe access and escape routes where required and access by emergency services”.
- Supporting text quoted references are not the most up to date and reference should be made to the most up-to-date surface water risk map available namely the Environment Agency’s Risk Surface Water Flooding Maps
- Policy should include funding mechanisms such as S106 Agreements towards the stated goal of managing residual flood risks resulting from developments
- Contrary to paragraph 10.35 a site-specific flood risk assessment is not directly required under the Environment Agency’s Standing Advice but is a requirement of NPPF,NPPG: Flood Risk and Coastal Change

Policy EN12 – Surface Water Flooding

- Paragraph 10.39 should be amended to refer to Essex SuDs Design Guide instead of SuDs guidance
- Exclusion of car parks and hard standings from incorporation of SuDs queried
- Run-off rates should be greenfield sites restricted to 1 in 1 greenfield rate and brownfield sites to be restricted to greenfield rate and where non-viability is demonstrated then a minimum 50% betterment on existing run-off rates should be sought
- Query basis of UDC’s information on an increase in water pollution associated with SuDs because SuDs do not increase pollution
- Last policy paragraph should refer to long-term maintenance of SuDs systems as well as bird hazard management plan
- Inadequacies in the policy such as exclusion of car parks from the requirement to incorporate SuDs.
- SuDs is likely to reduce risk of flooding to Great Chesterford but the SA Environment Report (July 2017) recognises development likely to be constrained by mitigation measures

Policy EN13 – Protection of Water Resources

- Recommended to reconsider some of the policy provisions set out in Policy EN13
- Addition of ‘.....the amenities of existing local residents’ to fourth paragraph
- Essex SuDs Design Guide and successor documents to inform emerging policy

- policy as the comprehensive coverage and wording of policy complements Environment Agency's internal water resources policy
- Support for water efficiency target of 110/litres /person/day within the policy
- Building Regulations 2010 require consumption of occupiers of new homes not to exceed 125/litres /person/day and this should be addressed through the Building Regulations
- Additional requirements need to be fully evidenced
- Unclear whether costs of the requirement for this infrastructure and impact on development viability have been assessed
- What plans have been made to ensure enough water for the new developments since East Anglia has the lowest amount of rainfall in the UK?
- NUGV located within groundwater protection zone and a risk based approach required to demonstrate that NUGV is protective of groundwater from potential contaminating activities
- Have the responsible water companies factored additional investment into their Asset Management Planning (AMP) process?

Policy EN14 – Minerals Safeguarding

- Policy considered as duplication of policy adopted Essex Minerals Local Plan 2014 and needs modification to clarify relationship
- Amendment sought in second paragraph specifying Consultation with Essex County Council as the Minerals Planning Authority
- Policy considered too onerous and not in accordance with NPPF paragraph 143
- Blanket policy seeking refusal of permission where minerals will be sterilised is contrary to guidance as Local Planning Authorities should encourage prior extraction of minerals where practicable and feasible

Environmental Protection (Paragraph 10.47)

- No provision of credible strategy for tackling air pollution and traffic congestion in Saffron Walden
- UDC not taking into account cumulative effects of new development
- Saffron Walden cannot sustain the level of development without serious infrastructure improvements

Policy EN15 – Pollutants

- Recommendation to reconsider some of the policy provisions as well as Essex SuDs Design Guide and successor documents
- Attention to be paid to schools and hospitals in proximity airport due to additional air and road traffic generated by Stansted Airport
- Compensation to listed buildings of significant heritage importance to facilitate repairs caused by increased pollution and air traffic vibration
- Noise assessments should be undertaken on a 24-hr basis so as to assess cumulative impacts on directly affected towns and villages
- Suggestion to add 'Any pollutants used or stored on site during construction of the development must be removed following completion of the development. Any such storage area must subsequently be verified as fit for public use and be accompanied by a test and inspection report to that effect.'

- Mitigation maybe required for individual properties e.g. occupants of Church St., Museum St. and George St. receiving grant payments for cleaning or maintenance

Policy EN16 – Air Quality

- How can it be pollution attributed to new development be measured and mitigated?
- Objection to policy as it does not include provision for measurement or mitigation as well as not mentioning the impact of new development
- Objective of plan should be minimisation of traffic movements and development of non-fossil fuel transport
- M11 and A120 should both have 100-metre width zones
- Urgent need to tackle poor air quality in Saffron Walden town centre
- Construction of a partial or full relief road would remove HGVs and other traffic from the town centre
- Query on how, when and by whom will air quality be assessed and also will monitoring be ongoing?
- Need to recognise importance and role in removal of certain pollutants when planted in the right locations
- Query of existence of past emission reports
- UDC Air Quality Action Plan does not contain any measurable mitigation actions nor does it set a target date for lifting the Air Quality Management Area
 - No account being taken of cumulative effect on air quality despite explicit instructions from DEFRA
 - “Phrases such as ‘reasonable and proportionate’ render policy utterly ineffective”
- All allocated sites except two will generate traffic through town thereby exacerbating the problem

Policy EN17 – Contaminated Land

- Stronger policies and enforcement required from UDC

Policy 18 – Noise Sensitive Development

- Policy EN18 in conflict with SP6 due Easton Park being affected by noise pollution from nearby Stansted Airport
- Proposed Stansted Airport expansion to 44.5mppa will worsen the pollution
- Recommended addition to policy “All activity should comply with BS5228:2009 Code of Practice for noise and vibration control on construction and open sites.”
- EN18 not in accordance with NPPF paragraph 109 which refers to unacceptable adverse noise and not adverse levels of noise as stated in UDC policy
- West Of Braintree Garden Community will be subjected to maximum noise and air pollution due being located under the eastbound flight path of aircraft departing Stansted Airport

Policy 19 – Light Pollution

- Requirement to specify criteria on design
- Street lamp design an important element of street furniture
- Concern over urbanisation effect of light pollution on villages
- Policy is in conflict with SP6 due to proximity of Easton Park to High Wood SSSI

- Boxted Wood “one of the darkest areas in the district” will be destroyed by the local plan
- NUGV proposal does not address adverse impact on the landscape and surrounding communities of light pollution from a highly visible development

Chapter 11 – Countryside

- Development depleting the countryside as well as destroying the natural habits and demolition of historic buildings.

Policy C1 – Protection of Landscape Character

- Policy considered as not seeking landscape enhancement
- Recommendation to change wording from “material harm”
- NUGC regarded as in conflict With Policy C1 principles regarding settlement pattern, scale, density and cross views
- Careful lighting installations in public and private developments to reduce visual impact in rural areas
- Policy supported for protection of panoramic views
- Thaxted’s historic character believed to be under threat from increasing levels of development especially, inappropriate design and lack of enforcement
- Policy considered not contrary to NPPF principles (paragraph 14)
- Policy considered overly restrictive and fails to recognise positive improvements and mitigations that development can provide

Policy C2 – Re-use of Rural Buildings

- Policy welcomed by Historic England as it will protect heritage assets or enhance the countryside
- Policy offers opportunity to identify a potential role for re-use of agricultural in supporting rural economy
- Use of Dutch Barn footprints for dwellings should be avoided
- Construction of agricultural buildings as a pretext to provide a future dwelling footprints should be avoided
- Delete last Policy Bullet point as is heading of next paragraph and Policy C3 title

Policy C3 - Change of Use of Agricultural Land to Domestic Garden

- Permitted rights should not be included
- Proposed Garden Communities do not meet Policy C3 criteria
- Proposed garden Communities will change the character and appearance of the countryside
- Policy rewording require to ensure that domestic gardens cannot be used for house building
- Policy may give rise to domestic infill in form of annexes on originally designated agricultural land

Policy C4 – New Community Facilities within the Countryside

- Reference to be made to Essex Rural Strategy 2016-2020 (RCCE 2016) and successor documents published by Essex Rural Partnership to help promote vibrant, mixed and sustainable rural communities
- Suggestion to add ‘indoor and outdoor sports facilities’ to the list in paragraph.
- Recognition that in principle outdoor sports facilities may be justified in the countryside beyond development limits is welcome
- Outdoor sports facilities requiring access to natural resources may not be met in urban areas due to land take and locational requirements
- Community facilities and other built amenities should not be permitted beyond development limits except in exceptional circumstances
- Policy as drafted make no provision for expansion or improvement of community facilities in the countryside
- Flexibility required to meet community needs
- Policy to be amended to require a Landscape Assessment on application

Chapter 12 – Residential allocations

No overarching summary

Chapter 13 – Non-residential allocations

No overarching summary

Chapter 14 – Delivery and Monitoring

- Monitoring proposals welcomed but concern that thresholds are inadequate or delivery requirements omitted altogether e.g. green space, sports provision and affordable housing.
- Monitoring should be completed annually, rather than waiting until the end of the plan period.
- Concern over the capacity of UDC to monitor development.
- Concern that the existing Plan has been ignored by UDC so monitoring should be central to the Plan.
- Concern that the impact of development on residents should be minimised.
- The default assumption should be that consultation with residents and parish councils is vital e.g. implementation of housing schemes.
- There should be a provision whereby applications will not be considered from developers who have been found to be inadequate in the past.

Chapter 15 - Glossary

No representations

Chapter 16

Appendix 1 – Replacement Policies

No representations

Chapter 17

Appendix 2 – Monitoring Framework

- Detailed comments provided about the approach to monitoring and the wording of the Monitoring Framework including the objectives, targets, performance measures and who collects performance information.

Chapter 18

Appendix 3 – Housing Trajectory

- Braintree District Council suggest that for clarity and ease of reference delivery from the garden communities is separated out from the housing trajectory.
- Suggestion that the projected shortfall of homes could be met in one garden community.
- Concern that the housing trajectory does not match the housing need.
- Questioning of the 14,100 figure and suggestion that the figure should be closer to 11,500.
- Clarity requested in relation to when each year starts and ends.

Chapter 19

Appendix 4 – Garden community principles

- Some support for the garden community principles but also concerns that the principles will not be sufficiently adhered to by developers or Uttlesford District Council resulting in housing estates with no infrastructure. Obligations should be legally binding.
- Greater explanation and clarity requested including in relation to the operation of land value capture, delivery of the garden communities and management of the garden communities' assets.
- Environment Agency support the Principle 7 as it seeks to enhance the natural environment and suggest that UDC refer to the recently published TCPA guide - *The Art of Building a Garden City*.
- Some changes suggested to the wording of Principles 8 and 9.

- A more proactive approach to multi-user routes accessible to all vulnerable road users, such as equestrian users, is requested throughout the Plan including in the garden communities.
- Support for a locally-led, innovative and distinct approach to the visions and principles for developing and delivering the three new communities in Uttlesford.

Chapter 20

Appendix 5 – Marketing Assessment Information

- Many developments at Thaxted have been allowed as 'exceptions'; indeed much of what has been built at UDC has occurred outside an LP
- Requirements under Appendix 5 should be rigorously reviewed and in some instances strengthened
- Where needed to make a development sustainable (e.g. Forest Hall Park) actual shops and other amenity should be built by the developer as part of the planning permission i.e. a shop or multi - purpose community centre which should be built by the time 30% of the development is complete.
- Under General Criteria, note that the Government has announced plans to abolish leasehold

Chapter 21

Appendix 6 – Existing Employment Sites Schedule

- Gaunts End is located within the Countryside Protection Zone and no further development should be permitted.
- Allocation of Thremhall Park as a 'Principal Employment Area' is supported and has capacity for additional employment land
- Support identification of M11 Business Park (North) and M11 Business Park (South), Support their allocation in order to safeguard them for employment use and is suitable for extension but as the site is in the Green Belt it would require allocation of additional land
- Hoblongs Industrial Estate If suggested amendments to EMP1 and EMP2 and supporting text (DP3878 to DP3881) are not accepted, then it is requested that the land outlined on the attached plan (comprising the hotel and adjoining development area previously consented for hotel and restaurant uses) is removed from the existing Hoblongs Industrial Estate. This would allow for intended development options to be considered on their merits and brought forward without conflicting with the over rigid policy requirements as set out in EMP1 and EMP2.

CHAPTER 1 – Introduction

General Comments (No specific paragraphs referenced)

This text was responded to by 19 people and organisations.

	TOTAL
Support	2
Object	9
Comment	8

Overarching Summary

- A number of responses express concerns over the traffic congestion that will result from the Garden Communities.
- Concern that the consultation period is undemocratic as it was undertaken in the school holidays.
- Concern that the SA does not consider reasonable alternatives.
- Concern that housing in the garden communities will not meet NPPF sustainability requirements.
- Questioning how housing targets have been reached due to the lack of a clear audit trail.
- Detailed comments on the SA in relation to Easton Park Garden Community proposal from Little Easton Parish Council.
- Some support for the Plan.

Statutory consultees and other bodies

Saffron Walden Town Council - Concern that the consultation period was undertaken in the school holidays. This has caused difficulty in coordinating a well-considered response. No council meetings are ordinarily held during the month of August and many councillors and officers are off on family holidays. This will also affect all other statutory consultees. In future, avoid periods of school holidays, e.g. Christmas, Easter, July and August in line with established government guidance.

The Plan should cross-reference CIL to cover an eventuality where UDC may adopt CIL. Why has UDC not yet adopted a CIL?

Little Easton Parish Council - The Sustainability Assessments for the three sites included in the local plan have not been consistently assessed and there are significant omissions in the Easton Park assessment:

SA Objective SA5 should be re-written and the omissions corrected and the objective reassessed. It is incomprehensible that Easton Park be given a green status in comparison to other sites, gives the number of heritage assets within the site and the impact on Little Easton Conservation Area.

The Sustainability Assessments for the three sites included in the local plan have not been consistently assessed and there are significant omissions in the Easton Park assessment:

SA Objective SA5 should be re-written and the omissions corrected and the objective reassessed. It is incomprehensible that Easton Park be given a green status in comparison to other sites, gives the number of heritage assets within the site and the impact on Little Easton Conservation Area.

Evidence:

1. The West of Braintree assessment references the Landscape Assessment undertaken and details the fact that the wider settings of listed buildings both on and in close proximity to the site will be altered as a result of the proposals. The Landscape Assessment for Easton Park details the fact that there will be an impact on the settings of the Grade II listed Gardens of Easton Lodge, Little Easton Conservation Area and a number of listed buildings both in and in proximity to the site. However there is no mention of any of this in the sustainability assessment.
2. The Easton Park sustainability assessment is vague about “settings issues with Little Easton Church” and doesn’t even mention the conservation area. This is a continuing theme with all assessments of the Easton Park site which continue to underplay the impact upon all the heritage assets in and around the site.
3. The North Uttlesford Assessment states that “Development of the entirety of the site would be unsuitable” (although it is unclear where the assessment is referencing evidence for this statement). The Landscape Assessment for Easton Park finds that “there is potential for part of the site to accommodate development” and concludes that the northern part of the Site is the most sensitive part of the Site and therefore it is desirable for development in this location to be limited on landscape and visual grounds whilst the southern part of the Site is of lesser sensitivity to development.

There is no mention of these findings in Sustainability Objective 5.

SA Objective 3: To conserve and enhance the District’s landscape character and townscapes. The assessment for Easton Park of this objective as “Realistic prospect of meeting criteria” is incorrect. This objective needs to be reassessed and graded correctly.

Evidence:

1. No mention is made within this assessment of the Landscape and Visual Assessment* which states that only part of the site has the potential to accommodate development and makes no mention of the landscape impacts in the north of the site

2. The assessment shows a green grading under coalescence when the site is less than 300 metres from Great Dunmow and should be graded as there being a strong possibility of coalescence with Great Dunmow.

* (source: UDC evidence base: UDC Landscape and Visual Assessment – Land at Easton Park – C Blandford & Associates June 17)

SA Objective 9 to promote and encourage the use of sustainable methods of travel

The assessment does not detail the fact (as it does for North Uttlesford) that it would also be expected that there would be a large amount of commuting outside the area.

Evidence:

The 2011 Transport Census found that 58% of Uttlesford residents travelled to a work destination outside of Uttlesford and that the car is by far the preferred means of transport (76%). Even with the desire for a modal shift from car use, there will be a large percentage of commuting outside of the area by car. This needs to be reflected in the assessment of this objective.

WeAreResidents.Org - Concerns about the lack of the evidence base behind the plan, such as the lack of the Comparative Sustainability Assessment and reasonable alternative proposals. Also concerned over the lack of an infrastructure plan, sports facility delivery programmes and other community facilities, an environmental programme, and any transport or sustainable transport plans. Without addressing these the plan does not comply with the NPPF on sustainability.

The Thaxted Society - Traffic - Where traffic issues at Dunmow and Saffron Walden are listed, consequent impact at Thaxted should be noted equally.

Public Transport - Current public transport infrastructure should reflect an evidence base derived from on the ground use.

Enforcement - An overarching caveat to our support is the presumption of renewed and invigorated enforcement.

Language - The repeated use of legal terms does not help enforce and bolster the Plan. When 'material' anything, or 'viable' anything, stand between two opposing arguments with no clarity in the particular, it provides for argument and distrust. Strongly urge clarification in the specific and its consequent enforcement.

Developers/landowners/site promoters

Individuals

- Object
- There is no audit trail to explain how housing targets have been derived. Housing targets appear to be founded on a period of exceptional growth; and an assumption about airport expansion. Housing forecasts need should be replaced

with one that is evidence-based and transparent and whose calculations can be followed. Without these changes, the Local Plan is unsound.

- Concern that consultation was undemocratic as it was held over the summer holidays, when many people are on holiday, which makes it difficult for people to respond.
- I fundamentally object to the assumptions underpinning this plan and I am concerned about the Council's ability to administer this plan if approved.
- Strong opposition for the Garden Village, as it would have an effect on infrastructure and the character of the area.
- The draft Local Plan concentrates on the provision of housing with no detail on how the housing will meet sustainability criteria such as environment, low carbon economy, climate change, transport and employment.
- Policies must be clear and include specific requirements that can be implemented and enforced. However much of what is in the policies, especially regarding infrastructure, is phrased as 'nice to have' and 'encourage'. Concern that developers can ignore them, particularly in the absence of a five-year supply. No choices given – choice of different methods of doing the housing numbers or settlements and sites. Weak on detail and totally without choices. More specific implementable and enforceable policies needed.
- Even on the optimistic presumption that the developers do everything the Local Plan asks of them, the District Council will be involved in a huge amount of work over and above what it currently undertakes. Checking, monitoring, and negotiating. What provision is there to increase capacity at the District Council to enable them to do this?
- More housing would help the retail businesses in Saffron Walden and Great Dunmow thrive in the long term. However new housing near Saffron Walden will add to the illegal levels of air quality at the Thaxted Rd/ Radwinter road junction and the High St/George St junctions. Before a new Garden Village is built near Great Chesterford, a northbound access to the M11 must be provided at Junction 9. Concerned that people living at Great Chesterford will drive to Audley End station rather than Chesterford where there is no parking and where the station is already extremely busy. Concern over the large numbers of houses planned for Gt Dunmow and Braintree without a railway with access to London. Concern over how secondary level education is going to be provided to meet the needs increasing outside the three Garden Villages. Council officials need to get out and about to make personal observations on our streets and roads rather than being almost entirely desk-based to prevent poor decisions as a result.
- Why has UDC bought a holding in the Chesterford research park? Why is this considered to be district council business? How independent is this Local plan and its proposals?

- The consultation process is flawed as the process of signing up will deter people from commenting; the displaying of full names would deter those in small communities from commenting. The site is not mobile phone friendly which makes it unusable.
- A local plan can only be valid if all the evidence is factual. Too many questions about numbers of housing, infrastructure, developer input, highways, public transport, health and education remain unanswered and have been very poorly presented.
- Support for house building, as it is important to build new houses close to where people would prefer to live. The proposed new North Uttlesford Garden Village (NUGV) is the only solution remaining to providing sufficient new housing and the necessary associated infrastructure. Great Chesterford is not the place to build all the required houses, as it is at the extremity of the district, but it is likely to be the outcome due to opposition elsewhere including Saffron Walden, Elsenham and Newport. This will mean that Saffron Walden will probably no benefit from development and investment but may experience infrastructure pressure particularly traffic congestion in Saffron Walden. The district will still be very rural. There will be advantages for some and negatives for others in the district.
- I think the Draft Local Plan is a sensible document and therefore has my support.

Sustainability Appraisal June 2017

Not Applicable

What is the Local Plan?

Paragraphs 1.1 – 1.4

	TOTAL
Support	2
Object	19
Comment	7

This supporting text was responded to by 28 people and organisations.

Overarching Summary

- The Plan should take into account emerging and adopted Neighbourhood plans.
- Questioning whether UDC has fulfilled Duty to Cooperate requirements, in particular with South Cambridgeshire District Council.
- It is noted that consultation was not held in the most convenient time (i.e. School summer holidays).
- The Reg 18 consultation only took into account written comments, rather than oral comments given at forums. This excludes certain groups of people.

- Concern that as the AMR has not been updated since 2014, and as such UDC does not properly understand housing supply and so risks a 5-year housing land supply shortfall.
- Concern over that the SA does not present a clear evidence trail in regard to the garden communities.
- A number of responses state that the Plan does not meet NPPF paragraphs 155 and 151.

Statutory consultees and other bodies

- **WeAreResidents.org** - There are very few references to Neighbourhood Plans which need to be taken into account once they are made, and also do carry increasing legal weight as they move through their own processes. Please evidence that you have reviewed and considered NPs, even those that are still emerging.
- **Great Chesterford Parish Council** - Great Chesterford Parish Council's experience of its dealings with UDC:
 - Ignored repeated requests from the GCPC for information relevant to Great Chesterford in the context of the emerging Plan;
 - In its dialogue throughout 2015-2017 with Bidwells (acting on behalf of the Council) that UDC appointed Troy Navigus as a consultant to UDC knowing it was already advising GCPC on spatial strategy aspects of its emerging Neighbourhood Plan, resulting in the need for GCPC to appoint alternative advisers on account of the conflict of interest thereby created.
 - UDC provided GCPC with no information about the possible structure of NUGC other than via PPWG agenda documents to enable GCPC to prepare and present considered comments at forthcoming PPWG meetings.

We have shown in this Submission that this has not been the case in relation to NUGC. Inadequate Duty to Cooperate. UDC's cooperation with South Cambridgeshire has been deemed "effectively non-existent."

- **Stansted Neighbourhood Plan Steering Group** - Concern over the timing of the Regulation 18 consultation (July to September) which has made it difficult to coordinate a thorough and well-coordinated response. Council meetings are not normally held during this time and many team members are on annual vacation. In future school holidays should be avoided as established protocol dictates.
- **Historic Environment** – Many of the historic environment issues raised will be relevant in a cross-boundary perspective affecting South Cambridgeshire, Chelmsford City Council and Braintree District Council in particular. Each authority will need to take into account the impact on the conservation and enhancement of the historic environment as one of their strategic priorities. We welcome the supporting text at paragraph 1.4 which acknowledges the Duty to Cooperate and the need to collaborate with other nearby authorities and organisations at a strategic level.

Developers/landowners/site promoters

- It is essential that the evidence base, particularly the objectively assessed housing need, needs to be as up to date as possible in order for the Plan to be considered 'sound'. An Annual Monitoring Report has not been published since 2014, and so suggests that the council does not have an accurate understanding of current and future delivery rates in the district. An AMR should be produced to ensure the plan is effective and justified. Concern that the council risks a five-year housing land supply shortfall of 737 dwellings and a plan period shortfall of 3,726 dwellings. Additional allocations are required to meet the identified need. Concern that the delivery rate is higher than quoted at 654 dwellings per annum rather than the 641 dwellings per annum currently quoted and as such the total number of dwellings required is 14,388 rather than the 14,100 currently quoted. The local plan should be amended to reflect the current housing need and realistic delivery rates and include additional allocations in order to be considered sound.

The council needs to work more closely with East Hertfordshire District Council as well as Hertfordshire County Council to ensure that opportunities to deliver growth around the sustainable market town of Bishop's Stortford have been properly assessed. Greater cooperation is required regarding housing growth and education provision across boundaries to ensure that the Plan is positively prepared, justified and effective.

- Having inspected the proposals they do not seem to comply with the National Planning {Policy Framework recommendations and in particular NPPF sections 151 and 155.
- The key parts of the Regulation 18 Sustainability Appraisal prepared on behalf of the Council by Place Service were carefully examined. The SA is deeply flawed in relation to Policy SP2 and other strategic policies. It does not show how that strategy emerged from a range of plausible alternatives. It therefore provides a wholly unsound underpinning for the emerging Local Plan.

Policy SP2- Concern over the SA evidence base. In Table 9, the description not a reasonable alternative is used in all seven cases. It is inferred that alternative in this context means an alternative to Policy SP2, however the scenarios should be regarded as less well-developed precursors to the preferred strategy, not alternatives. The picture is made even more confusing by the qualification to not a reasonable alternative in the case of Scenario G; despite this, the notion of three new settlements under a broad hybrid option of distribution across the wider District warrants further exploration and testing within this SA within the above proposed Policy SP2. This hints that Scenario G is some kind of antecedent of the preferred strategy; but this notion cannot be derived from Scenario G, summarised as hybrid option 2 which resembled an equal distribution across all of the above 750dpa options, with less growth in Bishop's Stortford as it does not resemble it in any meaningful way. Of Scenario E, Table 9 states: This Scenario is not considered a sound distribution strategy as it would rely on only 1 or 2 large sites to deliver the housing, which would have

deliverability issues within the Plan period, it deprives other settlements of sustainable growth, and there would be negative impact on 5-year land supply. Two issues arise here: first, if one or two large sites are likely to deprive other settlements of sustainable growth, then a strategy of the kind the Council now proposes, based on three garden villages, is likely to have an even more adverse effect in this respect. Secondly, maintaining a five-year supply of housing, however important, is a means to an end, not an end in itself. No local planning authority should reject an otherwise plausible strategy for this reason; if there are concerns about this issue, other measures should be taken to maintain an appropriate supply. The second paragraph following Table 9 states there emerges a need for three new settlements, or Garden Communities within the District, forming a significant part of the Plan's proposed Spatial Strategy. In relation to what has gone before, the alleged need emerges from nowhere.

Policy SP3- Concern that the alternatives deliver less housing and should have never been considered in the first place.

Policy SP5- Concern that the longer-term effects cannot be appraised in any meaningful way. The SA contains scarcely any reasoned justification which might support this policy. The three proposed garden communities (policies SP6, SP7 and SP8) are dealt with together as the approach to them in the SA is the same-, however the appraisal should not be taken as that of the whole Garden Community. Questioning whether the distinction between policy off and policy on is useful or necessary.

Policy SP6, SP7 and SP8, encapsulate the shortcomings of this SA. The principles and requirements of this Policy are specific to the Garden Community, to which this policy relates, ensuring that aspirations surrounding sustainable development will be met from any successful proposal. In so far as the Policy ensures sustainable development, it accords directly to the presumption in favour of sustainable development of Policy SP1 and more critically, the NPPF. As such no other alternatives can be considered reasonable the preferred policy approach has been selected. This demonstrates circular reasoning, faulty logic and raises doubts about whether sustainable development can be achieved. We conclude that the appraisal does nothing to explain or justify the benefits of the preferred strategy. Overall the SA is deeply flawed in relation to Policy SP2 and other strategic policies. It constitutes an ex post facto rationalisation of the preferred strategy and does not show, as it should, how that strategy emerged from a range of plausible alternatives. It provides a wholly unsound underpinning for the emerging Local Plan.

- UDC has held DtC meetings with all neighbouring authorities (i.e. Braintree District Council and South Cambridgeshire District Council) and has published supporting documents that identify cross-boundary issues. It appears that the meetings on housing related matters have taken place prior to the publication of the recent Strategic Housing Market Assessment (SHMA), dated July 2017. The Objectively Assessed Needs identified within the recent SHMA show that unmet housing has been projected upwards. However, the DtC does not reflect this current position on housing distribution between the SHMA area authorities.

Meeting the housing needs between the neighbouring authorities will need to be discussed with all authorities within the SHMA area to determine whether the amount of housing need directed to Uttlesford District Council is correct and where the remainder of any unmet need will be accommodated. At present, South Cambridgeshire District Council is still unable to demonstrate an adequate supply of housing. Further discussions are required in respect of DtC to determine whether the current distribution of housing within the SHMA is sufficient in dealing with unmet housing delivery between the two authorities. It is clear that co-operation must be constructive and effective. Consultation and discussion on its own is insufficient. What is required is a co-ordinated approach towards the delivery of sustainable development and to meet strategic priorities. The policy impacts of large strategic developments in neighbouring areas must be discussed through the DtC process because they affect the delivery of strategic priorities and are cross boundary matters and, in particular they will affect housing delivery. The housing delivery assumptions for North Uttlesford Garden Community will need to be adjusted to take into account the close proximity of other existing and potential strategic developments in neighbouring areas which will almost certainly compete for housebuilders and purchasers. Request that in due course an updated DtC Statement is published and that this document provide clear evidence that the requirements of the DtC have been complied with in respect of meeting unmet needs from South Cambridgeshire and the delivery of strategic sites within Uttlesford and in neighbouring areas including the implications for housing delivery of these developments.

Individuals

- Does not comply with NPPF 155 or 151.
- UDC's draft local plan is fundamentally flawed. Concern that there is no explanation as to how housing targets have been established and whether any account has been taken of lower growth rates in the future. Further expansion of Stansted Airport will be opposed by residents. The current forecast of housing needs must be carefully questioned and arguments developed for redistributing some of UDC's target housing development to councils where brownfield sites exist and would be welcomed. Easton Park Garden Community should be abandoned, as it would desecrate a rural area of beauty with historic significance and only be of benefit to developers.
- The section fails to elaborate on what "more recent Government Policy" the plan is intended to encompass in addition to the impact of BREXIT. The section fails to communicate the boundary of economic assumptions "e.g. high / low forecasts" over the life of the plan.
- Because the local plan is supported by UDC after the comments of the state's inspectors, which detailed shortcomings in transport links and local infrastructure.
- Object
- Please reference the specific government policy you are referring to else the plan has no context to meet any government defined objective (s).
- Support
- A web address is needed for the UDC Corporate Plan 2017-2021 and to the Uttlesford Community Strategy. There needs to be a more precise reference to

the evidence base. The evidence needs to be collated into one location and restructured. The search feature is inadequate and many of the documents are out of date.

- This plan does not comply with paragraph 155 of the NPPF, as there has been no early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that the local plan reflects a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made. You have not provided a list of Brownfield sites which was set out in the green paper which was given Royal assent May 2016.
- There does not seem to have been 'a wide range of consultation over several years' when it comes to the proposals for new garden communities.
- The Plan does not comply with NPPF 155 or 151.
- Makes reference to "types of places and environment that will be created" but fails to mention any intent to maintain existing places and environments. Therefore should also include a statement that indicates the continued maintenance of existing places and environments will be part of the Local Plan.
- Concern that existing home owners adjacent to the Eastern Park Development are having trouble selling their homes and the proposal is having an effect on lower property values due to the prospect of 10,000 new homes. Concern that UDC may put a business park on the nearby farm land. Concern over traffic congestion and road noise from the A120 and Stortford Road which would be exacerbated by a new business park. Questioning if the business park would be located near to the residential homes or the road.
- UDC should ensure that the Local Plan incorporates any actions outlined in the Development Plan and in any Neighbourhood plans. It should also address the issue of timing with regard to new roads and the installation of new infrastructure and how this will affect the area. UDC should identify and agree in advance which agencies or companies will finance all of the various infrastructure required. Time should be allowed to resolve any arguments between organisations about infrastructure provision and implement them. It is essential that this infrastructure be in place PRIOR to the granting of planning permission for the building of new dwellings or businesses.
- There is no evidence presented to show any serious communication with the northern neighbour of South Cambridgeshire District Council and its various parish councils prior to publication of this plan. Given that the plan proposes a massive new development of NUGV on that border, this would appear to be a direct contravention of the Duty to Cooperate.
- Concern that UDC have failed to acknowledge the two large developments at Sawston, which would impact on the NUGV location. UDC is refusing to consider this, which seems to be a wilful ignoring of the system.
- There has not been proper consultation with residents, particularly concerning the WoBGC. This is not in line with NPPF guidelines on consultation. Concern that oral representations of residents at the consultation forums have not been taken into account, and therefore the views of those who do not favour letter writing or are not computer literate are not taken into account. Concern that the

views of parish councils have not been given enough weight. There is also an unfair presumption in favour of development and the Government openly advocating garden communities, when most rural residents favour supplying similar numbers in smaller, more sustainable settlements. The online portal may be difficult for many residents. Concern that the consultation period was too short and fell in the school holidays.

- Concern that the development in Stebbing Village, known as "West of Braintree", is now referred to as East of Stebbing. Braintree has called their new town proposals "West of Braintree" not "West Braintree". This has led to confusion and psychologically to people thinking that the development is "elsewhere" I object to the Council not being honest with its residents.
- Inadequate consultation with South Cambridgeshire
- Concern that UDC and BDC have already decided on the WoBGV. Concern over the size of the community, which is bigger than Harlow. Concern that the proposal will be an isolated rural slum in the future.
- It is not sufficient to claim that the Authority has worked, or will work, collaboratively with neighbouring authorities. Stansted Airport sits on the border between the area governed by this authority and that of East Herts Council. Concern that residents of Bishop's Stortford have been ignored. Concern that focusing development around the town will result in traffic congestion. The Duty-to-Co-operate (DTC) is carried out in private and thus undemocratic. Nothing in the plan convinces me that the DTC will be effectively carried out and on that basis the plan is not sound.

Sustainability Appraisal June 2017

Not Applicable

The Development Plan

Paragraphs 1.5 – 1.10

This supporting text was responded to by 12 people and organisations.

	TOTAL
Support	0
Object	6
Comment	6

Overarching Summary

- Concern is expressed that there are very few references to Neighbourhood Plans and that Neighbourhood Plans have not been taken into account in the process of preparing the Plan.

- Concern that there should be only one development plan document – the Local Plan.
- Request for clearer referencing and explanation of technical terms.

Statutory consultees and other bodies

Saffron Walden Town Council - There are very few references to Neighbourhood Plans throughout the document. These will have to be taken into account once they are made.

Great Chesterford Parish Council - This community is working on a Neighbourhood Plan. NUGC does not form part of its thinking and the lack of proper consultation by UDC makes a mockery of the whole Neighbourhood Plan process.

Stansted Neighbourhood Plan Steering Group - There are very few references to Neighbourhood Plans which need to be taken into account once they are made. Town and Parish Councils should be more involved in meetings with developers and decisions affecting them, especially with regard to design, housing mix, parking etc. Suggestion: Policies should say 'in conjunction with the local parish or town councils'.

Developers/landowners/site promoters

- The Local Plan should be one comprehensive document and not of a format similar to the previous Local Development Frameworks with separate documents to avoid confusion and give locals and developers one point of reference of the planning policies applicable in the area so that it is both positively prepared and effective.
- Concern that there are no policies in the Plan to allow for new development to be brought forward through a Neighbourhood Plan notwithstanding the numbers proposed for Category A and B villages. The Felsted Neighbourhood Plan Steering Group is in process of preparing a Felsted Neighbourhood Plan. The Felsted NP makes provisions for new community facilities, a new doctor's surgery and the relocation of the village shop and Post Office in a new Community Hub. Felsted Neighbourhood Plan Steering Group has recognised that market housing has a role in funding these types of Community projects. The current version of the draft Local Plan contains no provisions for this type of community led development to be funded by market housing, contrary to the NPPF and preventing localism taking place in these types of sustainable settlements. This Draft Local Plan therefore is not positively prepared and not consistent with national policy.

Individuals

- Braintree and UDC proposals are both on land rich in minerals, surely this takes precedence over residential development
- An indication is needed as to where any local plan documents prepared by ECC and any neighbourhood plans might be found, if present.
- There is little evidence of co-operation with South Cambridgeshire
- Questioning what is meant by 'Material considerations'. What are the circumstances in which an application might be considered regardless of the Plan? Suggest that there should not be any. This section should be deleted.
- Excessive and unsustainable development to the south of the district.

- Lack of consideration or interest in the visual, historical and agricultural quality of the area.
- Concerned that the Great Dunmow Neighbourhood Plan is not taken into account as the Plan does not consider the entrance to the town which the NP explicitly said it wanted to preserve.
- A much more detailed landscape assessment was completed by the Stebbing Neighbourhood Plan group. Concern that this was not taken into consideration when issuing this consultation.
- Concern that the creation of isolated housing estates outside existing settlements is an attempt by UDC to work around existing Neighbourhood Plans. Concern over urban sprawl as there is hardly any separation between planned developments within the Parish of Great Dunmow and the Easton Park development. This partly due to UDC not observing Great Dunmow's existing Neighbourhood Plan.
- As part of Central Government Policy, Neighbourhood Plans approved by their respective constituents are to be closely followed as part of any overall planning policy. The Inspectorate overseeing the Uttlesford Local Plan will ensure that all relevant Neighbourhood Plans proposals are properly considered and adhered to.
- Please state where the Neighbourhood Planning (General) Regulations 2012 can be found.
- Local plans are ignored and abused by the district council.
- Please state the web address for these details (neighbourhood planning support).
- At the Planning Committee on 30/8/17 permission was given for a site at Dunmow which was specifically excluded in the Dunmow Neighbourhood Plan. Other towns and villages are spending considerable resource on NPs. Concern that NPs are overridden by officers and the Planning Committee.

Sustainability Appraisal June 2017

Not Applicable

National Planning Policy

Paragraphs 1.11 – 1.12

The supporting text was responded to by 13 people and organisations.

	TOTAL
Support	0
Object	12
Comment	1

Overarching Summary

- Concerns that the Plan does not meet the tests of soundness including lack of evidence, inconsistent with national policy.
- Concern that consultation has been lip service only, contrary to the NPPF.
- Concern that the housing development is not required.
- Concern that the impact of the development proposed has not been considered.

Statutory consultees and other bodies

Great Chesterford Parish Council - This Regulation 18 Local plan is neither Justified nor Effective. There is no evidence of any meaningful consideration of reasonable alternatives, an obvious lack of proportionate evidence, and no joint working at all with South Cambs DC.

Developers/landowners/site promoters

- There is no doubt that the draft Local Plan is unsound. The LP it should be positively prepared, justified, effective and consistent with national policy. It is considered that the Plan does not meet any of these criteria.
- Positively prepared – Concern that a full traffic assessment is required for the Plan including consideration of the impact of additional traffic on the market towns of Saffron Walden and Great Dunmow. There is minimal strategy which will not meet either the development or infrastructure needs.
- Justified – The plan is not an appropriate strategy and is not based on sound evidence.
- Effective - The plan will result in a continued 5 years housing shortfall for somewhere between 7 and 10 years of the plan period. The Council will lose control over where housing is delivered with none or minimal improvement to local infrastructure despite an increase in housing of numbers over the 2011 figures of approximately 45% during the DLP period and a minimum increase over the 2011 figures by 90% if the 3 new settlements were to reach the ultimate stated size.
- Consistent with national policy – The plan enables the delivery of sustainable development - The DLP prioritises the new settlements but will only supply minimal retail so as not to affect the existing market towns which will not make the new settlements particularly sustainable and will overload the market towns roads networks, particularly in Saffron Walden and will neither protect or enhance the sustainability of the 70% of Uttlesford's existing population from the rural areas. It does nothing to address the sustainability of the 68.4% that commute out of the area, mostly by private car. It is not based on sound evidence, it will not provide the number of houses required in the short term (5 years supply) and it does not make sufficient or detailed provision of self-build and starter homes. The DLP is vague in parts, silent in others and will not result in balanced sustainable communities and is not consistent with national policy.
- Two sites put forward by Pegasi as potential allocations in the village of Quendon and Rickling Green, which is classified as a Type A Village: Land North East of Belchamp's Lane, Rickling Green; and Land to the south-west of Brick Kiln Lane, Coney Acre, Rickling Green. The objectively assessed development needs (OAN) for the Local Plan period, between 2011 and 2033, includes 14,100 new homes (both market and affordable). However, it is important that this figure should not be seen as a target, rather the minimum base line number of homes which the Local Plan will deliver over the plan period, with sufficient flexibility to

adapt to rapid changes and ensure that the plan significantly boosts the supply of housing. Therefore, the Plan's ambition should be, to deliver significantly more than 14,100 homes.

Individuals

- In order that individuals within the community are able to have the opportunity to access National Frameworks and Guidance (e.g. NPPF and NPPG) information should be provided as to the locations of these documents.
- The district council is clearly mistreating the consultation process as lip service only and does not treat issues fairly or adequately.
- The Ministerial foreword to the NPPF states that the historic environment needs to be cherished. Concern that the WoBGC on prime agricultural land dwarfs nearby historic towns and villages. Concern that development would also decimate ancient woodlands and wildlife and destroy a vibrant, working and training airfield. The consultation process is flawed as it does not meet the NPPF guidelines, which state that it should be a collective enterprise involving people and communities, and should not be elaborate or forbidding - the preserve of specialists. Challenging the contents of the Plan is very difficult for many. Concern that oral representations at the consultation forums are disregarded so the views of many people who oppose sections of the Plan, particularly older residents, are not taken into account. Concern that the consultation period has taken place in a holiday period. Concern that the objections of all the neighbouring parish councils to the largest development (WoBGC) appear to have been overridden without alternatives being considered. The vast majority of residents favour smaller settlements which would be more in keeping with a rural community. Unfair to consider the weight of postbag for a particular site because the West of Braintree plan covers a largely rural area with fewer residents, many of them elderly. The safety of these vulnerable residents should also be considered.
- Please state where the NPPF and NPPG are to be found
- Object.
- It is not obvious that this policy was positively planned, or can be justified, particularly with respect to NUGV. Concern that NUGV was found in desperation after other solutions had run up against politically uncomfortable barriers for UDC. Throughout the plan it looks as if it has been added to make up the numbers on shortfalls elsewhere. The jobs justification is very dubious since South Cambs did not seek help. Stansted airport jobs are at the other end of the region will not justify the size of NUGV. Chesterford Research Park job numbers will not at the most optimistic justify the size of NUGV. Concerned that the proposals depend on decisions taken by neighbouring authorities, and have not taken account of plans already under way in those areas. Concern that they will increase congestion and pollution in Saffron Walden.
- No compliance with NPPF 155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans reflect a collective vision for the sustainable development of the area, including those contained in any neighbourhood plans that have been made. The communities surrounding the proposed development of West of

Braintree have not been engaged with. UDC has a lack of understanding of this area. Concerned that the people who work at Andrewsfield will not be offered new jobs and the flying school will not be relocated. Concern that West of Braintree does not meet garden community principles and is in the wrong place. Concern that there is no infrastructure so it is not self-sustainable.

- The selection of Great Chesterford appears not to have been made following evidence based principles alone. The Great Chesterford location failed previously. Previously NUGC was not included in the plan, and then included. The inclusion is therefore political. Request for more evidence for its inclusion. UDC will have to demonstrate that a proper process has been followed, that it has implemented safeguards to prevent any conflict of interest arising, and that it is evidence based.
- Concern that housing supply will be met by using rural land. Objection to the number of houses proposed as they are not required. Concern that there is not enough work locally to support this number of additional residents and the transport routes into London are already past capacity.
- The Government Housing Policy is fundamentally flawed. There is plenty of available housing, much cheaper than in the overcrowded south/ London areas. Government policy should be focusing on economic development of the North of England to reduce the North/ South economic inequality. Not destroying productive agricultural land and adding to the division of the whole country. Our local representatives have failed us in getting this point across.

Sustainability Appraisal June 2017

Not Applicable

Sustainability Appraisal and Habitats Regulations Assessment

Paragraphs 1.13 – 1.16

This policy and supporting text was responded to by 38 people/organisations.

	TOTAL
Support	0
Object	19
Comment	19

Overarching Summary

- A number of representations question the validity of the SA and how it has been used to favour the garden community allocations. It is stated that a number of sites performed better in the SA than the garden community sites. Clarification is

therefore sought as to why the garden community allocations were brought forward and other sites discounted.

- EA suggest that waste management should be included in the Plan to identify areas where significant improvements can be achieved.
- Concern is expressed over the sustainability of NUGC, in terms of vehicle usage, public transport links and employment offerings.
- Natural England are concerned that the Epping Forest SAC has been screened out of the HRA. They also have a number of other detailed comments in relation to the HRA.
- ECC recommend, among a number of suggestions, that UDC include a Recreational Disturbance Avoidance and Mitigation Strategy for recreational activities that will result from the garden communities.
- Concerns are raised as to why a number of sites are not included in the SA.
- It is suggested that the SA should be available for consultation.

Statutory consultees and other bodies

Historic England - The SA contains an assessment of individual alternative sites against the SA objectives. Despite the abstract nature and minimal information associated with the sites chosen to be brought forward as part of the draft plan the initial SA assessment undertaken for each site discounted certain sites and has been based on particular development proposals put forward at Call for Sites stage rather than on the development potential for each site. It seems that discounting a site entirely on the basis of a certain scheme would result in a distorted outcome as it is not a comparison of realistic alternative options. The assessment is based on the particulars of specific schemes and not site capacity; as such rather than a proposal fitting with the plan the Plan is being derived to fit proposals. It is recommended that improved evidence is compiled in order to outline why some sites have been discounted in favour of the three brought forward for garden community allocation.

Environment Agency - The Local Plan will be used to inform decision on planning applications across the District, in conjunction with any local plan documents relating to minerals and waste prepared by ECC and any neighbourhood plans prepared by the community. The supporting Sustainability Appraisal (SA) addresses waste management in a constructive and positive manner for such a Plan and should be seen as supportive to Policies and Directives on waste. Recycling is mentioned in Policy SP12 - Sustainable Development Principles and Policy D8: Sustainable Design and Construction refers to waste, recycling and storage areas should be provided. The SA also makes reference to emerging waste site allocations and refers to the Waste Local Plan.

Reference is made to the ECC Joint Municipal Waste Management Strategy 2007-2032. Therefore, as noted in the SA "Planning policy and allocations within the Local Plan should have regard to the aims set out in this strategy. Waste management should be included in the Local Plan to identify areas where significant improvements can be achieved, specific to the District of Uttlesford, to assist in the realisation of the aims set out in the ECC Joint Municipal Waste Management

Strategy". Developers within the district should be encouraged to design, construct and that occupation of any development should be such that waste is minimised, safely stored and properly recycled or disposed causing no environmental harm.

The waste hierarchy is mentioned in Annex B of the SA, along with information on the local authority collected waste, transfer stations and the replacement Waste Local Plan for Essex and South End on Sea. It is encouraging to also have Anaerobic Digestion plants, Commercial and Industrial Waste and Construction, Demolition and Evacuation Waste referred to. There is also a section on the Links to the Adopted Minerals Local Plan 2014.

Great Chesterford Parish Council - NUGC is not sustainable development. It is not even close. as it is wholly reliant on the transport links at Great Chesterford (which, due to the nature, location and layout of the station, mean vehicle trips will be essential for almost all travel, even if it did involve onward rail travel via Whittlesford or Audley End). The employment offering at NUGC will not be providing sustainable jobs for the residents, they will be commuting to London, Cambridge and the South Cambridgeshire biotech hubs referred to so often by Bidwells and UDC. Shoppers will inevitably be driving to Saffron Walden.

Harlow District Council - There is support for the recommendations set down in Section 9.3 of the Sustainability Appraisal, particularly in respect of the revisions to the spatial objectives. A reference to aspirations relating to water quality and the conservation of high grade soils would be welcomed.

Natural England - Given that Natural England is currently engaging with UDC through a memorandum of understanding relating to Epping Forest SAC, we are surprised to see that there is no mention of it within the HRA. The Draft HRA screens out impacts on Epping Forest SAC. Whilst we acknowledge the distances involved Natural England advises that until zones of influence have been established and/ or a mitigation package has been agreed its outcome should not be pre-empted. The precautionary principle applies and a likely significant effect should not be screened out.

Increased Recreational Use - Natural England does not consider the use of our Access to Natural Greenspace Standard (ANGSt) here to be appropriate. ANGSt is to be considered a guide to recommended provision of greenspace it should not be read to imply that the maximum distance that the residence of new development are likely to travel. Natural England is aware that people do travel further than the ANGSt standards might imply in order to find suitable areas for recreation. Natural England does, however, recognise the distances involved.

The potential for a recreational impact on the Epping Forest SAC is being considered through the MoU process. Information thus far provided has indicated that the zone of influence is likely to be 4/5km but since this data is considered to be unreliable and further work is ongoing we would expect future iterations of the HRA to take into account the finding of additional survey work.

Atmospheric Pollution - It is insufficient to say that "as there are no European Sites within 200m of any of the roads in the District, and as any new roads linking the new

settlements with the existing road network will also be over 200m of any European site, NOx emission resulting from vehicle movement associated with the new settlement allocations need not be considered further.” The HRA needs to consider roads outside of the district. Air Quality impacts on Epping Forest SAC are being considered under a memorandum of understanding to which both Uttlesford District Council and Natural England are signatories.

Natural England advises that until a zone of influence has been established and/ or a mitigation package has been agreed its outcome should not be pre-empted. A likely significant effect should not be screened out at this stage.

Water Resources - Natural England agrees that an impact on any European Site is considered unlikely but advises that the opinion of water and sewerage undertakers should be sought.

In combination Assessment - As stated above Natural England is surprised to see no reference here to the memorandum of understanding where recreational and air quality impacts are being considered in combination with other authorities.

Conclusion - Natural England does not currently agree with the conclusion that a likely significant effect can be screened out.

Essex County Council - Natural Environment - ECC wishes to draw UDC’s attention to the Appropriate Assessment for the North Essex Authorities (Braintree DC, Colchester BC and Tendring DC) Shared Strategic Section 1 for their respective Local Plans, which recommends a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) for likely recreational impacts resulting from Garden Communities developments, including land West of Braintree. The RAMS was a requirement stipulated by Natural England. It is recommended that UDC liaise with Natural England to determine what approach is required within the UDC administrative boundary and if so undertake Appropriate Assessment as soon as possible, so that the Natural England response can be included within the UDC HRA.

The North Essex Shared Strategic Section 1 to their respective Local Plans highlighted that the key aspects for consideration included the provision of alternative open space and green infrastructure, on-site management, and an adaptable approach which responds to regular monitoring of both people and bird populations. As a result of the North Essex Shared Strategic Section 1 HRA (and detailed and ongoing discussions with Natural England and the North Essex Authorities who are actively engaging in a strategic, proactive and coordinated approach), there is a high degree of certainty that the impacts identified can be avoided.

Historic Environment - ECC considers that there is an overall lack of assessment of the archaeological remains, and therefore the overall assessment of the historic environment has not been undertaken appropriately within the Draft Local Plan and needs to be addressed. It is recommended that further consideration be given to ensure appropriate regard is given to the historic environment.

ECC has made separate comments on the proposed Garden Communities where further consideration of existing archaeological sites is required.

Public Health - ECC welcomes that the Draft Local Plan refers to health with the need to ensure that health and wellbeing is considered in the delivery of future developments. It is supported that the spatial vision specifically mentions health which again is positive.

ECC are engaging and working closely with neighbouring authorities to ensure that health and wellbeing is suitably incorporated and reflected within their emerging local plans. ECC is working closely with Hertfordshire County Council (HCC) Public Health on cross boundary spatial development issues. At this stage, ECC are using Hertfordshire's health and wellbeing planning guidance, which is considered best practice. ECC is considering developing similar guidance, and in its absence, it is recommended that UDC review this document and ensure the Local Plan reflects its content. ECC is particularly interested in ensuring that the Garden Communities throughout Uttlesford take due consideration of health and healthy lifestyles. It is recommended that health and healthy lifestyles are planned and delivered from the inception of these communities.

Clare College Cambridge - The Council does not appear to have published the Interim Appraisal of New Settlement Options (October 2016) which is where, purportedly, the SA of the Garden Communities is individually assessed against the SA Framework. This document needs to be made available in the consultation process to understand how the potential Garden Community options can be tested in a consistent and transparent manner against the SA Framework.

It is a legal requirement that a distinct set of alternative policies and strategic options should be subject to sustainability appraisal. It is expected that the policies and strategic options should be set against the SA framework so that the quality of the Local Plan, its policies and proposals, can be set against the sustainability objectives and tested against the alternatives in a consistent manner. The results of the assessment should be available for decision makers to refine their policies and spatial planning. However, if a SA of the alternatives is available it does not appear to be published on the UDC web site.

Twelve options were assessed, of which six contained Great Chesterford as a site within the combinations of three site options. However, the assessment does not allow the proper scrutiny of Great Chesterford as a standalone option. Also, each option was assessed against thirteen SA Objectives. This assessment is coarse and does not allow the proper evaluation of sites. Whereas, in Appendix 2 the appraisal undertaken of Site Allocations and Reasonable Alternatives assesses against 48 SA Objectives and sub-objectives allowing a much more refined assessment of the smaller sites.

If the Sustainability Appraisal has been used for decision making, it should also be made available in the consultation process so that there is a clear, transparent and robust evidence base for the comparison of alternatives and the Council's Preferred Strategy as set out in NPPF 151, namely that the objectives should be consistent

with the principles and policies set out in this Framework and NPPF 165 that states a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process.

Stebbing Parish Council - It is considered that the Sustainability Appraisal is biased towards the promotion of new settlements, and insufficient consideration has been given to a more dispersed approach to maintain and enhance the vitality of existing towns and villages and the role that neighbourhood plans can perform in achieving this. Full details are set out in the Parish Council's response.

Wellcome Genome Campus - Clarification sought as to whether the SA has adequately assessed 'real' alternatives as is its duty. In particular, it appears as though:

- a) not all options appear to have been assessed – see above;
- b) the Sustainability Appraisal does not give weight to any particular criteria or draw any conclusions about the most sustainable settlement options over all. On its face, however, other non-selected options appear to score better than NUGC – see below.

Full details are set out in the Wellcome Genome Campus' response.

SERCLE - Concerned that the WoB development will have a detrimental impact on the surrounding villages including Great Saling, Bardfield Saling, Stebbing and Rayne while destroying the landscape setting for future generations. The proposal would also result in the loss of 2,500 acres of grade 2 versatile farmland and AECOM themselves acknowledge that "the scale of the development will undoubtedly have a significant impact on the surrounding settlements ... and the nature of the area may be altered as part of the process". They also comment that the "Large scale development of the site would impact on the rural character of the small settlements surrounding the site."

The development is also adjacent to a conservation area accommodating many Grade-1 and Grade-2 listed buildings and as a consequence there is likely to be a serious erosion of heritage and historic assets. The ancient woodlands and hedgerows which comprise a significant part of the threatened area need to be protected and accommodated within such a proposal and no details of how this is to be fulfilled have been suggested or discussed.

Developers/landowners/site promoters

- Dunmow Park, Great Dunmow (SLAA ref 09GtDun15). Dunmow Park was included as an alternative site within the Sustainability Appraisal (ref: GtDUN17). Whilst we are pleased to note that Dunmow Park has been assessed positively in terms of its sustainable location and has been provided the highest score when compared to both allocated and alternative sites in terms of accessibility to services, we would question some of the site's other scoring. We would disagree with the heritage assets rating of Dunmow Park (--) especially when compared

with the rating given to Helena Romanes School (-). Whilst we agree that there would be some impact on heritage assets from developing Dunmow Park, we would not consider these impacts to be any greater than that of developing Helena Romanes School, which abuts both a Conservation Area and approximately 9 listed buildings. We would urge the Council to review their Sustainability Appraisal in light of the above and to review the rating given to the allocated site at Helena Romanes School in light of our comments set out above. Part 9 of the site appraisal relates to proximity of the site to existing public transport nodes. The site at Dunmow Park has been rated as (+), however, the site lies within 73m of an existing bus stop at The Avenue (Stop ID: esxdgapd). We would therefore suggest that this rating is amended to reflect a positive rating (++)). Furthermore, the site has been allocated a reasonable prospect of partially meeting criteria uncertain impact rating in relation to the Sustainability Appraisal's Objective of improving a population's health and promoting social inclusion by PROW or bridleway. Dunmow Park currently does not include any PROW or bridleways, however, the proposed scheme, set out in the accompanying Vision Document, suggests that the proposal would include heritage trails and footpaths and as such we suggest that the rating is updated to reflect this. Dunmow Park was cored highly in respect of its sustainable location and accessibility to services. If the site were to be considered in line with the above reasonable adjustments to the SA, the site at Dunmow Park would score particularly favourably in comparison with the other sites.

- We disagree with a number of conclusions made in Chapter 8 of the SA on site New11 (Land to the south of Wicken Road, Newport). See Countryside Properties' response for full details of their comments and suggested revisions. Regardless of whether or not the Council agree with our conclusions drawn, the SA demonstrates that this is a sustainable site and Newport an appropriate location for new development.

Despite being submitted to the Council's Call for Sites this site (Sampford Road, Thaxted) was not assessed in the Council's SA. No reason is provided as to why. Given the conclusions in the Council's Call for Sites Assessment which noted that the site would not constitute patterns of sustainable development this is considered unacceptable as the Council has no evidence to justify its exclusion from the Plan. An assessment has therefore been undertaken by Savills. See Countryside Properties' response for full details.

There are concerns about the assessment of Takeley against the criteria in Chapter 8 of the SA, and have, therefore, reassessed the site against the criteria to clarify matters and issues raised. See Countryside Properties' response for full details

- Concerns about some of the conclusions in the SA for the proposed new settlement at Easton Park. For example it is noted that the development will support the vitality of Great Dunmow town centre, yet we consider it more likely that a new town located in such close proximity to Great Dunmow will have a negative impact on its town centre, drawing existing consumers away.

- It would appear that the Pines Hill site (SHLA ref 02STA15) is not included in the list of non-preferred reasonable alternative sites for Stansted Mountfitchet, however, there is no clear rational why this is the case. The site is considered to be suitable, achievable and deliverable as set out in the SLAA and one that would score more positively against the SA Framework in comparison to both the allocations as well as the non- preferred sites.

It is assumed that its non-inclusion may be the result of the site's location in the Green Belt, however, the criteria at the start of Appendix 2 makes no mention of Green Belt being a reason to exclude potential sites and the criteria in the assessment does actually include Green Belt as an issue, so the fact that the site is in the Green Belt should not be a definitive reason for the site's exclusion. If the site's non-inclusion is down to the historic planning refusal, this should also not be considered a legitimate reason, as again, the refusal was on the basis of the site's Green Belt location.

The site should be included and assessed as a reasonable alternative for Stansted Mountfitchet. This scoring will illustrate that the site is in fact more sustainable than the allocations in the plan, in which case it should be allocated.

- The Council needs to ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent. There have now been a number of instances where the failure to undertake a satisfactory SA has resulted in Plans failing the test of legal compliance at Examination or being subjected to legal challenge.
- We disagree with a number of conclusions made in Chapter 8 of the SA on sites ELS6 (Land west of Station Road) and ELS7 (Land north of Stansted Road). See the Crown Estate's response for full details of their comments and suggested revisions.
- The Council has not selected the most sustainable sites for proposed new settlement allocations. This is clearly shown by Table 86 Appraisal of new settlement options of the Reg 18 Local Plan Sustainability Appraisal (June 2017). A comparative analysis of the conclusions of the SA in relation to the Elsenham new settlement option and the sites selected by the Council as new settlements has been set out. This is attached to the response.

Table 86 shows that the performance of the Elsenham new settlement location against the Sustainability Objectives is superior. This evidence has been ignored by the Council. The Council has selected sites which have a poorer performance against the identified sustainability objectives of the plan.

There are critical flaws in the assessment of the Elsenham site within the SA. The assessment is inconsistent and inaccurate against a range of site selection criteria and fails to take account of the SLR proposal. The assessment also

provides an inconsistent assessment of the new settlement sites selected by the Council in its growth strategy which presents an overly positive conclusion of the relative characteristics of these sites.

On this basis, the SA cannot be relied upon as robust evidence justifying the draft spatial strategy. Notwithstanding that there are fundamental flaws in the comparative assessment of the new settlement sites considered, the Council should review its decision to select Easton Park, North Uttlesford and West of Braintree as new settlement locations. The Council should give further consideration to the evidence to the conclusions of the SA in that it shows that Elsenham is the most sustainable location for a new settlement when full account is taken of the entirety of its conclusions for all of the Sustainability Objectives.

- Sites have been assessed through the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) which accompanies the Plan. However, a reason given for the failure to consider a number of sites is not expressly stated within the SA/SEA. However, there is reference within Appendix 2, page 234 of the SA / SEA to sites that are currently within the Green Belt being filtered out, and not considered 'reasonable'. If indeed this is the reason for the failure to consider the potential allocation of certain sites, it raises three particular concerns:
 1. It presupposes that sites within the Metropolitan Green Belt still merit continued allocation as Green Belt, as per the previous Development Plan which this new Local Plan will supersede. Given that the NPPF is clear that the preparation of new Local Plans is the only appropriate vehicle through which to make changes to the Green Belt boundary, the automatic rejection of any site that is within the current Green Belt clearly raises concerns as to whether such an approach can be considered justified.
 2. Green Belt is a policy designation, rather than a physical constraint to development. It is considered highly questionable whether sites which sit within the current Development Plan's Green Belt can be considered inherently less sustainable than those outside of it. As such, it is questioned whether a Local Plan that take such an approach can be considered justified.
 3. Notwithstanding national and local planning policy, it is a legal requirement, as per the Environmental Assessment of Plans and Programmes Regulations (2004), that all reasonable alternatives be considered and assessed to the same level of detail as the preferred approach. As a policy designation, a current Green Belt allocation cannot be considered to render a site incapable of being considered a reasonable alternative. It is clear that Green Belt boundaries can be reviewed and indeed other authorities have done so in order to meet development needs.
- Site 13Sta15 has not been assessed through the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) which accompanies the DLP. 4.15. A reason given for the failure to consider the Site is not expressly stated within the SA/SEA. However, there is reference within Appendix 2, page 234 of

the SA/SEA to sites that are currently within the Green Belt as being filtered out, and not considered 'reasonable'. If indeed this is the reason for the failure to consider the potential allocation of the site, it raises three particular concerns:

1. It presupposes that the Site (and indeed all sites currently within the Green Belt) still merit continued allocation as Green Belt as per the previous Development Plan which this new Local Plan will supersede. Given that the NPPF is clear that the preparation of new Local Plans is the appropriate vehicle – the only appropriate vehicle – through which to make changes to the Green Belt boundary, the automatic rejection of any site that is within the current Green Belt clearly raises concerns as to whether such an approach can be considered justified.
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- Site 01LRod15 has not been assessed through the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) which accompanies the DLP. A reason given for the failure to consider the Site is not expressly stated within the SA/SEA. However, there is reference within Appendix 2, page 234 of the SA/SEA to sites that are currently within the Green Belt being filtered out, and not considered 'reasonable'. If indeed this is the reason for the failure to consider the potential allocation of the site, it raises three particular concerns:
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 2. Green Belt is a policy designation, rather than a physical constraint to development. It is considered highly questionable whether sites which sit within the current Development Plan's Green Belt can be considered

inherently less sustainable than those outside of it. As such, it is questioned whether a Local Plan that take such an approach can be considered justified.

3. Notwithstanding national and local planning policy, it is a legal requirement, as per the Environmental Assessment of Plans and Programmes Regulations (2004), that all reasonable alternatives be considered and assessed to the same level of detail as the preferred approach. As a policy designation, a current Green Belt allocation cannot be considered to render a site incapable of being considered a reasonable alternative. It is clear that Green Belt boundaries can be reviewed and indeed other authorities have done so in order to meet development needs.

Individuals

- For the reasons given in our responses to Policy SP2 and SP8, the SA requires revision to re-assess the scores given to each option. In particular it should take fully into account the evidence and findings of: The Landscape Partnership's Landscape Sensitivity and Capacity Appraisal of Stebbing Parish, March 2017; Grover Lewis's Heritage Assessment of Stebbing Parish, August 2017 and AECOM's North Essex Garden Communities - West of Braintree Concept Framework, May 2017.
- Sustainability Appraisal (NUGC). Flood risk – cannot see this together with infrastructure to have been thought out – very costly.
- Sustainability Appraisal (Saffron Walden) – No progress – even plan saffron Walden bypass.
- Concern that the plan contravenes the NPPF as it does not consider future generations. It fails utterly as a plan for a low carbon economy, as required by the NPPF. There are no policies that adequately address the imminent threats of climate change and there seem to be no sections which address renewable energy generation.
- The plan is not set within a framework for environmental stability which should include proposals for contributing to a low carbon economy and for renewable energy generation in all aspects of the planning and development.
- This plan has not been positively prepared. The infrastructure requirements needed to make WOB work are unrealistic also the idea that people will give up car travel. Reasonable alternatives have not been considered, particularly as Gt Chesterford with easy access to the M11, A11 and A14 etc. has only been allocated 5000. The council is in danger of failing to achieve a five-year housing supply due to the length of time to deliver housing. No confidence in the Council's housing numbers – inflated by historical growth of Stansted Airport. Independent consultant should review the figures.
- Will the Development Plan still have to meet the requirements of the SEA Directive 2001/42/EC after March 2019? Have the necessary measures been put in place to protect the environment should UK no longer be adhering to this Directive?
- My interest in the SA stems purely from wanting an understanding of the decisions taken by UDC when the OAN numbers increased and the plan was paused (Nov 2016). My conclusions are that reasonable alternatives were

overlooked/ not considered – the only course of action looked at was adding a third settlement:

- Alternative 1 – Intensification. Concern that there is no mention of housing density for New Settlements, despite the NPPF requiring Councils to make sure housing densities are appropriate for different areas. However, other Local Authorities have considered intensification by increasing the minimum dwelling figure to 35/hectare for new settlements which has a huge impact on the number of dwellings deliverable in a new settlement.
- Alternative 2 - Increased build/ delivery rates- the start dates for new communities are unrealistic/unachievable; however an explanation is required for the low delivery rates. North Essex Garden Communities and Cambourne/ Northstowe all planned for/ deliver 250 a year.
- Regardless of whether the final OAN numbers are reduced there are reasonable alternatives that are not in the SA that on their own or in combination would mean that the third settlement was not required within this plan period.
- Scenarios for 3 Settlements – All options considered bear no relation to the chosen options/ numbers in the draft LP and there is no assessment of the published numbers for new settlement. It also says there are viability concerns for any scenario that explored less than the full proposal at Great Chesterford, so how can you put a possible cap of 3,300 in the draft Local Plan? Why is West of Braintree a constant in each scenario? Because it is the 'easiest'? The SA is not currently fit for purpose, is not legally compliant and has created a flawed and unsound Local Plan. (Joanna Francis)
- Sustainability Appraisal Paragraph 4.4: Table 2: Key Sustainability Issues and Problems and the state of the environment in the absence of the Local Plan Section Two. The plan is flawed in that the description/supporting underlying SA Objective 1 is totally inadequate because it is far too simplistic. That is because it is limited to the EBAP which is itself limited to those sites which have some form of biodiversity designation. What that means is that it does not take into account sites which do not have any form of status and hence formal 'protection' as such but which nonetheless are important locally as a biodiversity resource. The implications of this are that any sites within the district without any such status are ripe for development – irrespective of how important they may, or may not, be locally in terms of biodiversity. The SA should therefore be amended accordingly to reflect this. One such site which does have very significant local biodiversity value, but which has no designation as such, is the 0.5 ha. of land at De Vigier Avenue (which is included within Policy SAF 2). If that site was not allocated for development than an application of Policy EN8, as presently worded in that it protects non-designated sites of ecological value, would result in permission for its development being refused. That is because any development of the site would neither protect nor enhance the ecological value of the site but would, in fact, totally destroy it.
- Please give a reference for the 2004 Act and the SEA.
- You mention Compulsory Purchase in this paragraph. For you to do this you will need I believe to set up a corporation! For this you will need an Act of Parliament! Question: Have you obtained this? Please publish your intentions!
- The Sustainability Appraisal document is both dense and repetitive and not conducive to eliciting review and commentary by the average reader. Overall it is

rather bland and it is difficult to disagree with the Policy statements or commentary. They are generally stating the obvious.

- Without independent infrastructure, the proposed development cannot be considered sustainable in its own right and there is real danger of it becoming just another housing estate dependent on the already stretched resources of Saffron Walden.
- Please also note my comments under 'Sites', in relation to SP8, many of which are relevant to this Section. Excessive Cost - The plan for a West of Braintree Garden Village, SP8. is not sustainable because of the vast expenditure required in relation to sewage disposal, water, gas, electricity and the improvements needed concerning roads and rail transport. Lack of Employment prospects - As noted earlier, there are few employment prospects on the borders of UDC and BDC to sustain the provision 3,500 new homes. Housing needs to be near to nearer the growth employment areas. Protection of the environment - This is rural area. The W of B Garden Community would result in the eventual joining up of Great Dunmow and Braintree, thus changing the character of the District forever.
- Excessive deferential treatment of Saffron Walden and the north of the district. Abuse of great Dunmow and nearby villages in the south of the district
- Will the UK's departure from the EU mean that the European Directive will no longer be mandatory and are any changes to procedure foreseen as a result?
- The Sustainability Appraisal Reports (Scoping, Issue and Options) July 2015 and September 2015 were conducted before the national referendum that is resulting in the UK leaving the European Union. Therefore, the content of these reports cannot be relied upon for the purposes of informing the Uttlesford Draft Local Plan. New Sustainability reports must be commissioned in order that the impact of the post Brexit era are factored into the draft local plan.
- Regarding Boxted Wood – The development is not sustainable. This is ancient woodland. It is home to a very wide collection of plants, animals and insects. It is unlikely that this could survive 12000 homes and up to 50000 people in close proximity, which is terrible. Not enough details have been given in the plan to these very special sites of Biodiversity. The deer population is limited in terms of areas it can access due to fencing on A120. Boxted Wood provides home for 22 fallow deer. Badger and deer are increasingly moving into gardens due to loss of habitat. They can cause damage to people and cars on local roads.
- Development to the south of the district, allied to Braintree, of 23,000 houses, 46,000 cars and 69,000 people is ludicrous and unsustainable and will destroy the locality.
- Please indicate where these essential documents can be found.
- Lack of access to a main line railway station, length of journey to the M11 motorway and A12 trunk road, ignoring the M11 corridor and access to the A14 trunk road render the plan unsustainable and unworkable.
- Please state where the EU Habitats Directive and the HRA screening report can be found. There is also a Section 15, Glossary. The present document does not include the Policies Map, and therefore a web address is needed. It needs to be made clear that the various inset maps should be regarded as part of the Policies

Map and the Policies map overall is difficult to interpret. What is the thickish light blue line on the inset maps?

Sustainability Appraisal June 2017

Not Applicable

Structure of the Local Plan

Paragraphs 1.17 – 1.19

This supporting text was responded to by 3 people.

	TOTAL
Support	0
Object	1
Comment	2

Overarching Summary

- It is suggested that the development is needed in the north of the district where there is a demand for workers and housing, rather than the south of the district.
- The policies will destroy the district.
- Further details in the form of a summary are required of the policies to be replaced and the replacement policies.
- The reference to the Glossary is incorrect.

Statutory consultees and other bodies

No responses from statutory consultees or other bodies.

Developers/landowners/site promoters

No responses received.

Individuals

- Excessive and unsustainable development to the south of the district. Excessively deferential treatment of the north. Failure to engage with South Cambridgeshire, where there is a true demand for a highly qualified work force and additional housing.
- The Glossary is in Section 15, not 14.

- This statement is simply untrue. The policies will destroy the district. No attempt has been made to challenge the excessive and unreasonable house building numbers proposed.
- This section says policies written here will replace existing ones. Please can we have a summary of what is coming out or being significantly altered?

Sustainability Appraisal June 2017

Not Applicable

CHAPTER 2 – Spatial Portrait, Vision and Objectives

General Comments - No paragraphs

This policy and supporting text was responded to by 15 people/organisations.

	TOTAL
Support	4
Object	10
Comment	1

Overarching Summary

- Representations note that the vision should mention travel and transport, as this is a key concern of residents.
- Concern is expressed over the lack of green space and sport facilities that are to be provided.
- Concern that the objectives and vision will not be realised due to a lack of proposals which ensure that infrastructure will be delivered.
- Concerns are expressed over the evidence base used to inform the plan.

Statutory consultees and other bodies

Stebbing Parish Council - Surprised that the District Council District Council has set out a Spatial Strategy when it is yet apparently to produce a composite Strategic Land Availability Assessment, which is usually the starting point for determining an overall development strategy. Stebbing Parish Council is concerned that the precise scale and distribution of the proposed growth is covered by Policy SP3 in the draft Local Plan which indicates that 4,670 new dwellings (79%) of the 5,929 dwellings required between now and 2033 is to be accommodated in three new settlements to the north, east and west of the District.

Braintree District Council (BDC) - BDC welcomes the reference to the West of Braintree garden community within the Spatial Vision, but notes that there is no mention of travel and transport. As this is a key concern of local residents and as a key part of the strategy forming the garden communities, it may be worth referencing here.

Manchester Airports Groups (MAG) - The importance afforded to the airport in the spatial vision is supported. However, the vision does not address the direct social and economic benefits that the airport does, and will continue, to bring to the District. Instead, the vision focusses narrowly on managing the airport's environmental impacts. In order to more adequately reflect national planning policy objectives, the spatial vision should be amended to reflect the three dimensions to sustainable development in paragraph 7 of the NPPF.

Objective 2a: is welcomed; in particular the reference to employment opportunities related to the airport. Objective 2c, second bullet: this is supported but the theme would be more

effective if there was an explicit aim / commitment to partnership working to deliver transport infrastructure. It would be appropriate to amend the aim to read: Ensuring through partnership working with Highways England, Essex County Council and public transport operators that the cumulative effect of airport and all other planned development within the District is considered so that appropriate surface access infrastructure and service capacity will be provided without impacting on capacity to meet the demands of other network users.

WeAreResidents.org - In relation to Section 2 we note as follows. We have commented previously a number of times on the removal of the paragraph in the 2014 draft Plan which noted Uttlesford's carbon footprint and quite how unsustainable Uttlesford currently is. We would wish that paragraph to be reinstated. In the description of Uttlesford, there is no mention of the lack of green space of any description, other than agricultural land. In terms of the NPPF, this is an extremely important issue. We note also that the draft Spatial Vision makes no reference to the need to increase green space and that it should be amended specifically to refer to achieving this as part of the vision. The Spatial Vision does not appear to be followed by the detailed policies as it refers to making existing settlements clean and safe places to live, but it fails to take any action to assist Saffron Walden's unlawful air pollution levels. The vision refers to there being sustainable alternatives to car use, but the Plan fails to provide for any. There is a need to compare the detailed policies against the Spatial Vision and amend the detailed policies to reflect the Spatial Vision and objectives.

We have difficulty understanding whether the figures set out in Section 17 are actually intended: according to Appendix 2, in the period 2016-2033, the Plan is intended to deliver only 2 ha of allotments, 8 sports pitches and 11ha of natural space and according to Policy SP3, the target for 2011-2033 is 14,100 new homes, of which 2,468 will have been built by 2016, leaving 11,632 new homes to be built in the period 2016-2033. 11,632 homes at 2.2 people per home, which is about the average, equate to some 25,000 new residents in this period, who will be sharing 8 new sports pitches between them! By comparison, South Cambs requires 1.6ha of new sports pitches per 1,000 new people, so they would require 40ha of sports pitches. In the period 2016-2033, UDC should be requiring the delivery of approximately 100 new sports pitches to meet national standards, as required by South Cambs.

Similarly, for natural and semi-natural space, the UDC Open Spaces strategy says there should be provision of about 6ha / 1,000 new residents, so the Plan should be providing for about 150ha rather than the Objective 1d proposal of 11ha.

The requirements in Objective 1d do not even correspond to Policy INF2, which requires 2ha of allotments per 10,000 people; over the Plan period 2016-2033, 5ha of allotments should therefore be being provided.

There is an absence of proposals to ensure that Objectives 1c, 1d and 2b will be achieved and provided.

Developers/landowners/site promoters

- The Spatial Vision is commendable, but won't achieve any of the objectives, as the introduction of three new settlements will completely change the character of the district. New settlements will not comfortably integrate and will be resented by the existing residents, particularly as they will through increased population and

associated traffic, detract from not only the most rural areas but more seriously from the quality of life for the residents of Stansted, Newport, Quendon, Littlebury, Great Chesterford, Dunmow and especially Saffron Walden.

- It is surprising that the UDC has set out a Spatial Strategy when it is yet to produce a composite Strategic Land Availability Assessment, which is usually the starting point for determining an overall development strategy.
- Support for the Spatial Objectives. The land at Thremhall Priory Farm is suitable for employment uses given its proximity to Stansted Airport and strategic road networks. The site is approximately 1.6ha. Thremhall Priory Farm lies between the B1256 (Dunmow Road) and the duelled A120. It is no longer a working farm, as the land has been bought by Stansted Airport for their expansion. The existing dwelling is unoccupied and in a deteriorating state of repair. The site is extremely well contained, with strongly defined boundaries on all sides. Between the northern site boundary and the A120 lies a strip of land which is understood to be within the ownership of Stansted Airport and is used by airport patrol vehicles. There are no public footpaths through the site. Adjoining the eastern boundary are two existing commercial sites. Thremhall Priory Farm is extremely well located, being only 2 minutes from Junction 8 of the M11 and within only 1.5km of the airport. The site is also accessible via public transport where bus services exist along Dunmow Road, providing half hourly services connecting Bishop's Stortford, Takeley, Dunmow and Stansted Airport. It is our client's view that the site represents suitable land in a sustainable location to meet the anticipated needs of new and existing businesses and that Thremhall Priory Farm should be allocated for B1, B2 or B8 uses.
- Supporting the Spatial Vision that focussing new development in the three new garden communities. ANSC supports the ongoing co-operation and joint working between Uttlesford and Braintree Councils to ensure the appropriate strategic and site specific planning for the WBGC.
- There is limited growth in the villages, with most not being allocated with new housing... Concerns with the overall strategy for two key reasons: concerns over the ability of large strategic allocations to deliver, as new settlements and large strategic allocations take time to deliver. We would suggest that the Garden Communities element of the housing trajectory to 2033 is pushed back at least two years, with first delivery of 125 dwellings in 2023-24. This would mean that the 500 dwellings in each of years 2031-32 and 2032-33 will need to be re-provided elsewhere. Secondly the lack of housing allocations in the villages is concerning, because it ignores the future needs of the rural areas. They may need new facilities e.g. play equipment, shop, etc., which may be cross funded i.e. via section 106 agreements relating to new housing developments in those areas. Villages might also need affordable housing which could be delivered via market led housing schemes. Uttlesford has a shortage of affordable housing. Little new provision is being made for some sustainable growth of the villages which national planning policy supports. The strategy for the rural areas is primarily focussed on their protection not their sustainable housing growth. The Plan has not taken an appropriately balanced approach to the proposed strategy, rendering it not fully compliant with national policy. Government has recently recognised that smaller housebuilders can play an important part in housing delivery, yet there are few new allocations that would be suitable for this sector of the housebuilding community.

Individuals

- Local residents have voted by over 95% in the neighbourhood plan opposing the garden community development. Uttlesford should not take into account the views of the landowners in a public consultation as they are biased and will not give a balanced opinion.
- This is the wrong location as support facilities and infrastructure basics are not in place to support a development of this size. Little thought and therefore the implications to the local community are not considered. Funding is not available for key upgrade projects needed to support this development. The consultation is very short for a development of this size with its potential implications over the local area and heritage. The Town and Country Planning Association's guidance states A Garden City's design must enable at least 50% of trips originating in the Garden City to be made by non-car means, with a goal to increase this over time to at least 60% and Garden Cities should be located only where there are existing rapid public transport links to major cities, or where plans are already in place for their provision. These conditions cannot be met. Your proposal talks about Quality of life for residents and maintaining character of the area. Character will be obliterated if this development goes ahead. The proposed development is about twice the size of Saffron Walden, and will dwarf Great Chesterford and will impact on the surrounding villages. A settlement in this location right at the northern edge of the District will therefore do little to service employment in the district, it will only encourage commuting to Cambridge and London. Concern that there is a conflict of interest, as UDC has holdings at Chesterford Research Park.
- Inadequate attention to these matters in the south of the district.
- I object to the plan because it fails to meet its own aim of 'ensure Uttlesford remains a great place to live, to work and to visit. Concerned that the evidence base is wrong and does not support the plan. The proposal for three new garden communities, is not, does not, shape our district in a positive way. In the case of the proposed NUGV there is no reason to select this location other than it was offered by local landowners willing to exchange their heritage for cash. Concerned over the recent loss of a hospital, an ambulance station, the courthouse and the police station, an independent secondary school. The crime rate in Uttlesford in the year ending March 2017 is up by nearly 40% in the period March 2014 to March 2017 and is more than 25% higher than similar areas of South Cambridgeshire and East Cambridgeshire
- Spatial Vision/ Transport: The District Council should encourage the extension of the guided busway from Cambridge to Stansted Airport, via Saffron Walden.

Introduction

Paragraphs 2.1- 2.3

This policy and supporting text was responded to by 1 person /organisation.

	TOTAL
Support	0
Object	1
Comment	0

Overarching Summary

- Biased, unsustainable objectives.

Statutory Consultees and other bodies

No comments received.

Individuals

- Biased, unsustainable objectives.

About Uttlesford

Paragraphs 2.4-2.17

This policy and supporting text was responded to by 101 people/organisations.

	TOTAL
Support	5
Object	49
Comment	47

Overarching Summary

- There are a number of representations that ask for UDC to reference the population figure.

- A number of representations are concerned with the inaccuracies in the retail patterns of residents. The inaccuracies are outlined in the representations.
- A number of representations are concerned over the sustainability of the loss of agricultural land for development.
- Concerns that the garden communities will not be sustainable as they will rely on car usage which will increase already high pollution levels.
- Representations are concerned that many of the new residents of the garden communities will commute to work and add to the overcrowded trains.
- A number of representations question the notion that transport links are 'good'.
- Representations question whether employment opportunities are available for the residents of the new garden communities.

Statutory consultees and other bodies

Education and Skills Funding Agency - Welcomes reference within the plan to Objective (1d) Infrastructure.

Great Chesterford Parish Council - The shopping needs of NUGC will be met by Saffron Walden. Concern over traffic congestion on the B184. A settlement which is stand-alone and not on a railway line will inevitably make this worse, not better. NUGC does not go anywhere near achieving this, as it does not maximise the use of sustainable development. To reduce the need to travel, shorten travel distances and make sustainable travel a priority by: Locating development so that the use of sustainable travel modes such as public transport, cycling and walking can be maximised whilst recognising the continuing role that the car has in meeting transport and accessibility needs in the rural area. NUGC does not conserve and enhance the natural environment.

Takeley Parish Council - Grade 2 and Grade 3 Agricultural Land must be preserved. Agricultural land should not be considered for housing for sake of sustainability. As Carbon Dioxide Transmissions levels are high, the likelihood of housing needing cars to access services and facilities must remain a planning consideration. High density housing in single, inaccessible areas with current poor transport links and infrastructure will further exacerbate the problem. Too few roads being an issue that can further impact the current problems. Expansion of the airport must not be so great that air quality is impaired or road networks so congested that emissions build up to even greater levels.

Developers/landowners/site promoters

- Quotes a population of 85,100. I believe this figure is estimated, but based on the 2011 census (beginning of plan period of 75,900 people, occupying 31,300 residences averaging 2.425 persons per household).
- The statement "Saffron Walden and Great Dunmow provide nearly all of the districts food shopping needs" is a gross exaggeration because people in the NW of the area shop in Royston which has a large Tesco Extra and other retail. The south west and mid-west of the area shop in Bishop's Stortford. The extreme east and north east are likely to use Braintree and Haverhill. There are regular (several times a day) food deliveries to all parts of the district by Tesco, Ocado and Sainsbury which is extensively used and growing exponentially. Saffron Walden is a most beautiful

market town but is generally avoided for everyday shopping due to severe congestion at times and a poor choice of retail, particularly clothing and white goods. For these Cambridge and Freeport at Braintree are the most likely choice where you can also do a weekly/monthly main shop.

- Due to the rural nature and history of Uttlesford there are relatively few previously developed and brownfield sites within the District. This is misleading and technically incorrect. The rural economy is thriving; almost all of the 56 parishes have some form of employment sites. These are mostly converted farm buildings but none the less are previously developed brownfield sites.
- Rural jobs no longer exist and people travel to work. Stansted Airport and Chesterford Research Park are the major employment sites. Many people work at home. Many small rural businesses are based permanently from home or home offices.
- 68.4% commute beyond the district boundaries. This figure destroys the myth that new settlements will result in shorter travel distances. Concern that commuting will result in the area just being a dormitory.
- Average house prices in Uttlesford are generally in line with its distance and commuting times from both London and Cambridge. They will remain high unless supply meets demand. Technical advances will change work patterns considerably during the DLP period. Low-cost housing rents are related to open market costs and charged at 80% of open market rents- this is not affordable. The council should control properties at genuinely affordable rents.
- Despite the relatively affluent position of many in the District there are pockets of deprivation as a result of rural isolation and lack of access to services and facilities, particularly for the elderly.
- Concerns over traffic congestion contributing to high carbon dioxide emissions in the District. The M11 J8 interchange is a key junction in the District providing access to London Stansted Airport and the M11 and A120 transport corridors. The B184 forms an important north/ south spine for the District connecting its two largest settlements. In the rest of the District the highway network and transport connections in general are very limited. Consequently, accessibility to services and facilities is an issue. There is no mention of the B1383, which is a vital local link between Bishop's Stortford and the M11. Its importance should not be overlooked and upgrading will be essential if the area is to accommodate the increased population. Houses should be built in proximity of readily accessible railway stations, of which two of the three proposed new settlements are not.
- Concerns over pollution at the major junctions in Saffron Walden. Central Saffron Walden is an AQMA. Within the period of the plan we will have self-driving vehicles running on renewable energy, however there are limited policies to encourage faster take up of and production of renewable energies. All new houses should have charging ports and all have solar panels or solar tiles.
- (Para. 2.17)- O- There is a need to focus new development in locations where there are opportunities to reduce travel between homes, jobs and services and facilities and where there are alternatives to using the car. The new developments do not achieve this objective.
- The Market Town of Bishop's Stortford adjoins the Uttlesford District boundary rather than 'lie close' to it. Paragraph 2.6 should be reworded as follows to ensure the

accuracy of the Plan: "Beyond the District the nearest towns are Bishop's Stortford and Braintree which both lie adjacent to or close to the District's southern boundaries, whilst Cambridge and Chelmsford are also accessible and provide a greater range of services. Further afield is London with good transport links to the District by both road and rail. The south west of the District includes the outer edge of the Metropolitan Green Belt around Bishop's Stortford. London Stansted Airport is located in the south of the District surrounded by a designated Countryside Protection Zone."

- It is important for the local planning authorities to maintain dialogue with neighbouring areas outside the HMA under the Duty to Cooperate. The district will also need to maintain dialogue with the Mayor of London through the Greater London Authority. However, the SHMA 2015 undertakes an assessment of OAN without modelling the needs of the wider area and in particular ignores the implications of known under provision in London and as such is unsound. A review of the OAN methodology accompanies this submission and concludes that the requirement is higher than quoted at 654 dwellings per annum rather than the 641 dwellings per annum currently quoted and as such the total number of dwellings required is 14,388 rather than the 14,100 currently quoted. The local plan should be amended to reflect the current housing need and realistic delivery rates and include additional allocations in order to be considered sound.
- The recognition that "...there is a need to focus new development in locations where there are opportunities to reduce travel between homes, jobs and services and facilities and where there are alternatives to using the car" is welcomed as it will ensure the Plan is effective and in line with national policy regarding reducing the reliance on single occupancy car trips. Greater consideration should be given to the role that Bishop's Stortford, its railway station, shops and services can play in delivering sustainable growth in the district.
- The 2011 Census reveals that the Parish of Widdington has 188 households and a population of 504. The village has small but reasonable range of facilities. The village lies in close proximity to Newport, Saffron Walden and Bishops Stortford which provide good facilities. Bus services serve Widdington, which has previously been under threat. Additional patronage brought by occupiers of new housing development along its route would be helpful to maintaining the bus service in to the future. In nearby Newport and Wendens Ambo the railway services provide destinations to Cambridge and London Liverpool Street. The nearest station (Newport) is within easy cycling distance and bicycles can be parked here. Buses also serve Stansted and Bishop's Stortford for train services there. At paragraph 2.15 the Plan states: 'the District the highway network and transport connections in general are very limited and accessibility to services and facilities is an issue across the District as a whole'. However, Widdington fares well in respect of paragraph 2.15: it is an accessible village with good public transport facilities and is in close proximity to nearby employment and retail centres. As a Category B village, no housing is being proposed for Widdington. We suggest an allowance for a small amount of housing in Widdington should be made to cover the period to 2033. We would suggest that approximately 15 to 20 houses be allocated for Widdington in the Local Plan. This would represent an increase of circa 8% to 10% in the number of village households,

based on those recorded in 2011. Broadly, this suggested allocation would provide an average increase of one dwelling per annum in the village to 2033.

- Felsted is an accessible village by the road network, and by public transport. Felsted is also close to the City of Chelmsford and Broomfield Hospital, major employment areas which can be easily reached from Felsted by regular public transport. The Plan makes no reference to the importance of Broomfield Hospital of Chelmsford as destinations for employment. Stansted airport is also accessible by regular public transport from Felsted. Equally, Chelmsford is accessible for employment, but the does not refer to its importance as an employment pull. Given the accessibility by bus, Felsted is a strong contender for a reasonable amount of new housing development to take account of its sustainable location. Our Suggestion If the LPA is intent on retaining a village settlement hierarchy, our suggestion is that Felsted should be included as a Key Village as it clearly meets the relevant criteria. It should therefore be allocated with new housing to reflect its suggested status as a Key Village. Felsted should be allocated with new housing to take account of its available facilities and services.
- Support paragraph 2.17. Significant housing growth needs to be accommodated within the District. However, the 3 new settlements are going to be slow to deliver and are going to be reliant on significant infrastructure installations that reduce the need to travel. If sustainable growth is to be delivered across the district, the efficient use of sites within the settlement boundaries of the existing Market Towns need to be maximised. Land at Ashdon Road is currently zoned for employment use however there is no reasonable prospect of this employment land coming forward for employment use. The land is brownfield land and is well connected to the already consented residential development at site SAF2. The site is to be directly served by a bus service and enjoys pedestrian and cycle links into the town centre and the facilities and services provided within it (including active and occupied employment sites). This land is entirely suitable for residential use and should be brought forward for new housing. The development will be highly sustainable and, given the land is available now, will help address the Council's housing land supply shortfall which, as confirmed in the recent Little Walden Road appeal decision (APP/C1570/W/17/3168869) is substantial (a shortfall of 1.9 years or 1,216 dwellings has been identified when applying a 20% buffer).

Individuals

- The population figure needs to be referenced. The population growth per annum needs to be shown also to give context for how the local plan is expecting to manage homes, infrastructure etc. within the years the plan references. With no population reference, trend or expectations then the plan cannot possibly have a sustainable objectives and delivery goals.
- Agree this is a rural area, necessary to produce food and openness for society
- There is a need to say when the population was 85,100.
- Other centres besides Saffron Walden and Great Dunmow provide schools and health services, and these towns do not provide for "nearly all" the District's food shopping needs. Residents of Elsenham and Stansted Mountfitchet shop either in Stansted Mountfitchet or in Bishop's Stortford.

- Saffron Walden and Great Dunmow will be swamped by this amount of new housing. There is no population reference, trend or expectations. This plan does not have sustainable objectives and delivery goals. Concern over congested roads.
- Concerned that there are not the employment opportunities to support development in Dunmow and West of Braintree. The M11 corridor is a more suitable location for development. Stansted cannot employ the inhabitants of the 10,000-20,000 proposed new homes. Concern over congestion on the A120.
- UDC is seriously overstating the number of houses required. The latest statistics show that immigration has reduced substantially since the expansion of Stansted. UDC Have not taken in to account significant house building at Bishops Stortford, Harlow North and Braintree.
- Rail links from London to Stansted airport are adequate for the moment, but with no real effective public transport links from Great Dunmow to Stansted. The car parking provisions both at Stansted and the other stations in the area are very expensive. It is not reasonable to say that the rail transport links to London from Dunmow are "good" relying as they do on car usage for it to be a 2-hour commute to London. X2
- Not everyone would agree with good transport links by both road and rail.
- The transport links into London and Cambridge by rail are terrible - frequent delays, cancellations, late running trains with above inflation ticket price rises. Concern that this will worsen with more people from the housing developments. Great Dunmow does not have a rail station so you still have potentially thousands more people driving to get to the nearest train station. Concern that the bus service is poor. For example, buses for the elderly are hardly used and have seen cut backs in service by 40% in the past year. The roads around Uttlesford are in disrepair and there has been no new road infrastructure built to take account of this massive increase in traffic. X2
- Transport links are poor in the Great Dunmow area. It is expensive to park at rail stations
- Objection to good transport links. Trains from Braintree to London run every hour, and parking is severely limited and expensive. Concern that the plan does not concern the existing community, but rather the commuters. Concern over infrequent buses with poor links, especially to local train stations and larger towns from the villages. Any new development in the Dunmow area (particularly the proposed West of Braintree development) will be heavily car dependent.
- Transport links from the Andrewsfield, West of Braintree area cannot be described as "good". Travel by train involves getting to Braintree, Chelmsford or Bishop's Stortford. Parking is expensive, busy, and causes traffic congestion. Concerned that bus services in the area are not adequate for commuting.
- Transport links are dreadful! Concern that the WoBGC will not cycle. The A120 is at capacity & will only get worse once it is duelled all the way to Marks Tey. Concern that the country roads are dangerous. Concern that increased traffic congestion will destroy agricultural land, decrease air quality and create grid lock.
- Is there a policy to meet the expected rise in older people in the District?
- The rail links are not good, particularly as Braintree has such a limited timetable. Also with recent local developments the B1256 has an increased amount of traffic making it difficult to exit the villages during peak periods.

- The infrastructure does not exist to support the plan. Transport links are inadequate. Braintree Rail Station is on a one-train-per-hour branch line requiring users to change at Witham to continue any journey. Concern that the B1256 and the A120 will not be able to accommodate substantial increases in traffic volume. Concern that infrastructure such as schools and hospitals are too few and too far away to support development.
- Haverhill should be added to nearby towns, as there are good parking facilities, public transport connections and shopping facilities.
- If UDC really did value its historic sites, ancient woodland, listed buildings and everything else listed, then they would listen to their residents & not build such large developments but smaller infill sites which residents would accept.
- It seems that the plan is endangering the 'distinct rural character of the District'. Concerned that historic villages and market towns will be swamped by the new homes. Concerned that tourists will no longer see the area as 'attractive and historic'.
- I agree with your comment. Why are you therefore going to ruin it all?
- If there are few, how many have been developed by a specific date or in certain years? 'Few' does not quantify how many brownfield sites are expected to be available.
- Please list them and show how many houses they can support and then subtract them from the need for further housing. Brownfield sites should be used first before any further development allowed and all developers should be pointed towards these first.
- The first sentence is a bit wonky - the second half needs a verb.
- You forget to mention the Science Park at Harlow and the College to be built at Stansted. There is NO cluster economics for development at West of Braintree.
- It is inappropriate to refer to the "London Stansted Cambridge Corridor" in an official document such as this. The London Stansted Cambridge Corridor (LSCC) is an unofficial term that represents a group with narrow economic interests and an agenda that is opposed by many in the local community.
- If the District is central to the London Stansted Cambridge corridor why is the majority of the development away from this area and not in the north of the district with easy access to both Cambridge and the M11 to London avoiding Junction 8.
- All the employment opportunities are a car's commute away reinforcing the concerns about lack of transport infrastructure.
- Debden Airfield, to be decommissioned by the army, is a large brownfield site, large town size, reasonably close to the M11, and totally ignored.
- Building houses will not bring employment into the district. The challenge is surely more about facilitating older people to remain economically active into old age- the policy should be about keeping older people fit & healthy & able to contribute to work. Post Brexit, there will be fewer employment opportunities. Stansted will lose out to Europe's air ports. A high percentage of the local population commute to places of employment.
- You forget to mention the Science Park at Harlow and the College to be built at Stansted. There is NO cluster economics for development at West of Braintree.
- Why is attracting investment into the area assumed to be desirable? It is only desirable if it enhances and doesn't destroy the advantages that Uttlesford currently enjoys

- Government policy has been steered towards building on brownfield sites as a priority over and above greenfield sites. The plan needs to align with this.
- The transport infrastructure is inadequate to cope with additional commuter traffic, if residents of the proposed settlement are to commute to Stansted. Concern that new residents will commute to London or Cambridge. Great Chesterford and Audley End stations are already at capacity. Concern that the road infrastructure cannot support commuters.
- Questioning why there is a need for housing in Uttlesford since Cambridgeshire is already planning further housing developments to meet the need for employment in the biotech research industry.
- A significant number of residents commute out of the district and so rail infrastructure investment and improvement routes should be a very high priority.
- How is the 'social good' of using land to keep the district an attractive area in which to live and for wildlife to live taken into account?
- The paragraph first implies that Stansted Airport is a major employer in the district, however 68.4% of people are commuters. A geographical analysis of where Stansted's workers come from is needed.
- Concern that development is located at Stebbing Green, where there are no employment opportunities.
- This paragraph reinforces the lack of transport infrastructure in the Andrewsfield, West of Braintree area and the lack of employment opportunities in the area itself.
- Concerns that employment opportunities do not support the increased population.
- There is an assumption that the new towns will provide employment opportunities, however this is unlikely. The jobs created at WOB will be in Braintree district. UDC is losing employment sites as the increase in land value for residential is causing companies to move. People need to commute to afford housing. The employment offered by Stansted Airport means that no home is "affordable" and shift work means a car is essential.
- Concern that the new houses will result in more commuting which the road and rail infrastructure cannot support. It is suggested that more local jobs should be created.
- These statistics mean almost nothing unless put into context by reference to adjacent districts, Essex, Herts, London. Average house prices mean little Uttlesford, as there is a high proportion of listed buildings and larger farms. Average values would be more meaningful if given for detached and semi-detached houses and flats. Delete "higher than" from lines 4 / 5 for this to say what it means.
- Concerned that there is no mention of the commuters who travel to nearby Cambridge, both by rail and road. This needs to be reflected here to ensure sustainable housing is also built to support these growing jobs growth areas.
- It cannot be guaranteed that new residents will work at the research park. The majority will be seeking to commute to London or Cambridge. Concern that Great Chesterford and Audley End stations are already at capacity. Concern that the route to the train station goes directly through the village of Great Chesterford.
- If the average house price in Uttlesford is £355,000 why are new builds starting at nearly £400,000? We need more two and three bed houses at affordable prices.
- First time buyers cannot afford the average house price in Uttlesford. The Plan needs to provide more affordable housing to attract younger people.

- Instead of decreasing house prices through market forces, social housing should be built for people on the waiting lists and some for key workers. Cambridgeshire have the bio cluster expansion covered (or should do). Airport expansion has not been agreed.
- Questioning why Harlow is not taking a larger share of housing, because of its proximity to London.
- Uttlesford is a rubbish place to live & grow up as a young person, due to terrible commuting links to employment centres. Suggestion that policy should aim to improve opportunities for businesses to start, develop & thrive.
- Concern that sustainable developments cannot be built if socially deprived communities don't have access to reasonable jobs close by. Build business, jobs, infrastructure and houses to make sustainable communities.
- Concerned that additional development will increase already high carbon dioxide levels.
- The bus services are poor. Work centres are outside of the range of cycling. Rerword to reflect this.
- Transport infrastructure is poor, especially in the West of Braintree area, and the development will make it worse. There are no proposals on how to create more local employment.
- Many skilled people will move away from the area, if its quality is destroyed by unsustainable planning policies.
- We would like to use bus services and cycling more in the district, as they reduce congestion and pollution. However, the focus is on profit and not service for buses and the cycle network is fragmented and in areas is dangerous.
- There are pockets of deprivation not related to living in a rural area, or to age. Specifically, Castle ward in Saffron Walden and Great Dunmow South ward. These were the two prominent wards where people sought the help of the Uttlesford Foodbank.
- The area is unsuitable for mass scale housing development, due to the points raised in this paragraph. Significant infrastructure construction to support house building will change the environment.
- Concerned over traffic congestion as a result of the developments. The Stansted Express is never on time.
- Concerned that NUGV will not reduce pollution and congestion in Saffron Walden, because the nearest facilities are located here. The best station for London commuters will be Audley End due to traffic congestion.
- The B184 is carrying a significantly increased volume of traffic since additional housing was built on the way into Saffron Walden and the ALDI supermarket was opened. Heavy goods traffic now uses the road as a cut through between the M11, the A11, the A505 and the A120. Concern that more dwellings would exacerbate this.
- Concern over traffic congestion as a result of the new developments.
- Concerned that there is no plan for tackling the air quality issues in Saffron Walden. Past proposals have lacked measurable objectives and there is no target date for the lifting of the AQMA. UDC has been specifically instructed by DEFRA to take cumulative air quality effects of new developments into account in planning decisions but this has not been done. Consequently, the two most recent Air Quality Status Reports (2016/17) show continued deterioration in pollution levels across the town.

The new Local Plan must introduce tougher and more enforceable controls on developments that will harm public health. Sites which would lead to further traffic pollution should be removed from the plan.

- The solution would seem to be a number of houses to facilitate a bypass around the town to protect the historic centre it cannot remain set in aspic.
- Concern that the new development will result in more traffic congestion. Infrastructure is needed to support the developments and should be part of this consultation
- Saffron Walden is very urgently in need of some form of simple bypass, possibly located on the Audley End estate. Health centres and school need to be provided before the construction of housing
- Whilst I have no problem with this as a statement I cannot find the link between it and the proposal for NUGV, which fails most of the criteria.
- The AQMA problem related to Saffron Walden supports the need to develop new communities away from the existing main settlements.
- What are the expectations and expected calculations for the overall AQMA in terms of it expanding or contracting, and by how much in percentage terms over the term of the plan? Are there expected to be new by-road schemes to take traffic around the town rather than through it to reduce the AQMA longer term?
- Objection to WoBGC because it will destroy the local environment and arable land and rely on car usage. There are better alternative sites within UDC, e.g. Easton Park and Great Chesterford which would meet the housing needs in Uttlesford, and are more suitable as far as public transport and employment is concerned. Stansted Airport cannot be relied on for employment.
- We agree it makes sense to build only where there is local employment and there are local services so traffic is reduced. West of Braintree has neither.
- The observation about ancient street patterns and congestion in Saffron Walden is valid but there is no proposal to solve the problem. A ring-road is an obvious solution, which could enable concepts such as Park and Ride and revival of the town centre.
- Aspirational statements without any evidence that they can be achieved.
- Proposals for non-car travel do not include specific measures to encourage or facilitate walking.
- The plan will not achieve this, as it will increase travel by car.

The Spatial Vision

Paragraphs 2.18

This policy and supporting text was responded to by 39 people/organisations.

	TOTAL
Support	5
Object	20
Comment	14

Overarching Summary

- Concerns are expressed over whether creating the garden communities supports the vision and the objective to conserve the natural environment.
- A number of representations question how sustainable transport will be provided for given the location of the garden communities, and lack of existing infrastructure.
- Representations support the aspirations for high quality design, however question how this will be ensured.
- Representations express the need for infrastructure (road, rail, broadband, water, sewage, hospitals and schools) to support existing and new communities.

Statutory consultees and other bodies

Great Chesterford Parish Council - North Uttlesford Garden community is part of the vision. The Sustainability Appraisal impacts of Spatial Vision not adequately assessed and not properly evidenced. There is no consideration of alternative approaches. GCPC want removal of reference to NUGC in Spatial Vision.

Historic Environment - Support for this approach, however creating housing estates separate to existing settlements does not achieve this, as it lacks the infrastructure required to support it.

Natural England - Natural England is pleased to see the safeguarding of the natural environment included in the Spatial Vision, however the plan should seek to achieve enhancement in line with your aspiration for the historic environment.

Historic England - Historic England welcomes the specific reference to the conservation and enhancement of the historic environment within The Spatial Vision. There is also a helpful reference to maintaining and enhancing the vitality and viability of towns and villages in the district. Paragraph 2.8 of the supporting text usefully outlines the distinctive and historic nature of the District's towns and villages. It is recommended that this paragraph also recognises the irreplaceable nature of the historic environment. The provision within theme 3 of the Spatial Objectives to conserve and enhance the District's heritage assets and their settings is a clear overarching theme which is welcomed. It is noted that The Spatial Vision is not itself labelled as a policy.

The Thaxted Society - We are aware of the need for both planning, i.e. a Local Plan and housing i.e. a Local Plan. Without an LP, not only Thaxted, but the entire district is prey to speculative development and 'catch up' planning. Thaxted Society supports the Spatial Vision if infrastructure goes hand in hand with housebuilding in Uttlesford.

The LP makes the expected presumption in favour of sustainable development in response to the NPF. However recent case-law has shown the primacy of an LP as a statutory consideration as opposed to the NPPF which is merely Government policy. Care should therefore be taken in developing 'sustainability' as an original and localised vision for UD and not simply a broad and generalised reaction to government policy.

Essex County Council - ECC considers that there is a need to reinforce reference to sustainable travel within the spatial vision. It is recommended that paragraph 4 of the vision includes the following sentence 'The new communities will be designed to support sustainable travel within and outside the community to the wider area'. ECC notes that UDC recognise they have a lack of passenger transport links and identify that new development should be located in areas where there are opportunities to reduce travel and where there are alternatives to the car. It is recognised that the Spatial Vision highlights convenient, comfortable, safe and affordable environmentally sustainable alternatives to the use of the car. ECC recommends that the new Local Plan provide a clear explanation as to what sustainable transportation provision will be provided throughout UDC and in particular the Garden Communities. This information should be clearly linked and supported by the transportation modelling, providing stakeholders and the local community with a clear consensus of the transportation mitigation measures and a vision for sustainable travel.

The Hundred Parishes Society - The plan should recognise that Uttlesford and adjoining districts have a shared responsibility to preserve the special character of the wider area known as The Hundred Parishes. The draft Plan claims that, over the period of the Plan, it is necessary to add thousands more homes, in addition to what has already been built or approved. Given the lack of clear evidence, the choice of an exceptional period of growth as a base, the failure to consider alternative forecasting options and the absence of audit trails demonstrating how the "need" has been calculated, we are not convinced that further houses are needed before 2032 in addition to those already approved. The garden communities do not minimise the need to travel. High priority should be given to working with and enhancing the historic environment, especially historic settlements, conservation areas and areas of ancient countryside. We urge the Council to oppose any further expansion beyond the existing authorised limits at Stansted Airport. We encourage the Council to promote alternative employment opportunities throughout the district. Any new development should respect and enhance such amenities and the provision of information, encouraging residents and visitors to use public transport, to cycle and to walk.

Clare College Cambridge - The scale of housing delivery proposed at North Uttlesford Garden Community (NUGC) will increase traffic on already busy roads and junctions without the necessary infrastructure in place to support increased traffic movements. There is no reason to expect that a modal shift away from car use can be delivered in NUGC.

Developers/landowners/site promoters

- Emphasis should be placed on how development will be located in areas to help reduce single occupancy car trips with development focussed around existing rail connections, in accordance with the aims of paragraph 2.17 to ensure that the Plan is effective in delivering sustainable development without the over reliance on the private motor car.
- Support for the Council's stated Spatial Vision Strategy, particularly the desire to see the District thrive as a successful balanced local economy. Emphasis should be on balance, and we are concerned about elements relating to the provision of adequate employment opportunities alongside significant housing development.
- We consider that Uttlesford's proposed vision for the District is not aspirational, realistic or clear enough to achieve the economic, social and environmental dimensions of sustainable development advocated by the NPPF. The ability of three new garden communities to meet the District's needs over the plan period is considered unrealistic as a result of the delivery constraints associated with new settlements.
- Object to the proposal to adopt a plan for the period 2011- 33. When adopted in 2019, the plan will provide a planning strategy for only 14 years. Paragraph 157 of the NPPF indicates that Local Plans should relate to an appropriate time scale with a preferable time horizon of 15 years. Stansted Airport wants to increase, which would alter anticipated jobs growth forecasts in Uttlesford and housing need accordingly. In this context and given the dynamic nature of housing need in Uttlesford, it is critical that the Local Plan time horizon is extended, or the plan commits to an early review to ensure that a credible long-term strategy for growth in the District can be secured that takes account of these specific circumstances.

Individuals

- The NUGV will not meet the criteria set out in this vision, as it would be dependent on the car for access to employment. Walking and cycling are not viable all year round for such a decoupled community and the probability of achieving a public transport system which meets residents wishes on timing and destinations is unrealistic.
- New houses continue to be built around the town of Saffron Walden. Concerned that there are no employment opportunities that can be reached on foot or by public transport.
- How will you ensure that Housing will be of high quality?
- Objection to the 2 garden communities in the south-east corner of Uttlesford, as the transport infrastructure, water supply, or employment opportunities are insufficient. Concerned over urban sprawl.
- UDC LP does not comply with NPPF 155, as the WoBGC is not supported. The road infrastructure is not adequate and there is no proper rail support.
- The West of Braintree and Easton Park developments will not enhance the unique character of this part of the district, as it will dwarf all the local villages. This will change not enhance the area so they are not in keeping with the 'Vision'.
- Concerned that Uttlesford will not continue to be one of the most desirable places to live and work in the UK due to the scale of new development.
- Convenient or affordable alternatives to the use of the car do not exist at present. How will this be implemented in the future?

- The inappropriate scale of housing growth, focused into three large settlements is out of character for this rural area.
- The Spatial Vision takes no account the negative consultation response to the West of Braintree development with regards to health/schools/roads/water infrastructure. Concern over the loss of historic villages, ancient woodland and Grade II agricultural land. There is no detail as to how the infrastructure will change, or who will pay for it.
- Concern that the planned housing will attract more commuters from London and Cambridge which will overwhelm the transport infrastructure. Concern that local employment opportunities where people can easily walk or cycle to work are not planned for.
- The proposals ignore access to a railway station and the m11 motorway.
- Garden communities are not nationally endorsed and therefore there are no guarantees that the proposed settlements can be delivered to these standards. Concerned that the houses will be small, with small gardens and no parking.
- Concerned that West of Braintree is not close transport links.
- The quality of life in Saffron Walden will not be safeguarded by more housing within the town (especially Keir) or a massive new garden community at Stumps Cross.
- Easton Park will put considerable pressure on Bishop's Stortford. Saffron Walden is at risk of being destroyed as a town due to too much unsustainable development being approved.
- The proposals for the North Uttlesford Garden Village do not conform to the requirement to safeguard the quality of the countryside or natural environment nor to conserve and enhance the historic environment.
- There is no section devoted to the way that this Local Plan will be implemented with local people and communities at the centre of the planning, consultation and decision-making processes. Requests confirmation about what affordable housing is. Social housing should be referred to throughout this document, which would enable local people who cannot afford to buy a home to continue living locally.
- The linking of the Flich Way across Dunmow as a multi-purpose path would give good access for all, and should be included in the plan. Any new developments need to have rights of way that link into the current network of paths. There is not enough green space or recreational parks. Provision for this should be included for the Little Canfield/Dunmow area.
- This vision is not true given the amount of the countryside and natural environment which will need to be sacrificed to build the garden communities.
- The plans for West of Braintree do not support this vision, as they create a dormitory town without its own employment or services.
- Pride of Place requires good quality distinctive design of housing and sympathy to topography. Access to green spaces will require public land in the new towns. How will broadband be provided to existing homes?
- Crucial to the delivery of this will be infrastructural and service (specifically health care and education) provision. This has to be in place first, to allow services to develop.
- Saffron Walden does not have a community that is healthy and safe, due to the poor air quality and difficulty contacting the police force. The existing road surfaces break up routinely and the road drains are usually blocked. Despite allotments being recognised as providing measurable health benefits, there have been no additional

plots provided in Saffron Walden. What is meant by "Affordable housing"? The secondary school is already over capacity.

- The spatial vision is an appropriate vision for future development in the garden settlements, however it doesn't fully address the needs of the present settlements in the area. These will continue to have the majority of the population and the infrastructure in place cannot support further development.
- The support of employment opportunities should not be to the detriment of the community, as an expansion of Stansted would generate housing, traffic and pollution problems. Building designs should be site specific.

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Significant, Temporal and Secondary Effects

At the broad strategic level, the Vision is aligned with the positive aspirations of a range of sustainability objectives in line with its general focus. The Vision is particularly strongly aligned to those sustainability objectives related to housing and economic growth, accessibility and sustainable travel. It is also aligned to aspirations regarding the natural and historic environment, landscape, and infrastructure. Impacts can be expected to be more significant in accumulation with other Local Plan policies that expand on sustainable development in a local context and regarding the distinct characteristics of the District. The Vision does not appear to be directly aligned with those sustainability objectives and aspirations related to water quality, soil quality, climate change and pollution and also flood risk, which can all be expected to experience some implications from growth in the Plan area to 2033. It should be noted however that any impacts on these sustainability objectives will be minimised through Plan policies and such themes are and should not be the principle focus of a Local Plan.

Related to this however, those sustainability objectives corresponding to health and education could be elaborated on within the Vision, as areas of social infrastructure that will be put under pressure from growth.

Alternatives Considered

No alternative approaches can be considered reasonable as the Vision largely reiterates the thread of sustainable development as espoused in the NPPF. Any alternative that deviates from this approach would be contrary to NPPF and therefore an unsound approach.

Proposed Mitigation Measures / Recommendations

It is recommended that the Vision be expanded to focus more directly on ensuring that social infrastructure provision is ensured throughout the Plan period, particularly regarding health (where relevant and within the scope of the Plan) and education

Spatial Objectives

Paragraphs 2.19

This policy and supporting text was responded to by 31 people/organisations.

	TOTAL
Support	6
Object	11
Comment	14

Overarching Summary

- A number of comments on objective 2 question whether providing opportunities for employment at Stansted is a contradiction of UDC's position on objecting the second runway at Stansted.
- Concerns are expressed over whether creating the garden communities supports the vision and the objective to conserve the natural environment.

Statutory consultees and other bodies

Thaxted Parish Council

- Objective 1e: Change 'resisting' to 'refusing'
- Objective 2: Possible conflict with Corporate Plan which states that UDC will oppose 2nd runway but this paragraph wishes to provide employment growth opportunities. UDC to clarify this point.

(Natural England - Objective 1d - Infrastructure. Natural England is encouraged to see Green Infrastructure (GI) included as an infrastructure requirement under Objective 1d.

Essex County Council - Objective 1d - Infrastructure Although the bullet point under this objective does refer to new infrastructure, this is within the context of protecting existing services. ECC recommends that objective 1d entitled Infrastructure be amended to read "To protect and enhance existing and future local services by: ..." Objective 1e - High Quality Design ECC recommends that the high-quality design overarching objective includes reference to Sustainable Urban Drainage. The objective should include a further bullet that states "Delivering Sustainable Urban Drainage within new residential and non-residential developments".

Theatres Trust - The Theatres Trust supports the intent of Objective 1D, however, there is no clear policy in the plan that reflects and implements the Objective in relation to cultural facilities. Policy C4 only has limited application and Policy INF1 isn't worded in a way that would promote or protect cultural venues. Culture and the creative industries play a key role in developing vibrant town centres which are at the economic and social heart of sustainable

communities. The National Planning Policy Framework (NPPF) provides clear directions about the importance of safeguarding and promoting culture activities and venues in their areas. Policies should therefore protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments. To be found sound and reflect guidance in the NPPF, the Trust recommends inclusion of a specific policy with wording along the lines of: Cultural and Community Facilities- Development of new cultural and community facilities will be supported and should enhance the well-being of the local community, and the vitality and viability of centres. The loss or change of use of existing cultural and community facilities will be resisted unless: replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or it has been demonstrated that there is no longer a community need for the facility or demand for another community use on site. The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported, particularly where they help activate and revitalise town centre locations and the public realm. For clarity, and so that guidelines are clear and consistent, the accompanying text and the Glossary should contain an explanation for the term cultural and community facilities. We recommend this succinct all-inclusive description which would obviate the need to provide examples: cultural and community facilities provide for the health and well-being, social, educational, spiritual, recreational, leisure and cultural needs of the community.

Environment Agency - We support the thrust of the Vision, in particular that the natural environment will be safeguarded and challenges presented by climate change will be embraced and development located and designed to minimize resource and energy use and risk of flooding reduced. Objective 1d - infrastructure We support the thrust of this objective, in particular that new and enhanced infrastructure is provided in a timely and sustainable manner. This is important given the level of growth and proposals for the three garden communities. Objective 3b Climate Change and Use of Resources We endorse this objective.

South East Education and Skills Funding Agency - Welcomes reference within the plan to Objective (1d) Infrastructure.

Saffron Walden Town Council:

- Objective 1 High Quality Design Comment- Proposed Change: change words to “ensuring high quality design” and delete “resisting poor”, as this is too negative.
- Objective 2b - Notes that the Local Plan will support Market Towns. How will this objective be met? Hierarchy given within Retail policy to SW? Need to clarify.
- Objective 2c London Stansted: Possible conflict with Corporate Plan which states that UDC will oppose 2nd runway, but this paragraph wishes to provide employment growth opportunities at Stansted. UDC to clarify this point

Sport England - Support is offered for including a strategic objective (1d) ensure sports facilities are provided to meet the needs of people and business. Support is offered for including a strategic objective (1e) that seeks to achieve high quality design that provides a healthy place for residents, visitors and businesses.

Developers/landowners/site promoters

Objective 2c: Strong opposition to any further expansion of Stansted Airport, due to the environmental consequences.

Individuals

- I'd like you to demonstrate how you have complied with the consultation principles of the NPPF. The expansion in the Bishops Stortford / Dunmow area is causing chaos on the roads, utilities, schools, NHS etc. The needs of the community are being ignored.
- NUGV fails to meet 1c as it will create a community highly dependent on the car and delivery vehicles from elsewhere. The main job opportunities cited are Stansted Airport and Chesterford Research Park, which would require a substantial journey on current and proposed links. Concern that this will create further traffic congestion and damage existing communities.
- Objective 1a: How will you ensure they're attractive? Objective 1e: High Quality Design Resisting poor quality design. How will you do this? Concern that UDC has not done this in the past. Objective 2c: Why should Utilising the permitted capacity of the existing runway be part of the District plan?
- The proposal for so called 'Garden Communities' is completely at odds with Objective 3a, as it destroys a rural area and its distinctive character.
- The Council's spatial vision is flawed with an over reliance on the 3 large garden communities to deliver the District's Objectively Assessed Needs. This is not a sustainable approach to development, as it will not deliver community benefits. Concern that they will not deliver the 5 year land supply. The Council's spatial strategy should be a more dispersed across the towns and villages.
- Roads and rail improvements, in addition to schools, need to be included within the plan. Concerned that there is no mention of Social Care and Welfare needs such as mental health, jobs assistance programmes where government programmes are being developed to provide.
- Concerned that NUGV does not meet exceptional circumstances to build on the green belt.
- Concern that UDC are not listening to people's comments, as the vision does not represent what people think. Questioning how many affordable houses will be built for local families. The roads are in a state of disrepair. Concern that there are very few bus routes
- Has the increased need for services such as broadband, water and sewage been considered? More affordable housing is needed. Concern that new houses will increase congestion on roads, cause higher pollution levels, create busier trains and stretch public services.
- The size of Uttlesford District has been emphasised, as people commute. Jobs and services are not well connected. Concern that the road system is not well maintained.

- Objective 1b is not supporting or protecting the rural community of village and the community of Stebbing. Loss of employment opportunities in relation to agriculture, due to loss of agricultural land.
Objective 1c: Concerned that there is no clarification about who will fund this.
Objective 3a: WOB does not conserve and enhance Stebbing. Concern over urban sprawl, which does not conserve the natural environment and landscape character. It will not enhance Boxted Wood.
- The infrastructure item is key, due to the high level of commuters. This means significant investment in new roads and improved rail services. Infrastructure fails to include broadband provision.
- 1c an unrealistic and unrealisable aspiration until the full infrastructure for the North Uttlesford Garden village (NUGV) is in place. 1d, 3a and 3b: NUGV does not meet these aspirations. Policy SP1: there is no evidence that the NUGV would be sustainable.
- The vision makes sense, but the West Of Braintree proposal is contrary to the vision, as it creates a dormitory town without its own employment or services.
- The vision seems to be broad and acceptable if a little idealistic. Delivery will be key.

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Significant, Temporal and Secondary Effects

The Plan's Spatial Objectives can be seen to have broadly significant positive impacts on the majority of the sustainability objectives and aspirations through their direct alignment. Despite this, the Plan's Spatial Objectives do not directly cover those aspirations related to water quality or the conservation of high grade soils.

Alternatives Considered

No alternative approaches can be considered reasonable as the policy reiterates the thread of sustainable development as espoused in the NPPF. Any alternative that deviates from this approach would be contrary to NPPF and therefore an unsound approach.

Proposed Mitigation Measures / Recommendations

It is recommended that the Spatial Objectives are expanded to reference positive outcomes and aspirations related to water quality and the conservation of high grade soils.

Paragraph 2.20

This policy and supporting text was responded to by 11 people/organisations.

	TOTAL
Support	1
Object	7
Comment	3

Overarching Summary

- Concerns that the delivery of timely and sufficient housing and affordable housing within the plan period via the proposed new strategic new settlement given the high infrastructure cost involved and the complexity of development.
- Concerns are expressed over the mechanism to deliver sustainable travel through different transportation options including vehicles, railway, cycling and bus.
- A number of representation expressed concerns over the provision of affordable housing for local people.

Developers, Agents and Land Owners

The proposed spatial strategy approach needs to be based on the principles of sustainable development, as set out in the NPPF particularly Paragraph 7, 17, 30, 34 and 55. The plan aims to deliver 14,100 dwellings (641 dwellings per annum) during the plan period. However, too much emphasis is being placed on new settlements and villages which require significant new infrastructure (Easton Park, West of Braintree and North Uttlesford Garden Communities) and on strategic extensions to existing large scale allocations where development has not yet started, or delivery is delayed, and lower than anticipated levels of affordable housing will be delivered (e.g. East of Saffron Walden and west of Great Dunmow). It is inevitable that there will be delays to the delivery of development at the new settlements and village sites because they are complex, as shown historically with Northstowe and Cambourne in South Cambridgeshire. Also, these developments will require a significant amount of new infrastructure, and we are concerned that the associated costs of providing that infrastructure will reduce the amount of affordable housing that can be delivered from these sites. We have undertaken a preliminary review of housing delivery at some of the strategic allocations, and conclude that some of the assumptions about housing delivery are optimistic, and as a result less housing will be delivered from the allocated strategic sites and the proposed housing target will not be met during the plan period. In addition, any delays to the delivery of housing at the existing and potential strategic sites will have an adverse impact on the delivery and supply of affordable housing. As such, we conclude that Objective 1a will not be met.

Individuals

- Objectives seem balanced and acceptable. Further growth at Stansted should be considered.
- The plan ignores and insults most of the objectives.
- Destroys living environment of the south of the district.
- The development will destroy the rural and historic nature of the existing town countryside.
- The whole route of Flitch Way should be made accessible for the complete route from Braintree and beyond Takeley - including the old Railway line from Braintree to Great Dunmow for families/ cyclists and those with impaired/ limited mobility. Endangered species of birds/ mammals should be protected.
- Need to ensure new development promotes the use of sustainable travel
- Current roads/ rail and buses struggle with the current road users. Extra pressure from construction traffic and the subsequent road use will create more bottlenecks.

- Need to facilitate the provision of sustainable smart travel solutions, and concerned how to deliver extra bus routes, better roads, expansion of the rail network.
- Need to meet local housing needs in terms of type and tenure including affordable housing and housing for people with specific accommodation needs. Affordable housing should be provided for local residents who are born and bred in the area and want to stay in the area.
- Need more police on the streets and more police stations.
- The council should impose fines on companies 'fly tipping' their advertising banners on fences adjacent to roundabouts.
- Safety and risk assessments are needed to ensure risk management.
- Need to define whose "best practice" is.
- There is no reference to building infrastructure to support the needs to London or Cambridge commuters, either by Rail or Road.
- Objective 1c ignores the fact that the car is also required by many people within the urban areas of the District.
- Objective 1b should include reference to the provision of new homes, particularly affordable housing, as a means of 'protecting and supporting' rural communities.
- Need evidence of the people already living in North Uttlesford that need a new home to justify "To deliver housing for Uttlesford".
- Will the purchasers/occupants have recourse to UDC funds to rectify the failings if housing provided failed to reach the expected level?

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CHAPTER 3 – Spatial Strategy

Paragraphs 3.1 – 3.3

This supporting text was responded to by 7 people/organisations.

Support	0
Object	5
Comment	2

Overarching Summary

- The Plan is not ambitious enough – it should be a plan for the world in the 2020s. The garden communities provide the perfect opportunity for a sustainable local economy in the information age.
- The strategy is too focused on housing numbers at the expense of everything else.
- It is not clear when and where the houses are needed.
- Consider that a plan is needed, not a spatial portrait.
- The phrase garden communities conceals unpalatable truths.
- This plan is not sustainable due to the size and lack of infrastructure.
- The plan clearly does not respect the local character of Uttlesford and the villages to be directly affected by this plan, especially those nearby the West of Braintree site.

Statutory consultees and other bodies

Littlebury Parish Council – Uttlesford claims it wants to be one of the best places to live in the 2020s and beyond. The plan must be much more ambitious and embrace the world of the 2030s if it to achieve this. Aiming for a sustainable local economy in the information age should be a priority. The Plan should deliver world class broadband throughout the district, early development of new large employment sites to attract growing industries, development of a comprehensive network of non-fossil fuel transport links and build on the enviable local education provision to give young people a head start. The proposed new garden villages provide a perfect opportunity to do so.

Stop Erosion of Rural Communities in Local Essex (SERCLE) – The strategy appears to be one of packing as many dwellings into an area as possible with total disregard for how the population will be supported in just about every respect.

Developers/landowners/site promoters

No responses from developers, landowners or site promoters.

Individuals

- Whilst much is made of the numbers there is nothing about where or when the houses are needed, merely an average annual requirement of 641. Distribution is based on settlement hierarchy etc. but where is the evidence that shows when/ where the housing is needed?

- What is a spatial portrait? Surely it should be a spatial mission with a vision to provide to the people of Uttlesford? This is not a painting, it is a plan.
- Object to the statement that the spatial strategy sets out the principles of sustainable development. The proposals in this plan are not sustainable due to the size and lack of suitable infrastructure.
- The plan clearly does not respect the local character of Uttlesford and the villages to be directly affected by this plan, especially those nearby the West of Braintree site.
- Garden communities is a cuddly, woolly phrase, plannerspeak, to conceal unpalatable truths.

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Not applicable

**Presumption in favour of sustainable development
Paragraph 3.4**

This policy and supporting text was responded to by 4 people and /organisations.

Support	1
Object	1
Comment	2

Overarching Summary

- Some support for Paragraph 3.4.
- Suggest include reference to making the efficient use of previously-developed (brownfield) land in accordance with national policy.
- Concern that there are no priorities between different goals which could lead to conflicts and negative impacts on Uttlesford.
- Concern that development should be accompanied by local business growth and sustainable transport.

Statutory consultees and other bodies

No statutory consultees or other bodies responded to Paragraph 3.4.

Developers/landowners/site promoters

The general content and policy direction of Policy SP1 is supported. It is however noted that paragraph 3.4 defines the key criteria against which the sustainable credential of a development should be assessed. It is considered that the need to actively encourage

developments to make the efficient use of land by promoting the re-use of previously developed (brownfield) land should be included within the text. In order for the supporting text and Policy SP1 itself to be compliant with national policy, and therefore pass the tests of soundness, it is suggested that the following text change is needed to paragraph 3.4 [suggested additional text shown underlined]:

“... This includes: building a strong, competitive economy, making the efficient use of land by promoting the re-use of previously developed (brownfield) land, ensuring the vitality of town centres: supporting a prosperous rural economy, promoting sustainable transport; supporting strong vibrant and healthy communities and protecting and enhancing the natural, built and historic environment...”

Individuals

- Support paragraph 3.4. The objective is laudable.
- Concerned that there has been a reduction in higher-wage, long-term job opportunities in the local town over the past years. The local plan should provide good incentive to revive local business with jobs provision together with housing developments. And transport infrastructure should be sustainable.
- Concerned that there are no priorities among different goals as there may be conflicts among them. A presumption in favour of development is only positive if the condition of the district is poor. But in Uttlesford, it is likely to destroy much of what makes Uttlesford attractive.

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Not applicable

Policy SP1 - Presumption in Favour of Sustainable Development

Policy SP1 was responded to by 28 people and organisations.

	TOTAL
Support	9
Object	9
Comment	10

Overarching Summary

- Clarification sought as to the definition of “sustainable development” and “presumption in favour of sustainable development” specifically for the local context. Suggestion that Policies S1 and S12 could be combined.

- Concerns raised regarding the following part of Policy SP1: ‘where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise’. The concern was that this position would undermine the Local Plan.
- Strong objections were expressed by Little Chesterford Parish Council, including assumptions for the stated housing numbers, the need to safeguard the separation of settlements, and the selection and delivery of the North Uttlesford Garden Village.
- Detailed wording changes suggested by a number of respondents.
- Concern that the audit trail for the Local Plan is incomplete particularly in relation to the Local Plan Sustainability Assessment process, including the transparency and availability of data, the interim SA Environment Report and some supporting decision-making evidence.
- Some support for the policy including from most of the landowners/ developers and Historic England.
- Some support for Paragraph 3.4.
- Suggest include reference to making the efficient use of previously-developed (brownfield) land in accordance with national policy.
- Concern that there are no priorities between different goals which could lead to conflicts and negative impacts on Uttlesford.
- Concern that development should be accompanied by local business growth and sustainable transport.

Statutory consultees and other bodies

CPREssex - Support for a shared, clear and meaningful understanding of what is meant by “sustainable development”.

East Hertfordshire District Council - The positive and proactive approach taken in the Uttlesford Local Plan to ensure that the identified housing needs are met across the Plan period is endorsed by EHDC. The Plan exceeds the needs identified in the recent SHMA update of July 2017 by some 700 homes, thus building in an element of flexibility. Whilst East Herts Council is generally supportive of the Uttlesford Local Plan consultation document, the Council considers that there are a number of areas of the Plan that require amendment, either in order to make the Plan sound or for clarification and robustness purposes.

Elsenham Parish Council - Elsenham Parish Council is concerned by the statement ‘Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise’. This formulation suggests that the default position for an application not included within the Local Plan is that it should be accepted. The vast amount

of work involved in producing and commenting on the Plan would thereby be rendered largely valueless. The 'material considerations' whereby an application might be rejected are too vague to be meaningful. The statement should be amended on the lines of, 'Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, the application will be refused unless overwhelming reasons can be produced for its acceptance.'

Historic England - Policy SP1 states that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. Reference back to the meaning of sustainable development as defined by the NPPF is welcomed.

Little Chesterford Parish Council - Little Chesterford Parish Council strongly object to the 2017 Uttlesford Local Plan:

- The need for the stated housing numbers is based on unsound assumptions.
- We urge UDC to include preserving separation of settlements in the spatial vision and policies to maintain and protect their distinctive character.
- Policies that apply to housing development in Little Chesterford are unclear.
- The spatial vision of focusing development in new "garden communities" is unsustainable, and compromises the environment which makes Uttlesford a desirable place to live.
- The selection of the NUGV as a site is not supported by evidence and goes against the UDC and national policies on protecting the historic environment and landscape. It does not follow garden community principles, as it will serve as a dormitory town for Cambridge and further afield.
- Delivery of the NUGV as outlined in the plan will bring services (eg education, health) and infrastructure (eg transport) that is already at capacity to crisis point. This will have far reaching detrimental effects on neighbouring villages and towns in both north Uttlesford and neighbouring areas such as South Cambridgeshire.
- Financial viability and deliverability of the plan for NUGV has not been adequately demonstrated. The probability of planning conditions being relaxed is high, resulting in profits being maximised whilst design and delivery of benefits such as affordable housing are sidelined as allowed by plan policy.
- The process of local plan creation is compromised, both by the conflict of interest between UDC as financial stakeholders in Chesterford Park, and by failure to demonstrate co-operation with South Cambridgeshire by addressing their significant concerns.
- Employment designation of the wider Chesterford Park site establishes a presumption for development outside of agreed development limits that is unwarranted in a rural location.
- Substantiation of these objections is further described through our comments on the following policies in the Local Plan and accompanying evidence base:

The Spatial Vision

1. We do not support the spatial vision of focusing development in new "garden" communities as we believe that this will compromise the delivery of the overall vision for Uttlesford. The challenge of these three new communities successfully delivering the

qualitative parts of the vision is significant. The delivery of “well designed development” with “high quality employment, services and facilities” and “excellent accessibility” where the “necessary infrastructure and community facilities and services will be in place to support growth” whilst “ensuring that the distinctive character of the District’s towns and villages will be maintained and enhanced” requires careful planning, preparation and management. The policies and evidence outlined in the local plan submission do not demonstrate that that this significant challenge will be met (see our further comments under the relevant policies). Moreover, examples of developments elsewhere in the UK that have successfully implemented garden city principles are rare. We therefore have no confidence that focusing development in this way will achieve the stated vision.

2. We urge UDC to include separation of settlements in the vision and supporting policies We note that, unlike the 2014 draft local plan which stated “settlements will continue to be separate entities with green space between them”, no mention of separation of settlements is to be found in the vision or its accompanying policies. We believe that maintaining the separate and distinct nature of the different settlements is a key factor in creating “places that have character and communities create and feel a ‘pride of place’”. We strongly urge UDC to include this.

Thaxted Parish Council - The third paragraph of Policy SP1 currently states that where no policy, permission will be granted. Suggest this should be amended to: “where no policy, Council will determine one in order for the application to be determined”.

The Thaxted Society - The Local Plan makes the expected presumption in favour of sustainable development per the NPPF. However recent case law has shown the primacy of an LP as a statutory consideration as opposed to the NPPF, which is merely Government Policy. Care should therefore be taken in developing 'sustainability' as an original and localised vision not simply a broad and generalised reaction to government policy.

WeAreResidents.org - Policy SP1 goes further than the NPPF provides. In particular it states “The Council will always work proactively with applicants jointly to find solutions which mean that proposals will be approved wherever possible”. This should be amended to refer only to proposals which would achieve sustainable development.

Developers/landowners/site promoters

Object to this policy. It is a paraphrase of NPPF paragraph 14 which adds nothing of local distinctiveness to what is already clearly set out in national guidance. Change sought: merging this policy with Policy SP12, subject to the changes recommended for that policy.

Support Policy S1 with reservations. Support the statement that the “Council will always work proactively with applicants jointly to find solutions which mean that proposals will be approved wherever possible and to secure development that improves the economic, social and environmental conditions in this area.” It is considered the policy is consistent with what it is set out in the NPPF (paragraph 14), in that the presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision-taking.

It is also important however to reiterate that in the words of Council at paragraph 2.9, “there are relatively few previously developed and brownfield sites within the District” and ultimately a positive approach should be taken to meeting the objectively assessed housing need. The Planning Practice Guidance 1 “PPG” states that Local Plans should apply the presumption by “identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally”. It is considered that the Council should seek to set out how the presumption will be applied locally, in the context of a District largely constrained by Countryside and Green Belt designations.

Fully supportive of the inclusion of the policy on Sustainable Development. The ethos of sustainable development is key to assessing planning proposals, it is the golden thread running through the NPPF.

Strongly support and agree with this policy approach and the need to secure sustainable development.

Having reviewed the Uttlesford Local Plan Regulation 18 Consultation Document (2017) and its associated evidence base, the landowners support the approach proposed in Policy SP1 which:

- (i) presents a “presumption in favour of sustainable development” that is consistent with the provisions in the National Planning Policy Framework (NPPF) (2012); and
- (ii) recognises that where development plan policy is out-of-date or absent, Uttlesford District Council (UDC) will grant planning permission unless material considerations indicate otherwise, taking into account whether any adverse impacts would significantly and demonstrably outweigh the benefits or specific policies in the NPPF indicate that development should be restricted.

Having reviewed the Uttlesford Local Plan Regulation 18 Consultation Document (2017) and its associated evidence base, we support the approach proposed in Policy SP1 which:

- (i) presents a “presumption in favour of sustainable development” that is consistent with the provisions in the National Planning Policy Framework (NPPF) (2012); and
- (ii) recognises that where development plan policy is out-of-date or absent, Uttlesford District Council (UDC) will grant planning permission unless material considerations indicate otherwise, taking into account whether any adverse impacts would significantly and demonstrably outweigh the benefits or specific policies in the NPPF indicate that development should be restricted.

The general content and policy direction of Policy SP1 is supported. It is however noted that paragraph 3.4 defines the key criteria against which the sustainable credential of a development should be assessed. It is considered that the need to actively encourage developments to make the efficient use of land by promoting the re-use of previously developed (brownfield) land should be included within the text. In order for the supporting text and Policy SP1 itself to be compliant with national policy, and therefore pass the tests of soundness, it is suggested that the following text change is needed to paragraph 3.4 [suggested additional text shown underlined]:

“... This includes: building a strong, competitive economy, making the efficient use of land by promoting the re-use of previously developed (brownfield) land, ensuring the vitality of town centres: supporting a prosperous rural economy, promoting sustainable transport; supporting strong vibrant and healthy communities and protecting and enhancing the natural, built and historic environment...”

Individuals

- Support for presumption in favour of sustainable development as long as there is a meaningful understanding of what is meant by “sustainable development”. One reason as to why Uttlesford is such an attractive place in which to live is that it is still relatively undeveloped and has so many lovely small villages with an incredible collection of fine listed buildings. The land is good agriculturally productive land and the wide open views of distant horizons are uplifting. Farmland should be retained as security against the future when there will be global shortage of land on which crops can be grown to feed an increasing population.
- Support Policy SP1 which:
 - (i) presents a “presumption in favour of sustainable development” that is consistent with the provisions in the National Planning Policy Framework (NPPF) (2012); and
 - (ii) recognises that where development plan policy is out-of-date or absent, Uttlesford District Council (UDC) will grant planning permission unless material considerations indicate otherwise, taking into account whether any adverse impacts would significantly and demonstrably outweigh the benefits or specific policies in the NPPF indicate that development should be restricted.
- There are many instances of weak wording that need to be strengthened in the Plan. In relation to Policy SP1 it is suggested that UDC could work proactively with applicants AND “communities” to jointly find solutions [second sentence of first paragraph of Policy SP1].
- Whilst I totally agree that there is a need for more housing in the district, I believe the numbers are vastly overstated given the post Brexit economic climate and it is imperative that these figures be verified by an independent consultant. To overburden roads, rail, schools/ public services without doing so is reckless. An over supply of housing stock in the wrong place would have as dire a consequence on the district as an understock. Too often, new housing developments have a proliferation of large 4/5 bedroom homes which are unaffordable to many prospective home buyers. This consultation offers little examination of population movement from London or other cities to the district and the impact that it is having on the area. There are no figures available from Uttlesford planning department on the number of homes, existing or new, sold to people from outside the area. Without this and a review of housing numbers, this latest Local plan remains like the last. Flawed
- In the past 6 years, local towns have had businesses sell up to developers. This causes an imbalance where the local economy is disassembled in place of planning for new houses where there are fewer sustainable businesses to ensure long term employment for people, and where shops and outlets become the main employers paying less wages.

This means the local economy does not become strong or competitive. There has to be a good incentive that aligns building houses for the needs of sustainable local businesses with jobs to make areas more sustainable. And where they need to travel further afield then the infrastructure has to be sustainable in the first instance too.

- Local Plan Sustainability Assessment Process: From the view of the SAs the 'golden thread' or audit trail of the Local Plan story and decision making is extremely difficult to follow and understand. This is mainly due to the absence or difference in maturity of baseline evidence; inconclusiveness of SA and the availability of decision making records (see the full response for details of the respondent's specific concerns). I therefore object to the process of the Local Plan as the audit trail is incomplete; it lacks transparency and some supporting decision making evidence is absent.
- Section 3.4 and SP1 juggle with the question of whether development which is not included within the plan will be considered. What does 'Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise' mean? SP1 seems to suggest that all proposals will be viewed favourably. What then is the point of this plan? Why have you spent so much time producing it, and why am I and many others spending time responding to it? What is the status of the Plan? What are the 'material considerations' which alone will prevent favourable consideration of any proposal?
- The loss of rich farmland land, ancient woodlands and historic monuments in an area recorded as being of outstanding natural beauty is unacceptable. The amount of new homes proposed is unjustified and there is no clear evidence of any appropriate or adequate infrastructure. If approved, this development will ruin communities, countryside, ecological environments, air quality, history and so much more.
- Please clarify what is meant by "presumption in favour of sustainable development". The second sentence does not make sense, so its meaning is ambiguous.
- 'When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework'. What does this mean for Uttlesford? Do we need to now read the National Planning Policy Framework?
- Support paragraph 3.4. The objective is laudable.
- Concerned that there has been a reduction in higher-wage, long-term job opportunities in the local town over the past years. The local plan should provide good incentive to revive local business with jobs provision together with housing developments. And transport infrastructure should be sustainable.
- Concerned that there are no priorities among different goals as there may be conflicts among them. A presumption in favour of development is only positive if the condition of the district is poor. But in Uttlesford, it is likely to destroy much of what makes Uttlesford attractive.

Significant, Temporal and Secondary Effects

At the broad strategic level, this policy can be expected to have positive impacts on all of the sustainability objectives in line with its general principles. Impacts are assessed as minor within this SA based on a high level assumption that sustainable development will occur throughout the plan period in accordance with the Local Plan's adherence to the wider content of the NPPF. Impacts can be expected to be more significant in accumulation with other Local Plan policies that expand on sustainable development in a local context and regarding the distinct characteristics of the District.

Alternatives Considered

No alternative approaches can be considered reasonable as the policy reiterates the thread of sustainable development as espoused in the NPPF. Any alternative that deviates from this approach would be contrary to NPPF and therefore an unsound approach.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed

Spatial Strategy

Paragraphs 3.5-3.11

This supporting text was responded to by 18 people and organisations.

Support	0
Object	13
Comment	5

Overarching Summary

- Historic Environment suggests that archaeology should be included for in paragraph 3.8 to align with the NPPF.
- Taylor Wimpey are concerned that UDC will fall short of its stated annual housing requirement due to the complexity of the Garden Communities and the required infrastructure.
- Bloomhall suggest that the para. 3.6 be reworded to ensure sustainable development.
- Concern that the Countryside Protection Zone has previously been ignored by UDC. More assurance is sought on the sincerity of the CPZ.

- Concern that the rural character of the area has not been kept in regard to development.
- Concern that the West of Braintree development is being built on agricultural land.
- Concern that UDC is placing too much emphasis on Stansted Airport providing the majority of employment opportunities.
- Concern over the lack of transport infrastructure to support new developments.
- Suggestion that the Plan refer to more than just aircraft noise in relation to Aircraft Pollution.

Statutory consultees and other bodies

Historic Environment (Para. 3.8) - Archaeology (both designated and non-designated historic assets) should be included for protection in this paragraph to align with the NPPF.

Developers, Agents and Land Owners

(Para. 3.5) - Support the spatial strategy which seeks to ensure that growth takes place in the most suitable locations in the District, i.e. where it is needed, where it is deliverable and where it is the most sustainable. However the Plan is heavily reliant on delivery associated with three new Garden Communities. The inherent complexity of such developments and up-front infrastructure requirements means that they will not come forward until much later in the plan period and their delivery will be complex and subject to delays. Even with the optimistic lead-in times for the development of these sites, the housing trajectory still anticipates that Uttlesford would fall short of its stated annual requirement (641 dwellings pa). This shortfall could leave Uttlesford without five years supply of housing.

- SP1 is consistent with the NPPF, however the Council's approach to site selection does not align with these intentions (sustainable development) as there are no sites selected in the smaller villages. (3.5)

The strategy is not a fair or proportionate approach to achieving sustainable development across the District; a more balanced approach is required that recognises the distinct needs of smaller villages and communities. (3.7)

(Para 3.6) – Releasing the Green Belt land south of Beldams Lane Bishop's Stortford would represent sustainable development and so should be considered by UDC. Suggested that Para. 3.6 should be reworded to ensure sustainable development: "The strategy is to enable the local economy to thrive and prosper and in doing so meet objectively assessed needs in relation to market and affordable housing and employment growth whilst ensuring that the special character of the District is safeguarded, including protection of the Green Belt where other material considerations do not outweigh the benefits of development."

Individuals

Para. 3.5

- Objection to WBGC as there would be a severe impact on Boxted Wood, an ancient woodland and SSSI.

- Objection to the proposal to locate NUGV in Great Chesterford, as the topography of the location is restrictive to creating a community that serves life outside its boundaries and so defies the Garden City principles. The topography of the valley requires car use to access facilities, and so defies the walkability principle. Concerns over air pollution. Concerns that a secondary school will not be provided. Concerns that the topography does not cater for cycling.

Para. 3.6

- Concern that 2500 acres of arable land is lost in regard to the West of Braintree development.
- Concern that UDC is prioritising Stansted Airport rather than residents.
- Concern that the plan is unsustainable in regard to the distance from motorway and railway, destruction of the existing local area and loss of agricultural land.
- Garden Communities are being designed to abstract areas away from planning consent so that planning has to be allocated elsewhere in towns or cities.

Para. 3.7

- Concerned that the West of Braintree development does not conserve the local environment.
- West of Braintree is solely agricultural land, so this contradiction has been ignored.
- The proposed West of Braintree development removes any rural gap between Braintree and Stebbing, effectively turning Stebbing from a village to a suburb.
- Concern that the West of Braintree settlement is not compatible with protecting the agricultural character of the District, when the proposed settlement will build over Grade 2 agricultural land and swallow nearby hamlets and villages of historic character and rural beauty.
- The character of local villages, which the Local Plan has promised to preserve, will be changed in disregard of your own plan. I ask you to review Point 3.7 where the Council commits to "conserve and enhance the character of these rural settlements."
- West of Braintree is solely agricultural land.
- Why is Green Belt safeguarded but not the rural environment around the West of Braintree.

Para. 3.8

Needs to be re-examined in the light of the destruction to rural communities from development.

- No Green Belt is assured by the West of Braintree development which will link Braintree with the rural villages.

- The plan ignores the protection of conservation areas, listed buildings and SSSIs.
- Unclear what design quality standards are adhered to. References are required for this.
- The proposed NUGV does not demonstrate compliance with the protections in this paragraph.

Para. 3.9

- How does further job growth benefit a district with ultra low unemployment?
- Stansted's employment catchment is mainly from the north and south where there are multiple transport links. Sustainable development should be more closely located to it.
- Concern that there is a lack of transport infrastructure for the West of Braintree site, which will affect Stebbing Village, specifically the historic High-street conservation area and the area around the Grade 1 listed Stebbing Church.
- Concern that UDC is over reliant on Stansted Airport as the provider of employment opportunities. UDC should concentrate on helping smaller villages to expand tourism opportunities. The trains and parking at Stansted are too expensive to be presented as a commuting solution to London.

Para. 3.10

- The Countryside Protection Zone at Takeley appears to already have been eroded by development. Suggestion that Takeley (south of the B1256) is a better location for a Garden Village as there are already some services there and access to the airport / infrastructure is better.
- Concern that UDC have already adjusted the boundary of the CPZ to enable it to give planning consent to 350+ houses to be built in Elsenham, (ELS2). There must be cast iron guarantees that there will be no further development within the CPZ.
- Concern over the UK's exit from the EU impacting major employers at Stansted. This needs to be considered when determining the housing requirements in the Plan.
- The airport has no shortage of staff from surrounding areas and any expansion there would simply allow more local people to be employed. The airport is a good option for young people in the villages West of Braintree; any further development should not be excused as necessary for staffing the airport!
- Aircraft noise is a small part of Aircraft Pollution. Development management policy requires to ensure all aspects of health, environmental and safety are considered in terms of a local plan.

- Support for the Countryside Protection Zone, as this prevents coalescence between the airport and surrounding settlements.
- Concern that the CPZ has not been adhered to thus far in regard to the CPZ at Elsenham with 300 dwellings receiving approval and this plan proposing another 40.
- The housing should be sited near to the airport and near to other employment along the M11/ Cambridge corridor in the proposed West of Braintree Garden Community.

Para. 3.11

- Aircraft noise is only a small part of Aircraft Pollution. More concern must be given to all aspects of health, environment and safety.

Sustainability Appraisal June 2017

Not Applicable

Map 1 - Key Diagram

This policy and supporting text was responded to by 13 people/organisations.

	TOTAL
Support	2
Object	7
Comment	4

Overarching Summary

- West of Braintree Garden community is welcome by the site promoter, but the member of public raised concerns over the impacts on wildlife, Boxted Wood and historic Andrewfield airfield.
- A number of representation expressed concerns over the impacts of developments on the main highway including M11, A11, A120 given the increase in commuters.
- Some inconsistencies between the map and the policies in the plan are identified.
- Some representation suggested that brownfield should be developed, the Easton Park Garden Community should be smaller scale, and the developers should pay for the transport improvement scheme.

Developers, Agents and Land Owners

The Key Diagram fails to identify those towns adjacent to the district, notably Bishop's Stortford, that make a significant contribution to the services and facilities available to the residents of Uttlesford and therefore is deficient and has not been positively prepared based on the evidence. A further non-strategic residential allocation ought to be made to the south of Beldams Lane, Bishop's Stortford, call for sites reference: 03GtHal15, to balance the development across the district while making the most of the site's proximity to services, facilities and rail connects all of which are within cycling and walking distance of the land

south of Beldams Lane, Bishop's Stortford and therefore its ability to deliver sustainable development.

Supports the identification of a proposed Garden Community to the north of the A120 across both Uttlesford and Braintree Districts. ANSC and GL Hearn have engaged positively and pro-actively with Uttlesford and Braintree Councils particularly during the last two years to provide a development vision, illustrative master plan and supporting site specific evidence base material relating to the proposed Andrewsfield Garden Village. ANSC and GL Hearn have also worked closely with Galliard Homes relating to the proposed inclusion of Boxted Wood as part of the planned new garden community. The Map 1, Key Diagram provides appropriate high level clarity on the joint strategic approach to be taken between Uttlesford and Braintree in planning for a new Garden Community across the two districts.

Individuals

Support

- The positioning of the key development growth areas adjacent to the main transport routes (i.e. M11, A11, A120) is consistent with the aims of this plan. However strict oversight of the detailed development plans will be required such that developers do in fact provide and/or fund the necessary access and other changes.

Object

- The village of Little Easton will be significantly and adversely affected by the proposals at Easton Park; its individual, distinct rural character and heritage will be seriously harmed by the resultant urban sprawl and the inevitable large increases in traffic flows on the local network. This proposal should therefore be omitted from the Council's strategy in favour of a more balanced and proportionate spread of development, including a small scale extension and rounding off of Little Easton's settlement boundary.
- The Garden Community of West of Braintree on the map does not adequately reflect its proximity to Stebbing, or the size of the proposed development.
- The development on Garden Community of Andrewsfield and West of Braintree is inaccurate. For instance, A120, M11 and A12 is overloaded already in peak hour, and the increase in London commuters will exacerbate congestion. Rail links are appalling from Braintree and expensive from Stansted Airport. Comments relating to bus links are untrue. Additional health facilities and education is not provided. The development will destroy the historic Andrewsfield airfield which provides employment and amenity to local community. And the location is in fact on the Stansted flightpath. The site is chosen to generate windfall for landowners and revenue for the council and developer.
- Andrewsfield was the first American air force base in Europe, and needs to be preserved. Concerned the effect of increased pollution (noise, air and light) on the area's wildlife and Boxted Wood which is an ancient woodland. Brownfield sites are available and should be prioritized for developments.
- Concerned that the strategic transport links appear to only be road orientated and the volume of people planned to settle here will lead to gridlock. Developer should pick up this transportation improvement.

Comment

- Considerable more infrastructure will be needed to support the increased levels of traffic and people once built. The need for dual carriageway/ access to the M11/ bypasses etc should all be within this plan to support the growth of the garden communities.
- Map 1 Legend gives 'B roads' for roads in brown. But not all the B roads are shown. Either they should all be shown or the Legend should be amended to 'Strategic B roads', or 'B roads (selected)', or similar.
- The new garden villages should have rail links to allow for people to walk or cycle to the station.
- The map shows Farnham as a Type B village. However, Farnham is listed in the table of Type A villages in section 3.2. A correction should be made to the appropriate section and an update published.

Settlement Hierarchy Paragraphs 3.12-3.13

This supporting text was responded to by 12 people and organisations.

Support	1
Object	7
Comment	4

Overarching Summary

- Enodis Property Developments Ltd suggest that UDC should reconsider the settlement hierarchies so as that more development can occur in Type A Villages.
- Bloomhall also suggest that the Market Towns tier in the hierarchy is redefined to reflect the cross-boundary importance of Bishop's Stortford.
- Bloomhall are concerned that the Garden Communities will not be delivered on time and so there will be a housing shortfall.
- Thaxted Parish Council suggest para. 3.13 is amended to reflect that the Garden Communities are included in the Corporate Plan.
- Concern that the West of Braintree Development is not supported by strategic employment sites.
- Objection to Stebbing being included as a Type A Village
- Suggestion that Hatfield Heath is given a different classification.
- Clarification is sought on how new settlements will fit into the settlement hierarchy so as to aid development

- Concern that large developments do not fit in with the rural environment.

Statutory consultees and other bodies

Great Chesterford Parish Council – Clearly in relation to the rest of the district Policy SP10 is important. We firmly believe it is equally if not more so for Great Chesterford.

Thaxted Parish Council – Suggestion that para. 3.13 needs to reference the inclusion of Garden Communities within the Corporate Plan. Proposed Change: Add ‘and in alignment and accordance with UDC’s Corporate Plan.’

Developers, Agents and Land Owners

- The top tier of the settlement hierarchy should be redefined as follows: "Market Towns (including the fringe of Bishop's Stortford)." This recognises the cross-boundary importance of Bishop's Stortford.
- The proposal for three garden communities presents a risk to housing delivery. See report into housing land supply that concludes that the council risks five-year supply shortfall of 737 dwellings, a plan period shortfall of 3,726 dwellings and needs to allocate additional sites in order to remain sound when national and local evidence is considered regarding delivery rates and commencement timescales. Additional allocations should be made to ensure that there is sufficient land identified for housing to maintain delivery during changing economic circumstances. The allocation of the land south of Beldams Lane, Bishop's Stortford would provide additional capacity.
- Objection to the Council's proposed settlement hierarchy and the role which they have been assigned. It is inappropriate to group Type B Villages with Hamlets. The Council should reconsider the grouping of Type B Villages and Hamlets and incorporate an additional tier or category to provide flexibility for smaller sustainable villages. Our recommendation is that a sub-category is formed under Type A Villages, which can be defined as small sustainable villages when viewed in context of its surrounding area (including distance to nearby settlements, facilities and public transport). In line with this, in respect of the Council's decision to opt for no new allocations for housing development under this tier, it is suggested that the Council reconsider villages such as Little Dunmow as a sub-category to Type A Villages when set in context. This could allow residential development to come forward in these villages, contributing to the overall objectively assessed housing need and assist in delivering the Council's expectation of 1,190 dwellings from small unidentified windfall sites.

Individuals

- Support
- The West of Braintree development is not supported by any strategic employment sites. There are more suitable areas for development.

- Objection to the incorrect assessment of Stebbing as a Type A village. Stebbing has a community shop; it is not a commercial enterprise in the usual sense.
- The proposed West of Braintree Settlement is not near to strategic employment sites and so will more severely impact the surrounding rural area of Uttlesford.
- Concerns that the Plan for Little Easton will destroy Little Easton as a beautiful place.
- More clarification sought on where new settlements will fit into the settlement hierarchy.
- The Spatial Strategy states that Key Villages are a major focus for development in the rural areas. Given that Hatfield Heath continues to fall within the protected Green Belt, the village is unable to fulfil its role as a Key Village and meet the required development obligations. Given these circumstances, it would be better to give another classification to Hatfield Heath which better reflects its role within the Spatial Strategy.
- New large settlements in rural area are inappropriate and unnecessary. Housing should be provided in a small-scale piecemeal way, in sympathy with existing communities.

Sustainability Appraisal June 2017

Not Applicable

New Garden Communities

Paragraphs 3.14 – 3.15

This supporting text was responded to by 77 people and organisations.

Support	8
Object	56
Comment	13

Overarching Summary

- The ULP is not positively prepared and it does not meet development and infrastructure needs, and does not enable the delivery of sustainable development.
- Each proposed GC is in an unsustainable location and building all three within such close proximity will cause a detrimental impact to the area and associated amenities.
- There is a lack of road and rail infrastructure to support such settlements in these locations with no access to public transport
- There will be a detrimental impact caused to the countryside and rural landscape, wildlife, ancient woodlands, listed buildings, archaeology, surrounding villages setting and a loss of agricultural land
- The proposed locations will not allow for the provision of pedestrian or cycling routes due to their remoteness
- NUGC will not be served by adequate employment opportunities

- NUGC will be highly dependant on the car with a knock on effect caused to the already strained road network
- no evidence that the necessary transport, health, education or retail infrastructure will be provided, in place from the start & clearly planned for financially
- Rate of build needs to be increased
- support for 3 locations, considered to be only solution in these circumstances and will provide much added housing
- Duty to cooperate has not be fulfilled
- No proposed development adheres to the GC principles
- W of Braintree least sustainable of all three sites and loss of airfield is unacceptable

Statutory consultees and other bodies

Saffron Walden Town Council

– Support for the overall spatial strategy in that it focuses on new development in three new settlement sites.

– Asking for clarification on many homes are proposed in the Uttlesford area. Cross boundary development means this is unclear. Comment: Answer (found later in Local Plan proposals) is 3500 as per page 37 (Policy SP8).

Elsenham Parish Council – Support for three new garden communities in the locations indicated is the best solution available in the circumstances, given the constraints of the number of new dwellings decreed by government and the severe limitations of other potential sites.

Stansted Neighbourhood Plan Steering Group - Concern that the numbers proposed before 2033 are too modest. Suggestion that the rate of build out should be increased and infrastructure should be provided before 30% of homes built.

Braintree District Council - The total number of homes in the West of Braintree Garden Community is not yet an absolute number which is how it is reflected within this text. At present the BDC Local Plan estimates a range of between 7,000 and 10,000 new homes on the garden community within BDC. The exact number of homes on the site will be refined through the specific development plan document (DPD) and masterplanning which will include setting the red line boundary of the site and examining in more detail the constraints and opportunities which within the site as well as the land take necessary for essential.

Essex County Council - ECC aims to ensure that sustainable transportation is promoted and facilitated throughout Local Plans. It is recommended that the sentence in bullet 2 be amended to read: 'Located close to the A120 this garden community will be conveniently located by including sustainable transport options to Braintree and London Stansted Airport for employment opportunities.'

Great Chesterford Parish Council - We strongly object to NUGC as a settlement option. 5,000 dwellings is enormous, will swamp the countryside, the surrounding villages and is a

knee-jerk reaction by UDC to some shaky housing numbers they themselves evidently have no confidence in.

Wellcome Genome Campus – Requesting clear justification for the allocation of three settlements rather than a strategy based on more, smaller settlements or fewer larger settlements.

Uttlesford Futures - Are the sizes of the new settlements large enough to attract associated services, that will be needed by residents and so that travel to services can be by foot e.g. shops, health, schools, social services, utilities etc? With new settlements the infrastructure should be in place from day one. Design of new settlements should allow for future growth so that pressure on existing areas to accommodate more housing is relieved.

Developers, Agents and Land Owners

- Concerns that there will be a housing shortfall due to the underestimation of the time to deliver the garden communities.
- The reliance on new garden communities that require significant investment in services, facilities and infrastructure fails to make use of the existing services, facilities and infrastructure within Bishop's Stortford. Delays in the delivery of the new garden communities are likely and will have implications for the wider housing delivery across the district. Additional allocations should be made to ensure that there is sufficient flexibility within the plan to remain effective given the inevitable delays in delivering the new garden communities. See report into housing land supply that concludes that the council risks five year supply shortfall of 737 dwellings- a plan period shortfall of 3,726 dwellings and needs to allocate additional sites in order to remain sound when national and local evidence is considered regarding delivery rates and commencement timescales that accompany these representations.
- Concern that the cost of providing new infrastructure will reduce the amount of affordable housing that can be delivered from the new Garden Communities. Concern that the development of the garden communities will be delayed, resulting in the delivery of less housing during the plan period.
- The proposed new settlement at North Uttlesford will require a significant amount of new transport infrastructure to make it successful. At this stage, the funding required and the timetable for delivery of these projects is unknown. The proposed development at North Uttlesford is intended to be a standalone settlement, however there are a number of constraints to development at the site including drainage, archaeology, landscape and highway capacity, all of which will need to be resolved before this site is allocated. North Uttlesford is closely positioned to existing settlements that already provide a wide range of day to day to services and facilities that are considered sustainable locations ie. Saffron Walden to the south, and Sawston and Great Abington to the north. Request that North Uttlesford should be excluded from the development strategy contained in Policy SP1 and not included as an allocation in the DULP.
- Support for Para. 3.14, as it accords with adopted National Policy, the Government's stated position and proposals for change to the Planning system in its support for new settlements.

- Galliard Homes is the principal deliverer of the homes referred to at the West of Braintree Garden Community. It supports the Council's proposal, and recognises the unique opportunity to create a special place for living and working that will be provided through a co-operative approach to development with neighbours Braintree. The 970 figure quoted in the local plan should indeed be viewed as a minimum. Subject to satisfactory infrastructure support, there should be no reason why more homes shouldn't be delivered within the Plan period, especially if other garden communities or other plan allocations are unable to deliver the number of homes anticipated on their respective sites.

Individuals

- SP10 Protection of the Countryside is contrary to building new houses by 2033. Concern that development 'sometime between 2017 and 2033' is too vague, as is not delivering housing where it is going to be most needed. Concerns over the cost of Garden Communities.
- The North Uttlesford Garden Village proposal does not demonstrate compliance with the requirements for sustainability or sensitivity to the natural or historic landscape. No evidence that the necessary transport, health, education, or retail infrastructure will be provided.
- Concerns that NUGV is built on prime agricultural land to achieve a community heavily dependent on the car and remote from employment opportunities.
- Objection to the inclusion of the proposed North Uttlesford Garden village in this strategy on the grounds that it will not meet the aim set out in paragraph 3.5: 'to ensure that growth takes place where it is needed and most sustainable.' There are no guarantees that the transport, health, education or retail infrastructure needed for sustainability will ever be delivered. Concerns that it will impact adversely on the natural and historic landscape and have a detrimental impact on the existing infrastructure at Great Chesterford.
- Concerns over how funding is provided for the infrastructure/ utility services for the new Garden Villages and whether the funding will include sufficient capacity for the full development beyond 2033
- The Local Plan has no duty to set out the knock on effects on the area of its proposals beyond 2033 which is when the new roads will be needed to accommodate the increased density of people.
- Concern that the term 'Garden Community' is trying to make the new developments sound more attractive.
- Concern over new development.
- Reservations about North Uttlesford Garden Community because of the lack of easy access to a decent rail link: Great Chesterford station is small, and has virtually no parking. It is therefore inevitable that commuters living in this proposed area will drive to Whittlesford but more likely to Audley End, placing increased pressure on the B1383 and on parking at Audley End station.

- Support for the creation of Garden Communities, as they provide the housing and facilities needed, in addition to creating opportunities for well planned, landscaped and attractive townscapes.
- Concern over the size of the new developments within such a small area due to the traffic congestion that this will create.
- Concern over the new settlements being large enough to attract services that are in a walkable distance, such as. shops, health, schools, social services, utilities. Suggestion that the infrastructure should be in place before the garden communities are inhabited. Suggestion that the design of new settlements should allow for future growth so that pressure on existing areas to accommodate more housing is relieved.
- Concern that development will increase traffic congestion.
- Concerns that proposed NUGV will not be serviced by employment opportunities, creating traffic congestion as residents will have to travel long distances to seek employment. The topography of the area cannot support cycling.
- Support for the garden city developments centres has a better probability of providing the necessary infrastructure than any plan that spreads growth thinly across the region which is the only alternative.
- Questioning what sustainable transport links are.
- Strong opposition to the planning policy and the Easton Park Development, as it will impact on existing residents. Concern that the local area cannot cope with 10,000 new homes. Concern that local facilities already cannot cope, as Dunmow primary school is oversubscribed and there are no new proposals to build a primary school in Easton Park. The doctors surgeries in Dunmow are already oversubscribed. Bishops Stortford train station is already too busy. Parking at Stansted is too expensive. The development will double the size of Dunmow, which will impact on the natural environment and the historical significance of Easton Lodge.
- Objection to the plan to build 10,000 new homes at Easton Park. Concern that this is more than Uttlesford's fair share of the national housing need. The roads around Dunmow including the A120 are already at grid lock, and neighbouring towns with train stations like Bishops Stortford are already unable to deal with the rush hour numbers of people and cars that need to park. A garden city is supposed to be a self contained place, with its own Doctors, Schools and amenities, with a distinct gap between itself and the next town. Concern that the new garden city does not comply with this.
- West of Braintree should say that a minimum of 970 homes will be built in Uttlesford by 2033. Support the policy to build three new garden communities in the locations proposed. The District is in the position where a large quantity of new houses must be built by Government edict, and it does appear that the Plan represents the least worst option. However, concern over how these plans will impact local communities. Concern that all the alternatives have not been considered. Questioning whether the proposal for one or more additional junctions to the M11 is not being considered any longer.

- Suggestion that the Plan needs to clarify whether the 970 homes are in Uttlesford or Uttlesford and Braintree combined.
- Concern that West of Braintree cannot accommodate the inhabitants of 10,000 houses, as the roads are unmaintained, the schools and doctors are over subscribed and the bus service has already been removed. Questioning the sustainability of the development in a rural environment. Concern that the A120 is already too congested at peak times.
- The North Uttlesford Garden Community should be conditional upon major upgrades to local infrastructure before construction begins. Concerned that the local infrastructure is already operating close to full capacity. Housing developers should be required to partially fund infrastructure upgrades, such as local health and education infrastructure, along with the Cambridge to London railway and A505. Suggestion that a bypass to the East South of Saffron Walden should also be considered as the town centre is congested at peak times. Parking regulations in Saffron Walden should also be reviewed again to improve the flow of traffic along the main roads at peak times. The focus of new housing development should be on affordable and key worker housing.
- Concern that there are not enough local employment opportunities to cater for the size of the new development.
- Support for the new developments as additional housing is needed.
- Concern that adding 10,000 homes to a place where currently there are none is not sustainable development. Improvements need to be made to access in Uttlesford in a wider scale and spreading. New homes across the district would seem to be a better use of resources to benefit all the current residents. Concern that the plan lacks quantification of other services that will be provided and how infrastructure delivery can be monitored. The road between Dunmow and Saffron Walden is already very busy with construction vehicles and farm traffic adding further resident traffic seems to be hazardous.
- Concern that the West of Braintree option introduces characterless homes to an already over saturated area. The plan creates another unsustainable commuter town, with no new jobs putting strain on the existing transport infrastructure.
- Concern that the significant increase in the housing stock in the district over the next 15 years does not provide adequately for the safety, facilities and environment of the existing communities in the district. Discussion of the plan has exposed the fact that neither the promoter of the project nor the Council have done 'due diligence' in addressing the consequences of building such a large new community in the location proposed, both for the rest of North Uttlesford and for the neighbouring parts of South Cambridgeshire.
- Concerned that UDC planning team lack local knowledge of the area and the problems that Takeley and Stanstead have faced due to new development ie. Schools, Doctors, roads etc. Suggestion that Braintree has brown fill sites that can be reclassified for home Building. Concern that cycling, walking and working from home will not be taken up so more road infrastructure needs to be provided.
- Concern that the new large-scale communities will be created seemingly at random near to roads which is inappropriate in a rural area. The new settlement near Dunmow will be under

the flight path of the airport concern over aircraft noise pollution. The other two settlements seem to be located cynically on the border with other districts in the hope that most of the problems and lack of infrastructure will be someone else's problem.

- West of Braintree -10,000 new dwellings is not a 'garden community' - it is a small town that will swallow up the villages and market towns in this area and cripple an already congested road system and increase pollution. There is no timeline for the provision of new employment opportunities.
- Concern that the new developments are not garden communities but housing estates. They do not provide homes for people working locally. Work places need to be built first, then the houses to accommodate the workers for these businesses. Concern that these towns will increase commuters by car as there are no rail links anywhere close by.
- Objection to all three proposed garden communities, but specifically West of Braintree, which has the potential to be the biggest of the three due to its association with Braintree. The developers eco assessment report presented by Capita concludes that the land around Andrewsfield is of low ecological value, with few pollinators, but the area is teeming with life of all sorts and judging by the constant working and harvesting of the land it is productive too. Concern that with Brexit more food will have to be supplied at home so arable land should not be built on. Concern that these new homes will just be dormitories for London commuters. The site at West of Braintree is very poorly served by public transport and with no easy access to the A120, except via Dunmow or Braintree, the extra traffic will cause congestion. Concern that developers will not provide any infrastructure until they are forced to, so the current residents and the new residents will struggle for years.
- Support for the New Garden Communities as they will allow for planned infrastructure - roads, services, medical and educational facilities, shops.
- Strongly objection to the West of Braintree Garden Community. There is already vast development in the Dunmow & Takeley area and there is not have enough jobs or services to support any more large development. Councillors at the local consultation meetings say that Stansted will be a hub of employment, Stansted cannot support 10,000 homes now or in the future. The Braintree-Uttlesford liaison will completely ruin the rural characteristics of the region as well as destroying the wildlife, ancient woodlands, listed buildings and heritage. Suggestion that smaller infill developments in each village where the local community can support them would me more appropriate to support development needs. We are told that services would be provided if a garden community is built, but from past experience this does not happen. The area around the Salings, Stebbing & Raine is completely rural, surely it makes more sense to develop the M11 corridor where there is already the infrastructure. Near the proposed West of Braintree development does not have a gas main or main line sewerage in our road, low water pressure and little or no Broadband, so it is not the best area to develop.
- The West of Braintree and Dunmow proposed sites are within a 5 mile stretch of the A120 and over 22,500 homes are planned for these sites. The A120 is not supported by any rail structure therefore new residents of in excess of 50,000 people will be reliant on using cars to get to and from work and for domestic use. The projected peak flow of only 600 cars per hour is widely underestimated. Roads will grid locked by commuters wanting to use Bishops

Stortford and Chelmsford train stations. Concern that these new so called communities are for the benefit for the London overspill rather for exiting local people. There is a total lack of road and rail infrastructure. It is easy for developers to state schools and doctor surgeries will be built however nowhere does it state the health and education authorities will fund and support this. Stebbing is beautiful village with many listed buildings and the ancient woodland of Broxton Wood this development would destroy the community and the village of Stebbing. Uttlesford Council has totally disregarded the views of local residents. Of the 558 recent local parish plans distributed we had 532 responses of this and over 90% strongly objected to the proposed West of Braintree garden settlement.

- The UDC decision to locate the bulk of new housing to 'Garden Communities' is fundamentally flawed in that it is totally out of keeping with the essentially rural and dispersed nature of the district. The UDC plan requires high density housing to be sited in areas which have no pre existing infrastructure of any sort, have no pre existing employment prospects and whose entire economic raison d'etre is based upon the discredited idea of dormitory commuting towns. The idea that 50% (say 10k people) will somehow be employed within walking or cycling distance of these new towns is demonstrably nonsense. The commuting car will be the transport method of choice for these new towns and the destruction of the local environment will be commensurate with this. UDC have not demonstrated that placing the bulk of the future housing in Garden Communities is sound compared to the obvious alternative of extending the existing large conurbations of Walden, Stansted and Dunmow. Historically this route has delivered more heterogeneous and viable communities than the 'fresh start' ideas that have resulted in the mono cultural, socially deprived towns of Harlow, Basildon and the like. In particular, the proposed 'West of Braintree Garden Community' suffers from all the above flaws. It has no current access to public transport (Braintree railway station is approx. 4 miles away with limited service and very limited car parking).
- Concern that UDC are even considering the destruction of the beautiful rural landscapes (Andrewsfield / West of Braintree) and the lives of so many of its rural residents by even considering this appalling scheme. If UDC does go blindly ahead without listening to their residents, as they did with their previous plan, it will be our only hope that the Inspectorate will see this devastation and the ignoring of local wishes as a step too far. There are far better options to develop the housing infrastructure using appropriate calculations without destroying so much of our historic and wonderful countryside.
- We need affordable homes in this area and plonking homes on an airfield where cars are needed is not making them affordable. It's really good arable land in the west of Braintree area and so would also have a massive effect on the wildlife and ancient woodlands. This area of Essex is full of historical interest and this shows in the amount of listed buildings and narrow streets. The roads are already too busy and with all the stations a drive away would mean a massive impact to residents and environment. Concern that jobs are not available so it would be full of commuters which will just put even more pressure on schools and health services and will do little for the community. Please put the London overspill nearer a train station and motorways and off prime arable land.
- Concern that the existing healthcare infrastructure locally is inadequate. Objection to the loss of agricultural land considering Britain needs to rely less on imports. Objection to the impact on local wildlife which is diverse, rich and a source of great wonder. Objection to the

loss of amenity of Andrewsfield Airfield as it is an asset to the area, training pilots, allowing recreational flying and employing people locally. Specific objection to the West of Braintree Development. Concern about the effect on the houses at Stebbing Green that would arise if Andrewsfield were built upon as the area is identified at risk of flooding.

- Concern that 'West of Braintree' is not a garden Village and is actually a town, which will put strain on the existing road network, destroy Andrewsfield airfield, which is 1 of only 10% of airfields in the UK which trains pilots both for private and commercial licences, and remove a Met office weather station; the siting of a new town will make the current met station unsuitable for its present use. The development will seriously impact the ancient woodland of Bosted wood and adversely affect the listed buildings and church of Stebbing village. Concern that the placing of this development ignores the views of local residents as expressed in the Stebbing Neighbourhood plan. Concern that the consultation with local residents was not a real consultation at all as a plan had already been produced ready for issue before the consultations were finished.
- Wanting clarification as to why the volume of dwellings mentioned as being required for each of the Garden Communities proposed is necessary. The Council waiting list for social housing is claimed to be less than 900 families / houses. Therefore the volume of dwellings to be built need only be circa 900 to fulfil existing needs. The Spatial plan recognises the rural aspect of Uttlesford, the few concentrated work locations and the high proportion of long distance travel to work that takes residents out of Uttlesford to other areas. Therefore the proposed Garden Villages is most likely to create a situation where more people come to live in Uttlesford only to then commute to other Districts or Cities to work. This is not sustainable development and neither is it environmentally friendly.
- Objection to Policy SP8 West of Braintree Garden Community for the following reasons: The site name 'West of Braintree' is misleading, this is Stebbing which is 3 miles from Great Dunmow. This proposed Garden Community of 10,000 homes would devastate the small picturesque rural hamlet of Stebbing and have a significant impact on the small market town of Great Dunmow, which has 2 proposed new Garden Communities of 20,000 houses. Other proposed sites (only 5,000 North Essex) are more suited due to their links to public transport, access to employment and infrastructure. West of Braintree has no links to public transport.
- Concern that resident's comments will make little or no difference. Objection to the development of the West of Braintree Garden Community. The massive increase of housing in one specific area will over run local roads and facilities. The destruction of the historic airfield at Andrewsfield which is now a thriving local facility is unacceptable. Suggestion to reconsider the development plan and not stick specifically to the A120 corridor. It is far better to spread the development.
- Concern that so many new homes in Uttlesford will strain the already congested road network. The plan does not adequately address who it will be responsible for and who will fund the infrastructure improvements that would be required in advance of any housebuilding.
- Objection to the inclusion of the West of Braintree settlement proposal. It does not comply with the legal requirements of the NPPF or Garden City Principles in the following ways:

Duty to Cooperate compliance on the West of Braintree development: there is no evidence that the council has undertaken any of its requirements under the Duty to Cooperate principle as there has been no proof provided of any meetings, working party group activities or even conversations between Braintree District Council and Uttlesford District Council.

Concern that this section of the Local Plan is not sound.

- Objection to the development at the West of Braintree site. Concerned that the proposed development will engulf and destroy the character of the beautiful historic village of Stebbing and surrounding countryside. There is no adequate public transport, the main local roads are already very congested and other roads are narrow, unmarked single lanes totally unsuitable for high volumes of traffic. There is very limited local employment and commuter links are some distance away and congested to get to with very little parking. This proposed site would also mean the loss of 2,500 acres of high grade agricultural land and the very popular WW2 Andrewsfield Airfield. It will have a terrible impact on local wildlife and residents.
- The North Uttlesford plan is badly designed and contains numerous flaws and inaccuracies. It would be an environmental disaster for the local rural community, with adverse effects on the landscape and wasteful loss of vital agricultural land. To call it a "garden community" is a lie since the proposal is for a town that will be greater in area than the local market town of Saffron Walden.
- Support, however concern over how much the locations and size of developments chosen have been influenced by developers rather than true need to meet current and future need. The proposed development between Elsenham and Henham was rejected by the Government Inspectors on a number of basis but most significantly transport. These same arguments still apply and I wonder how well these plans would stand up to the same scrutiny. Only one site references possible sustainable transport links.
- There are better alternative sites that are much more suitable in relation to the impact on the environment, wildlife, historic and cultural importance, roads, public transport, employment etc. that the West of Braintree site. The WoB Andrewsfield site has no access to public transport (buses, railway stations- Braintree railway station is approx. 4 miles away and as a former Braintree resident can testify that this station doesn't properly support the Braintree commuters who drive to Witham!) so the number of cars on the local roads would increase by at least the same as the number of houses built, more likely, twice that number! There is no obvious local employer. Stansted Airport has been proposed as a major employer, however Stansted employs staff from a wide area.
- Concerned about the plans for West of Braintree and the effect this will have on the existing rural communities and quality of living in the area. The planned community, or town (let's call it what it is), will destroy the way of living in the villages in the area. It feels as though UDC are ignoring the feedback already provided to the location of the new homes. Although I accept that the country needs more houses there are much better locations to build in the local area. The Easton Park and Chesterford plans are much better suited for transport links and the availability of jobs. Proper consideration is not being given to the infrastructure with regard to the West of Braintree.
- Concern over the building of three Garden Communities in this area. Uttlesford is and always has been, an agricultural area, growing food to support the population. With a

growing population the country needs food as well as houses. UDC is not supporting its residents, but seeking 'new build' payments as easy income and to cover the severe loss it made in short-sighted invests. If this plan is adopted, all of Uttlesford will be concreted over.

- West of Braintree is the least viable of the three proposed sites. The others have better infrastructure and transport in terms of roads and buses and are closer to main railway stations. Braintree station only has one train an hour to London and no service going to Stansted Airport, one of the supposed drivers of employment for the new community. The roads around Stebbing are already struggling with the amount of traffic.
- Objection to the planned 10,000 homes to be built on the West of Braintree Garden Community site. This area is surrounded by villages and the building of 10,000 homes, would mean the surrounding villages would all be swallowed up. Concerns over congestion as existing congestion on the roads to Bishop's Stortford and Cambridge for work. The slip road off the A120 to Bishop's Stortford is regularly backed up onto the A120 and you queue from here onto the M11 roundabout every day. Concerned that there is no public transport that services the WoBGC. Lack of viable rail connections as Braintree train station is 4 miles away so still necessitates the use of a car and the parking is very limited at the station. There is only 1 train an hour that runs to London and no service going to Stansted Airport so people would have no choice but to drive to the Airport where I believe it is suggested a lot of the employment would come from. Concerned that there is little evidence to support people working from home, especially as there are no plans to improve the Broadband in the area. The plans say they include facilities such as schools, retail and health. Concern that there will not be enough Drs and nurses to actually staff a new surgery. This site would mean the demise of Andrewsfield, a CAA Approved Airfield and provides valuable training and certification services and is an integral part of the local community. This site would also mean a serious detrimental effect on Boxted Wood which is an ancient woodland, which directly contravenes the latest Government White paper on this topic. The area has problems with water drainage and water pressure and so I would like to know what will be put in place to cope with this when the extra 10,000 homes are built. Concerns over who will pay for infrastructure.
- Concern that garden village between Stebbing and Rayne of up to 10000 dwellings constitutes a new town, with part of it to be built on ancient woodland and an historic airfield. A new large village / town, even at an early stage of development, would certainly require much better access to the new A120 than currently exists i.e. a new junction, to avoid severe congestion in Dunmow and significantly increased risk of road accidents at various junctions along the old A120. There is no public transport between Dunmow and Braintree at the moment and no other public services or amenities. The proposed development would be directly under the Stansted airport flight path.
- The concept of provision of housing by way of a new Garden Community at "West of Braintree (sic)" must be considered as mutually exclusive to the provision of housing in Stebbing as a Type A Village. Objection to the proposed said garden community but support development of Stebbing as a Type A village.
- Objection to Garden Communities, as UDC have not taken the views and opinions of local residents into consideration. 90% of respondents to the recent Neighbourhood Plan questionnaire said that the proposed development would be a bad or very bad thing to the

parish. The consultation process did not ask for views on sites locations as the decision was already made. There clearly was no intention of listening to what local residents had to say.

- Concern that the building of three garden communities, and two within 5/6 miles of each of other, in this part of the district as well as the number of permissions already given and suggested in this regulation 18 plan is too much for the area. Infrastructure: WOB has at present no evidence of where the funding will come from for the building of roads, water and sewerage etc. It is a concern that UDC would be unable to help fund these infrastructure needs or would make residents pay through council tax increases.
- Objection to the potential siting of the garden village near to Great Chesterford as there seems to be questionable demand for the proposed increase in this level of housing in this part of Uttlesford and there also seems to be little demand or support from neighbouring districts. There is clearly a total lack of existing infrastructure to support this.
- Objection to the inclusion of a new town at Great Chesterford. The Great Chesterford site is not an appropriate location for the following reasons:
 - Highways infrastructure constraints - the access to the site itself is inadequate for the scale of the development, at the public exhibition no access was shown from the north of the new town to Abington/the A11. It seems incredible that the amount of traffic generated by all the residents of Saffron Walden might feed onto one minor access road/roundabout. Beyond the site itself, J9 of the M11 junction forces a disproportionate volume of traffic to the A1301 and A505 junction. The M11 junction would need to be altered to allow full access/egress before this development should be built. Additionally the A505 would need to be dualled. Improvements are already required to the A1301/A505 roundabout to deal with current capacity issues. Highways studies need to take account of the developments that are already proposed in the area, particularly the crematorium and the genome campus extension. The main impact of the development will be on the residents of South Cambridge.
 - Rail Accessibility and Capacity - again at a superficial level the proximity of a mainline railway may be seen as a benefit in terms of sustainability. However, the site location is well beyond walking distance and there is no parking capacity at the station as well as in the trains themselves. It is clear that the development will largely be reliant on transport by car, especially as there are no services nearby.
 - Landscape impact - the landscape impact of the proposals is considerable as the development is on top of hill.
 - Impact on Groundwater - the impact of such a large development above the aquifer must be very difficult to assess. The risk of interruption to sensitive groundwater supplies is too great to take.
 - Impact on flooding - similarly there is a huge risk of increased flooding, with parts of Hinxton already flooding.
 - Inadequate research and Information - as this proposed allocation has come to light so late in the Local Plan process, the accompanying research is unbelievably thin and the time allowed for this public consultation too short to allow the local community to seek appropriate advice to be able to respond fully.
 - Garden Village principles - these are highly aspirational. What vehicle will the council use to capture the land value. What guarantees will be in place that infrastructure is built prior to the houses?

- ALTERNATIVE PROPOSALS – UDC and the Plan Inspector should consider larger extensions to existing settlements that are within easy reach of existing settlements. These must be more sustainable and preferable to what will be a dormitory location. An increased allocation at Easton Park and a larger extension to Saffron Walden with a southern bypass to deal with traffic issues. Chesterford could also still accommodate a large allocation to provide some further housing in the north of the district.
- Concerns for the negative impact on the surrounding villages and the strain it will place on local infrastructure. Objection to the scale of this proposed development and doubt it is deliverable. Having previously lived on Flitch Green I have experienced first hand the inept handling by Uttlesford Council of a development a fraction of the size of the West of Braintree development. We moved on to the Flitch Green development as construction entered its third year. We were promised playgrounds for the children, sports fields, a Doctor's surgery, a shop and a pub. Due to weak planning conditions we ended up living on a road that wasn't tarmacked for 5 years and it was 2 years before a children's park was built. When the recession started all construction work stopped as the developers refused to build houses they couldn't sell and we were left for a number of years living amongst rubbish strewn wasteland. We moved to Stebbing from Flitch Green after 11 years, since we left there has been a shop built and playing fields laid but there is still no Doctor's surgery or pub and there is nothing for the children to do on the estate other than roam the streets.
- Objection to Garden Communities on the following grounds:
 - 1: UDC have not taken the views and opinions of local residents into consideration. 90% of respondents to the recent Neighbourhood Plan questionnaire said that the proposed development would be a bad or very bad thing to the parish. The consultation process did not ask for views on sites locations the decision was already made. There clearly was no intention of listening to what local residents had to say.
 - 2: The sites of Easton Park in the South and Great Chesterford in the North of the district offer better sites. It would appear they are both more viable options in planning terms and sustainability. They have the infrastructure of roads & public transport and the employment opportunities to fully support and meet the housing needs in both the south & north of the Uttlesford district. The West of Braintree, Andrewsfield site is not sustainable as it does not have the infrastructure to support the number of houses being proposed, such as public transport (the nearest rail station in Braintree over 4 miles away has hardly any parking facilities). The remote location of the Andrewsfield site will result in a huge increase in the number of cars on the road.
 - 3: There are not the employment opportunities in place to support the West of Braintree site. It is unrealistic to use Stansted Airport as the main employer for this number of homes. Stansted Airport is an employer for a very wide area of the district. Braintree, equally does not offer suitable employment opportunities. Suggesting that employment in the retail sector or proposed business parks (non-existent) would offer the type of opportunities that people would want is again unrealistic. The West of Braintree residents would for look for employment in Cambridge, London, Chelmsford & Colchester. There is neither the public transport or road infrastructure in place to support the number of dwellings being proposed and cars that would be on the road.
 - 4: The proposed site would mean losing 2500 acres of Grade 2 prime agricultural land, this would seem a hasty decision in light of the uncertain future ahead of this county when trading with other countries.

5: Many of the roads and lanes around the proposed site are unclassified and some protected. Both the B1256 & A120 are highly congested already. The increased road traffic would not be sustainable. The B1256 will have to accommodate the majority of the extra traffic as the new A120 junction has been put on hold.

6: The substantial increased pollution, noise, air and light on residents and wildlife. The proposed site would have a detrimental effect on Boxted Wood, this is an ancient, protected woodland. This development contravenes the latest Government White Paper on this subject.

7: The loss of a valuable local community amenity in Andrewsfield.

8: Insufficient plans for the upgrading the water, sewage and electricity requirements for the number of houses planned.

9: Lack of detail on public services. Currently, the area has insufficient resources to meet the demand for Doctors, Schools and healthcare provision generally. The proposals do not make it clear how these needs will be met to support the proposed number of new residents and more importantly who will be responsible for paying for it.

- Concern that UDC is only maximising opportunities for economic linkages with The Wellcome Genome Campus and Chesterford Research Park and should also include Granta Park and possibly Babraham as well if the basis for this location is employment opportunities in the southern Science Cluster.
- Support for the location but the development must provide schools, surgery, shop, community hall or public house. These to be constructed first or at the same time as the houses. A garden settlement should indeed be VERY GREEN both visually and in physical construction.
- The Uttlesford Plan is not positively prepared as it does not meet development and infrastructure needs and does not enable delivery of sustainable development. An entire area of significant agricultural, cultural and historic heritage will be irreversibly destroyed. There is little in the plan that details transport and infrastructure needs, nor does it clarify how these are to be paid for. This will become a vast commuter belt with unsustainable impact on the well-being of current and future residents. Pollution, air, noise, light will increase to unsustainable levels. Areas of natural beauty, historic interest and cultural heritage of living in a rural community will be lost forever. The determination of UDC to extend W of B as far as it does shows a disturbing disregard for the district, including such historic and working gems as Andrewsfield. More crucially, UDC shows an unwillingness to propose smaller, more sustainable sites.
- Concern that new development is proposed in the south of the district along the A120. This part of the district has taken the highest proportion of development in Uttlesford over the past 10 years, particularly in Takeley and Great Dunmow. Traffic from the Garden Communities proposed at Little Easton and West of Braintree will use the A120 and Junction 8 of the M11. This junction is already at capacity at peak times. Concern over the costs of major building and road construction. There are no easy links from Easton Park into Stansted. The Four Ashes junction in Takeley which is one of the routes suggested is already at full capacity at peak times. The proposal for a new community in North Uttlesford would have the advantage of a railway line and station close by and a junction on to the M11 (Junction 9) which is not at capacity. This is not a full junction and I am surprised that there is no proposal to make this into a full junction.

- Objection to all three proposed new settlements, but specifically North Uttlesford (NUGC) on the grounds that it is the wrong location and that the scale will have very serious adverse impact on the area. It is contradictory to UDC’s objectives of sustainable Development whilst providing affordable homes and improved infrastructure across the district.

Sustainability Appraisal June 2017

Not applicable

Market Towns – Saffron Walden and Great Dunmow

Paras. 3.16-3.17

This supporting text was responded to by 18 people and organisations.

	Total
Support	0
Object	9
Comment	9

Overarching Summary

- A new secondary school needs to be provided to meet the need of existing and future residents of the local area around Saffron Walden and Great Dunmow, and associated new developments.
- The proposed development to the east of Great Dunmow will dwarf the historic town and cause detrimental damage to its rural setting and market town feel.
- The time allocated to build the proposed housing developments as per the plan is unrealistic and will take many years to implement fully which is not sustainable or useful to the current situation.
- The provisions for infrastructure, including walking, cycling and public transport are not considered enough and the existing situation is not fully understood or accounted for.
- Unclear if new retail space is to be provided and if so what type and amount is planned for?
- Figures given in relation to Saffron Walden are not accurate and need to be recalculated or include recently granted permissions.

Statutory consultees and other bodies

WeAreResidents.org – C - 3.16 - Since the R18 draft was produced, an additional 85 permissions have been granted on the east of Saffron Walden under appeal on the Gladman site on Little Walden Road (UTT/16/2210/OP). This needs to be reflected in the next draft of the Plan, reducing the allocation for Saffron Walden by 85 dwellings (and increasing the extant permissions by the same number).

Saffron Walden Town Council – C-3.16 - The figures given for Saffron Walden are incorrect and misleading Amend figures for Saffron Walden. Notes that no additional

employment space is located within SW. Notes that new retailing and open spaces will be provided. Should we be encouraging further employment space to encourage business and development? Where will this retail and open space be? There is no reference to further retail or open spaces within the Local Plan for SW.

Developers/landowners/site promoters

The definition of Market Town should include the Bishop's Stortford fringe in recognition of the role the town plays in providing services, facilities and public transport connections to people within the district. A new subheading under Market Towns should read as follows: Bishop's Stortford Fringe - Bishop's Stortford's function as an important centre for residents who live in the south-western part of the District will be maintained and enhanced 180 dwellings on new site allocations will be provided within the Local Plan period." See report into housing land supply and need that concludes the council has underestimated the number of dwellings required and that based on their own figures and an over estimate of deliver rates they risk five year supply shortfall of 737 dwellings a plan period shortfall of 3,726 dwellings and needs to allocate additional sites in order to remain sound when national and local evidence is considered regarding delivery rates and commencement timescales.

- Saffron Walden's function as the main centre of the District will be maintained and enhanced. In recognition of the air quality and traffic constraint on the growth of the town, 240 dwellings on new site allocations will be provided within the Local Plan period and no additional employment floorspace. New retailing and open spaces will be provided. The town provides good opportunities for further walking and cycling. Saffron Walden is to expand under the current plan by 1,269 houses, no additional employment space is planned and highway improvements which will probably not happen, are still subject to review.

- Great Dunmow Great Dunmow's function as an important centre for residents who live in the southern part of the District will be maintained and enhanced. 743 dwellings on new site allocations will be provided within the Local Plan period together with 21,000 square metres of employment development delivering a range of new jobs. A new secondary school and retailing will be delivered. Great Dunmow has in recent years benefitted from significant highway improvements including an initial east-west bypass, duelling and relocation of the A120 forming a further outer bypass. A link road between Thaxted road (B184) and the A120 west funded by development. The improvements and the provision of employment space appears the only logical part of the plan.

Individuals

Para. 3.16

- The statistics for these local homes in allocated Garden Communities needs review and assessment. Expectations will be that the proposed garden communities will only accommodate up to 10-18% of 5000 homes. What are the expected hectares of land allocated for these schemes, how much will be used for housing when all the garden hedgerows trees and green spaces etc will be retained. When are the first houses to be expected? These houses are needed now and within the next year.

- The second sentence reads as if you're building 240 dwellings because there are air quality and traffic issues – needs rewording.
- This gives a misleading impression of the proposed development of Saffron Walden and the likely impact on traffic and air quality. The overall effect of housing over the plan period will be to increase the size of the town by 19%. Although the town does provide good opportunities for further walking and cycling, there are no proposed measures to encourage or facilitate walking. Many of the proposed development sites are beyond the walking limits, to facilities and schools, recommended by the Chartered Institute of Highways and Transportation.
- At the rate of development envisaged, West of Braintree New Town will take 164 years to complete and the other two proposed new towns approx. 50 years each. UDC has an obligation to maintain a rolling 5 year supply, this is ridiculous over-kill. Housing needs could be met well beyond 2033 with only one of these proposed developments. The slow rate of development will mean that residents will suffer the inconvenience of construction traffic, probably for the rest of their lives! More rapid development of a single site would cause far less disruption.
- It appears that Saffron Walden is taking a "not in my back yard" approach to the Local Plan! With it being a market town, a strategic place for employment and having good transportation links, why would this not be a prime location for the district's development? If UDC want to achieve a balanced special strategy for the district, it should be fair for all!
- The open space should be publicly owned and controlled.
- Why is there no new employment floorspace? Surely it would be better to bring employment out of Cambridge and London into Uttlesford.
- Easton Park will dwarf Great Dunmow when complete - BUT - the housing is desperately needed now to avoid the talent drain of 18-24 year olds. UDC must reserve housing at appropriate prices for local people to ensure that they stay within the community.
- The numbers are so huge as to be unsustainable and unreasonable.
- Admits to a lack of air quality and traffic as constraints on growing town, this doesn't seem to be reflected in the intention to build dwellings on every bit of land. A coherent traffic plan must be devised and put in place before further building takes place. Same item states the town provides good opportunities for further walking and cycling really, where?
- Saffron Walden to Audley End Road through London Road to Newport Road cuts across Beeching Ride as does 1 of which also includes Burnt Woman Plantation (historic clay pit site and town amenity) and the playing fields the highs of Saffron Walden will be obliterated.

Para. 3.17

- Echo all the comments made here about the provision of school places - Schools already full before any of this development - and the services have to come first, not as an after-thought to comply with planning consents.
- Where will the new secondary school be built? Or is it just the current one being rebuilt elsewhere to meet increased demand? What new retailing is being considered? Many locals use the High Street because it contains local businesses, not 'chains'.
- Development must be constrained, although inevitable. Current infrastructure is stretched to the limit already- new infrastructure - additional school places, improved traffic flow, improved street air quality, medical facilities etc must be provided.
- The village of Great Easton it will destroy the rural landscape settings and turn our settlements into suburbs of these new towns and is not appropriate to the character of the area. Pollution and road chaos will increase dramatically turning our rural landscapes into a concrete corridor from Braintree to Canfield. Another set of commuter towns destroying our environment is not wanted or needed. Brexit will see immigration fall and the need for additional housing stock reduced.
- Great Dunmow is getting a new secondary school. Saffron Walden will also need a new Secondary school within 1-3 years because it is not sustainable with the current exponential growth in children requiring a local secondary schooling after leaving primary school. 280 school places were required in 2016 for children who could not attain a place at the SWCHS. This puts extra cost on local services to get them to school further away which long term cannot be sustainable. Consideration has to be made for a new secondary school in Saffron Walden on the back of new proposed building developments to 2033 and beyond.

Villages

Paragraph 3.18-3.23

This supporting text was responded to by 36 people and organisations.

	Total
Support	8
Object	18
Comment	10

Overarching Summary

- Objections to a number of villages being classed as Type A villages: Quendon, Rickling, Great Chesterford, Stansted Mountfitchet, Takeley and Elsenham,
- Support for a number of village classifications: Great Canfield, High Easter, Thaxted, Newport, Elsenham, Hatfield Broad Oak and Stebbing.
- Suggestion that Felsted should be classed as a Type A Village.

- Suggestions that Wendons Ambo, Widdington, Felsted and Ugley should be allocated for more housing, due to having adequate services to support development.
- Suggestion that more development should be allocated in the villages instead of large developments, as this would support the rural population.
- Concern that Saffron Waldon does not have the services to support the West of Braintree garden community.
- Concern that the garden communities rely too heavily on the limited services in the villages.

Statutory consultees and other bodies

Quendon & Rickling Parish Council - Objection to Quendon & Rickling being classed as Type A villages, as they are not local service centres.

Great Canfield Parish Council - Support the designation of Great Canfield as a Type B village with no new allocations of housing.

High Easter Parish Council - The Parish Council supports the designation of High Easter as a Type B village.

Thaxted Parish Council - In regard to Table 3.3 there appears to be some disparity in relation to Wendons Ambo and Ugley not being allocated any additional housing or development. Thaxted wishes to seek clarity and understand as to why the opportunities which are clearly present along the old A11 corridor are not being fully considered.

Great Chesterford Parish Council - If Great Chesterford is a key village, providing services to a wider rural area, how will it cope/ compete/ serve 5,000 houses? It cannot.

Developers/landowners/site promoters

The Case for Widdington - The 2011 Census reveals that the Parish of Widdington has 188 households and a population of 504. The village has small but reasonable range of facilities which include the following: Fleur de Lys Public House (High Street), Village Hall (High Street), Post Office at Village Hall (High Street), Church of St Mary the Virgin (Church Street), Large equipped Play Area (Hamel Way), Allotments (Rear of High Street/Hamel Way), Bus Services, Stops and Shelter (High Street), Telephone Box and Post Box (High Street), Glass Recycling facilities (Village Hall, High Street). There used to be a post office and stores in High Street opposite the public house but this closed and the building is now a private residence. However, the Village Hall now serves as a Post Office on Wednesdays between 10:00 am and 12:00 pm. The village lies 1.5 miles to the south east of Newport and approximately 5 miles south of Saffron Walden, where a range of other facilities are found, including primary and secondary schools, shops, surgeries, employment. The town of Bishops Stortford also provides good facilities and lies 7 miles south. There are public and school bus services which serve Widdington. The 301 Arriva bus service (Mondays to Saturdays) goes through the village, providing regular services to Bishops Stortford and Saffron Walden town centres, plus public transport nodes for onward travel. Buses enter the village from the north and travel along High Street, turning round close to its junction with Cornells Lane and picking up near our clients's site (see site details below). The bus service has previously come under threat but following a public outcry continues to operate. Potential additional patronage brought by occupiers of new housing development along its

route would be helpful to maintaining the bus service in to the future. The school bus (no.322 operated by Regal Busways) provides a service on school days to Newport and Saffron Walden allowing children of the village to access local secondary schools. In nearby Newport and Wendems Ambo (Audley End station) the railway services provide destinations to Cambridge and London Liverpool Street. The nearest station (Newport) is within easy cycling distance and bicycles can be parked here. Buses also serve Stansted and Bishop's Stortford for train services there. At paragraph 2.15 the Plan states, The District the highway network and transport connections in general are very limited accessibility to services and facilities is an issue across the District as a whole with just over one third of residents being within 15 minutes of an employment or retail site and 50% being within 15 minutes of a GP. Whilst over 80% of the population live within 30 minutes of a primary school, only 60% live within 30 minutes of a secondary school. However, Widdington fares well in respect of paragraph 2.15. It is an accessible village public transport using the road network. It has proximity of circa 15 minutes to Saffron Walden for employment, retailing and primary/secondary schooling. Newport lies even closer where primary and secondary schooling and GP surgery provision can be accessed. are opportunities to reduce travel between homes, jobs and services and facilities and where there are alternatives to using the car, noting the high levels of out commuting stated at paragraph 2.12. Stansted Airport is a major employer and only circa 15-20 minutes distant, so is not a large commuting distance. The proximity to Newport and Audley End stations means that employment areas eg Cambridge, Bishops Stortford, Harlow, Stansted and London are accessible by public transport. Therefore travel from Widdington for commuting by car need not be extensive. As a Category B village, no housing is being proposed for Widdington. For reasons previously set out we consider this the wrong approach. Our Suggestion - An allowance for a small amount of housing in Widdington should be made to cover the period to 2033. We would suggest that approximately 15 to 20 houses be allocated for Widdington in the Local Plan. This would represent an increase of circa 8% to 10% in the number of village households, based on those recorded in 2011. Broadly, this suggested allocation would provide an average increase of one dwelling per annum in the village to 2033.

Comments on Key Villages - The Case for Felsted. Looking at the criteria as to what constitutes a Key Village, it would appear that Felsted complies with the criteria listed and should be promoted from a Category A village. Paragraph 3.19 states that, "Existing facilities and services in the Key Villages include day to day shopping, GP services, primary education, public houses, community halls and regular bus services to other key villages, nearby towns and London Stansted Airport." Felsted boasts the following facilities: convenience store post office butcher delicatessen memorial hall (for meetings, clubs, functions, parties, other events) recreation ground/playing fields well equipped play areas Multi use games area eg for youths studio/gift shop antique shop public houses doctors's surgery dispensary sit down and takeaway restaurants primary school pre-schools private preparatory school private secondary school children's day nursery numerous clubs and societies visiting mobile library van a hotel B&Bs residential care homes There are regular bus services in Felsted. These include the following: no. 133 Service (Arriva) between Stansted and Braintree which generally runs hourly from the early hours of the morning to late at night, seven days a week. It is a well-used service. The bus serves Dunmow and Takeley as part of its route no. 16 Service (Stephenson's of Essex) runs between villages to

the north and the City of Chelmsford to the south. It runs 6 days a week, during the day, with arrival and departure times suitable for the needs of commuters to Chelmsford (via Broomfield Hospital). Demand Responsive Transport service, DRT2 (Arrow Taxis). This is a pre-bookable service serving the local area. M1 service (JW Lodge & Sons Mountfitchet) connecting Stansted, Takeley, Dunmow, Felsted, Barnston and High Easter, which is a school service. A requirement of a key village is to have regular bus services to other key villages, nearby towns and London Stansted Airport. It is clear that Felsted can meet this criterion. Its buses regularly serve Stansted Airport, the key villages of Takeley and (for schooling) Stansted Mountfitchet and the larger settlements of Dunmow, Braintree and Chelmsford. Services also connect to other local villages eg Little Dunmow, Flich Green, Stebbing, Rayne and High Easter. Whilst there are differences in the make up of all Key Villages, we believe that Felsted performs reasonably well to some in comparison. Great Chesterford and Hatfield Heath are listed as a Key Village and have some similarity of facilities as Felsted but not identical. However, Great Chesterford only has a population of 1494 (or across the Chesterford Ward the population is 1709). Hatfield Heath's population is 1930. By comparison, Felsted has a population of 3051 (the Felsted Ward population is 5525). The fact that Felsted has a large ward population assists its potential inclusion as a Key Village. This is because the Plan states that, "Key Villages are a major focus for development in the rural areas - suitable for a scale of development that would reinforce their role as provider of services to a wide rural area." Clearly, the Felsted ward is quite a wide rural area in itself with various smaller settlements and hamlets in its hinterland. Our Suggestion - If the LPA is intent on retaining a village settlement hierarchy, our suggestion is that Felsted should be included as a Key Village as it clearly meets the relevant criteria. It should therefore be allocated with new housing to reflect its suggested status as a Key Village. Irrespective of whether Felsted is eventually included as a Key Village, Felsted should be allocated with new housing to take account of its available facilities and services, its accessibility especially by public transport to employment and retail areas, as well its scale of population. It is a sustainable location.

Comments on Key Villages. The Case for Felsted - Looking at the criteria as to what constitutes a Key Village, it would appear that Felsted complies with the criteria listed and should be promoted from a Category A village. Paragraph 3.19 states that, "Existing facilities and services in the Key Villages include day to day shopping, GP services, primary education, public houses, community halls and regular bus services to other key villages, nearby towns and London Stansted Airport." Felsted boasts the following facilities: convenience store post office butcher delicatessen memorial hall (for meetings, clubs, functions, parties, other events) recreation ground/playing fields well equipped play areas Multi use games area eg for youths studio/gift shop antique shop public houses doctors' surgery dispensary sit down and takeaway restaurants primary school pre-schools private preparatory school private secondary school children's day nursery numerous clubs and societies visiting mobile library van a hotel B&Bs residential care homes There are regular bus services in Felsted. These include the following: no. 133 Service (Arriva) between Stansted and Braintree which generally runs hourly from the early hours of the morning to late at night, seven days a week. It is a well-used service. The bus serve Dunmow and Takeley as part of its route no. 16 Service (Stephenson's of Essex) runs between villages to the north and the City of Chelmsford to the south. It runs 6 days a week, during the day, with

arrival and departure times suitable for the needs of commuters to Chelmsford (via Broomfield Hospital). Demand Responsive Transport service, DRT2 (Arrow Taxis). This is a pre-bookable service serving the local area. M1 service (JW Lodge & Sons Mountfitchet) connecting Stansted, Takeley, Dunmow, Felsted, Barnston and High Easter, which is a school service. A requirement of a key village is to have regular bus services to other key villages, nearby towns and London Stansted Airport. It is clear that Felsted can meet this criterion. Its buses regularly serve Stansted Airport, the key villages of Takeley and (for schooling) Stansted Mountfitchet and the larger settlements of Dunmow, Braintree and Chelmsford. Services also connect to other local villages eg Little Dunmow, Flitch Green, Stebbing, Rayne and High Easter. Whilst there are differences in the make up of all Key Villages, we believe that Felsted performs reasonably well to some in comparison. Great Chesterford and Hatfield Heath are listed as a Key Village and have some similarity of facilities as Felsted but not identical. However, Great Chesterford only has a population of 1494 (or across the Chesterford Ward the population is 1709). Hatfield Heath's population is 1930. By comparison, Felsted has a population of 3051 (the Felsted Ward population is 5525). The fact that Felsted has a large ward population assists its potential inclusion as a Key Village. This is because the Plan states that, "Key Villages are a major focus for development in the rural areas - suitable for a scale of development that would reinforce their role as provider of services to a wide rural area." Clearly, the Felsted ward is quite a wide rural area in itself with various smaller settlements and hamlets in its hinterland. Our Suggestion - If the LPA is intent on retaining a village settlement hierarchy, our suggestion is that Felsted should be included as a Key Village as it clearly meets the relevant criteria. It should therefore be allocated with new housing to reflect its suggested status as a Key Village. Irrespective of whether Felsted is eventually included as a Key Village, Felsted should be allocated with new housing to take account of its available facilities and services, its accessibility especially by public transport to employment and retail areas, as well its scale of population. It is a sustainable location.

Objection to Stansted Mountfitchet being classed as a Key Village, as it more facilities than other villages classed as Key Villages. Stansted Mountfitchet should have a position in the settlement hierarchy that adequately reflects its status and that it should also deliver more land for development.

Table 3.1 - We support the identification of Newport as a Key Village. Newport is a wholly sustainable settlement suitable of supporting sustainable and appropriate large scale residential development. The village has an excellent range of local services and facilities which include a primary school, secondary school with sixth form, two public houses, a doctor's surgery, post office and small supermarket, pharmacy, garage, church and community centre. The village is strategically located on the West Anglian Main Line. Direct services operate out of Newport Station to Cambridge (24 minutes), Cambridge North (30 minutes), Bishop's Stortford (13 minutes) and London Liverpool Street (59 minutes) amongst others. The village is also well served by local buses with services to Saffron Walden, Stansted Airport, Cambridge and Bishop's Stortford. The village plays an important role in servicing its surrounding hinterland, and new development in the village will help support its existing services and facilities, and boost economic prosperity.

Table 3.1 - We support the identification of Thaxted as a Key Village. Thaxted is a wholly sustainable settlement which plays an important role in servicing its surrounding hinterland. The village sits between the main towns of Saffron Walden (7.5 miles north west) and Great Dunmow (6 miles south). As shown on Map 1 (Key Diagram) in the emerging Local Plan, the village is the only key settlement on the B184 between the two main towns. It is surrounded by a number of smaller villages, in which limited new development is proposed, and thus it is essential that housing development is permitted to come forward in the village to support the integral role the it plays in servicing the surrounding local community. This is noted by the planning inspector for the Walden Road appeal (reference APP/C1570/A/14/2222958) who concluded: "Thaxted is a thriving community...[which] would be reinforced by the new housing development recently completed and under construction. Additional housing would contribute further, socially and economically to Thaxted, making it an even more thriving community and increasing custom for existing businesses in the town...". The village is identified as Local Centre in Policy RET1 (Town and Local Centres Strategy) as a result of the role the settlement serves in servicing the local population. Thaxted and Stansted Mountfitchet are the only key villages identified as local centres, which reflects the important role they play in servicing the District. Shops and services in the village include a primary school, numerous local shop including a convenience store, pharmacy, doctor's surgery, numerous public houses and restaurants, a garage and community centre. The village is located approximately 5 miles north east of Stansted Airport which provides significant employment opportunities. The village is a popular tourist destination which also generates employment.

The housing numbers shown in column 2 (dwellings built) and column 3 (dwellings with outline planning permission at April 2016) and part of the numbers in column 4 (allocations in draft plan) have been provided mostly as a result of policy void and a persistent lack of 5-year housing land supply, they are not as a result of strategic planning and very little benefit has occurred to the communities affected. For development to reinforce their role as a provider of services to a wider rural area as stated, provision should be made for improved retail facilities, greater employment opportunities, reduced traffic where practical (Great Chesterford, Newport, Quendon, Stansted Mountfitchet and indirectly Thaxted and Elsenham. (see Appendix 1 for suggested highway improvements)

- Type A Villages – Paragraph 3.21 states that Type A villages are suitable for a scale of development that reinforces their role as a local centre. It is difficult to see how 44 houses to be allocated over 16 years between 19 villages, averaging 0.145 houses per annum each will do anything to reinforce that role.

- Type B Villages – Paragraph 3.22 states they are suitable for a scale of development that would reinforce their role as providers of services mainly to their own community. They are stated as suitable and the NPPF states that all communities have a role to play but no development is planned. These settlements desperately need small affordable open market starter homes (those sold at a minimum of 20% discount and a maximum price after discount of £250,000. Employment in these areas needs to be considered, supported and encouraged not just left to fate.

Support Hatfield Broad Oak as a Type A Village in the Local Plan as it has the necessary scale of services and facilities to support an appropriate level of housing growth to support its own needs for the plan period.

Support for the identification of Elsenham as a Key Village. The village is considered to be a wholly sustainable settlement, and it plays an important role in servicing its surrounding hinterland. New development in the village will help to support its existing services and facilities and further boost economic prosperity.

Suggestion that all type A and B villages should have a housing allocation made by the Local Planning Authority, as the villages concerned have not volunteered a housing allocation. More houses are needed so that young people, single parent families, and those people that have strong ties to the villages can buy housing at a reasonable price. Suggestion that the Local Planning Authority allocates the site known as Buildings to the rear of Mulberry House, Wendon Road, Arkesden. The site is Brownfield, having a number of buildings, commercial uses, and planning permission already granted for two dwellings.

Objection to the approach that prevents small scale site allocations in the villages (specifically Type B: little Easton) as it misses opportunities to achieve sustainable development proposals that meet specific local needs.

Individuals

- Objection, unless adequate green spaces are included in the planning
- The plan fails to recognise, and/or ignore many special qualities of Great Dunmow.
- Objection to Takeley's identification as a Key Village, as there are inadequate services.
- Objection to housing allocation in Great Chesterford and the nearby Garden Community as there are Problems with public transport in Great Chesterford.
- Objection to Elsenham being included for development as it has been inundated with development and the roads and other infrastructure cannot cope and the rural character of Elsenham is being destroyed.
- Objection to the exclusion of Felsted as a 'key village', as Felsted meets and in some respects exceeds all the criteria for a 'key village', having good amenities and public transport connections.
- Objection to Elsenham being included as a key village, as it is unsuitable for development due to the poor access and rural nature of the area.
- Objection to development only occurring in a handful of settlements. Objection to Elsenham being included as a key village due to lack of key facilities.
- Objection to the classification of Takeley as a 'Key Village', due to the lack of infrastructure and services. The access to the M11 via Junction 8 is already congested and further housing development would exacerbate this congestion.
- Provision should be made for improved retail facilities, greater employment opportunities, reduced traffic in Great Chesterford, Newport, Quendon, Stansted Mountfitchet and indirectly Thaxted and Elsenham.
- Elsenham should not be included as a key village, due to lack of services and traffic congestion.
- The plan proposals for the main villages is suitable and consistent with the rest of this overall strategy
- The Plan should not rely on the oversubscribed services in the villages, e.g. schools in Great Chesterford, or doctors' surgeries.

- Objection to major development in Stebbing, due to lack of services.
- Support
- Support for the inclusion of Stebbing as a Type A village.
- Stebbing's infrastructure could not cope with the West of Braintree development.
- Quendon and Rickling will bear a substantial percentage of these 44 houses
- Objection to the Plan allocating all new development in Saffron Walden where transport links are poor. Wendens Ambo provides a better development option as there are a range of sites which could be developed and better transport links to employment centres.
- Suggestion that justification is given to the size and shape of the "village envelopes", as the boundaries appear to be arbitrary, with some houses in the village but not in the village envelope.
- Concerned that Stebbing will be ruined by Braintree through the 10,000 thousand homes that are being built in close proximity.
- 44 homes seems a very low figure considering the number of smaller villages in the district and the low impact that such homes can have especially if on good-sized infill plots.
- Concerned that Stebbing, surrounded by 13000 houses to the east, and 10,000 to the west, will be destroyed as a village.
- Suggestion that there is scope for infill development in small villages to provide for local need, and prevent the destruction of agricultural land.

Sustainability Appraisal June 2017

Not applicable

**The Countryside
Paragraph 3.24**

This supporting text was responded to by 1 organisation.

	Total
Support	0
Object	0
Comment	1

Overarching Summary

- Great Chesterford Parish Council state that Great Chesterford should be considered to be countryside and development restricted to that which supports countryside uses.

Statutory consultees and other bodies

Great Chesterford Parish Council - This is a key policy. It should apply to Great Chesterford. Based upon the landscape evidence we provide in this Submission, NUGC flies totally in the face of this.

Developers/landowners/site promoters

No responses from developers, landowners or site promoters.

Individuals

No comments from individuals.

Sustainability Appraisal June 2017

Not applicable

Policy SP2

This policy was responded to by 200 people and organisations.

Support	99
Object	76
Comment	25

Overarching Summary

- The Local Plan appears to be overly-reliant on large strategic housing allocations which may not be deliverable within five years and which may not contribute positively to the Council's housing land supply;
- A clear need for additional sites to be identified for housing – sites that have the potential to deliver housing in the shorter / medium term. Small sites in established villages would be entirely deliverable in the short term.
- There is no provision for better infrastructure and the current roads (A120) will not withstand the increased traffic from 3 no. garden communities.
- The Garden Communities were not selected based on the evidence in the Sustainability Appraisal.
- A wider choice of type, size, location and design of properties should be spread across the district to give more choice to buyers and to allow for smaller house builders to develop sites.
- More employment sites should be allocated and in a range of locations.
- Many objections from individuals focus on concerns related to infrastructure provision for the new Garden Communities. Individuals are concerned that if rail links are not built to service the new developments then traffic congestion will become a problem.
- Individuals object to the Garden Communities as they feel that they will not be sensitive to the historic and natural environment in the rural area.
- There is an overwhelming amount of concern from individuals that the necessary infrastructure to service the new garden communities (such as schools, roads, sewage, water, health care) will not be provided for, especially by developers.
- Suggestions that infrastructure should be in place before the garden communities are built.

- Individuals are concerned that not enough affordable housing or bungalows will be built to meet local need.
- Individuals are concerned that there are not enough employment opportunities for the new residents of the communities.
- Many individuals think that the house prices will be too high, reflecting the demand from London commuters, not local residents who work at Stansted Airport on low income.
- There are concerns that the housing need projections for Uttlesford are too high.
- Individuals have suggested that Wendens Ambo could provide an appropriate location for development, given its proximity to existing rail links.
- Individuals have also suggested that Stansted Airport should not be allowed further growth beyond 35m passengers per annum until infrastructure improvements have been made. It is suggested that the plan reflects this.
- Many individuals support UDC's decision to remove Elsenham and Henham from the development proposals.
- Need identified to work across borders and through duty to cooperate.

Statutory consultees and other bodies

Chelmsford City Council - In principle CCC supports the Uttlesford Local Plan. The Duty to Cooperate between the two authorities raised issues in regard to transport infrastructure and the potential impacts on the A120 and surrounding road network arising from the proposed new settlements around the Uttlesford, Braintree and Chelmsford borders. Highways junction modelling is currently being undertaken by CCC, with both authorities agreeing to continue to share relevant information to support effective joint working.

Great Chesterford Parish Council - The evidence supporting the selection of North Uttlesford for a new settlement is not compelling and development of the site is inappropriate on several grounds. The Great Chesterford Garden Village is unlikely to be achieved without causing significant harm to the significance of the numerous heritage assets in close relation. The Land at Great Chesterford is of high landscape and visual sensitivity, as identified in the LVIA. As such, it is desirable to limit development on the upper valley sides and the ridgeline. Costs for infrastructure for NUGV are frequently listed as "to be assessed" and do not list some of the costs detailed for other sites. Where costs are listed, they are not robust.

Little Chesterford is not specifically listed in table 3.3 Type B villages, but is presumably included in "Other villages and hamlets". Little Chesterford would welcome limitation.

Objection to NUGC reference in Policy, supporting text. Requests deletion of any reference to NUGC in Policy Housing Topic Paper. Suggests reduced OAN and GCPC notes cites unclear justification for UDC's significant number of potential sites (See Appendix 1 East Herts DC Housing Topic Paper).

CPREssex - We are very concerned that in seeking to provide sufficient land to satisfy the predicted demand for homes the Plan will impact detrimentally on the character of the local landscape and existing settlements. Plan should promote "brownfield first" approach. CPRE report found that the capacity of brownfield land to deliver housing has been underestimated

and the new brownfield registers have resulted in significant increases in the number of suitable brownfield sites.

Epping Forest District Council - The policy is in line with the figures for housing need across the West Essex/East Hertfordshire (HMA) and are also compatible with Epping Forest District's Draft Local Plan (October 2016). Therefore, Epping Forest District Council supports the DLP.

Felsted Parish Council - Felsted Parish Council (FPC) supports the broad principles of sharing house building across the District. To this end dividing towns into their relative sizes then allocating house building numbers in accordance with the resulting groupings is right.

Great Dunmow Town Council - Lack of transparency on how sites were chosen, it should not be because owners offer them up. We object to the wording of this policy. All proposals, including garden community sites, should be subject to SP10 (Protection of the Countryside).

Harlow District Council - The Draft Local Plan acknowledges the interdependencies between London Stansted Airport and Harlow, East Hertfordshire and Epping Forest as the airport provides and underpins employment for a pool of workers and businesses from neighbouring local authority areas. Officers also welcome the principle of maximising the potential of unused or under-used land within the Airport. Policy SP11 includes the allocation of 55 hectares of land within the Northern Ancillary Area for B2 and B8 employment uses not restricted to airport-related development and also allows small scale ancillary retail and leisure. It would be helpful to define what is meant by small scale in this regard. The effective management of a wider variety of use classes and the juxtaposition with established uses within the airport will require careful consideration; the definition of thresholds/safeguards within the policy may be helpful in the preparation of briefs/masterplans.

Historic England - The policy refers to the need to enhance and maintain the distinctive character and vitality of local rural communities. However, the policy does not refer to the importance of the historic built environment in Uttlesford despite being part of The Spatial Vision. It is requested that the policy is amended to ensure that reference is made to the enhancement and conservation of the historic character of settlements to increase the soundness of your forthcoming plan. In the absence of such an inclusion the Plan lacks a strong strategic emphasis on the historic environment.

Summary of Garden Community allocations: further detail is required in relation to the historic environment for the proposed allocations West of Braintree and at Easton Park. The information should provide key evidence which should be used to inform the extent of the site allocation and any mitigation measures required. At present the draft Plan does not take account of the evidence in the supporting documents in terms of the historic environment. The site at North Uttlesford raises fundamental in principle issues and it is unlikely that further work would realistically address our concerns. At this stage an objection is raised to all three garden community allocations in the draft Plan.

The capacity for the area to accommodate new housing development whilst maintaining its historic environment should be a key consideration, so that the quality and character of neighbourhoods, towns and villages is conserved. Integrating consideration of the historic

environment into plan making alongside other considerations is a key principle of sustainable development. Where less successful neighbourhoods are proposed for redevelopment opportunities for enhancement should be a priority.

Little Chesterford Parish Council - The evidence supporting the selection of North Uttlesford for a new settlement is not compelling. UDCs advisors have deemed development of the site inappropriate on several grounds: the Brief Heritage Impact Assessment concludes that the Great Chesterford Garden Village would compromise the overall significance of the heritage assets (Park Farmhouse and Romano Celtic Temple); the *Land at Great Chesterford Landscape & Visual Appraisal* states that the land at Great Chesterford is of high landscape and visual sensitivity and development cutting across the upper valley sides and the ridgeline of the Site would be uncharacteristic of the local settlement pattern.

Additionally, the evidence presented in the plan is flawed. For example:

Economic Viability Study for Local Plan New Settlement and Neighbourhood Proposals, Revised October 2016: Where costs are listed, they are not robust. For example: A505 Newmarket Rd/A1301 (capacity) – roundabout junction improvements (PBA) is listed as costing £1 million, but South Cambridgeshire’s Transport study lists the cost as £7.5-11 million pounds. Both the unlisted costs and the underestimated costs together mean that the costs of this development have been seriously misrepresented.

Limitation of development in Little Chesterford and Type B villages: Clarification is required on permitted development in Little Chesterford and Type B villages. SP2 states that “*New development in the Type A and Type B villages will be limited*”, and Section 3.22 states that “*There will be no new allocations for housing development in Type B Villages in the Local Plan*”. Little Chesterford is not specifically listed in table 3.3 Type B villages, but is presumably included in “*Other villages and hamlets*”. Little Chesterford would welcome a limitation on the amount of development permitted within the village rather than reliance on SP10 – Protection of the Countryside to provide well considered, sustainable growth.

Littlebury Parish Council - We are broadly supportive of the proposal to focus the bulk of housing development in a few well-designed garden villages. However, it is essential that such garden villages really do deliver and be sustainably planned. Essential infrastructure such as transport links, schools, shops and healthcare facilities must be provided from the outset with high quality overall design and professional delivery.

Natural England - Natural England considers that the most likely impacts on any nationally or internationally designated sites are indirect (notably through recreational pressure or air pollution) and in combination. A number of the allocations are within close proximity to Hatfield Forest SSSI. Both Natural England and the National Trust (who own and manage the Hatfield Forest) are growing increasingly concerned about the impacts of increasing visitor pressure on the SSSI which is considered to be linked to nearby residential development. Recreational impacts are particularly prevalent in the northern areas including those which are easily accessible from the Flitch Way. This increased visitor pressure, particularly during the wetter winter months, has resulted in increased trampling of the rides and paths, parts of which have become very muddy. This in turn leads to visitors attempting to detour around these areas; thereby widening the paths and trampling important ride-edge vegetation. The National Trust have been forced to close

some of the affected rides and paths on a rotational basis in order to allow them to recover sufficiently to be able to withstand further visitor pressure. The strategic site at Easton Park and allocations at Great Dunmow, Stanstead Mountfitchet, Takeley and surrounding areas have the potential to significantly increase recreational pressure on the SSSI. Consideration needs to be given potential adverse effects on the SSSI and this will need to be reflected in the Sustainability Appraisal (SA). Natural England has already raised this concern with a number of development management consultations and the local plan process provides an appropriate mechanism for resolving this issue. To be found sound we would expect the plan to demonstrate that the housing allocation proposed can be delivered without impact on the SSSI. This will likely require the identification of a zone of influence and the proposal of a mitigation package agreed with both Natural England and the National Trust. Natural England is keen to engage further with your authority regarding this matter. Note that where appropriate allocations should also consider in combination effects on High Woods, Dunmow and Elsenham Woods SSSIs. Any mitigation required should be enshrined in policy.

North Hertfordshire District Council - The identified spatial approach is understood. As a neighbouring authority, we have recently signed a Statement of Common Ground which confirms there are no strategic cross boundary issues. ULP is unlikely to affect NHDCLP, however, there are likely to be strategic highways impacts, which warrant consideration in relation to the Duty to Cooperate. In particular impacts on the A505, and the highway network along the A505 corridor. As such, we would encourage further discussions under the Duty to Cooperate with the District Council, relevant neighbouring authorities including Hertfordshire County Council and other interested parties in the future to address the potential longer term impacts on the A505 corridor.

Quendon & Rickling Parish Council - We agree with the statements and policies declared and which provide a good framework from which to work. We are in favour of the Village Communities on the proviso that the appropriate infrastructure is in place before building commences. We believe that rather than have homes built at disjointed locations they should be included in the Garden Villages.

Saffron Walden Neighbourhood Plan Steering Group - Objection to the statement that: the majority of development will be focused at the towns of Saffron Walden and Great Dunmow. Suggestion: The majority of the development will be focuses in three new garden settlements. There will be further development at both Great Dunmow and Saffron Walden but the latter has limited potential without major infrastructure improvements due to an overstretched road network and across the whole of Saffron Walden Town Centre.

-S- In principle support for the spatial strategy, insofar as it primarily focuses new development in new settlement sites. However there is insufficient information to comment on the comparative sustainability of any new settlement sites presented.

Saffron Walden Town Council - Policy should be amended so that there is no assumption of hierarchy for development in SW and should state “the majority of development will be at the new Garden Communities at Easton Park, West Braintree and North Uttlesford followed by development at the towns of Saffron Walden and Great Dunmow”. This changes the hierarchy of proposed development.

Stansted Neighbourhood Plan Steering Group - The overall strategy seems sound with one new settlement to the north of the district, one to the south and one to the west, however, we cannot comment on the suitability of individual sites outside Stansted Mountfitchet.

Sustainable Uttlesford - The principle of developing new garden villages as a crucial first step in a longer-term development strategy are generally supported. We consider that it is vital that the District Council produces an Implementation Plan to go alongside the Local Plan to ensure that infrastructure is provided when it is needed. We consider that the Local Planning Authority should adopt the Community Infrastructure Levy approach rather than the use of S106s. More accountability and transparency is required on infrastructure provision in the proposed Plan. The district council must adhere very clearly to the TCPA Garden Village design principles. In particular that sustainability should be at the core of the local plan, that the housing provided caters for the whole population and that the district community should benefit financially and through community infrastructure provision. We must learn from South Cambridge DC experience and incorporate their good practice into our masterplans especially for secondary school provision. In addition there is concern about the viability of the North Uttlesford Garden Village of the scale proposed to provide the infrastructure suggested especially the proposed secondary school.

Thaxted Parish Council - First line of policy should be amended to state 'the majority of development will be at the new Garden Communities at Easton Park, West Braintree and North Uttlesford followed by development at the towns of Saffron Walden and Great Dunmow' this changes the hierarchy of proposed development.

The Thaxted Society - Thaxted cannot be regarded, as a 'key settlement' where provision required for this designation is not available or currently failing.

Widdington Parish Council - Widdington has been categorised as a type B village, we agree with this designation and as such we accept that 'There will be no new allocation of housing development in Type B villages in the local plan.' If plan is adopted will applications for housing in Type A villages be refused as such, and when the 44no. provision is achieved will subsequent applications for A & B villages be refused in principle. Also, clarification is requested on the role of existing village design statements in determining planning applications any proposed review of settlement boundaries.

Hertfordshire County Council - Smaller scale development is proposed in a number of villages around Hertfordshire's borders. Stansted Mountfitchet in particular has a strong synergy with Bishops Stortford and the encouragement for developers to promote sustainable transport infrastructure measures to reduce demand for car travel is supported (particularly given the potential offered by the rail station and the short travel distances involved).

Henham Parish Council - The DLP fully, and rightly, rejects the proposal for a garden community at North East Elsenham. Two Inspectors and the Secretary of State have therefore found (in 2014 and 2016) that the proposed new community at North-East Elsenham is without merit and not a suitable location for such development, indeed the S78 proposal was for a relatively modest 800 homes, but still failed critical tests of sustainability. It is therefore unsurprising that North East Elsenham has not been included by UDC as a

location for either a new community, or indeed for any scale of development. It would be very surprising that if there were any further examination or assessment of this location for development that an Inspector or SoS would come to any other conclusion than those recorded above.

Arkesden Parish Council - Arkesden Parish Council supports UDC's distribution strategy of providing the majority of new homes within the three new settlement areas. The Parish Council supports the Garden Village principles in that services and infrastructure must be provided at an early stage in the development.

Developers/landowners/site promoters

- Policy SP2 and paragraphs 3.14 and 3.15 of the Reg. 18 Local Plan are supported. Also supported is the statement at paragraph 3.15 that the Council will work closely with Braintree District Council to ensure that the WBGC is jointly master planned and delivered.
- The spatial strategy SP2 is heavily reliant on the delivery of 3 new garden communities. The infrastructure demands of these large-scale sites preclude them delivering any homes in the short to medium term which will not improve the council's current deficit or the 5YHLS. There are no provisions to allow for the Neighbourhood Plans being undertaken across the district to deliver development in support of their local services. There are 14 Type A villages all of which have existing services and local infrastructure which need the ability to grow in a sustainable manner.
- The Plan fails to recognise the important role that Bishop's Stortford plays for residents in the south west of the district and Policy wording should be updated to reflect this.

The proposed growth strategy needs to be based on the principles of sustainable development, as set out in the NPPF. We have particular concerns about North Uttlesford Garden Community regarding the level of infrastructure required and ability to provide policy compliant levels of affordable housing. We request that realistic assumptions about housing delivery rates are applied for these sites in any future housing trajectory, based on comparable housing delivery rates at new settlements and urban extensions elsewhere. We anticipate that new settlements will make a much lower contribution to the housing supply during the plan period to 2033. As such, additional and alternative sites which are deliverable need to be allocated to meet the housing target in DULP. Accordingly, there should be a greater distribution of housing towards smaller settlements that could facilitate additional development. We request that North Uttlesford is deleted from the development strategy in Policy SP2. The Council should make allowances for other smaller sites in rural locations that can assist with sustaining local services and meet sustainable development criteria. Additional housing supply should look to favour short and medium term gains, given the reliance on new settlements and urban extensions on delivering housing over the plan period. This reliance on large sites does not adequately address the five year supply of housing shortfall in the short and medium term.

- The Council has not rightfully considered the option that the additional 1,400 dwellings could be delivered through the allocation of a number of smaller sites. In focusing this additional growth through smaller sites their ability to deliver in the shorter term would additionally ensure the consistent supply of dwellings throughout the plan period. Housing Trajectory indicates a marginal shortfall, also have significant concerns that the planned level of growth reflected in the trajectory does not focus sufficiently on delivery in the early part of the plan period. The trajectory in

the consultation plan demonstrates that the Council will fail to address its housing backlog during the plan period. The plan is therefore considered unsound. In terms of local demographic adjustments, it is considered that migration trends form a critical factor in determining overall housing need. We consider that there is already potentially a short-term migration need which is not being met by the Objectively Assessed Need. Further, whilst the Council have previously included 20% uplift on their OAN based on market signals, their updated SHMA (2017) only provides 13.6% uplift on their basis that 20% uplift is deemed unreasonable. We disagree with this approach and consider that the former 20% uplift should be applied to take account of market signals. In light of this, at this time, we consider that the Council's OAN requires further review prior to the emerging Local Plan being progressed.

- The Draft Local Plan is based upon a housing need provided within the Opinion Research Service (ORS) report. Catesby Estates Ltd, through NIP, provided evidence at Inquiry (Ref: PP/C1570/W/16/3156864) which undertook an extensive analysis of ORS evidence and identified a number of components of the calculation which downplay the likely scale of OAN, as summarised below:

a) ORS's assessment does not take account of the 2015 ONS Mid-Year Estimate and so fails to take account of the population change that has occurred in Uttlesford to date;

b) The SHMA applies the 2014-based household formation rates as published, despite these rates being impacted by household formation suppression in the short term both during and immediately prior to the recession;

c) The market signals uplift is incorrectly applied to the 10-year migration trend, when it should be applied to the amended demographic starting point, including an uplift for suppressed household formation;

d) The market signals analysis downplays the housing market pressure within the HMA by inappropriate comparison with Greater London, and it assesses certain figures over a non-representative five-year period;

e) market signals are assessed on a HMA-wide basis only which does not allow for the market signals nuances of specific local planning authorities to be assessed and concluded upon;

f) ORS has not complied with the PPG requirement to consider applying a separate uplift to the OAN to reflect affordable housing need;

g) The labour force/housing required to support anticipated economic growth is only considered at the HMA level rather than on a local authority basis;

h) The SHMA does not apply a consistent set of economic activity rates throughout its assessment, thereby rendering comparisons between the demographic and employment-led scenarios invalid;

i) ORS has applied a blanket set of economic activity, commuting and unemployment rates across the HMA and has failed to take account of the different

characteristics of each local authority area when assessing the alignment of housing and jobs; and,

j) Insufficient details are provided on ORS's assumptions around commuting in response to the expansion of Stansted Airport.

The implication of these concerns is that the ORS August 2016 update is not robust and cannot be relied upon as the basis for the identification of an FOAN for Uttlesford. An OAN of 15,442 (702dpal) represents the absolute minimum level of PROPERTY GROUP housing for which provision should be made but that 15,824 dwellings (719dpa) is preferable and therefore should be applied as the FOAN. It is noted that the Inspector (Ref: APP/0570/W/16/3156864) suggested that a OAN of 719 dpa figure was driven in part by optimistic economic data for Stansted Airport and he suggests there is limited evidence that the provision of housing in Uttlesford would meet this specific aspect of need or that the Uttlesford area would need to provide more housing than the other three local authority areas within the HMA. However, as set out above, there are numerous other failings which undermine the current OAN as set out by ORS, failing to meet the full objectively assessed needs for housing and that it is therefore not positively prepared, and not consistent with national policy.

The draft Local Plan recognises that about 70% of the District's population live in the villages and countryside outside Saffron Walden and Great Dunmow. And yet, the strategy proposes a total of only 273 dwellings to be provided in the villages in Uttlesford. This represents less than 2% increase. This is contrary to the NPPF which at para 55 seeks to promote sustainable development in rural areas stating housing should be located where it will enhance or maintain the vitality of rural communities. The villages should be considered as a suitable and sustainable location for development to take place, as the PPG recognises "rural housing is essential to ensure viable use of these local facilities" and "blanket policies restricting housing development in some settlements ... should be avoided unless their use can be supported by robust evidence." Within the Local Plan the justification for providing so few new dwellings in Category A and B villages around the District is the lack of public transport opportunities. Again, the PPG also recognises that different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. Concerned that the current focus of the Draft Local Plan disregards sustainable villages, failing to meet the housing needs of rural communities and is therefore not positively prepared and not consistent with national policy.

In regard to spatial strategy the implication of allocating the majority of housing growth in garden communities is that there is a significant risk that the required housing growth will not be delivered over the plan period. Over a third of the overall housing (4,670 dwellings of the overall 14,100) are being proposed in garden communities which are not yet permitted, committed, are not fully tested and therefore may not be viable. In this regard, Catesby Estates Ltd considers that the plan is not effective as there is no certainty that the required growth is deliverable over the plan period to 2033. A more sustainable approach would be to promote a

dispersed pattern of new development at and around existing sustainable settlements.

- We object to Policy SP2 and the Spatial Strategy proposed in this Chapter of the Plan. The Plan fails to identify sites in sustainable locations across the District, and is overly reliant on new settlements. This is considered a wholly unsustainable strategy, as it will take a significant amount of time to start delivering housing due to their complex nature and long preparation, planning and overall lead-in times before development starts. They also rely on a significant amount of upfront infrastructure, the costs associated with new settlements means they tend to make lower contributions to affordable housing, of which there is a significant shortage in Uttlesford. Suitable housebuilders will still need to be sought which can be a lengthy process for schemes of this nature. The Local Plan is reliant on effective delivery of a small number of large schemes, and the failure of just one new settlement to deliver will result in a shortfall of housing towards throughout the Plan period.

In order for the Plan to be found sound, it is considered that development strategy should be revised and development located across the District's 7 key villages. As acknowledged throughout the Plan, Uttlesford is a predominantly rural district, and consequently its key villages have played an important role in servicing local communities. It essential that these villages are able to continue to grow so they can continue the role they have always played within the community.

The majority of development will be focused at the towns of Saffron Walden and Great Dunmow and the new Garden Communities at Easton Park, North Uttlesford and West of Braintree. Limited growth is proposed in the two main towns equating to 78% of all new dwellings being allocated to new settlements. This is clearly an unbalanced approach to new growth, which ignores the District's existing settlement pattern and the level of services and facilities provided within established communities, towns and Key Villages. These settlements would be able to accommodate carefully planned growth to support and sustain existing retail, employment and leisure opportunities.

Once completed, there will be 5 towns along a relatively short length of the A120 within 20 miles of each other, in addition to Stansted Airport. This is considered wholly unsustainable. Not only will it significantly change the landscape character of the area, but it could also negatively impact the vitality and viability of the three existing towns, which have historically served as focal points for the surrounding communities.

- Whilst we do not oppose the promotion of Garden Communities in principle, we now register objections and concerns relating to their scale and other related aspects as summarised as below:

The proposed Garden Communities at Easton Park and West of Braintree are far too large whilst the need for this scale of development to meet the housing requirements of North Essex has not been adequately demonstrated.

Arising from the large scale of two of the three envisaged Garden Communities, extensive tracts of greenfield land are to be sacrificed for non-agricultural development – with the resultant impact on the countryside and extent of the planning blight on existing residents likely to be greater than with alternative spatial strategies.

The large scale of the Garden Communities will, even with landscape buffers and open space on their periphery, result in the near coalescence of many existing settlements.

The associated infrastructure costs are prohibitive and cast doubt as to the ability to deliver the development on the scale envisaged.

The contribution to housing requirements within the Plan period is conjectural and, in any event, more needs to be known about post-2033 housing requirements before committing to such large scale projects.

Unless Garden Communities can deliver high levels of employment, they will replicate existing settlements which rely heavily on large scale and unsustainable out-commuting.

Garden Communities on the scale proposed will divert resources which could be directed towards making existing communities more sustainable.

The West of Braintree Garden Community will unacceptably extend development into open countryside between Braintree and Great Dunmow.

The West Braintree Garden Community is premature and if it is to go ahead, should be programmed in conjunction with the delivery of a new A120 route from Braintree to the A12.

The contribution Garden Communities can make to medium and long terms housing needs should be addressed in a separate DPD and the current Local Plan should be a prelude to this further work.

Consideration should be given to a role for smaller Garden Communities capable of being delivered or largely delivered during the Plan period.

Pre-2033 housing capacity envisaged in the proposed Garden Communities should be reviewed and re-distributed following amendments to the Spatial Strategy.

We therefore oppose large scale Garden Community projects in the open countryside of more than 5,000 dwellings. The need for Garden Communities on a greater scale is not adequately substantiated or adequately programmed in relation to availability of investment in infrastructure. Further research should be included in a separate DPD and pre-2033 capacity redistributed elsewhere.

We do not accept the case has been made for Garden Communities on the scale or in the locations proposed nor has their role and ability to contribute to housing

needs within or beyond the Plan period been adequately made. With regard to scale, we consider the envisaged 5000 dwellings for the North Uttlesford Garden Community to be the maximum if Garden Communities are to be endorsed as a sound strategic approach.

We point to various concerns. Firstly, paragraph 52 of the NPPF refers to new settlements following the principles of Garden Cities and states: *“Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development.”*

We do not consider that sufficient evidence has been adduced to demonstrate that Garden Communities represent the most sustainable means of securing sustainable development. Whilst Garden Communities do undoubtedly provide opportunities to “build in” many features of sustainable development, they require very high levels of infrastructure costs and represent a form of dispersed growth rather than concentrating growth within established centres. They may or may not be more self-contained than existing centres – but much will hinge on an ability to programme investment in community infrastructure and facilities to facilitate the delivery of housing. In the face of all these uncertainties, including the unknown level of growth in the post-2033 period and the investment and timing of improvements to the A120 in particular, large tracts of the Essex countryside will be blighted for a generation and the lives of thousands of existing rural residents will be harmfully affected. Indeed, we query whether the Local Authority has been working with the support of their existing communities in the promotion of the new Garden Communities as required by the NPPF.

The case for Garden Communities of the scale, location and extent currently being proposed as being the most sustainable form of development ie: more sustainable than other patterns of strategic development, has not been sufficiently made. Moreover, the ability of the three Garden Communities to deliver 4690 out of the remaining 5926 dwellings required during the Plan period is highly speculative and not justified.

With regard to all three Garden Community schemes, we point to the absence of justification for their scale relating to known future housing needs.

Finally, with regard to the above factors, there are other patterns of strategic growth embracing a palette chosen from a possible New Town, urban extensions, smaller Garden Communities, Key Service Villages and controlled growth in other villages which we consider represent a more sustainable pattern for growth. The expansion of existing settlements, accessible to the main urban centres of Great Dunmow, Saffron Walden and the A120, offers a viable and more sustainable alternative to large scale Garden Communities.

We therefore consider that inadequate consideration has been given to these other patterns of strategic growth as alternative scenarios to large scale Garden Communities.

The Plan is considered unsound for the following reasons:

There is a dearth of any clear vision of a future which seeks to address a sustainable relationship between existing and future houses and jobs – the key to ensuring a move towards more sustainable development patterns.

There is undue focus on long term growth when the need is for short and medium term growth to satisfy known existing needs and redress previous shortfalls in provision.

Alternative strategies incorporating smaller scale Garden Communities would have lower environmental impacts, require lower levels of investment, and deliver short and medium term housing and jobs compared to larger scale Garden Communities.

The West of Braintree Garden Community lies in the A120 corridor and is being advocated in advance of any programming for the A120 realignment or improvements. As such, this Garden Community is premature and should await confirmation of the Trunk Road investment programme.

The rationale behind decisions to promote Garden Communities is unclear and the justification of such disparities of scale is not explained.

The environmental impacts of the proposed Garden Communities have not been sufficiently explored and established to enable allocations to be finalised.

The social, economic and environmental impacts of the Garden Communities on the existing communities affected have been insufficiently established.

The locations of the proposed Garden Communities maximise the extent and effect of planning blight and do so in the absence of certainty as to the likely areas for future built development.

The areas earmarked to absorb the Garden Communities maximise the scale of the loss of countryside compared to higher density development associated with existing settlements.

Arising from inadequate assessment of the various strategic options, the Plan in its current form is flawed and will do irreparable but avoidable harm to the Essex landscape and many of its established communities.

- Support the overall principle of the ambition to create a new Garden Community to the West of Braintree.
- Uttlesford District Council's (UDC) principle of focussing majority of development in new settlement is supported. Objection to UDC's three new settlement sites on basis of unsustainable and undeliverable locations. UDC's process of identification of new settlement sites is challenged. Proposed development on Saffron Walden and Great Dunmow mitigates against delivery uncertainty. UDC's analysis regarded as incomplete and unreliable due to lack of consideration of proposals for a new settlement on land North East of Eisenham together with the Southern Link Road

(SLR). Advantages of proposed new settlement on land North East of Elsenham: relationship to economic activity at London Stansted Airport (LSA); lack of environmental constraints; and ability to provide direct multi-modal transport opportunities via Elsenham Rail Station.

North Uttlesford Garden Community regarded as unsustainable. UDC no evidence to support delivery of 4,670 dwellings during plan period. Rates of development deemed unrealistic due to development constraints and substantial infrastructure requirements.

Evidence base of new settlements: UDC's site selection deemed to have a poorer performance against identified sustainability plan objectives; UDC's Sustainability Appraisal regarded as not robust enough to justify Spatial Strategy; UDC urged to review selection of the three new settlements.

Easton Park regarded as subject to following development constraints shown in Sustainability Appraisal: Potential noise impacts from existing flightpaths; Dependence on road transport; High level of car use thereby increasing pressure on M11 Junction; Adverse impacts on designated heritage assets and settings; Pressure on Great Dunmow services; Existing mineral interests will affect delivery; Lack of modal choice for public transport.

Issues with the West of Braintree new settlement allocation: Development in UDC seen to form later phase of growth; Land ownership and control issues seen as likely to affect early delivery; West of Braintree independent allocation regarded as unsatisfactory due to scale, remoteness of location and jobs and high level of car dependency; Will require extensive infrastructure investment.

NUGC seen as performing poorly against identified and sustainability objectives for the following reasons: Proximity to SSSI and on-site Local Wildlife Sites; Presence of scheduled ancient monument and likelihood of archaeological remains across site; High sensitivity to change; Strong possibility of coalescence with Great Chesterford; Remoteness from London Stansted Airport; Lack of direct modal choice for public transport.

Significant benefits put forward for the proposed Elsenham New Settlement: Synergy with London Stansted Airport; Site availability and deliverability; Provides option for strategic growth based on following; Existing rail infrastructure at Elsenham; No on-site heritage assets, ecological or wildlife designation constraints; No Green Belt or Country Protection Zone designation constraints; Proposed (Southern Road Link – SLR) offers comprehensive solution to highway access for the new settlement; Land under single control.

- Support in principle the fact that growth within Uttlesford will effectively come from development in and around existing settlements and through the provision of three new Garden Communities. Whilst the new Garden Communities will help to meet housing demands in the medium/long term, there are concerns that they will not deliver the number of units the Council expects them to within the Plan period. Given the Garden Communities are likely to take time to implement, the Local Plan needs to provide smaller sites which will be delivered quickly in order to meet housing

needs in the short term and maintain a 5-year housing land supply. In allocating sites, the Council should therefore be mindful that to maximise housing supply, the widest possible range of sites by size and market location. In summary, a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery. The inclusion of a detailed Settlement Hierarchy in the Plan and the definition of Saffron Walden and Great Dunmow as Market Towns is supported. However, these should not be at the expense of ensuring that the housing and employment needs of other settlements are met. It is essential therefore, that the needs of the sustainable rural settlements across the district, including Takeley are assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability. Takeley is a vibrant settlement with good amenities, facilities and services. It is a settlement that is capable of delivering a significant level of rural housing, including much needed affordable housing whilst reinforcing the settlement's role as a provider of services to the wider rural hinterland. In terms of the wider countryside, it is considered that the Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework. The policy should recognise that a site's location outside of a settlement limit is only one factor that should be weighed in the planning balance when considering any particular proposal and it should not be the determinative factor in assessing whether a scheme is acceptable or not.

- The spatial strategy is heavily reliant on the delivery of not 1 but 3 new garden communities. The infrastructure demands of these sites preclude them from delivering any homes in the short to medium term and as such they will not improve the councils' current position with their 5 year land supply deficits. The council present 3.1 years of land supply will not be significantly improved with the strategy being based on large sites with inherent infrastructure delays and the like. In total all the Type A Villages there will be up to 44 new homes in new allocation for housing development in the Local Plan." If spread evenly across all 14 no. this would equates to less than a four homes for each of the Type A villages each of which would benefit from the benefits associated with the provision of sustainable development. In the event the Regulation 18 Local Plan allocates these 44 dwellings between just 2 no. Type A villages having been allocated as to 25 no. west of Thaxted Road, Debden and 19 no. land east of Foxley House in Quedon and Rickling. The council should therefore examine the lack of housing allocation amongst the Type A villages and total lack of any allocation to Type B villages.
- Support Policy SP2 in its identification of a balanced and equitable distribution of housing growth for the District through allocations to both the north and south.

Bidwells report upon the Full Objectively Assessed Needs for Uttlesford (Bidwells, September 2017), attached, provides compelling evidence of two distinct local commuting patterns with residents in the North of the District principally remaining working in the Northern area and surroundings and Residents in the South of the District principally work in the South of the District including across the border in Braintree, Chelmsford, Harlow and Bishop's Stortford. Whilst there is a shared

concentration of work locations around Stansted Airport the distribution is otherwise quite distinct. From this assessment the report identifies that there is a good balance of supply and demand in the North with the North Uttlesford Garden Community proving vital to this through representing almost half of the allocated supply. Grosvenor consider that this supports Policy SP2 in demonstrating that it will help to achieve a balanced and equitable distribution of housing to meet the needs of the District. If necessary, the report indicates that, when considering the higher levels of employment growth in the North of the District, there would be cause to support additional housing development during the Plan period at the North Uttlesford Garden Community such as to positively meet housing needs or address any slower than anticipated delivery upon other allocated sites. This flexibility is considered to support the robustness of the Spatial Distribution Policy.

Previous Southern focussed development pressures have contributed to increased stresses on the strategic rail and road networks in the Southern area and in this context there is currently no medium to long term solution for Junction 8 of the M11. In comparison, the north of the district has not previously been subject to such significant development growth. The disposition of growth as currently proposed through the Draft Local Plan helps to spread the travel demands associated with a growing economically active population. This is a view endorsed by Highways England who have confirmed that 'This site probably has the least impact upon the SRN...' (Strategic Road Network). The dispersal of growth around the district can also benefit from a utilities perspective where acute pressures are removed due to a more equitable spread of demand across the District.

- It is considered that in relation to Henham the DLP has not been applied appropriately and has not considered the benefits of releasing land within the countryside in order to provide opportunities for growth, and meet demands, within this Type A Village. The strategy within Policy SP2 to allocate of only 44 new homes across all 19 Type A Villages across the 22-year plan period lies in contradiction with this assessment of the villages. Not only does this spatial strategy place unreasonable pressure and reliance upon the Districts Market Towns, Key Villages and new Garden Communities, it represents the stagnation of amenities within smaller settlements, which will not be able to continue to sustain themselves with such limited growth. SP2 sits in stark contrast to the description of the services and benefits Type A Villages currently provide to existing residents. Paragraph 2.5 of the plan identifies that 'about 70% of the District's population live in the villages and countryside outside Saffron Walden and Great Dunmow' we consider that the extremely limited allocation of sites within villages is consistent with the aims of the plan to deliver sustainable development, and support Type A Villages in continuing to operate as local service centres expressed in paragraph 3.21.
- We support the Spatial Strategy in that the majority of development should be focused at the market towns of Saffron Walden and Great Dunmow. However, the Council need to be certain that the New Garden Communities at Easton Park, West of Braintree and North Uttlesford can be delivered and come forward as part of a wider development strategy. If this is not possible the Council need to focus additional development at the market towns.

A New Garden Community should only form part of a development strategy where a suitable, available and deliverable site has been identified. It is understood that a number of different development scenarios have been explored and the inclusion of a new settlement strategy seems to reflect more the opposition of locals to village and town expansion rather than the planning merits of the development strategy itself.

The Council are proposing that 40% of all new development between 2016 and 2033 will come from the three New Garden Communities. This forms a significant amount of new development that will come forward later in the plan period. The Council should therefore identify reserve allocations in sustainable locations (such as the market towns) which can be released for development if the delivery of one or more of these New Garden Communities is delayed.

- The clients control significant land holdings immediately south of that part of the WOBGC where proposed in the Uttlesford District (as well as in the Braintree District). The client's land at Sites 1 and 2 will be required for, or affected by, highway access and mitigation works to the B1256. It would therefore make sense to include these land parcels as part of the new settlement allocation. Should the council wish to enlarge the area of the new settlement further south beyond the A120, then the client's other sites can be considered for incorporation.

- Concerned that the spatial strategy focuses on large scale growth rather than growth in the villages/rural settlements, with most not being allocated with new housing. Concern that the large strategic allocations will not deliver due to unrealistic timescales for delivery. The council has a poor track record of housing delivery, as identified by the inspectorate and evidenced by previous development sites that have not delivered on time. Suggestion that the Garden Communities element of the housing trajectory to 2033 is pushed back at least two years, with first delivery of 125 dwellings in 2023-24. This would mean that the 500 dwellings in each of years 2031-32 and 2032-33 will need to be re-provided elsewhere. Concern over the lack of housing allocations in the villages and rural settlements, as it ignores the future needs of the rural areas. Villages might also need affordable housing which could be delivered via market led housing schemes. The strategy for the rural areas is primarily focussed on their protection not their sustainable housing growth. The Plan has not taken an appropriately balanced approach to the proposed strategy, rendering it not fully compliant with national policy. Category B villages and many Category A villages are effectively proposed as "no go" zones for housing, which is unduly negative. Suggests that the 1000 dwellings in the Garden Communities should be redistributed to new sites across the District, with a good proportion of these to be distributed to villages, especially those villages which are currently proposed with no allocations. Suggestion that many smaller sized allocations are made, in the rural settlements. Suggest that there is more emphasis on supporting sustainable village/rural housing growth in the Spatial Vision/Paragraph 2.18. Also, a wider breadth of rural settlement allocations should be made in turn requiring revisions to Policy SP2 (The Spatial Strategy) and Policy SP3 (The Scale and Distribution of Housing Development).

- The Local Plan proposes that Henham is a type “A” village and will receive no housing allocation. Objections are lodged that all type “A” and “B” villages should have a housing allocation made by the Local Planning Authority. None of the villages concerned have volunteered even a modest housing allocation which demonstrates they are not willing to take on board family diversity and therefore requires the Local Planning authority to take the issue and make allocations. Furthermore, many young people, single parent families, and those people that have strong ties to the villages are unable to find suitable accommodation within the existing housing stock due to lack of supply and indeed price. By the Local Planning Authority making an allocation for a mixed development this would enable first time buyers, single parent families, families with strong village ties, to return to the villages, notwithstanding the opportunity for families within existing housing stock to downsize, but still remain in the village.
- Support this policy and the desire to focus development towards Key Villages. These villages can support development through their provision of a range of services and facilities for both current and future residents.
- The Council identify that: *‘2. Key Villages will be the major focus for development in the rural areas reflecting their role as provider of services to a wide rural area’*

It is considered that in relation to Hatfield Heath the DLP has not been applied appropriately and has not considered the benefits of releasing land within the Green Belt in order to provide opportunities for growth, and meet demands, within this Key Village.

We consider the final paragraph (3.70) to be incompatible with the settlement hierarchy in relation to Hatfield Heath and inconsistent with Policy SP2 and SP1. Policy SP10 provides protection of the Countryside. In relation to Green Belt, it emulates National Policy by referring directly to it. This provides a degree of flexibility if there are changes to national policy but essentially ‘delegates up’ any consideration for managing development proposals in the Green Belt in the District. This approach does not meet the aims of subsidiarity, where the Council should directly manage proposals within its area.

However, more importantly the council have entirely missed an opportunity to allow Hatfield Heath to grow through the release of Green Belt. We note that the Green Belt does not make up a significant proportion of Uttlesford’s land area, at approximately 5% of the District. As such those Villages within the Green Belt are being both abandoned to manage demographic changes without any ability to change the settlement area, and simultaneously imposing their own growth on other parts of the district that are not subject to Green Belt restrictions.

Of the seven Key Villages, only Hatfield Heath is entirely surrounded by the Green Belt. This places the village in a unique situation that requires specific consideration for how to deliver growth and meet its ongoing needs. Policy SP10 provides a greater degree of protection to land within the Green Belt than it does for land that is outside of a settlement boundary and therefore it is highly unlikely that any

significant development will be permitted in Hatfield Heath unless land is released from the Green Belt.

Each of the other Key Villages will contain sites that provide opportunities for growth, without over-developing sites in the existing urban area. The unique situation for Hatfield Heath is emphasised in Table 3.5 which identifies the distribution of housing supply in the Towns and Villages. Tellingly, Hatfield Heath is not listed in the table at all.

It is worth exploring this position further. Paragraph 3.19 sets out the benefits of the Key Villages. The DLP seeks to delivery just 204 dwellings across all of the Key Villages over 22 years. This would appear to be in contrast to the description of the services and benefits they provide to existing residents. Given that *'about 70% of the District's population live in the villages and countryside outside Saffron Walden and Great Dunmow'* (para.2.5) we consider that the extremely limited allocation of sites within the Key Villages is inconsistent with the aims of the plan to deliver sustainable development, and inconsistent with the existing spatial distribution of residents expressed in paragraph 3.19.

Paragraph 84 of the Framework states that when reviewing Green Belt boundaries, LPAs should *'take account of the need to promote sustainable patters of development'* and *'should 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'*.

It is not evident that the council considered any alternative for the settlements within the Green Belt other than protecting, without amendment, the Green Belt boundaries. The SA for the DLP appears to rule out all Green Belt sites but does not explicitly state that this is the case. We are therefore concerned that the DLP as drafted does not comply with paragraph 84 of the Framework.

Further, paragraph 85 expects that, when defining Green Belt boundaries, LPAs should *'ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development'* and *'not include land that it is unnecessary to keep permanently open'*. We have significant concerns that the DLP is not internally logical in its approach to Hatfield Heath and does not accord with the Framework.

The Trajectory provided at Appendix 3 of the DLP identifies that all Villages will provide 273 dwellings (1.9% of dwellings). This compares to 983 dwellings in Towns (7%); 4,670 dwellings in Garden Communities (33%); and 1,190 dwellings as Windfall Allowance (8.4%). The remainder are identified as existing permissions and existing commitments (49.5%). It is considered to be entirely inconsistent with the aims of the DLP to identify such low allocations to Key Villages and results in the Villages being unable to contribute towards the growth of the District or able to benefit from the proceeds of growth such as investment in new infrastructure and facilities. This is compounded in Hatfield Heath where the Green Belt significantly restricts the possibility of windfall allowances, unless supported by National Policy.

The need to invest in local infrastructure is important. Demographic data for Hatfield Heath identifies that the resident population is ageing, in line with the general trends in Uttlesford, but to a greater degree. Of the facilities that define a Key Village (for the purposes of the UDC DLP), a primary school is an important component. If the DLP restricts new housing within the Key Villages the ability for the school to continue to operate over the Plan period may diminish with the possibility that it be unable to fulfil its role locally. The 2015-20 Schools Organisation Plan already identifies an expected decline in the number of children using the Community Primary school in the future. In fact, the entire School Group for this part of Uttlesford (Group 4) projects a reduction of 121 pupils over 5yrs. Should this trend continue, as it would be expected to do so without new development, and with pressure on all public finances, the school may need to receive pupils from a wider catchment area in order to continue, or more troublingly, need to close and provide transport to other locations for pupils from Hatfield Heath. While this is hopefully an extreme scenario, the demographic trends are only heading in one direction without new development for additional families. This would erode the community in Hatfield Heath and reduce its position within the hierarchy.

The NPPF states at Paragraph 55 that *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”*. Hatfield Heath is a rural settlement, however it is an established, self-sufficient and well-connected location. We therefore consider that further development at Hatfield Heath would be sustainable and in accordance with the NPPF as a whole.

It is considered that the DLP will only achieve a stagnation of the population in Hatfield Heath as it is currently drafted. For the benefit of the community and to secure the facilities within the village, suitable sites should be allocated for new homes within the Village. These sites will inevitably be within the Green Belt as the boundary is drawn tightly around the village. Release of such sites will be for the benefit of the Village and better relate to the stated aims of the DLP.

- Object to the intention of the Plan to focus the majority of development on the towns of Saffron Walden and Great Dunmow and the new Garden Communities. It is fully accepted that a large proportion of the growth should be directed to these settlements but the subsequent policy at SP3 indicates that the definition of majority amounts to 95% of the new housing provision to be provided across the plan period. Almost 80% of this provision is to be delivered at the new garden communities. Such developments are complicated to deliver and require the provision of new infrastructure (rather than the extension or improvement to existing facilities). They are therefore expensive to deliver and susceptible to market conditions. Lead-in terms are lengthy and susceptible to delay. This means that the delivery of new homes to support the early years of a housing trajectory need be given careful consideration. This is an unnecessary risk to take given the number of alternative sites that have been put forward including 15Sta15. The approach of this policy risks the failure of the Plan to deliver sufficient housing mean that it cannot be said to be positively prepared and raises doubts over its effectiveness.

The Sustainability Appraisal (SA) advises that the alternative scenarios for this policy were all rejected as they would fail to meet the District's OAN. This seems a little difficult to believe given the number of sites evaluated in the SLAA. Furthermore, the options considered ignored the potential for an option that sought to increase the proportion of housing in some Key Villages. Instead, the closest option to this alternative was the consideration of an equal distribution across all of the settlement options. This was ruled out because it relied on one large site, which does not seem to fit with the definition of the option that was tested.

MGH and BH consider that there is a reasonable alternative that allows for more growth at Key Villages such as Stansted Mountfitchet. It is accepted that there could be an infinite number of permutations to delivering housing needs but this is a realistic alternative that should have been tested and has not. This means that policy is not properly justified.

For all of these reasons policy SP2 is considered to be unsound.

- Objection to SP2, particularly to directing a large proportion of the District's growth to new Garden Communities at Easton Park, North Uttlesford and West of Braintree instead of at land north of Flitch Green and east of Little Dunmow, is contrary to the Local Plan's evidence base and therefore fails the test of being justified.

The Sustainability Appraisal assessment of the potential new garden communities in the district prepared by ECC confirms that Chelmer Mead scores significantly more positively than all of the other options. Furthermore, Appendix 1 in the SA (2017) assesses multiple different combinations for identifying three new settlement / Garden Community locations. Of these it is Option 8 (Easton Park, West of Braintree and Chelmer Mead) and Option 11 (West of Braintree, Takeley and Chelmer Mead) that generate the fewest negative scores (i.e. only 1 negative score from 15 SA objectives) and are likely to be least harmful to the environment.

If the Local Plan was based on evidence and contained the most appropriate strategy, the land to the north of Flitch Green and east of Little Dunmow (previously promoted as Chelmer Mead) should feature as one of the three new Garden Communities identified in Policy SP2. Instead this land has been omitted from the Local Plan for no obvious and justifiable reason.

The report for Item 3 of UDC's Planning Policy Working Group meeting on 22nd June 2017 suggests, at paragraph 6.7.9, that land to the north of Flitch Green and east of Little Dunmow (previously promoted as Chelmer Mead) may have been ruled out because "a new junction onto the A120 would be required" to serve the development and that this "would be challenging to deliver". Accordingly it was considered that the wider site "would be less preferable in terms of transport sustainability grounds". The Landowners are in no doubt that these comments are incorrect, misleading and not a justifiable reason to discount their land. As Markides Associates explained to officers at UDC, in written correspondence on 8th June 2017 and at a meeting on 12th June 2017, the wider site has:

"... excellent access to the strategic road network via Station Road, the B1256 and then onto the Dunmow South A120 junction, which is an all movements junction. This route is a quick 5-6 minute drive and avoids drivers having to travel through

other settlements. The B1256 has spare capacity and improvements are proposed at the junctions with Station Road and Braintree Road.”

Furthermore, ECC have previously agreed with the principle of serving development in this location from the Dunmow South A120 junction, subject to there being sufficient capacity available at the junction or made available through junction improvements. As a result, there is simply no need for a new junction on the A120 to serve this land and this is not a valid reason to exclude this location from the Uttlesford Local Plan.

In summary, the Landowners object to the Local Plan’s Spatial Strategy on the basis that: (i) it is flawed; (ii) it conflicts with its own evidence base; and, (iii) it is not the most appropriate strategy when considered against the reasonable alternatives. In order to address these shortcomings, Policy SP2 should identify the land to the north of Flitch Green and east of Little Dunmow as a preferred location for a new Garden Community.

- Our client objects to Policies SP2 and SP3 in that they unjustifiably limit the contribution for type A villages such as Stebbing, and to the Stebbing Inset Map on the same basis, which should be amended with the inclusion in part or whole of our client’s land to meet a range of housing needs within the village and surrounding smaller communities.

Although the draft Local Plan show a site that has an existing permission within Stebbing (site STE1), and a small site on the eastern side of the village is shown with planning permission there are no new allocations proposed in Stebbing.

Our client’s land is shown on the attached plan. Although there is not scope for the 2 sites shown to be developed in their entirety due to flood risk on a small area together with some open parts, there is scope for some more limited development closer to the road, given that the sites are close to the school; and that the visual impact from the south west would be against the backdrop of existing housing which could be ameliorated by landscaping.

Development of the sites would provide a greater choice of housing in the village and assist in sustaining the school in addition to other services. This would more closely accord with the aims and objectives of the role of type A villages within the proposed settlement hierarchy.

The Council’s proposed strategy is to focus development towards garden communities, and within or adjacent to the larger towns with larger developments that maximise community benefits. This approach is not challenged per se, but as many studies have shown notably the Matthew Taylor Report of 2008, which reviewed housing in the countryside, many smaller settlements have not seen incremental or proportionate growth, and that in the drive for major housing growth, in practice these smaller villages are often excluded from local strategies designed to meet even local housing need.

Taylor noted that this is a particular barrier for rural development as national policy at the time both implicitly and explicitly as set out above conveys the message to

local planners that development should be focused into areas which reduce the need to travel; directing new housing to be located near existing larger service centres and new enterprise to be located near concentrations of existing housing, both of which are more prevalent in urban areas. He called this the 'sustainability trap'.

However, the subsequent National Planning Policy Guidance in para 54 makes clear that in rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs.

As a consequence we suggest that housing policies should be responsive to local circumstances and planned housing development should reflect local needs and be met as close to their source as possible to provide balanced communities. It is important that a proportionate approach is taken, which provides a significant level of housing to the main towns but which is based on meeting needs as close as possible to where they arise as above, and which is based on service provision. Such a strategy should recognise the importance of both the key villages and the type A villages which all have an important role to play in securing balanced communities that aims to secure existing local schools and services where possible.

The draft Local Plan has had to seek to rely on significant numbers of new homes being delivered from strategic growth locations such as the new garden communities, where there is little potential for early delivery due to the need for co-operation between landowners/developers, assembly of the land, masterplanning, and other necessary pre-commencement work, and as such cannot be relied on in the short to medium term. In addition, we do not consider that there is environmental capacity within Uttlesford for a new freestanding settlements or 'garden communities' that would have the critical mass required to generate their own employment, shopping, and public services to make them sustainable and accord with the NPPF presumption in favour of sustainable development. The constraints of the large scale Elsenham expansion were noted by the Examination Inspector into the withdrawn Local Plan, and reflect this.

Indeed, paragraph 52 of the NPPF makes clear that local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development, and given the settlement hierarchy proposed with a good range of towns and villages with both good existing service provision and environmental capacity, new settlements are clearly not the best way of achieving sustainable new development within Uttlesford.

Because of the reliance on a limited number of strategic growth locations and the risks of delivery that could arise, despite the main strategy being supported in broad terms, it is appropriate that a range of site size should be included.

Indeed, a proportionate approach could be adopted which reflects the above and which still focuses development on the existing towns and larger villages, but which does not ignore smaller villages which have a degree of facilities and services, and where small proportionate allocations can be justified, or where account can be taken of other benefits to the district and its residents from the release of certain sites. This is not the same as dispersal or peppercotting, as it involves the majority

of housing to be concentrated within more accessible locations, but which also does not preserve the countryside in aspic. In our view, the district's development strategy is skewed towards larger developments at the expense of sustaining rural communities, and our client's land would contribute in whole or part to contributing to the Council's housing allocation strategy.

- It is considered that in relation to Hatfield Heath the DLP has not been applied appropriately and has not considered the benefits of releasing land within the Green Belt in order to provide opportunities for growth, and meet demands, within this Key Village.

The MGB in Uttlesford is an example of well-functioning Green Belt. The Green Belt Review recommended all of the 31 General Areas are retained. No other land will be released from the Green Belt in the Local Plan period. We consider paragraph 3.70 to be incompatible with the settlement hierarchy in relation to Hatfield Heath and inconsistent with Policy SP2 and SP1. The council have entirely missed an opportunity to allow Hatfield Heath to grow through the release of Green Belt. Key villages are under threat of any ability to change the settlement area, and simultaneously imposing their own growth on other parts of the district that are not subject to Green Belt restrictions.

The DLP seeks to delivery just 204 dwellings across all of the Key Villages over 22 years. Given that 'about 70% of the District's population live in the villages and countryside outside Saffron Walden and Great Dunmow' (para.2.5) we consider that the extremely limited allocation of sites within the Key Villages is inconsistent with the aims of the plan to deliver sustainable development, and inconsistent with the existing spatial distribution of residents expressed in paragraph 3.19.

The Trajectory provided at Appendix 3 of the DLP identifies that all Villages will provide 273 dwellings (1.9% of dwellings). It is considered to be entirely inconsistent with the aims of the DLP to identify such low allocations to Key Villages and results in the Villages being unable to contribute towards the growth of the District or able to benefit from the proceeds of growth such as investment in new infrastructure and facilities. This is compounded in Hatfield Heath where the Green Belt significantly restricts the possibility of windfall allowances.

The need to invest in local infrastructure is important. Demographic data for Hatfield Heath identifies that the resident population is ageing, in line with the general trends in Uttlesford, but to a greater degree. Of the facilities that define a Key Village (for the purposes of the UDC DLP), a primary school is an important component. If the DLP restricts new housing within the Key Villages the ability for the school to continue to operate over the Plan period may diminish, or more troublingly, need to close and provide transport to other locations for pupils from Hatfield Heath. While this is hopefully an extreme scenario, the demographic trends are only heading in one direction without new development for additional families. This would erode the community in Hatfield Heath and reduce its position within the hierarchy.

Land to the West of Mill lane presents an opportunity to make a contribution to the much-needed houses required to support Hatfield Heath, on previously developed land that does not contribute to the role of the Green Belt. Overview 61. The DLP should identify more housing to meet the immediate short and medium term need for housing to ensure it is compliant with the NPPF requirements.

While the Council may be able to demonstrate a consistent historic windfall for the purposes of its five-year supply, there is no rationale for concluding that this will continue to provide a reliable source of supply throughout the Plan. As they are developed the availability of further sites is reduced; meaning that it is highly unlikely that the such high levels of windfall supply will continue.

The Council's evidence base indicates that it is able to identify a sufficient number of available, suitable and achievable sites in sustainable locations to meet the full OAHN. To rely on windfall sites, which are by definition those not identified in a local plan, may result in the Plan being unjustified and unsound.

- Do not object to the advancement of new Garden Communities per se, for the reasons outlined below, it is considered that the Spatial Strategy and the unrealistic nature of the housing trajectory puts at serious risk the ability of the plan to deliver housing to meet its Objectively Assessed Housing Need within the plan period up to 2033. The evidence to demonstrate that the Garden Communities will be delivered to the planned timescales is weak. There is a serious risk that the plan will not deliver the housing within the projected timescales The Housing Trajectory is considered unrealistic and does not reflect the stages and complexity of delivery of the Garden Communities. The Council's Local Development Scheme (LDS) (July 2017) does not set out a timescale for the production of the 'Development Framework', be they either DPD's or SPD's. There remain significant issues to address through the 'Development Frameworks'. There is a risk that the Garden Communities will perpetuate car borne out-commuting and not deliver the modal shift referred to in the Local Plan (para 7.15). This is also referred at page 201 of the Sustainability Appraisal which concludes ' it would also be expected that there would be a large amount of commuting outside of the district for jobs would be by car' Remains significant uncertainty regarding what the Garden Communities will deliver and the mechanism for delivery. Uttlesford must ensure that it meets its housing needs over the plan period. Persimmon Homes does not consider that there is sufficient evidence to conclude that the proposed Garden Communities will make the proposed level of contribution to housing supply within the Plan period. the draft Uttlesford Local Plan does not demonstrate that it has allocated sufficient land to meet the housing needs arising within the first five years of the plan. This shortfall is significantly worse if the 575 homes from the Garden Community sites envisaged within the Housing trajectory are not delivered. Spatial strategy is too heavily dependant upon Garden Communities and an undue restriction is being placed on growth within Type A villages. these villages benefit from some local services. The plan recognises the aging population and the acute shortage of affordable housing. It is considered that a greater proportion of the growth can and should be accommodated through the plan within these villages in order to provide housing opportunities, including affordable housing. A greater emphasis on 'Type A villages'

would not be at odds with the emphasis placed within part 3 (1, 2, and 3) of draft policy SP2.

- Paragraph 3.45 identifies that the delivery of 14,100, homes would require an average completion rate of 641 dwellings per year between 2011 and 2033. This is a significant amount of annual completions and the plan needs to be more ambitious to ensure this rate of delivery can be maintained. Supports the Plan's attempt to focus development in the most accessible and sustainable locations, however suggests that this should not be done at the expense of stifling development in rural communities and delivering sufficient development to meet the Districts future development needs. The Policy should be amended and first paragraph 3 amended to include all villages and hamlets not only Type A & B.
- Uttlesford's strategic plan for this period assumes that three Garden communities will provide the majority of Uttlesford's new housing. There are underlying assumptions inherent in this policy which may not play out over the plan period. Local opposition to GCs will hinder plans and appropriate developers may not be found. The economics of development may not be propitious over the whole plan period. If any of these factors became of significance, there would be a serious shortfall in the provision of new housing over the plan period. Secondly, a significant proportion of new households may not want to live on large housing estates. The group represented here is therefore objecting to this policy. In its place there should be a stronger remit for developing housing in smaller groupings of say up to 40 properties dotted throughout the district, with many groupings of below 20 houses. Type A and B villages, as well as greenfield sites should have a stronger remit to provide housing at this scale with Development Limits. Additionally, the burden of traffic dislocation, which will inevitably arise when sites of 10,000 houses are located in an area, would also be spread more equally around the district. The A120 near Braintree already has serious dislocation issues without adding huge housing estates nearby.
- In total in all of the Key Villages there will be up to 204 dwellings on new site allocations will be provided within the Local Plan period. However, policy SP3 notes that there are no new housing allocations in Newport. We have previously provided full details of our clients' interests in the response to the Call for Sites and to the Issues and Options Consultation. These included land on the southern edge of the village which was included within the Submission draft Local Plan as the 'Newport Policy 3' site, currently subject of a planning appeal; and land off Bury Water Lane on the western side of the village. It is noted that proposed site 'Newport Policy 3' has now been deleted. Location plans of each of these sites are attached, and show that these sites are not constrained by landscape or conservation reasons. Newport is rightly highlighted as a Key Village as it has good public transport services, pubs, shops, post office, restaurants, church, and a highly-regarded secondary & primary school, and is a major focus for development in the rural area.

We do not consider that there is environmental capacity within Uttlesford for a new freestanding settlements or 'garden communities' that would have the critical mass required to generate their own employment, shopping, and public services to make it

sustainable and accord with the NPPF presumption in favour of sustainable development. The constraints of the large scale Elsenham expansion were noted by the Examination Inspector into the withdrawn Local Plan, and reflect this. Indeed, paragraph 52 of the NPPF makes clear that local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development, and given the settlement hierarchy proposed with a good range of towns and villages with both good existing service provision and environmental capacity, a new settlement is clearly not the best way of achieving sustainable new development within Uttlesford. As such we object to the deletion of Newport Policy 3 from the consultation, and to the non-allocation of the Bury Water Lane land. These sites should be included within policies SP2 and 3.

- The DLP confirms that the three Garden Communities will deliver no less than 4,670 new homes by 2033. Development of the Garden Communities will continue beyond the plan period. Whilst we recognise the sustainability benefits of such an approach – to provide employment within these Garden Communities - it is important that there is not an over reliance placed on new garden communities to deliver employment and economic growth for the District, and that existing communities continue to be supported and enabled to thrive. In particular the DLP should recognise that delivery of the Garden Communities will be challenging, requiring the significant cooperation of a multitude of agencies and delivery of substantial new infrastructure, and should be sufficiently flexible to account for potential delays in these coming forward. In this respect, our Client's site represents a deliverable employment growth location which will not require significant infrastructure improvements above those already anticipated, particularly when compared with Garden Communities.

It is considered that the Policy, in seeking to provide exactly the level of employment land estimated to be required over the Plan, does not provide flexibility for a situation where an allocation may not be delivered, or fails to be delivered at the right time. Accordingly, it is considered that, where appropriate, the DLP should allocate additional land either immediately or reserved for release according to market signals, or a further review of the Plan. Should the Council not consider it appropriate to allocate the wider site at this time, we recommend that a Reserved Land designation would be an appropriate policy response to enable flexibility in the DLP, to deliver further opportunities for employment, without a need to review the entire Plan. The Land at Slamsey's Farm would benefit from the location, infrastructure, access and services provided from the initial development, limiting the need to deliver significant infrastructure in advance of an immediate need for employment sites.

For the reasons set out above, we would seek an amendment to Policy SP5 to enable additional floorspace to be provided across the site at Land West of A131, Great Notley, which is already allocated for employment use in the Braintree District Local Plan and for the allocation to represent the whole site, including that which is located in Uttlesford District Council, as illustrated on the Site Location Plan at Appendix A.

- Policy SP2: The Spatial Strategy for 2011-2033 Paragraph 3.45 identifies that the delivery of 14,100, homes would require an average completion rate of 641 dwellings per year between 2011 and 2033. This is a significant amount of annual completions and the plan needs to be more ambitious to ensure this rate of delivery can be maintained. Policy SP2 seeks to focus the majority of development around the two Market Towns and three new Garden Communities. It states the Key Villages will be the major focus of the development in rural areas. Whilst the Plan's attempt to focus development in the most accessible and sustainable locations is supported this should not be done at the expense of stifling development in rural communities and delivering sufficient development to meet the Districts future development needs. The Policy should be amended and first paragraph 3 amended to include all villages and hamlets not only Type A & B. References to development being limited and restricted should be removed and replace with more positive and proportionate criteria. (Note: the sub paras of para 3 should be renumbered or lettered for greater clarity)

- The Council identify that new development in Type A villages will be limited and sustainable. It is considered that in relation to Leaden Roding the DLP has not been applied appropriately and has not considered the benefits of releasing land within the Green Belt in order to provide opportunities for growth, and meet demands. Given the recognition of Type A Villages as local services centres and their suitability to accommodate a scale of development that reinforces their role as a local centre, the allocation of only 44 new homes is not considered sustainable and places unreasonable pressure and reliance on the District's Key Villages, Market Towns and new Garden Communities. This would appear to be in stark contrast to the description of the services and benefits the Type A Villages provide to existing residents. Given that 'about 70% of the District's population live in the villages and countryside outside Saffron Walden and Great Dunmow', we consider that the extremely limited allocation of sites within villages is inconsistent with the aims of the plan to deliver sustainable development, and inconsistent with the existing spatial distribution of residents. The Trajectory DLP identifies that all Villages (key, Type A and Type B) will provide 273 new dwellings (1.9% of dwellings). This compares to 983 dwellings in Towns (7%); 4,670 dwellings in Garden Communities (33%); and 1,190 dwellings as Windfall Allowance (8.4%). The remainder are identified as existing permissions and existing commitments (49.5%). Delivery of garden communities will require significant infrastructure enhancements, and the cooperation and effective working of multiple agencies. Inevitably, there will be long lead in times for the delivery and completion of development. It is considered improbable that garden communities will begin to contribute towards housing completions from 2021-22 – from two years from current anticipated Local Plan adoption date. This further demonstrates the need for additional sites to be identified for housing – sites that have the potential to deliver housing in the shorter / medium term. Small sites in established villages would be entirely deliverable in the short term. It is considered to be entirely inconsistent with the aims of the DLP to identify such low allocations to villages and results in the villages being unable to contribute towards the growth of the District or able to benefit from the proceeds of growth such as investment in new infrastructure and facilities, and homes for those wishing to remain living in these communities.

- Paragraph 3.45 identifies that the delivery of 14,100, homes would require an average completion rate of 641 dwellings per year between 2011 and 2033. This is a significant amount of annual completions and the plan needs to be more ambitious to ensure this rate of delivery can be maintained. Policy SP2 seeks to focus the majority of development around the two Market Towns and three new Garden Communities. It states the Key Villages will be the major focus of the development in rural areas. Whilst the Plan's attempt to focus development in the most accessible and sustainable locations is supported this should not be done at the expense of stifling development in rural communities and delivering sufficient development to meet the Districts future development needs. The Policy should be amended and first paragraph 3 amended to include all villages and hamlets not only Type A & B. References to development being limited and restricted should be removed and replaced with more positive and proportionate criteria. (Note: the sub paras of para 3 should be renumbered or lettered for greater clarity).

-S- Policy SP2 seeks to focus the majority of development around the two Market Towns and three new Garden Communities. It states that the Key Villages will be the major focus of the development in rural areas. This is strongly supported.

- Objection to the spatial strategy as proposed by Policy SP2 and detailed in supporting text. It is considered that the Council is placing too great an emphasis and reliance on the ability of new settlements to meet its housing needs over the plan period. 78% of all new housing is proposed to be delivered in new settlements which is considered to be unrealistic and we therefore have significant reservations at this time as to whether the emerging plan strategy at this time will be capable of being found sound. All three new settlements are unsuitable and undeliverable within the Plan period as the ability of any new settlements to deliver new homes within two years of a plan being adopted is considered highly unlikely given the usual challenges associated with delivering new settlements as follows: a) They take a significant amount of time to deliver due to their complex nature and long preparation, planning and overall lead-in times before development starts.

Individuals

- Concern that in Saffron Waldon journeys are being designed to be longer. Concern that a very large number of new and existing residents will be working in the London, Cambridge and along the LSCC, but planned development in Saffron Walden does not provide sustainable access to this corridor. Concern that the railway service is being ignored. Suggestion that Wendens Ambo could have a strategic role in the sustainability of development in Uttlesford. Concern that the Garden Communities will not be radically sustainable as they will not be connected to the rail network, forcing the use of cars to get to train stations.
- Concern that the North Uttlesford community lacks evidence of compliance with the requirements for sustainability, sensitivity to the natural and historic landscape, or the necessary transport, health, education or retail infrastructure. Inadequate assessment on its impact on the facilities and infrastructure of Great Chesterford.

- SP2 does not provide a sustainable spatial strategy for Uttlesford District. Saffron Walden is the most sustainable location for new growth, due to education, leisure and employment facilities. Concerns relating to highway impact and air quality. Concern that brownfield windfall sites in Saffron Walden, such as Walden School site or the Print Pack site on Radwinter Road, will be stifled due to the highway impacts. The NUGC 5 km north of Saffron Walden will be heavily reliant on the main District town for health, education, employment, leisure and retail facilities, increasing traffic and air pollution in Saffron Walden. A solution to the highway impact and the air quality will aid housing delivery in this sustainable location
- Object to the inclusion of the NUGV in SP2 as the site does not meet the aim set out in paragraph 3.5 regarding sustainability. There are no guarantees that the necessary transport, health, education or retail infrastructure can be delivered. NUGV will adversely impact the natural and historic landscape and the existing community at Great Chesterford where the road network, education facilities and health service are already under pressure.
- The West of Braintree option will have a negative effect on the local area. Traffic infrastructure, schools, GPs, hospitals and public transport cannot cope with new residents.
- Objection to the new developments as they will spoil the natural countryside as it will become a concrete jungle, with traffic congestion and too much pollution.
- The proposal for three new large settlements is inappropriate in this rural district. Suggestion that they are removed from the Plan.
- Concern that the new developments will not protect the intrinsic character and beauty of the countryside development, as the landscape, heritage, wildlife, transport, village life will all be impacted. Concern that the support for these developments only comes from those who benefit financially. Suggestion that each village should take a pre-determined number of houses as infill within the existing parish boundaries.
- In what way does the West of Braintree new town possibly enhance and maintain the distinctive character of the local rural communities which it will engulf?
- Comments relate to the West of Braintree development. Suggestion that there are better alternative sites that are much more suitable in relation to the impact on the environment, wildlife, historic and cultural importance, roads, public transport, employment etc. The WoB Andrewsfield site has no access to public transport i.e. buses, railway stations, so the number of cars on the local roads would increase. No obvious local employer and so there is no guarantee of local employment, meaning new residents would be forced to commute to Cambridge, Chelmsford, London or Colchester with the likely mode of transport being by car. The impact would be huge and unfeasible and destroy the historic character of the Villages and threaten the local wildlife. Seriously detrimental impact on Bosted Wood, which is an ancient woodland in direct contravention of the latest Government White paper on the topic. Loss of 2,500 acres of prime agricultural land, an unsustainable economic strategy.
- I object to the Settlement Hierarchy set out as it is not transparent as to how the distribution strategy was selected.
- There has been no substantiation of the 14,100 which underpins the whole Plan. There is now an alternative figure of 11,196 from the same consultants. The numbers for Uttlesford from ORS are significantly higher than for any comparable authority in England. There is no audit trail published supporting the calculation of the 14,100.

Concern that the consultants at ORS are not qualified enough to do the job. There has been no independent verification of the calculations.

- The residents of Gt. Chesterford have peacefully demonstrated to stop the destruction of their village, environment and way of life. The people of Little Easton and Great Dunmow including the Town Council are desperately trying to stop 10,000 houses being built. The new residents will swamp the existing population. Uttlesford residents are demonstrating to stop these developments. The elected Councillors of Uttlesford have a duty of care to carry out the will of the people they represent not central government. Concern that the developments will destroy villages and communities because if these plans are carried out that is exactly what is going to happen. Good agricultural land is going to be destroyed for the financial gain of developers. The developers are offering bribes of schools and infrastructure to gain planning consent. If these plans go ahead Historic Towns such as Great Dunmow and Saffron Walden will be destroyed. The existing local roads will not be able cope with the vast amount of traffic that the Garden Communities will bring to the areas. Suggestion that there should be regeneration in existing towns such as Braintree.
- The Local Plan for Uttlesford and in particular Great Dunmow is the wrong strategy. Great Dunmow owes most of what it has to history and the geographic area in which it sits. There is very little room in the town for any expansion or major change in terms of Retail Shopping, Business, Restaurants, Leisure and Parking opportunities. Suggestion that a new town should be built with all of the facilities that it requires to run in parallel and complimentary to Great Dunmow including shared facilities and infrastructure such as schools, medical, leisure and transport. Transport should include an extension to the Railway to serve the new town Great Dunmow and then on to Braintree. The garden village needs to be more self-sustaining and a base to grow the future, which Dunmow town cannot.
- Concerns over funding. The proposed garden villages do not provide the level of infrastructure necessary to support these communities. Suggestion of smaller developments throughout the district as more wealth will be generated. The sites allocated in this plan will experience a vast increase in value, particularly if they are currently agricultural land. By allocating the majority of development on a very few sites a lucky few people will benefit. All other land owners are prevented from building dwellings for themselves or others. We are disappointed on behalf of ourselves and for others who have been over looked for another plan period. I fully support more development as there is clearly a need for more housing, business premises and infrastructure, but I am not aware of any support for the spatial strategy and garden villages in particular.
- SP2 does not represent a realisable policy to cater for UDC's predicted housing needs. There is no evidence that SP2, and in particular SP6 (Easton Park), has been led by UDC and every indication that the proposal is directed by the current land owner and associated developers. The Local Plan has no indication of what form the winning of local support to SP2 might take and early indications of public reaction (to be confirmed by this current consultation) are of local opposition. Neighbouring East Herts and Harlow Councils are advancing their proposal for a 10,000 dwelling development north of Harlow at Gilston, yet there is no mention of this in the Local Plan and of its effect on the deliverability of Easton Park. Just ten miles separates the two sites that share the M11 as the major road access. Stress on existing roads

and rail routes is well documented but there are only aspirational statements for capacity improvements to cater for the increased population, especially so for Easton Park. The Plan lacks detail of the management of the huge undertaking of garden city developments and evidence of support from cross-border authorities and agencies.

- Objection to policies SP2 and 3 as they are not sustainable. The 3 new garden communities will generate too much traffic and pollution, consume too much water and will have a detrimental impact on the rural character of the area. The upgrade to the A120 would have to be substantial and would be out of character for the area. These developments do not have access to a railway, increasing traffic congestion. The rail transport we do have in the vicinity is often at full capacity and expecting people to cycle is unrealistic in this hilly area.
- Concern that the overall housing allocation for Type A villages is too low. Suggestion that there should be limited housing allocations within Hatfield Broad Oak, in order to maintain the sustainable credentials that the village currently enjoys. Suggestion that there should be less of a focus on building new Garden Communities on greenfield land and more of a focus on providing needed dwellings within the existing villages.
- Objection to the local plan. Lots of building has taken place over the last 10 years. Concern over traffic congestion from the lack of provision for better roads and parking at train stations. Other concerns over school places, and other services like hospitals. UDC seem to think about nothing but providing housing for North London. What we need is true affordable housing for our youngster families who cannot qualify for Council housing.
- Concentrating that all the district's housing in just 3 sites will change the character of the area. If one small development fails, it can be recovered by finding another, but this is not the case for a development of 5000 houses. Concern that developers will not provide infrastructure.
- Saffron Walden and its surrounding villages have a shortage of secondary school places and doctors to cater for such an ambitious plan. The sewage system we have in place unless updated will not cope with this increase. The lack of policing in Saffron Walden has been evident with an increase in Burglaries. Concern that UDC will not listen to residents objections.
- Objection to new Garden Communities. The decision to identify these three locations, and especially the West of Braintree site, is contrary the Local Plan's evidence base and therefore fails the test of being "justified" Suggestion that the West of Braintree extension should be replaced by Chelmer Mead.
- Objections regarding development at Saffron Walden. No provision has been made for any infrastructure to support large scale development proposed such as; doctors and dentist's surgeries, schools, hospital, parks and play areas, sports facilities. No firm condition as far as provision of 2 parking spaces per dwelling. No clear guidance and conditions as to the style, character and ecological considerations as to the new housing. No plan to combat traffic problems and levels of pollution. No consideration for the protection of the old settlement and its unique historic importance.
- Concern over accuracy of the growth forecasts in both population and economic growth. Development must include more roads and will have a major impact on the character of the local landscape. Suggestion that a "brownfield first" approach is taken in the Plan.

- The crucial figure of 14,100 new homes cited as being needed by 2033 for the District appears early on but is at no point justified with zero workings or assumption basis provided for its calculation. Migration is slowing down post- Brexit so not as much housing is needed and evidence is based on outdated information.
- Objection to the plan as there is insufficient information regarding significant accident statistics on the only two major routes within the district, the M11 and the A120. Every accident brings Uttlesford to a stand still as there are no other main routes in the district to divert to. It cause massive tailbacks for those going into Stansted Airport and affects local residents daily lives by often taking them an hour to travel a twenty minute journey. Concern that the new developments will prevent Uttlesford from being rural. House prices do not reflect the average wages at Stansted Airport so any new housing cannot be justified as Airport related housing. Many homes are purchased by those working and earning London wages and traveling to and from the district on the M11. We need local housing for local people at a cost they can afford on local wages.
- The schools, doctor's surgeries, roads are struggling as things are to cope with the number of people living in and around Saffron Walden.
- Objection to the housing 'need' target of 14100, as it fails to take account of the rural, low density, low growth nature of Uttlesford. Concern over employment prospects for new residents. House prices in Uttlesford are too high for the majority of airport employees, who have average to low salaries. Concern that the Garden Community is unlikely to provide sufficient low cost homes. Only 18% of current airport employees live in Uttlesford and this figure is continuing to decline. It does not make sense to rely heavily on the airport for job growth, nor to plan housing for many new airport employees. The Inspector who rejected the previous UDC Plan criticised the heavy burden being placed on Great Dunmow, but the new Plan ignores this criticism.
- The Easton Park development will take Great Dunmow's effective population to over 30,000 (even before the impact of the West of Braintree development). Great Dunmow currently has about 3700 homes. Concern that infrastructure will not be delivered for Eastern Park quickly enough. The first stage of Easton Park, already half the size of Dunmow, will mean a 50% increase in demand for services. Occupants of the first 1800 homes will need doctors, schools and other facilities, and Great Dunmow is already hard pressed to provide these for its own residents. Impact of the development on an ancient town (Roman foundation, medieval heritage, listed buildings).
- Suggestion that the spatial strategy for North Uttlesford should include several new villages, rather than a single new community. Several villages could better meet the true demand, which is for a steady supply of homes in various locations. Several villages would better fit the very spatial nature of the district: the archaeology, the landscape, the historic market towns and villages, the historic settlement pattern and the science parks, which are deliberately sited in rural locations.
- There is no clear evidence for the numbers of housing required - the statistics have been based on a flawed methodology with no triangulation, no peer review and no alternative research has been conducted to test the veracity of the results. There is no evidence for the selection of the 3 proposed garden village sites as the most feasible and no alternatives considered. The numbers lack the initial critical mass

required for early infrastructure, and there is no evidence that developers would be forced to provide this. Consultation with bordering authorities has been patchy at best, and their plans not taken into account -eg: South Cambridgeshire and Suffolk.

The employment proposals are spurious and based on Stansted Airport or Harlow - most residents commute to London or Cambridge by train and/or car.

- London Stansted Airport's centrality to the plan is disturbing in environmental terms. The last para that the growth of LSA will be supported, directly contradicts the claim that the LSA's environmental impact will be managed.
- Questioning why Uttlesford have got into a joint venture with Braintree and not South Cambs. Questioning why the houses at the closing Garrison in Wimbish are not included in the draft plan. Concerned about the size of the West of Braintree Garden Community. Concerned over the loss of Andrewsfield, as the small planes using Andrewsfield cause the planes leaving Stansted to fly higher than normal, therefore if Andrewsfield is lost then the planes from Stansted will fly lower and create more air pollution and noise. Concerned that it will result in urban sprawl from Braintree to Great Dunmow and there will be no green spaces. Concerned that the character of the area will be removed. Concerned that the infrastructure needed to support the development is not in place and there is no guarantee that there would be. Concerned that there is a lack of roads and rail, insufficient provision of doctors, surgeries and hospital facilities, insufficient provision of education, recreation and leisure facilities.
- Concerned that the Council is relying on the ability of new settlements to meet its housing needs. Concerned that all three new settlements are unsuitable and undeliverable, as the new settlements will not deliver new homes within two years of a plan being adopted, as they take a significant amount of time to deliver due to their complex nature and they rely on a significant amount of upfront infrastructure.
- Suggestion of a new sub paragraph to Para 3 "Enabling the re-drawing of village envelopes to render villages a coherent shape within their countryside and locality."
- Support locating the majority of housing in separate settlements. But there are so many conflicting criteria that decisions can only be made based on evidence: studies and independent minds must decide the number of settlements, the location(s) and suitable allocations.
- The majority of the development has ALREADY focussed upon the market towns of Great Dunmow and Saffron Walden. These towns do not need or want MORE development (in addition to that already consented) The remainder of the development in Uttlesford should be focussed MAINLY upon the new 'Garden Settlements'. There is a significant risk that the proposed three settlements may degenerate into mere housing estates, devoid of proper facilities. They MUST have decent transport arrangements, so that their inhabitants can get out to work and to play.
- The quality of life offered to residents is important. Housing numbers overestimated given the small developments which have been given permission. There is little provision for bungalows given that the demography of the area is changing. The necessary infra structure should precede development; even the B1383, formerly the A11 is at times inadequate for the traffic using it & the B1051 grinds to a halt & creates lengthening vehicle queues at both the top & bottom of Grove Hill, Stansted & it will only get worse as more houses are built & an increasing number of vehicles

need to use that route as alternatives are either lengthy or unsuitable. Maintaining a healthy environment should be a high priority. Low housing density, local shopping, employment & services can help here if they are sufficiently relevant & adequate by increasing the number of journeys that may be made on foot. Sufficient land should be provided for formal playing areas. Wilder areas of grassland or woodland should be preserved. The further expansion of Stansted airport should be put on hold until we can see what the effect is of leaving the European Union. The Elsenham proposal should be scrapped completely. This field has numerous springs on it, & before Rush Lane houses were built was so wet that it was home to a snipe. Access to this site is restricted leading to overuse of the narrow lane & is next to the railway giving residents an unpleasant place to live.

- Dec 2015 Housing Strategy states that “Uttlesford is a beautiful rural area, regularly rated as one of the best places to live”. Yet the plans continually put forward by Uttlesford council want to make their so called ‘key’ villages become sprawling housing estates, without any proposal to improve the utilities, highways and the wellbeing communities.
- Under the draft plan, the 3 proposed sites will each deliver 150 completions per year (450 in total), however Braintree and South Cambridgeshire District Councils use a higher number of 250 per site, and, in the case of Cambourne and Northstowe for example, these higher figures have been achieved. If UDC adopted the same target figure, then 500 houses per year could be delivered from 2 sites; saving one of the three exiting communities from the impact of, what would then be an un-necessary development in this plan period.
- Stansted airport the largest employer in Eastern England. The average employee at Stansted Airport has to travel further than one does normally. Every increase in population requires a larger proportion of additional services than a population with a larger base. The proposition that there be three garden cities, one in the north two in the south is welcome. It provides for controlled planning and growth over a period of time that will start to relieve the likes of Saffron Walden which has to provide facilities for not only its own population but the present agricultural and village hinterland as well. Until a railway station is built at Addenbrookes the only way to commute is by car, adding to local traffic problems. Meanwhile the consistent increase in numbers of commuters to London adds to the strain that chiefly only the West Anglia Main Line can satisfy. Uttlesford does not have sufficient employment to support the population, so residents look to Bishops Stortford, Harlow, London, Chelmsford, Braintree and the Airport for work, shopping and other needs. Traffic will grow exponentially as there is no rail service. Road Traffic remains a considerable problem in this District. The M11 has remained two lanes in each direction despite two previous proposals to widen it. The local bus services are poor.
- Questioning why no development is envisaged for Wendons Ambo, which is within walking and cycling distance of the station.
- Concerned that Uttlesford should be building social housing for the local population, not market housing. Questioning why the houses at the Garrison, which is closing in Wimbish are not included in the Draft Plan.
- Questioning why Uttlesford has not also determined its housing need in talks with Brentwood Borough, as they have an unmet housing need. In order to be sound, the Local Plan is required to consider unmet needs of its neighbour and whether it is in a

position to help meet such needs. Concerned that Stansted Mountfitchet will be classed as a Main Urban Area.

- The Draft Local Plan is supported because Uttlesford District Council has fully taken on board the two Inspectors and Secretary of State's Reports that Elsenham and Henham are not suitable locations for development. It is to be hoped that any speculative planning applications for housing development, especially in Elsenham and Henham, will be refused permission unless the site is allocated in the Draft Plan. Residents' potential use of trains is without proof – there has been some reduction in passenger use at Elsenham since 2011/12 and travel by train only accounts for a small minority of total trips. (X 63)
- I wish to endorse the proposal for three garden villages as set out in the local plan. The North Uttlesford Garden Village is the most sensible solution to the question of building more houses in this part of the district.
- Support for the three garden communities for our district. UDC residents will need to be assured that the right mix of homes will be controlled by the planners. There is a need for more social housing. Young people are forced out of our district to afford a place to live. Assurance will be needed that part of these plans will include regard for the needs of all residents, schools, doctors, dentists etc.
- You have a 1. 2. and 3. within 3. I suggest amending to a. b. c. Reluctant support for the policy to build three new garden communities in the locations proposed. The District is in the position where a large quantity of new houses must be built by Government edict, and it does appear that the Plan represents the least worst option. These plans will have a considerable impact on local communities and this impact must be minimised. I do not think that it has been shown that all the alternatives have been considered. The possibility of 'one or more additional junctions to the M11', has stopped being talked about. You need to show when and why to demonstrate a clear audit trail. It is clear that the Fairfield site remains non-viable, for reasons summarised in Uttlesford Transport Study, 6.7.6. The alternative southern route which has been sketched in by Fairfield would not solve the problems of stress on a network of rural roads. The continued focus on connectivity towards Bishop's Stortford via Takeley does not take account of the considerable extent to which the large settlement of Stansted Mountfitchet is a destination for journeys from the Henham and Elsenham area. The attraction of Stansted Mountfitchet will be increased following the recent opening of an enlarged Co-operative retail store in Lower Street, Stansted Mountfitchet.
- I support the development of the three new communities. The introduction of supporting infrastructure though is essential, as is the correction of inadequate infrastructure in the existing communities. Key areas are schooling, air quality and medical facilities. Rail transport needs to be enhanced to match the additional demand. Road development is good to the north, west and south of the plan area but remains very poor in the east/ central areas.
- There is much with the new Draft Plan about which I feel happy i.e. the proposed creation of three new garden villages and then also spreading the building load around existing towns and villages.
- UDC have taken on board the various reports about previous flawed proposals resulting in a supportable strategy

- I fully support the exclusion of Elsenham and Henham from the Draft Local Plan. Policies SP9 and SP10 are supported. Policy SP11 should be amended in line with Objective 2c. The Plans should not allow any further growth beyond the 35 million passengers per annum approved limit. Paragraph 4.37 lacks clear numbers on 'need' for additional sites or any detail of where they might be located. (X2)
- I strongly support the local plan, as after many years, we at last have a plan that is evidence-based. my strongest comment is support for the EXCLUSION of the North East Elsenham.
- I fully support the draft plan in allocating housing in three garden settlements near the M11/A11 where there are suitable road and rail links. The allocation of new housing near the A120 at Easton Park and west of Braintree has the road infrastructure to cope with the new development, unlike the previous plan where Henham / Elsenham were chosen. There is a good base of evidence to show that these three areas are suitable to take housing, this evidence was absent in the former plan which was rejected by the inspector. I am concerned that adequate services be supplied, such as schools, doctors, shops.
- I support the Local Plan 2017.
- I support this plan and am pleased that Uttlesford District Council has produced a draft plan on which it is agreed. Please progress the process of making it legal as soon as possible to halt opportunist developer applications in unsuitable locations.
- Support for the local plan. Houses have to be located in places where there are existing road and train infrastructure. There is no benefit to building further houses in any of the villages which means that traffic has to go through the town until such point as a by-pass can be built. Stansted is becoming even more of a bottleneck with the traffic from the B1383 and the B1051 from Thaxted. Village development limits and the protection of the countryside are supported. People have to shop somewhere and Bishops Stortford will not be able to cope due to all of the building being done in the town. People, particularly from the villages, will be looking to shop in Saffron Walden. If the Garden Communities are built then there should be some shops within the sites. It makes sense to build the Garden Communities as the roads and infrastructure will have to be in place when the developments are being built. Unlike smaller scale developments, where nothing needs to be done with regard to infrastructure. Stansted Airport should not be allowed further growth beyond 35m passengers per annum. Car Parking is becoming a problem and until Network Rail can provide a proper rail service just for the airport from London, Birmingham, and from the East, running a service which serves all flights, so that people don't have to rely on cars to get there, they should not be allowed to increase the flight numbers. There needs to be more clarification on the details of additional sites for travellers and where they might be located. (X2)
- Concerned about the politically motivated development originally planned for NE Elsenham, however UDC has taken on board the decision by two government inspectors and the Secretary of State that no further development can take place in the Elsenham/ Henham area.
- Please treat this email as support for the draft local plan. We are resident in Henham and support the plan.
- As a resident of Saffron Walden I am more inclined to support the garden towns. Any further significant building in Saffron Walden will put far too much pressure on the

town's roads, health services, schools etc. The recent closure of East street combined with an accident on the M11 illustrates how easily the town can become gridlocked, even at midday.

- Support for the Local Plan. Sympathy for the folk who live in the areas proposed for large new developments. However, the development is split into three well-spaced areas, which is better than putting it all in one megablob. The proposed developments are large enough to justify building the extra infrastructure required by large developments. The North Uttlesford development is well located to the extensive developments around Cambridge, and have good communications in that direction. The Easton Park and West Braintree developments are next to the A120 which provide good access to adjacent locations. It will be interesting to see how a modern large-scale community will develop, a wonderful opportunity for planning to meet the needs of the inhabitants.
- I am pleased UDC has at last taken on board the need for new settlements and for this present research.
- Support for the proposed Draft Local Plan which is of such importance to the area. In particular the recognition of the Inspector's decision that the previous Elsenham proposal was unsustainable, although I feel that the inclusion of a further 40 houses in an already excessively over developed village is a step too far. The current draft proposal to meet the Government's requirement is a practical solution but will require considerable infrastructure work to avoid greater traffic congestion in the area.
- Support for the Draft Local Plan as it appears to offer a practical solution to meeting the Government's requirements. Whilst the establishment of settlements in Uttlesford will not enhance the character of the area the proposed location is reasonable in order to retain the nature of this part of the Country.
- Supports development of South of Cambridge, Great Chesterford as development at this location would not disrupt the surrounding areas. This site has mainline rail access to national employment centres. The M11 needs upgrading to 3 lanes to accommodate growth.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

In considering the Spatial Strategy of the District, it can be seen that the majority of the Plan's allocations will occur in accordance with directing long term growth to Garden Communities and in the short-medium term within the most sustainable settlements within the District; those being Saffron Walden and Great Dunmow. This approach ensures that development is located to the most sustainable existing locations, and also those that have the capability of being self-sustainable. Additional growth allocations are then directed to Key Villages in the next instance. Where growth is allocated in accordance with the settlement hierarchy, responding to the most sustainable settlements in the District, this will have positive sustainable outcomes. Impacts are therefore significantly positive on objectives associated with sustainable travel, access to services, health and social inclusion, housing, infrastructure delivery, education and skills and employment. The development of Garden Communities will alleviate pressure on existing settlements in the latter stages of the plan period, related to social and environmental tenets of sustainability. This includes infrastructure pressure, and impacts on cultural heritage, the historic environment and landscapes that can be expected from a more piecemeal approach to development at existing settlements through urban extensions were the Garden Communities not

progressed as a solution to meeting the District's OAN. This leads to positive outcomes, however it should be noted that much depends on the specific locations of development for many environmental objectives.

Long term significant positive impacts will also be recognised in regard to the allocation of Garden Communities, which will see the largest proportion of the Plan's overall growth target. The sustainability implications of these are numerous, not least due to their scale (explored elsewhere in this Report), but also the positive thematic implications of their allocation; those being directing growth away from existing settlements that can be expected to be harmed significantly if they were to accommodate such growth. In that sense, the principle of Garden Communities will ensure a number of secondary or comparably more sustainable benefits than the alternative of distributing growth rigidly to the District's most sustainable settlements as per the settlement hierarchy.

The broad distribution of allocations can be seen to respond to the strategic road network and rail links within the District, which although not offering a widespread dispersal does reflect the most sustainable broad locations in a predominantly rural District and increases the potential for synergies to improve public transport as stated in the Plan. The distribution of large and strategic new allocations can be seen to be largely focused on the A120, with the exception of those allocations at Saffron Walden.

Alternatives Considered

At the 'Issues and Options' stage in 2015, the Council explored a number of focuses of growth that would see growth distributed to different areas of the District. These included the following options:

- New Settlement Options
- Urban Extensions in Saffron Walden
- Urban Extensions to the Edge of Bishops Stortford (in Hertfordshire)
- Urban Extensions in Great Dunmow
- Village Extensions and Small Sites

At that stage, a number of Strategic Scenarios were developed for the OAN at the time, precisely for 580 dwellings per annum and 750 dwellings per annum. Under both of these quanta, extant permissions were set at 5,000 dwellings and a windfall allowance of 50 dwellings per annum or 750 over a 15 year plan period. These Scenarios were:

- Scenario A - A focus on a New Settlement (580dpa)
- Scenario B - A focus on Villages and Bishops Stortford (580dpa)
- Scenario C - A focus on the District's Towns (580dpa)
- Scenario D - A 'hybrid option 1' which resembled an equal distribution across all of the above (580dpa)
- Scenario E - A focus on two new settlements (750dpa)
- Scenario F - A focus on the District's Towns and Villages (750dpa)
- Scenario G - A 'hybrid option 2' which resembled an equal distribution across all of the above 750dpa options, with less growth in Bishop's Stortford.

At this current stage, new evidence has emerged that suggests that the District's OAN is 14,100 over the plan period, which equates to 641 dwellings per annum 2011-2033. A total of 8,171 of these are identified as dwellings which have already been built (2,468), have planning permission at April 2016 (4,513) and are included within a windfall allowance of 70

dwellings a year (1,190). As a result of this, the Plan has to find a total of 5,929 remaining dwellings.

The below table sets out whether any of these previously explored options can be defined as a 'reasonable option' at this stage, with 'reasons for rejection / progression' outlined. For the sustainability impacts of these options / scenarios, please refer to the previous SA that was made available for consultation in 2015.

Scenario A - A focus on a New Settlement (580dpa) - This Scenario is not a reasonable alternative as it would not meet the District's OAN. The Scenario is not considered a sound distribution strategy as it would lead to the reliance on only 1 large site to deliver the housing, there would be issues surrounding deliverability within the Plan period, it deprives other settlements of sustainable growth, and there would be negative impact on 5 year land supply. For these reasons the alternative has been rejected.

Scenario B - A focus on Villages and Bishops Stortford (580dpa) - This Scenario is not a reasonable alternative as it would not meet the District's OAN. The Scenario is not considered a sound distribution strategy as the scale of development is likely to have a detrimental impact on the character of villages, the countryside and the highway network in many circumstances, and there would be uncertainty that the scale of individual developments would provide the infrastructure required. For these reasons the alternative has been rejected.

Scenario C - A focus on the District's Towns (580dpa) - This Scenario is not a reasonable alternative as it would not meet the District's OAN. The Scenario is not considered a sound distribution strategy as there would likely be significant impacts on historic character and landscape setting, it would restrict the pooling of s106 for infrastructure, and there are also insufficient deliverable sites as submitted for consideration. For these reasons the alternative has been rejected.

Scenario D - A 'hybrid option 1' which resembled an equal distribution across all of the above (580dpa) - This Scenario is not a reasonable alternative as it would not meet the District's OAN. The Scenario is not considered a sound distribution strategy as a reliance on only 1 large site to deliver the housing would lead to issues surrounding deliverability within the Plan period. For this reason the alternative has been rejected.

Scenario E - A focus on two new settlements (750dpa) - This Scenario is not a reasonable alternative as it would not meet the District's OAN. This is based on an assumption as to the delivery related to any new settlement providing a maximum 1,400 homes over the plan period based on expected start-dates and delivery rates. The Scenario is not considered a sound distribution strategy as it would rely on only 1 or 2 large sites to deliver the housing, which would have deliverability issues within the Plan period, it deprives other settlements of sustainable growth, and there would be negative impact on 5 year land supply. For these reasons the alternative has been rejected.

Scenario F - A focus on the District's Towns and Villages (750dpa) - This Scenario is not a reasonable alternative as it would not meet the District's OAN. The Scenario is not considered a sound distribution strategy as some villages are more constrained than others which could result in disproportionate growth, and there would be an uncertainty that the scale of individual developments would provide the infrastructure required. For these reasons the alternative has been rejected

Scenario G - A 'hybrid option 2' which resembled an equal distribution across all of the above 750dpa options, with less growth in Bishop's Stortford - This Scenario is not a reasonable alternative as it would not meet the District's OAN. This is based on an

assumption as to the delivery related to any new settlement providing a maximum 1,400 homes over the plan period based on expected start-dates and delivery rates, which would not be achievable through two new settlements. Despite this, the notion of three new settlements under a broad 'hybrid option' of distribution across the wider District warrants further exploration and testing within this SA within the above proposed Policy SP2.

At this current Preferred Options stage, few options and alternatives can be identified as 'reasonable' and are required to be explored. This takes into account existing commitments, dwellings built (2011-16) and those with outstanding planning permissions at 1st April 2016. These correspond to development within the District's main towns and key and other villages and can be seen to contribute to Policy SP2's distribution pattern.

With further considerations given to the findings of the SHLAA and the plan's corresponding non-strategic site allocations, which are also in accordance with the distribution proposed in Policies SP2 and SP3, there emerges a need for three new settlements, or 'Garden Communities' within the District, forming a significant part of the Plan's proposed Spatial Strategy. This is identified through a current forecast 'shortfall' of 4,673 dwellings that need to be allocated within the plan period in addition to those that are identified for allocation in the Plan within the District's towns and key villages. Therefore, the only reasonable Spatial Strategy options that exist at this current stage are different permutations of three New Settlement or 'Garden Community' options (in consideration of the aforementioned assumptions regarding New Settlement / Garden Community start dates and delivery rates within the plan period).

The appraisal of these options / alternatives can be found in Appendix 1 of this report. The preferred Policy Approach (Easton Park, Great Chesterford and West of Braintree) is also included within Appendix 1 for comparison purposes.

Identifying and Meeting our Housing and Jobs Needs Paragraphs 3.25 – 3.30

This supporting text was responded to by 22 people and organisations.

	Total
Support	1
Object	10
Comment	11

Overarching Summary

- Authorities in the West Essex and East Hertfordshire HMA should be required to set out in their Local Plans the necessary contingency measures should one authority be unable to meet their own needs within the Plan period.
- Whilst there has been co-operation in considering housing needs across the HMA the Councils need to further align their plans to provide greater certainty they will work together in meeting housing needs.

- The Objectively Assessed Needs identified within the recent SHMA show that unmet housing has been projected upwards. However, the DtC does not reflect this current position on housing distribution between the SHMA area authorities.
- There is no mention of Hertfordshire County Council as part of the Duty to Cooperate.
- Uttlesford needs to work extremely closely with the airport to ensure its issues are identified and addressed through the Local Plan so it can deliver its significant economic growth potential.
- Uttlesford is within the London Stansted Cambridge Corridor area and this should be noted in the plan.
- The proposal for North Uttlesford Garden Village lacks evidence of co-operation with S. Cambridgeshire and does not take account of the implications of their development plans for North Uttlesford.
- Uttlesford could adopt more of a leadership role with these adjacent authorities in the promotion of new business initiatives, modern networking to enable such development and high-tech hubs.

Statutory consultees and other bodies

Harlow District Council

Thank you for consulting Harlow Council on the Draft Local Plan and supporting documents. This is an officer response and focusses upon some of the overarching issues and themes which are considered to be of mutual interest. The acknowledgment of the longstanding collaborative working with Uttlesford Council related to strategic planning matters within the London Stansted Cambridge Corridor, particularly in relation to infrastructure requirements and economic development, is welcomed Under the Duty to Co-operate there has also been joint work to define OAHN across the West Essex -East Hertfordshire Housing Market Area since 2010 and joint work is also underway regarding the overall scale of employment growth within the Functional Economic Market Area (Paras 3.27 to 3.38). The recognition given to the broader regeneration and sustainable growth of Harlow is also welcomed as well as Harlow's role as a key retail centre with Cambridge and Chelmsford. Para. 3.28 could be expanded to include the local authorities in the West Essex -East Hertfordshire Housing Market Area. Harlow Council looks forward to further joint working with Uttlesford Council under the Duty to Co-operate. This is primarily to agree a framework for the delivery of sustainable growth which is supported by appropriate infrastructure to the benefit of the residents and businesses in both districts.

Housebuilders Federation

- Duty to Co-operate - From the evidence provided it would appear that the Council has co-operated with its neighbouring authorities and statutory bodies on the key strategic and cross boundary issues and have mechanisms in place to support such co-operation in future. The only aspect of co-operation we have some concerns over is with regard to the policy mechanisms should any one authority in the HMA not be able to meet their housing needs. Whilst we recognise that each authority has said they will meet their own needs we are concerned that Epping Forest BC (EFBC) may struggle to plan for the necessary homes within the agreed plan period for HMA. It will take a significant increase in development with EFBC to delivery over 500 dwellings per annum (dpa) which is made even more difficult

given the significant backlog in homes they face. We estimate that their back log against their objectively assessed housing need (OAHN) is just over 1,800 homes which if their current trajectory is maintained will rise to nearly 4000 homes by 2021. Whilst we recognise that EFBC are still in the process of preparing a new Plan it would be prudent for those authorities in the West Essex and East Hertfordshire HMA to set out in their Local Plans the necessary contingency measures should one authority be unable to meet their own needs within the Plan period. For example, in the Oxfordshire HMA a review trigger was included in Local Plans with regard to the unmet needs arising from Oxford City. A similar trigger may need to be considered by the authorities in this HMA. Finally, we would also suggest that the Council clearly outlines the distribution on housing needs across the HMA and how this need was apportioned. It is unclear from both the 2015 and 2017 SHMA as to how the Council's arrived at the apportionment between each authority. By setting out needs in full for the HMA and then delivery expectations for each authority allows more effective monitoring of delivery across the HMA and, where necessary, for consideration to be given to addressing any failures to meet needs. Therefore, whilst there has been co-operation in considering housing needs across the HMA the Councils need to further align their plans to provide greater certainty they will work together in meeting housing needs.

Developers, Agents and Land Owners

Paragraph 3.27 of the Draft Uttlesford Local Plan refers to the requirements of the Duty to Cooperate (DtC) and indicates that the Council has held discussions on cross boundary issues with neighbouring authorities. It appears that the Council has held DtC meetings with all neighbouring authorities (i.e. Braintree District Council and South Cambridgeshire District Council), and has published supporting documents that identifies specific cross-boundary issues, including housing, infrastructure, and economic growth. It appears that the meetings on housing related matters have taken place prior to the publication of the recent Strategic Housing Market Assessment (SHMA), dated July 2017. The Objectively Assessed Needs identified within the recent SHMA show that unmet housing have been projected upwards. However, the DtC does not reflect this current position on housing distribution between the SHMA area authorities. Accordingly, the main issue that will need to be resolved through the DtC process, is as follows: Meeting the housing needs between the neighbouring authorities will need to be discussed with all authorities within the SHMA area, to determine whether the amount of housing need directed to Uttlesford District Council is correct and where the remainder of any unmet need will be accommodated. At present, South Cambridgeshire District Council are still unable to demonstrate an adequate supply of housing. Whilst their Local Plan examination is drawing to a conclusion, there is still some level of uncertainty as to where the additional housing requirements will be provided. Accordingly, further discussions are required in respect of DtC to determine whether the current distribution of housing within the SHMA is sufficient in dealing with unmet housing delivery between the two authorities. The duty to co-operate requirement for plan-making is derived from Section 110 of the Localism Act 2011, which inserted Section 33A into the Planning and Compulsory Purchase Act 2004. Section 33A states: Duty to co-operate in relation to planning of sustainable development (1) Each person who is (a) a local planning authority, (b) a county council in England that is not a local planning authority, or (c) a body, or other person, that is prescribed or of a prescribed description, must co-operate with every other person who is within paragraph (a), (b) or (c) or subsection (9) in maximising the effectiveness with which

activities within subsection (3) are undertaken. (2) In particular, the duty imposed on a person by subsection (1) requires the person (a) to engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and (b) to have regard to activities of a person within subsection (9) so far as they are relevant to activities within subsection (3) We note in particular the duty imposes a requirement to engage constructively, actively, and on an on-going basis . The NPPF provides key guidance on the duty to co-operate requirement. Paragraph 156 identifies the strategic priorities where co-operation may be required, including the delivery of houses and jobs and transport infrastructure. Paragraphs 178 to 181 explain how the duty to co-operate should be carried out. It is clear that co-operation must be constructive and effective. Consultation and discussion on its own is insufficient. What is required is a co-ordinated approach towards the delivery of sustainable development and to meet strategic priorities. Paragraph: 011 Reference ID: 9 of the Planning Practice Guidance (PPG) identifies what actions constitute effective cooperation under the duty to cooperate, and states in part: The activities that fall within the duty to cooperate include activities that prepare the way for or support the preparation of Local Plans and can relate to all stages of the plan preparation process. This might involve joint research and evidence gathering to define the scope of the Local Plan, assess policy impacts and assemble the necessary material to support policy choices. These could include assessments of land availability, Strategic Flood Risk Assessments and water cycle studies. Authorities should submit robust evidence of the efforts they have made to cooperate on strategic cross boundary matters. This could be in the form of a statement submitted to the examination. Evidence should include details about who the authority has cooperated with, the nature and timing of cooperation and how it has influenced the Local Plan. The policy impacts of large strategic developments in neighbouring areas must be discussed through the DtC process because they affect the delivery of strategic priorities and are cross boundary matters, and in particular they will affect housing delivery. We comment on housing delivery in the context of the overall development strategy, housing needs, affordable housing, and for individual strategic sites in other representations. The housing delivery assumptions for North Uttlesford Garden Community will need to be adjusted to take into account the close proximity of other existing and potential strategic developments in neighbouring areas which will almost certainly compete for housebuilders and purchasers. Requested Change We request that in due course that an updated DtC Statement is published, and that this document provide clear evidence that the requirements of the DtC have been complied with in respect of meeting unmet needs from South Cambridgeshire, and the delivery of strategic sites within Uttlesford and in neighbouring areas including the implications for housing delivery of these developments.

There is no mention of Hertfordshire County Council as part of those authorities with whom the council has cooperated; although reference has been made elsewhere in the draft Plan Given the importance of traffic flows through the district and the possibility of sharing education services around Bishop's Stortford the plan fails to meet with national policy in respect of its duty to cooperate with neighbouring authorities. Hertfordshire County Council should be added to the list of authorities in paragraph 3.27 and further discussions should be had with Hertfordshire County Council and East Hertfordshire District Council in respect of a residential allocation on land south of Beldams Lane, Bishop's Stortford (call for sites reference 03GtHal15) and the necessary Green Belt review to ensure that the duty to cooperate has been fulfilled.

– Duty to Co-operate - The position of Uttlesford within a wider HMA means that increased pressure is placed on making provision for the full objectively assessed needs in order to be compliant with the NPPF. The wider HMA is made up of local authorities Harlow DC, East Herts DC and Epping Forest DC all of whom are progressing separately with local plans, currently at different timescales of the procedure. We are aware that East Herts DC has progressed substantially with its emerging Local Plan to a point where examination of the plan will be programmed in due course once several matters are resolved. Since its submission to the Secretary of State a number of further evidential submissions have been made by the Council to bolster its housing need evidence. The latest Update Note (2) from the Inspector handling the submission has outlined the following in regards to housing numbers within the HMA, which are applicable to the emerging Uttlesford Local Plan: My previous note (Inspector's Note 1) indicated that the OAN had to take into account the most recent household projections and look to update the OAN and the final housing requirement accordingly; Document ED112 published in July 2017 relates to the housing market area. This indicates that the most recent household projections published in July 2016 have been taken into account. In addition, the document considers the Office of National Statistics (ONS) estimates up to mid-2016 published in June 2017 and the Greater London Authority (GLA) 2016 based, household projections published in July 2017; and The overall conclusion of the document is to reduce the previous estimate contained in document HOP/011 from 54,608 to 51,700 for the whole market area. In light of this analysis, the Inspector has requested evidence that supports ORS' conclusions that a lower OAN be taken forward for the HMA, which is applicable to the work underpinning Uttlesford's evidence base. For the avoidance of doubt, we support UDC's assertion to maintain a higher housing figure than that identified in the most recent OAN Study undertaken by ORS, but maintain that attention be given to the following questions put to EHDC, which should also be accounted for by UDC in its Local Plan to avoid any delays in the examination of the document and its supporting evidence: The GLA 2016 household projections have not been examined; therefore, what is their status?; Please provide a summary of the differences between the calculations underpinning the OAN for the whole market area from 54,608 to 51,700 explaining why a lower number has been arrived at; and Section 3 of document ED112 indicates that an uplift of 20% might still be justified as a response to market signals, to align with future jobs and to be consistent with the approach taken in similar areas. The figures supporting these issues do not seem to have changed; however, a lower uplift is now proposed. Where is the evidence to show that this would be sufficient to address these matters including the worsening affordability index? What would the effect be on the component of affordable housing within the OAN? In relation to the final bullet point above, E&A considers that as a direct result of suppressed headship rates in recent years, the originally intended 20% uplift to reflect market indicators should remain and the further equating to an additional 9,100 homes across the HMA be planned for in the best locations for their delivery. This in turn needs to be related to a specific increase above the 14,100 homes proposed for Uttlesford in the emerging Local Plan.

Whilst Gladman recognises that the Duty to Cooperate is a process of ongoing engagement and collaboration as set out in the PPG, it is clear that it is intended to produce effective policies on cross boundary strategic matters. In this regard, the Uttlesford Local Plan must be able to demonstrate that the Council has engaged and worked with neighbouring

authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.

Epping Forest, East Hertfordshire, Harlow and Uttlesford form the West Essex and East Hertfordshire Housing Market area and have therefore been working in collaboration to prepare a joint evidence base to support their relevant Plans. However, Uttlesford also has significant connections to Braintree, South Cambridgeshire, Chelmsford and, given its proximity, London.

The strategic links to Braintree are particularly important in the context of this Plan as one of the proposed Garden Communities straddles the Uttlesford/ Braintree administrative boundary. It is therefore critical that Uttlesford works alongside Braintree Council to ensure the delivery of the Garden Community within the timeframes set out in both Plans. Failure to do so could be critical to the overall delivery of the Local Plan's strategy given the site's strategic scale. This should also be the case for the Garden Community which sits close to the boundary of South Cambridgeshire.

London Stansted Airport is located within Uttlesford and has a major influence on the district in terms of providing employment, workers and in terms of travel patterns. Providing sufficient workers, particularly in lower paid professions, to support the airport's operation is a significant problem given the lack of suitable, available and affordable accommodation in close proximity. Therefore, Uttlesford needs to work extremely closely with the airport to ensure its issues are identified and addressed through the Local Plan so it can deliver its significant economic growth potential.

Further, the PPG reflects on the public bodies which are subject to the duty to cooperate. It contains a list of the prescribed bodies. The PPG then goes on to state that: "These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters."

It is clear that the Council has co-operated with its neighbouring authorities as part of the plan making process. However, we do have concerns that the neighbouring authority Epping Forest DC will struggle to plan for the necessary homes within the agreed plan period for HMA. 49. Epping Forest DC is a largely Green Belt district and has therefore found it difficult to deliver houses in the past. Therefore, it will take a significant increase in development to increase delivery in EFDC by over 500 dwellings per annum (dpa) require. which is made even more difficult because of the significant shortfall in housing supply. We estimate that their back log against their objectively assessed housing need (OAHN) is just over 1,800 homes which if their current trajectory is maintained will rise to nearly 4,000 homes by 2021. 50. Due to this risk of under deliver in EFDC it would be prudent for those authorities in West Essex and East Hertfordshire HMA to set out in their Local Plans the necessary contingency measures should one authority be unable to meet their own needs within the Plan Period.

Uttlesford is within the London Stansted Cambridge Corridor area and this should be noted in the plan. Things are being done to Uttlesford/ pressures put on our housing/desire to live here that might not meet/look after the needs of the existing local community.

Comments by Individuals

- No evidence has been provided in the Plan to demonstrate that NUGV has been discussed in advance of proposal with the neighbouring authorities in Cambridgeshire. NUGV has a direct impact visually, on traffic flows, potential pollution and road loading, on water supply and risk of flooding, and on sewage disposal. If there had been co-operation this should be clear.
- A small district like Uttlesford does not have the resources to deal with three Garden Communities.
- Growth assumptions I don't understand the conviction in the plan regarding the population and employment growth and the subsequent increase in demand for housing. These growth assumptions seem incorrect and appear to have been accepted into the plan without ever once mentioning Brexit. Surely our exit from the EU is the single most significant event to impact the country over the last 50 years, yet the possible effects are not considered by the Plan. This week Pound Sterling fell to an eight-year low against the Euro, and businesses across the country are re-evaluating investment plans and relocation options. And the country has still not left the EU. No-one knows what is in store for the UK over the next few years. To make such an important decision as the creation of three massive new communities, which will have an irreversible impact on the local area, before the full consequences of the vote to leave the European Union are fully known, seems to be the height of irresponsibility.

Paragraph 3.26

- Link to the Localism Act 2011 and the NPPF would be useful. And where can the PPG be found?
- The proposal for North Uttlesford Garden Village lacks evidence of co-operation with S. Cambridgeshire and does not take account of the implications of their development plans for North Uttlesford
- North Uttlesford Garden Village is on the boundary with South Cambs but the draft plan makes no mention of consultation with South Cambs - indeed the proposals are contrary to South Cambs policies of concentrating new development on the edge of Cambridge City. There is a mention on the UDC web-site of a consultation meeting on 13th Jan 2017, but published minutes suggest that Uttlesford Councillors forgot to mention that they were intending to allow the development of 5,000 new homes adjacent to South Cambs boundary. Uttlesford are therefore in breach of their duty to consult under paragraph 178 of the NPPF.
- As to the duty to cooperate between UDC and Braintree District Council, disclosure of all the meeting agenda items and minutes in draft and final form will be required to verify the extent of effective and proper consultation undertaken. Included in this will

be required documentation as to the participation (or otherwise) and, very importantly applicable terms and funding costs, by UDC in the "joint delivery vehicles" already established by Braintree, Colchester and Tendring District Councils and Essex County Council as to the overall North Essex developments contemplated by these councils and currently not including UDC.

- Uttlesford DC has paid lip service only to co-operation with South Cambridgeshire. S. Cambs was anxious to co-operate with Uttlesford, but was ignored.

Paragraph 3.27

- It was to Great Chesterford that the Romans sent their cavalry to put down the Iceni rebellion. Great Chesterford is the site of the crossing of the river Granta with the oldest road in England "the Icknield way" a track that is as today as it was in ancient times crossing undeveloped landscape with not a road or development in sight. This location for a settlement will dominate the sense of place and history. Cambridge is booming. We have not thought about protecting that which should be protected. There are scheduled ancient monuments here. The crematorium is being built to be completely hidden in the landscape on this site has discovered an ancient saxon burial site. The least likely of all the periods in history to be represented here. The chalk uplands and the valley have been protected but not designated as needing protection. When the M11 was built there was no north bound access provided, the idea was to protect exactly this ancient and valued landscape from development. The protection came from deliberately limiting the infrastructure so that it could not support development. There is no mitigation around the chalk upland or the valley for the traffic from this development. Quite simply put it's the right place for political survival for the conservative party it's the wrong place for just about every planning reason I can think of.

Paragraph 3.28

- It seems strange that neither South Cambs nor Cambridge City is apparently in the LSCC.

Paragraph 3.29

- Uttlesford could adopt more of a leadership role with these adjacent authorities in the promotion of new business initiatives, modern networking to enable such development and high-tech hubs. Note that high-tech will be unrecognisable within the plan period
- I agree with this, why then is the majority of the development taking place as remote from the Cambridge Great Chesterford companies as possible. I note the small amount at Great Chesterford but it is small in comparison to the advantages of the area.

- Where is the proof of this? Does the 'significant number of jobs' mean new jobs for the people moving into the new housing?
- Uttlesford plan ignores the M11 corridor. It attempts to open an A120 corridor.

Sustainability Appraisal June 2017

Not Applicable

**Vision for the London Stansted Cambridge Corridor Core Area
Paragraphs 3.31 – 3.34**

This supporting text was responded to by 20 people and organisations.

	Total
Support	4
Object	7
Comment	9

Overarching Summary

- The Crossrail 2 will help to support the train services between Uttlesford and London.
- An integrated approach of rail-based public transport network within Uttlesford and Cambridgeshire is suggested, for instance Easton Park with Stanstead airport and North Uttlesford with Saffron Walden, Cambridge and Great Chesterford Stations via the proposed Cambridge-Haverhill railway.
- LSCC involvement in the preparation of plan may have conflict of conflict as it is funded by Stansted Airport.
- Any new development should ensure the provision of super-fast broadband.
- Some suggestions about wording and presentation were made.
- Additional housing allocation should be considered to take the London overflow on housing requirements in Uttlesford into account.

Statutory consultees and other bodies

Epping Forest District Council

Paragraphs 3.31 -3.33 set out the vision for the London Stansted Cambridge Corridor Core Area which is in line with the vision agreed by the Cooperation for Sustainable Development Member Board and is identical to that included in the Epping Forest District Draft Local Plan. It is considered, however, it would make it helpful if in future versions of the emerging Local Plan that this was presented in such a way as to make it clear that this is the agreed vision

e.g. by way of including this within a separate text box, rather than within the main body of the document.

Greater London Authority

Uttlesford sits within the London - Stansted - Cambridge - Peterborough Corridor extending from north London through Hertfordshire and Essex. Policy 2.3 of the current London Plan sets out how these corridors can support strategic co-ordination of planning and investment. For the emerging new London Plan a corridor-approach is again being considered, and the borough's involvement in the London Stansted Cambridge Consortium is supported. From an economic perspective, we understand the update of the Objectively Assessed Economic Need work is underway. Given the District's location on the M11 corridor, it may be useful to explore relevant economic linkages including the Council's thoughts on land for industry and logistics and the role this may play for the wider area. In terms of housing, the use of longer term historic migration trends in the West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA) is welcomed, and we support the consideration of our latest population and household projections in the latest SHMA update. Our latest projections include consistent outputs for all local authorities in England and will form the basis for housing need in the next London Plan. We also welcome the Council's commitment to meet its need in full. We recognise the partnership work within the West Essex and East Hertfordshire Market Area. We also support the identification of three Garden Communities providing longer term growth opportunities. We would like to offer a specific conversation with the Council about the scale of these Garden Communities and infrastructure requirements they may depend on. From a transport perspective, Crossrail 2 will help to support improved train services on the West Anglia Mainline potentially benefitting a number of stations in Uttlesford including Great Chesterford. Increased rail capacity will help future growth in the District and increase sustainable travel options.

Harlow District Council

Paragraph 3.32 could also refer to the Harlow & Gilston Garden Town.

Network Rail

In regards to Chapter 3 Spatial Strategy, Network Rail would welcome the opportunity to engage with the Local Authority in relation to rail and how this can provide a high quality public transport link to garden communities. Notably Easton Park with Stanstead airport and North Uttlesford with Saffron Walden, Cambridge and Great Chesterford Stations. It is welcoming that reference has been made to the West Anglia Mainline and Braintree Branch Line improvements.

Saffron Walden Town Council

In relation to the spatial strategy referring to rail travel. A new station is proposed at Granta Park on the Cambridge to Haverhill light railway. Uttlesford Garden Village should be connected to the light railway proposed for the Haverhill to Cambridge line. Eastern Park also needs a rail link to Stansted and Braintree.

Transport for London

TfL welcomes the references to Crossrail 2 in paragraphs 3.31 and 3.33 which is linked to maximising opportunities and working with partners to secure investment in major infrastructure. Crossrail 2 will help to support improved train services on the West Anglia mainline potentially benefitting a number of stations in Uttlesford. Increased rail capacity will help support future growth in the District. Any development supported through improvements in rail capacity linked to Crossrail 2 should be explicitly recognised in the Uttlesford Local Plan.

Developers, Agents and Land Owners

The recognition of Bishop's Stortford as a centre for development and sustainable growth which will help the prosperity of the London Stansted Cambridge Corridor Core Area is welcomed; however, the Local Plan currently fails to allocate any additional growth to the Bishop's Stortford Fringe. A further allocation should be made on the land south of Beldams Lane, Bishop's Stortford to meet the projected shortfall contained with the accompanying report into housing land supply that concludes that the Council risks five year supply shortfall of 737 dwellings a plan period shortfall of 3,726 dwellings and needs to allocate additional sites in order to remain sound when national and local evidence is considered regarding delivery rates and commencement timescales. The objectively assessed housing need has failed to take account of the London overflow on housing requirements in Uttlesford and as such the requirement is higher than quoted at 654 dwellings per annum rather than the 641 dwellings per annum currently quoted and as such the total number of dwellings required is 14,388 rather than the 14,100 currently quoted. The local plan should be amended to reflect the current housing need and realistic delivery rates and include additional allocations in order to be considered sound.

Comments by Individuals

- Firstly, please define "The Core Area" - it is not included within the Glossary. What relevance does it have to Uttlesford's decision-making process? Who decided that the local authorities should "support the economic ambitions of the LSCC", a pressure group funded by Stansted Airport? Was this in anyone's manifesto? This is an ill-considered objective, without reference to other stakeholders and issues including quality of life. There seems to be a conflict of interest here. How can a planning authority objectively consider an application from the sponsor of a pressure group that the authority has vowed to support? Turning this round, would it be appropriate for UDC to declare that it supported the environmental aims of Stop Stansted Expansion? Such a declaration might be more valid as the membership of SSE probably includes more electors than the membership of organisations that make up LSCC.
- Note especially the importance of the second bullet point- supporting infrastructure.
- The plan needs to have a more positive approach to Uttlesford being a part of the plan in relation to business development and hi-tech growth rather than just being a dormitory area for employment elsewhere. There is no logical reason why we should not be a leader in this regard. Super-fast broadband needs to be universally available for this to be possible of course!

- The 4th bullet point needs to have built in to it a requirement for all new developments (whether road, rail, housing etc.) to protect neighbouring properties from noise, light-spill etc. This has been sadly lacking in developments recently permitted.
- I fail to understand how you can make references to the London, Stansted, Cambridge Corridor as an engine of UK growth with its world class industries and businesses, and then totally ignore the railway line which serves it and the potential for a strategy of genuinely sustainable transport using the existing railway service. Crossrail will indeed make the railway link at Liverpool Street even more important, but Uttlesford needs a better strategy of getting people onto trains at this end!
- Every new build appears to miss the opportunity to have fast broadband because the provision is not included by planners to ensure BT Openreach (or whoever now) delivers the service. This has to be a major consideration because new houses without high speed fibre broadband are worthless these days. You have to make sure the new builds are future proofed.
- I am supportive of this proposal. Further thought needs to be made around broadband. As this document is severely lacking in its reference to it. Development of rail routes is extremely promising however this will require significant funds. All admirable aims but the key is the detail.
- The plan lacks evidence of the benefits of this vision for Uttlesford as a whole. So far, the vision is piecemeal.
- 'The provision of new, alternative green spaces - the use of the word alternative suggests that some existing green spaces will be destroyed. Will this be just the fields on which houses are built, or others? What is the nature of this proposed green infrastructure Upgrading the West Anglia line will only increase the pressure for more houses in Uttlesford. What are the opportunities that Crossrail 2 promises?
- This plan goes into great detail on new housing but has next to no detail on how new employment opportunities will be created.
- If we have an A120 core area, many opportunities will be missed.
- Why is there a need to create an economic powerhouse in Uttlesford? Greater economic development generates an influx of people which creates a need for housing which destroys the unique benefits that Uttlesford enjoys and which UDC boasts of in earlier paragraphs.
- See also comment re paragraph 3.31. Who decided that Uttlesford's Local Plan should "reflect the aspirations and opportunities identified in the LSCC Vision". LSCC is a pressure group funded by Stansted Airport. This is an ill-considered strategy,

without reference to other stakeholders and issues, establishing either a bias or a conflict of interest.

- I understand that the LSCC is an unelected pressure group sponsored by Stansted Airport. Shouldn't the focus be on what the residents want?

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Not Applicable

The West Essex and East Hertfordshire Strategic Housing Market and Functional Economic Market Area Paragraphs 3.35 – 3.38

This supporting text was responded to by six people and organisations.

	3.35	3.36	3.37	3.38	Total
Support	0	0	0	0	0
Object	1	1	0	1	3
Comment	0	0	2	2	4

Overarching Summary

- Epping Forest District Council and Harlow District Council reminded that all three MOUs were signed in March 2017 already, and the latest joint evidence on FONH published in July 2017 should be referred.
- The council may risk a five-year housing supply shortfall of 737 dwellings and a plan period shortfall of 3,726 dwellings. Additional allocations should be considered.

Statutory consultees and other bodies

Epping Forest District Council - It would be helpful in the interests of completeness if reference was also made to the MoU agreed in March 2017 for managing the impacts of growth within the West Essex/East Hertfordshire HMA on Epping Forest Special Area of Conservation. It is noted that Paragraph 3.38 makes reference to three draft MOUs. However, these were all signed in March 2017, i.e. prior to the publication of the Regulation 18 Local Plan.

Harlow District Council - Paragraph 3.37 could also refer to the latest available joint evidence on FOHN published in July 2017 by ORS.

Developers, Agents and Land Owners

Bloomhall on behalf of Mr T Lowe, Mr D Lowe, Mr R Lowe & Mrs S Bearman - Please see the corresponding reports regarding housing supply and need submitted via email to support these representations which conclude that the council risks a five year housing land supply shortfall of 737 dwellings and a plan period shortfall of 3,726 dwellings suggesting that additional allocations are required to meet the identified need. A similar report into the objectively assessed housing need which accompanies the representation indicates that the

delivery rate in higher than quoted at 654 dwellings per annum rather than the 641 dwellings per annum currently quoted and as such the total number of dwellings required is 14,388 rather than the 14,100 currently quoted. The local plan should be amended to reflect the current housing need and realistic delivery rates and include additional allocations in order to be considered sound.

Comments by Individuals

Para. 3.35

No responses from individuals.

Para. 3.36

- Low skilled jobs in rural locations are preferred by UDC to highly skilled jobs where they are needed.

Para. 3.37

- Please state where the SHMAs can be found.

Para. 3.38

- See also comment re 3.31 and 3.34. Who decided that Uttlesford should deliver "the LSCC vision"? LSCC is a pressure group funded by Stansted Airport. This is an ill-considered strategy, without reference to other stakeholders and issues, establishing either a bias or a conflict of interest.

Sustainability Appraisal June 2017

Officer response

Proposed changes to plan

**Identifying the Housing Needs
Paragraphs 3.39 – 3.45**

This supporting text was responded to by 39 people and organisations.

	3.39	3.40	3.41	3.42	3.43	3.44	3.45	Total
Support	0	0	0	1	0	0	0	1
Object	3	1	1	16	5	1	5	32
Comment	2	1	2	8	1	1	1	16

Overarching Summary

- A mechanism to review the housing needs is needed as unmet need of between 3,750 and 4,000 homes per annum may arise from the South Essex Housing Market Area (HMA).
- The discrepancy of housing needs between the (FOAN, July 2017) 13,332 and the housing target 14,100 in the draft local plan is not explained.
- The ten-year trend in relation to migration instead of the 5-year trend used by ONS in the Sub National Population Projections is not justified in the SHMA.
- 20% - 25% uplift should also be provided given the strong market demand. But a representation suggests that 10% is enough as supported by the inspector and similar figures from neighbouring councils.
- Concerned that the OAN of Uttlesford is more than one-fourth of the total housing needs of the West Essex and East Hertfordshire Strategic Housing Market.
- The total housing need should be 12,950 over the Plan period to 2033, using a stepped model which reflects the proper historical need.
- The SMHA does not take the effect of unmet housing demand in London given its proximity to London which has continued shortage of housing.
- The level of housing might reduce from 14,100 to 13,332 over the period of the Local Plan. Even lower need is likely because of reduction in migration due to Brexit and slower growth in Stansted Airport.
- Identification of housing needs should be specific to existing local people and the elderly.

Statutory consultees and other bodies

Basildon Borough Council

In relation to strategic approach to growth set out in the Uttlesford Regulation 18 Draft Local Plan, Basildon Borough Council wishes to offer support to Uttlesford District Council in pursuing the strategic approach to growth involving the extension of existing settlements in accordance with the settlement hierarchy, and in delivering three new garden communities within its area over the period to 2033 and beyond. However, Uttlesford District Council is advised that unmet need for housing may arise from the South Essex Housing Market Area (HMA). The Objectively Assessed Housing Need (OAHN) in South Essex is for between 3,750 and 4,000 homes per annum. This equates to between 75,000 and 80,000 homes over a 20 year period. There is currently a concern that there may be insufficient capacity to deliver this quantum of housing in the South Essex HMA, although at this time the full scale of any unmet need has not been quantified. However, as work in South Essex is progressed, any gap between the OAHN and potential supply will become clear, and the need may arise for the South Essex authorities to make a request of other authorities in different HMAs within Essex to assist in meeting that unmet need. Basildon Borough Council does not wish to delay Uttlesford District Council in progressing its plans to take into account these concerns. However, it is noted that as currently drafted, the Uttlesford Regulation 18 Draft Local Plan does not include a mechanism for its review in light of any such requests. In order for Uttlesford District Council to be able to consider such requests it is considered that a review mechanism should be introduced within the Local Plan as it is progressed towards Regulation 19 to ensure it is sufficiently flexible and responsive.

Elsenham Parish Council

Elsenham Parish Council notes recent press coverage to the effect that the level of housing for the District might be reduced from 14,100 to 13,332 over the period of the Local Plan (Herts & Essex Observer, 17 August 2017, p. 4). For reasons outlined below (Section 3.48; Policy SP3), the Parish Council holds that excessive development has already taken place in Elsenham since the commencement of the Local Plan period. It is therefore contended strongly that if there is a reduction of total numbers in the District then Elsenham's allocation of an extra 40 dwellings should be cancelled.

Great Chesterford Parish Council

We have outlined in this response how the housing figures are wrong and unreliable. Cooperation with South Cambridgeshire is virtually non-existent.

GCPC notes the following on housing need; 14,100 housing target not justified. GCPC notes that UDC's spatial strategy predicated on unjustifiable figures November 2016 UDC needed provision of 12,500 homes for 2011 - 2033 or 568 dwellings p.a. 2 new settlements proposed i.e. Easton Park and West of Braintree. Nov/Dec 2016 UDC revised OAHN figures to 14,100 for plan period. Full Objectively Assessed Need (FOAN) (July 2017) concluded that 13,332 dwellings for 2011 or 606 dwellings p.a.

Harlow District Council - The figure of 14,100 new homes in Paragraph 3.42 is not formally referenced.

Historic England - National Guidance requires that the most up-to-date official population projections should be used as the basis for calculating housing needs. The draft Plan proposes an overprovision of dwellings of 1000 when compared to the most recent OAN.

House Builders Federation

Housing Needs - As we stated in our representations to other authorities in the West Essex and East Hertfordshire HMA we have considerable concerns regarding the approach taken in assessing housing needs in the 2015 SHMA. Whilst this report has since been updated to take account of the most up to date information our concerns regarding the approach to assessing housing needs remain. Our particular issue with the SHMA is its argument that a ten-year trend in relation to migration provides a more accurate projection than the 5-year trend used by ONS in the Sub National Population Projections. The SHMA considers that these projections to provide a significant over estimation of housing need when translated into the DCLG Household Projections that is not supported by past trends in migration. However, Planning Practice Guidance PPG is clear that the household projections published by DCLG are the starting point for assessing housing needs, that they are statistically robust and that any changes must be clearly explained and justified. We do not believe that the SHMA provides the necessary justification to reduce the demographic starting point of housing needs by such a significant margin.

Demographic starting point - The key justification for using alternative assumptions on migration are that they provide a less volatile assessment of past trends and as such provide a more accurate assessment of future trends. THE SHMA argues that a five-year rolling

average shows significant volatility and as such cannot be relied upon to provide an accurate assessment. In particular it is considered that a recent spike in migration leads to future needs being over estimated. We don't dispute that in some circumstances a longer-term trend can provide more realistic projection where there is considerable volatility in migration trends. However, they can also include periods of unexpectedly lower levels of population growth and migration that are no longer relevant and can be slower to address change in population. There does not appear to be any other argument except that a 10-year trend is potentially less volatile than the five-year trend and that in turn the five-year trend over estimates housing needs. However, one could also state that the five-year trend considers the most up to date trends without being affected by past trends that are unlikely to be repeated. In this scenario, the SHMA would lead to a significant under assessment of housing needs adding to the current housing crisis rather than addressing it. Given that supply in London continues to be well below the GLAs assessments of housing needs and the HMAs strong links to the Capital there is evidence to suggest that recent trends are likely to continue. As such there is little justification in using the ten-year trend based on the evidence provided. However, what is evident is that the adjusted figures set out in the SHMA provide significantly lower projections than any other source. The 2017 update to the SHMA considers the latest projections provided by the GLA as well as the 2014 based and 2012 based projections in figures 2 and 3. It is clear that the SHMA's projections are significantly below any of these, even the GLA's central projection which uses a 10-year trend as proposed in the SHMA. As such the proposal to reduce the demographic starting point when assessing housing needs is flawed and unjustified. The Council and its partners in the HMA should use the 2014 Household projections as they are published as the starting point and not modify these projections on the basis of a 10-year migration trend. We would also recommend that the approach taken to the use of a ten-year trend is specifically raised with those authorities neighbouring the HMA.

The impact of this approach could place additional needs on those authorities in future due to under delivery against needs in the W Essex and E Herts HMA.

We would agree with the 2017 SHMA that the market signals for the HMA indicate that there are considerable pressures in terms of affordability, price and past under supply of housing and the conclusion reached in the original SHMA that a 20% uplift was correct. However, the SHMA then seeks to justify a much lower uplift on the basis that the 20% would not be reasonable as it would require a much smaller household size or a significant increase in net migration. By proposing an uplift of 6,200 homes (an uplift of 13.6%) the SHMA looks to set an OAHN that is more in line with the GLA 2016 household projections allowing for the increased migration expected in these projections. It is also argued that this allows for increased household formation amongst those aged under 35. However, we would fundamentally disagree with this approach to considering market signals which seeks to limit any increase on the basis that migration could not be expected to increase significantly beyond level seen in the past. This does not provide any boost to housing delivery and fails to recognise that the significant failure by local authorities to allocate sufficient land to meet housing needs has suppressed both migration and household formation. The approach taken in the SHMA seeks to maintain existing patterns of migration and growth and will not address the problems faced in the housing market one of past under provision. As Ludi Simpson and Neil MacDonald explained in an article for the TCPA in April 2015 when

considering the DCLG 2012 projections: projecting forward based on past trends is, in effect, assuming that the factors which have caused those trends will continue to apply.

The market signals are indicators that show an area has failed to deliver sufficient new homes which has led to high housing costs, poor affordability and suppression in household formation. The market signals uplift should be applied at a reasonable level to make up for the past failings to deliver sufficient land for new residential development. As outlined earlier the local planning authorities in this HMA have not delivered the homes needed for the area. It failed to meet its annual housing targets set out in RSS which has contributed to the concerns regarding the affordability of housing identified in the SHMA. However, it is only recently that the Council has looked to address these concerns and consider increasing housing supply. To conclude on the Council's OAHN we judge the local adjustments to the demographic starting point to be unjustified and that inadequate consideration has been given to the market signals adjustments. We would recommend that the Council use the 2014 Household projections as the starting point and then apply at least a 20% uplift to take account of market signals.

Saffron Walden Neighbourhood Plan Steering Group

Housing figure of 14,100. New evidence suggesting fewer homes are needed which will make the five-year land supply more challenging if overall figure is not reduced. Suggestion: Figure 13,400.

Saffron Walden Town Council

The housing figure for Uttlesford is 14,100 of a total 46,058 across 4 authorities. 14,100 is more than $\frac{1}{4}$ of the total requirement and represents 30% of the requirement across 4 authorities. We question these figures anyway and believe that 11,500 is a more appropriate figure. Houses in Saffron Walden = total of 1269 (inc built, planning permission granted and those proposed in Local Plan), this represents 9% of the total required for Uttlesford. why 30% of housing for Uttlesford? Please clarify If this percentage is based on actual and projected population figures from census, is it fair to assume that because there has been a large percentage increase in past 10 years that this should continue?

Thaxted Parish Council

Para 3.42 (Page 26) Comment: The housing figure for Uttlesford is 14,100 of a total 46,058 across 4 authorities. 14,100 is more than $\frac{1}{4}$ of the total requirement and represents 30% of the requirement across 4 authorities. It is the opinion of Thaxted Parish Council that Uttlesford must re-visit their Objectively Assessed Housing Need figures. The figures that they are currently using are now out of date and probably hugely inflated giving rise to a requirement for far more housing than is actually needed. Since their figures were produced we have had Brexit (and the latest net migration figures which are a fraction of what they were pre-Brexit); the second runway for Heathrow; and an analysis of Stansted Airport jobs showing that workers don't actually live in Uttlesford and anticipated growth has been overstated. Proposed Action: Query this allocation with UDC, why 30% of housing for Uttlesford?

If this percentage is based on actual and projected population figures from census, is it fair to assume that because there has been a large percentage increase in past 10 years that this should continue? This should be re considered to reflect a more accurate statement of needs.

Weareresidents.org

It would seem that UDC may be using a faulty model. The model used for this draft of the Plan has assumed that 641 units pa are need for each year of the plan, but backdated to 2011. In fact the housing need, as previously assessed by UDC and previous Local Plan Inspector was never 641 pa between 2011 and 2017. It was 338 pa in 2011, 415 from March 2013, then moved to 523 in October 2014, to 568 in September 2015, and only to 641 pa in July 2017. By using the 641 pa flatline model, UDC is overestimating the housing need by 1,153 homes. Using a stepped model which actually reflects the proper (and previously evidenced by UDC) historical need, the total need should be 12,950 over the Plan period to 2033, not 14,100.

New settlements take time to start delivering new homes to the required 5-year supply of new homes because there is a lot of up-front master-planning. Where there is a significant dependence on new settlements, it is an established practice in Local Plans for the delivery of new homes to be back-end loaded to allow for this. In other words the total number of new homes of the Plan period is the same, there are just more delivered in the latter years. For example 300 units pa in the first 5 years of a plan, 600 in the middle 5 years, and 900 in the last 5 years of a plan. It would seem prudent for UDC to adopt this acknowledged model as part of its Local Plan to allow it to recognise the realities of delivery and protect itself from accusations of failing to meet its 5-year supply. To be specific, given the reliance of 3 new settlements, a new policy should be inserted that adopts the back-end loaded model as the basis for how the Council will measure supply. The adoption of this model will also help protect the Council from a developers 'free for all' as the Plan starts to carry more weight in the period up to the Plan being adopted. It is strongly recommend that this action is taken.

Developers, Agents and Land Owners

It is essential that the evidence base, particularly the objectively assessed housing need is as up to date as possible in order for the Plan to be considered 'sound'. The failure to publish an up to date Annual Monitoring Report since 2014 suggests that the council does not have an accurate understanding of current and therefore future delivery rates in the district. In order to assess whether the Local Plan is sound an up to date annual monitoring report should be produced to ensure that the Plan is effective and justified by up to date evidence. Please see the corresponding reports regarding housing supply and need submitted via email to support these representations, which conclude that the council risks a five year housing land supply shortfall of 737 dwellings and a plan period shortfall of 3,726 dwellings suggesting that additional allocations are required to meet the identified need. A similar report into the objectively assessed housing need which accompanies the representation indicates that the requirement is higher than quoted at 654 dwellings per

annum rather than the 641 dwellings per annum in the draft Local Plan and as such the total number of dwellings required is 14,388 rather than the 14,100 currently quoted. The local plan should be amended to reflect the current housing need and realistic delivery rates and include additional allocations in order to be considered sound.

- Support the Council's decision to endorse the 2014-based Projections and set a housing requirement of 14,100 dwellings for the plan period (2011 to 2033).

Housing Needs - Having reviewed the 2015 SHMA we have concerns regarding the argument made that a ten-year trend in relation to migration provides a more accurate projection than the 5-year trend used by the ONS in the Sub National Population Projections. The SHMA has then concluded that these provide and overestimate when translated into the DCLG Household Projections that is not supported by past trends in migration. However, Planning Practice Guidance PPG is clear that the household projections published by DCLG are the starting point for assessing housing needs, that they are statistically robust and that any changes must be clearly explained and justified. The SHMA does not provide such necessary justification to reduce the demographic starting point of housing needs by such a significant margin.

We endorse the HBF's comments regarding it being prudent for Local Plans to set out the necessary contingency measures should one authority within the Housing Market Area be unable to meet their own needs within the Plan period. Furthermore, the need to each authority within the HMA to detail how the SHMA has apportioned growth. The HBF on behalf of its members has raised serious concerns regarding the approach taken to assessing housing needs in the 2015 SHMA. In particular, the SHMA does not provide the necessary justification to reduce the demographic starting point of housing need by such a significant margin. Persimmon refers to the HBF's representations in this regard.

Land north of Station Road, Elsenham - Identifying the Housing Needs (Paragraphs 3.40 - 3.46)

- Paragraphs 3.40-3.46 sets out how, through the Strategic Housing Market Assessment (SHMA), the proposed objectively assessed needs (OAN) for housing in the District for 14,100 homes (640dpa) has been arrived at.

- We do not consider the SHMA (2015) and SHMA Update (Update on Overall Housing Need (based on 2014 Projections) (February 2017) (2016) has correctly assessed the OAN for the District and indeed the wider housing market area (HMA)(The West Essex and East Herts HMA Uttlesford, Epping Forest, Harlow and East Herts). Consequently, it is our view that the proposed OAN is too low, and the Council has not identified sufficient housing sites in the plan to meet its needs.

- Firstly, it does not appear that London overspill has been considered when identifying need. The District has strong links to the capital and thus it is fair to conclude that the District will be affected by London overspill patterns. The OAN should therefore be revisited to provide for an element of London's unmet housing needs.

- Secondly, the SHMA has not taken appropriate account of market signals. The Local Plan Expert Group Report to the Government in March 2016 recommend that as a minimum an uplift of 25% should be

applied to local authority housing needs figures in order help achieve the Government's housing objectives.

- As acknowledged in the Plan, house prices and affordability ratios in the housing market area (HMA) are amongst the highest in the country outside London, especially in Uttlesford. This would suggest that uplift in excess of 25%, and certainly in excess of the 20% applied by the SHMA, should be applied to Uttlesford's OAN.

- Further to this, whilst not forming part of the evidence base for the Regulation 18 Local Plan, we note a further update of the SHMA (July 2017) has been published. This proposes an adjustment of market signals from 20% to 14% in Uttlesford. In light of the above, this reduction is considered inappropriate and it is not reflective of Uttlesford's housing needs. It is essential that Uttlesford's evidence base is robust, at the risk of the Local Plan being found unsound.

Comments by Individuals

- Housing needs - If UDC really wanted to provide local housing they would ask developers to build housing suitable for an aging population such as low level housing and bungalows with gardens so older people would be happy to move from large family homes. All recent new housing for older people seems to be rabbit hutch apartments why is this? Why are older people never considered in your plans a quarter of all new developments should be designed for older living.
- The 2015 Strategic Housing Market Assessment can no longer be relied upon for planning purposes because the assessment was completed before the UK decided to leave Europe (BREXIT). Therefore a new post BREXIT Strategic Housing Market Assessment will need to be undertaken in order that the post BREXIT housing market need can be identified.
- What formula was applied to achieve this disaggregation?
- Comments - Where is the evidence that this figure is needed? Is it not based on an expected higher employment figure at Stansted Airport a few years ago, and which is not likely to occur in the foreseeable future? How is it justified if we are told that UDC's housing list is about 1000? Why do we seem to be providing for people to migrate in from other areas, e.g London as our prices are slightly less?
- Housing Need - My comments relate to the calculation of housing need. The consultation document assumes a growth figure of 14,100 dwellings for Uttlesford over the plan period 2011-33. However, I am conscious of a later calculation following a release of figures by the Greater London Authority (GLA) which are reflected in an update by the council's consultants, ORS, dated July 2017. This concluded that a lower figure of 13,332 was appropriate. I have commented on this later, lower, figure in a separate section. For the moment, my comments address the higher figure stated in the draft plan.
- Exceptional Growth Figures. Firstly it must be pointed out that the forecast growth for Uttlesford shows an increase over the plan period of 43% which is far higher than any of the neighbouring authorities (see attachment 1). In fact I can only find

two districts in the entire country with higher growth rates of housing need and these are both in Oxfordshire. Housing growth in that county has been exceptionally low over the last 15 years and so its districts are now playing catch-up. Also one of the districts claims it is unable to absorb massive growth and is asking its neighbouring districts to share the load. But this projected growth for Uttlesford follows a period of exceptional growth. In the 10 years up to 2011 Uttlesford was growing at one of the very fastest rates in the country, even outstripping Milton Keynes, and considerably faster than its neighbours. The result being that if these figures are accepted then the increase for the district over the first 33 years of this century will be one of the highest, and quite probably the very highest, in the entire country. Exceptional Period 2001-11 It would seem that a key factor in forecasting future growth for Uttlesford has been the increase in population in the 10 years to 2011. This was caused by a prediction that passenger numbers at Stansted airport would increase massively and housing would be needed for employees. In the event the predicted increase in passenger numbers did not transpire but the planned housing still went ahead and was largely purchased by those working outside the district. A comparison showing populations for the four SHMA areas over the period 1981-2011 is shown on the attached schedule (attachment 2) which clearly indicates the exceptional nature of the period 2001-11. Turning now to the ORS documents showing the calculation of housing need. The initial report, dated September 2015, concluded that the appropriate figure for Uttlesford would be an additional 12,500 dwellings. These figures were based on the DCLG 2012 household forecasts although they appeared to show no relationship to them. For example, the ORS report showed the total number of dwellings for the four SHMA districts being lower than the DCLG figures. The figures were lower for three of the districts but a higher in the case of Uttlesford. There was no clear explanation. The only factor that could have accounted for the difference was migration rates. Here ORS state that they have used a 10-year average whereas the DCLG figures are based on a 5 or 6 year average and so this could account for the difference. But no details were given in the report and so it is impossible to tell.

- Conversion of Households into Dwellings When converting household numbers into dwellings (to allow for empty properties, second homes etc.) ORS have used the 2011 census date as the basis for their calculations. This is obviously a one-off snapshot and may not be representative. An alternative method would be to compare household and dwelling numbers that are produced annually by the DCLG. This has the merit that it can be averaged over a number of years and is more current. The 5 years to 2015 for Uttlesford show an average difference of 3.5% compared to the one-off figure used by ORS of 4.7%. This difference would reduce the total housing need for Uttlesford over the plan period by about 150 using the initial requirement of 12,500, or 170 based on the subsequent revision to 14,080.
- Market Signals - ORS determined that after calculating housing need there should be an uplift of 20% for market signals. The justification for this being that the Planning Inspector for Eastleigh had calculated that a 10% uplift was correct for that district and that Uttlesford warranted a higher figure. This ignored the fact

that the Eastleigh examination was held at the same time as that for Uttlesford and the reports were issued within a few weeks of each other. The Inspector for Uttlesford had determined that 10% was the correct figure for the district and so there seemed to be no reason to deviate from this. Furthermore, other local districts were putting forward, or already had approved, similar figures e.g. South Cambs 10%, North Herts 10%, Central Beds 5%, Brentwood 0%, Broxbourne 0%, Milton Keynes 0%. It should be stressed that there is no requirement for all districts within the same SHMA area to have the same uplift, and frequently they don't.

- Consultants - For almost two years I have been asking UDC to employ an outside consultant to check the figures. This has never been done. However some outsiders have commented on the figures. A consultant from the Planning Advisory Service stated that the method of apportionment between the authorities is not clear and he could find no explanation. He went on to comment that the most significant gap was the lack of evidence on the increased housing need identified in the latest DCLG household projections. A further narrative was essential to explain the final strategy. Uttlesford's own QC stressed that work needed to be strengthened so that it was more explicit as to how the figures were derived. And an Inspector from the Planning Inspectorate stressed the need for the figures to be defensible when robustly challenged at Examination. He made the point that the Spatial Options Study show its workings, not that the conclusions were necessarily right or wrong, but the process wasn't clear. You simply couldn't tell. It needs to be stressed that none of these individuals are statisticians who have actually checked the mathematical models. They are simply individuals with experience of local plans who having taken a critical look at the reports presented are unable to find evidence to justify the results.
- Update to 14,100 dwellings - In August 2016 ORS updated the housing need to take into account the latest DCLG 2014 based forecasts. These showed a minor increase of only about 1,000 households across the four SHMA districts. ORS translated this into a need for an extra 8,500 dwellings. The reason for this appeared to be due to large migration figures in the later years (2013/14 and 2014/15) which were considerably greater than the figures for 10 years earlier that they replaced in the latest ORS calculations. However although numerous figures appear in the ORS report there is no audit trail and it is impossible to deduce how the final total for the SHMA districts has been arrived at. The split between the four districts is nowhere explained and so it is impossible to determine how this is calculated.
- An audit trail - A constant criticism of the reports has been that it impossible to tell how the results have been calculated. The minutes of the Scrutiny Committee on 7 February 2017 and those of the Planning Policy Working Group on 22 February record the following: Update. HMA consultants to produce a clear explanation for scale of housing apportionment with clear and logical explanation of the calculations of the housing requirement showing workings behind the headline figures. Due in March. This has never been produced.

- Latest Forecast - In July ORS issued a report on housing need which takes into account the latest forecasts produced by the Greater London Authority (GLA). As a result ORS have amended the total housing need of the four SHMA districts from 54,600 to 51,700. The figures for each district have simply been reduced proportionately from the previous ORS figures with the Uttlesford figure falling from 14,080 to 13,332. The ORS calculations start with the GLA household increase figure (central trend) for the four SHMA districts of 47,248. This is then updated to a dwellings figure of 49,116. (I do not agree with this calculation see paragraph on Conversion of Households to Dwellings, above. But the differences would not be massive). ORS then make an adjustment for household sizes based an argument that average household size will reduce in 2033 to 2001 levels. This results in the dwellings figure increasing to 51,700. I cannot agree with this since a) no justification is offered for using 2001 household sizes and b) I cannot see from where the suggested household sizes in 2001 have been obtained (in fact my research suggests that the figures were higher rather than lower in 2001). Having got this far ORS then look back at their previous calculation of housing need for the SHMA districts of 45,507 before the market signals uplift of 20%. ORS then determine that the market signals uplift should be changed to 13.631% which takes you (co-incidentally) to the revised GLA total of 51,700. However, rather than accept the GLA split between the four districts, ORS use its previous figures of housing need for each district (before market signals uplift) and simply add the new uplift of 13.631%. It seems incomprehensible that having used the GLA results to determine the total figure for the four districts then the GLA individual figures for each district are ignored. Instead the old ORS figures are used to determine a split between the four districts. There would seem to be no logic in producing a total for the SHMA districts based on the GLA figures, but then ignoring the GLA split between the four districts and substituting the old ORS figures. The calculations seemed to have mixed up apples and pear.

- Uttlesford and Epping Forest An interesting comparison can be made between Uttlesford and Epping Forest districts. According to the latest ORS report migration rates for the two districts are very similar. Epping Forest has an average gain of 870 over the 25 year projection period (it is not clear what this covers) and Uttlesford has an average of 900 (see paragraph 2.5 of the ORS report dated July 2017). An illustration of these migration rates is contained in the earlier ORS report, dated September 2015, page 37 (see attachment 3). The population of Epping Forest is about 50% larger than Uttlesford so the rate of natural change (births versus deaths) will be much higher. Therefore it would be expected that the housing need for Epping Forest would be greater than that for Uttlesford. This is reflected in the GLA conclusions but the conclusions presented by ORS show the opposite with a higher figure for Uttlesford than for Epping Forest. There is no explanation.

- CONCLUSION Over the last two years numerous questions have been raised concerning the figures contained in the ORS reports. None have been answered. The very latest report dated July 2017 raises fundamental questions about mixing up the latest figures from the GLA with previous ORS calculations. In February 2017 the council agreed that a full report showing all the detailed calculations

would be produced in March. This was never done. Since the calculation of housing need is the essential basis of the plan and this has not been established then I believe that UDC has no alternative but to withdraw the draft plan until this work is carried out. Whether these numbers are sensibly based is not clear. It is clear however that they are all based on a carve up between four authorities based around the south of the UDC area (SHMA) There is no logic in then translating that demand right to the northern boundary of Uttlesford and trying to justify NUGV on a series of very hand-waving concepts. If the demand is in the south the need is to the south, otherwise commuting and car use is unavoidable.

- Uttlesford's latest local plan is fundamentally flawed: there is no audit trail to explain how housing targets have been derived; the targets appear to be based on a period of exceptional growth; an apparent single assumption about future airport expansion has not been questioned. The current forecast of housing need should be replaced with one that is evidence-based and transparent, and whose calculations can be followed. Planning Practice Guidelines and UDC's consultants ORS encourage consideration of alternative assumptions, not unquestioning acceptance of simplistic projections. UDC's forecasts should therefore be recalculated to recognise that the rate of migration into Uttlesford caused by 'airport-related' housebuilding in the years following 2001 substantially distorted the trend in population growth. Either that exceptional element should be discounted or the base period should be more representative. Until these problems are addressed, I regard the local plan to be unsound.
- P22, 3.42, Population: I very strongly dispute the claimed housing need stated here. There is zero evidence that the extreme increase in population growth proposed is justified the figure of 14100 dwellings given is ludicrous and way beyond the growth rates in similar, neighbouring areas such as East Herts. I maintain that no additional housing is necessary beyond that already approved. There is no housing crisis. Even if additional housing were needed nationwide it would be better located in areas in need of economic regeneration. The Uttlesford district has already taken more than its fair share of development over the past few years and it is important not to assume that further mass construction and despoliation of our attractive, rural area is inevitable. The council's pursuit of endless growth does not reflect the wishes of a great many of those that it is supposed to represent.
- Where can we find these new Government household projections? Clearly they are vital for the plan. And where is the further work on the SHMA? You really need to show your working. The Inspector will insist on it - so why not make it available to all?
- I strongly object to a new settlement at Easton Park because; I believe the calculation of Local Need for housing has been grossly exaggerated.

- I strongly object to a new settlement at Easton Park because; I believe the calculation of housing needs has been grossly distorted.
- Government released figures would have drawn upon data and assumptions that considered a pre BREXIT environment. These Government figures can no longer be relied upon for forecasting purposes because there is no experience of what the economy and housing need will be in a post BREXIT world. Therefore the Government will need to review and revise the model they use for their housing figures in the light of the outcomes from BREXIT negotiations and the impact BREXIT negotiations will have on the economy, interest rates, migration and immigration.
- This figure is being objected too by many people. An independent review is needed.
- Page 22 (Page 26), Paragraph 3.42: I oppose the proposed figures for new housing in the strongest possible terms. There is no convincing evidence that if any more new houses are required beyond those already approved, other than perhaps isolated buildings here and there. If the scale of building envisaged in the draft Local Plan is realised it would lead to the desecration of significant parts of our largely unspoiled area. There are other parts of the country where some house building would help with economic regeneration but this does not apply within Uttlesford. No housing development should be permitted here or nationwide on greenfield sites until brownfield sites have been exhausted.
- The current forecast of housing need should be replaced with a forecast that is clearly evidence-based and transparent to all.
- Please provide evidence of how this figure was derived and when. How much of this is dependent on an expanded Stansted? How is the impact of Brexit factored in? Given that Haverhill is a deprived area should it not receive focus for development and improvement given there is already a good road network to Cambridge? That would clearly require cross authority working. Has some of this figure already been catered for by neighbouring authorities such as Cambridgeshire and south Cambridgeshire?
- It is unclear that the numbers of houses needed in the plan are correct in fact there is good evidence to suggest that they are unreasonably inflated. The rates of growth in the plan are significantly greater than those rates of neighbouring areas, and do not appear to take in to account the economic downturn or the most up to date national forecasts. Examination of these alternative sources suggest that the projected numbers may be inflated by as much as 25%. Basing the strategy on these presumptions together with political and government pressure appears to have panicked the UDC into creating a plan to provide housing however/wherever they can, rather than a considered, deliverable plan which preserves and enhances what is special about the district.

- The calculation of the overall 14,100 houses for plan has not been substantiated. There are recent quotes from UDC leadership, noted in the local papers, which state the UDC numbers maybe higher than necessary. This needs addressing and changes made to the plan in the coming period which reduce or remove NUGV Chesterford.
- The overall 14,100 houses for UDC has been accepted by the Council' s leadership as incorrect (Aug 2017) and may reduce at some point. Information from Greater London Authority for the whole of England suggests 11,200 houses. This needs to be reviewed now as this would fundamentally affect the need for/ or long term size of the (North Uttlesford Garden Village) NUGV site and should fully take into consideration the National Planning Policy Framework's (NPPF) social, economic and environmental requirements. Please can you note the Easton Park alternative solution in point b below in this letter.
- It is regrettable that UDC chose to commit to other Districts that it would take such a high level of additional housing, committing to a far greater percentage growth than each of the other three districts, without first giving proper consideration to challenges by myself and others to key elements of the SHMA, in particular the general lack of audit trail to show how "need" had been calculated and failure to show why such a high rate of growth had been allocated to Uttlesford. Uttlesford's signature of the MoU came despite my advice not to commit.
- What is Uttlesford housing need? How is this defined? Is it the role of the authorities to attract further Inward Investment?
- How was 14,100 calculated? Why is growth in Uttlesford expected to be so large contrasted to districts in Essex and other counties? Has anyone at UDC queried and understood this number? Without transparency it is impossible to verify whether the plan is fundamentally sound and the large increase in houses required of Uttlesford is fundamental to the plan's recommendations.
- There is no mention in the plan regarding what will happen if Uttlesford does not meet the number of new houses proposed. Surely this information must be available and should be disclosed in this plan.
- These figures are skewed by a government in thrall to major housebuilders. The figures may change/ reduce as a result of Brexit and economic cycles.
- If UDC is building to meet its own need without requiring help from outside why is NUGV located at the furthest point from much of this need? Part of the justification of NUGV is that it is close to the Cambridgeshire need but Cambridgeshire have not asked UDC to support this requirement either.

- If Uttlesford is committed to meeting its housing need within its Administrative boundaries and there are just under 900 families on a waiting list for housing then the true housing requirement is 900 plus a few for each additional year Not the many thousands asserted with the draft plan.
- There is no audit trail showing either how the total housing need has been calculated or how it has been disaggregated between the four districts. Furthermore, the forecast was based on an exceptional period of housebuilding, approved in relation to the approval to expand Stansted Airport, and consequent exceptional inward migration. Despite persistent challenges by myself and others, UDC has failed to provide evidence of how the figures were derived and failed to consider alternative methods for calculating population growth and housing need. I have provided a fuller commentary in response to Policy SP3.
- I believe this to be untrue.
- The scale of 'housing needs likely to be generated' appear to be colossal. It cannot be the case that the district needs all these houses in just a few years. Where on earth are all these people coming from?
- This area's community has already been hammered with extremely excessive development. There is not this amount of development required and this amount of new dwellings that have been projected as being needed is INCORRECT. We need to see details (in an understandable form) of how calculations were done. They need redoing, basing them on a period of development that is more normal for the area historically. There are too many families, too many properties and too many planned!

Housing Supply
Paragraphs 3.46 – 3.49

This supporting text was responded to by 27 people and organisations.

	3.46	3.47	3.48	3.49	Total
Support	0	0	1	1	2
Object	4	4	10	2	20
Comment	1	6	4	2	13

Overarching Summary

- No explanation is given for the gross disparity between the number given to other key villages and the number for Hatfield Heath.
- Table 3.4: The Windfall Allowance row is titled incorrectly
- The methodology to then allocate the housing numbers to specific villages is based on data which remain in a high state of flux and needs reviewing.
- Great Chesterford's status as a key village must be removed unless NUGC is abandoned.
- The figures for Saffron Walden should be amended.

- If there are problems with housing delivery at the strategic sites then additional sites (small, medium and large) in a variety of sustainable locations should be identified to ensure that the housing target is met during the plan period.
- To prepare and publish a new and robust housing trajectory, amended to reflect realistic delivery rates at the strategic sites, to demonstrate that the proposed housing target can be met during the plan period.
- Realistic start dates and delivery rates are applied to these potential strategic development sites.
- The Council has failed to accommodate their own objectively assessed housing need.
- Windfall allowance too high over the plan period to be effective and is not consistent with the NPPF.
- The Spatial Strategy discriminates against small to medium sized builders by providing an insignificant supply of land for small schemes of 1-30 houses.
- Further and more up-to-date evidence on permission already granted needs to be evident within the plan.
- Many discrepancies within tables 3.5.

Statutory consultees and other bodies

East Hertfordshire District Council

Table 3.4: The Windfall Allowance row is titled incorrectly. It should say 2016-2033 as it is the remaining plan period at 70 per year for 17 years.

Elsenham Parish Council

With regard to Table 3.5, Elsenham Parish Council would like to draw attention to the fact that the 16 dwellings included under Henham Parish in the Former Goods Yard in Old 2 Mead Road are adjacent to the parish boundary, such that the southern corner of the site is within Elsenham parish. The parish boundary does not accord with what might be regarded as obvious settlement boundaries. This site is so far from Henham that it is not shown on the Henham Inset Map, although it does appear on the Elsenham Inset Map. The site is very close to Elsenham station, and there can be no doubt that residents will make use of Elsenham primary school, together with shops, doctors' surgery and recreational provision in Elsenham. On any rational basis these 16 dwellings would be included in the allocation for Elsenham. It is understood that dwellings are only included in the Table if they are in developments of 10 or more. It is difficult to understand why the restriction should be made. There have been several smaller approved schemes in Elsenham, as follows: Alsa Leys, UTT/13/2836: 6 Elsenham Sawmill, UTT/14/0480: 5 Barker's Garage, UTT/14/0051: 4 Hailes Wood, additional houses, UTT/15/1121: 3 Cobwebs, Robin Hood Road, UTT/14/2786: 2 Several single dwellings Total: 20 plus single dwellings. The paragraphs above identify 16 dwellings plus 20 dwellings, a total of 36, excluding single houses, which should be added to the already large allocation to Elsenham. The total dwellings column shows a significant difference amongst key villages between those with a large number - Elsenham 641, Stansted Mountfitchet 594 and Takeley 652 - and those with a much smaller number - Great Chesterford 133, Newport 293 and Thaxted 223, to which should be added Hatfield Heath with 0. No explanation is offered in the Local Plan for this gross disparity.

Felsted Parish Council - Felsted Parish Council is concerned that the methodology to then allocate the housing numbers to specific villages is based on data which remain in a high state of flux and needs reviewing. For example, the original calculation assumed a windfall allowance of 50 houses a year across the District. This has now increased to 70 in the latest consultation. We believe that this remains a significant underestimate of the number of houses which will be built per year in the developments of fewer than 10 houses. Felsted Parish Council has averaged 10 new houses a year for the last three years (and a total of 20 per year if you include developments over 10 houses). Whilst the intention may be to curtail developments not identified in the Plan, it is still likely that the windfall allowance will be, in our opinion closer to 100 per year.

Great Chesterford Parish Council

Table 3.5 lists Great Chesterford as having 133 dwellings. Clearly this is incorrect: the intention is for it to take 2033 (1900 plus 133)! Great Chesterford's status as a key village must be removed unless NUGC is abandoned. We cannot be faced with further growth on top of 1900 houses in the next plan period.

Saffron Walden Town Council

Paragraph 3.16 (cross reference with 3.49 re housing numbers) - The figures given for Saffron Walden are incorrect and misleading. Also note the 85 homes granted for Little Walden Road, Gladman site plus the number of units in the care home. The figures for Saffron Walden should be amended.

Stansted Neighbourhood Plan Working Group

Concern that so many permissions have already been granted. There are approximately 5,000 homes in Bishop's Stortford and 5,000 new homes in Uttlesford still to be built that will directly affect Stansted Mountfitchet and congestion in the area. This will be a strain on resources. It is suggested that new junctions are needed on the M11 at Newport or Quendon. The M11 needs to be extended to three lanes north of Bishop's Stortford.

Weareresidents.org

There is an error in the existing permissions in Saffron Walden. There are 42 independent dwelling units as part of the care retirement village on the Radwinter Road site in Saffron Walden that were approved and so need to be included in the numbers. They are listed in the most recent 5-year supply delivery report, but have been omitted from the R18 draft Plan. That means that the number of overall existing permissions increased from 4513 to 4555, permissions in Saffron Walden should to be increased by 42 from 548 to 590, and the number of dwellings to be allocated in Saffron Walden reduced by 42 from 204 to 198. These changes should be reflected throughout the plan.

Note: Since the R18 draft was produced, an additional 85 permissions have been granted on the east of Saffron Walden under appeal on the Gladman site on Little Walden Road (UTT/16/2210/OP). This needs to be reflected in the next draft of the Plan, reducing the allocation for Saffron Walden by 85 dwellings (and increasing the extant permissions by the same number).

Developers, Agents and Land Owners

- Table 3.4 identifies the number of dwellings that would be delivered from housing commitments. Paragraph 47 (Bullet Point 4) states that: To boost significantly the supply of housing, local planning authorities should: for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target. The Council has published housing monitoring data, which includes the housing trajectory. However, it must be expected that to comply with the requirements of Paragraph 47 that the assumptions about housing delivery included with the housing trajectory are realistic, and for the larger strategic sites in particular; it is delays at the strategic sites that can have a significant impact on whether the annual housing targets are met. It is inadequate to simply incorporate developer/housebuilder assumptions about housing delivery without further scrutiny. As set out in our representations to Policy SP2, the development strategy should avoid an over-reliance on new settlements and towns. Our concern is with housing delivery at the strategic allocations and the implications for meeting the overall housing target. If housing delivery rates at these strategic sites do increase then a subsequent upward adjustment could be made for future trajectories. It is clear from Appendix 3 of the DULP that the strategic sites of the Garden Communities start to deliver units from 2021-2022. This is overly optimistic given the significant infrastructure requirements and other site complexities associated with such developments. Nevertheless, the 2015 AMR shows that small and medium sized sites in the more sustainable villages are deliverable quickly. If there are problems with housing delivery at the strategic sites then additional sites (small, medium and large) in a variety of sustainable locations should be identified to ensure that the housing target is met during the plan period. As set out in our representations to Policy SP2, additional land should be allocated for residential development in Littlebury. Furthermore, the Council are currently not able to demonstrate an adequate supply of housing. At a recent appeal decision (appeal ref. APP/C1570/W/17/3168869), permission was sought for the development of land at Little Walden Road, Saffron Walden for 85 dwellings. The appeal was allowed addressing several issues, one of which was the supply of housing against a full objective assessment of housing need. The Officers' Report (December 2016) to the planning application referred to an estimate of a 5.1 to 5.2 year supply of housing when applying a 5% buffer. These figures were taken from 5 Year Supply Statement, dated November 2015. During the course of the Inquiry, it was agreed between the Council and the appellant that based upon an OAHN of 640 dwellings per year, for the purposes of this Inquiry the Council could only demonstrate a 3.1 years housing land supply with a 20% buffer (my emphasis). The inspector goes further to

reference the case of *Suffolk Coastal v Hopkins Homes Ltd*. The inspector summarises the judgement, by stating the following: This recent judgment makes it clear that the agreed housing land supply, being less than 5 years, triggers the tilted balance under paragraph 14 of the Framework. This is in accordance with paragraph 49 of the Framework which says that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites. The second bullet point of the decision-taking part of paragraph 14 says that in such circumstances planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Paragraph 49 of the NPPF states: Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. A failure to maintain a five year supply means that applications for housing should be considered in the context of the presumption in favour of sustainable development, as specified in Paragraph 14 of the NPPF. If an application is refused then the applicant could appeal and a decision would be issued within a year approximately. Despite the uncertainty of the appeal process, if a site is sustainable and there are no significant technical constraints then it is likely that appeals would succeed. Therefore, the appeal process would overtake any action to tackle under-delivery. Whilst the site is not subject to any planning application for residential development, the principle of development would be considered acceptable given the current lack of a five year supply of housing. In any case, the shortfall of housing supply is not adequately addressed through this DULP, and the Council should therefore consider allocating smaller settlements for housing which would assist in the short and medium term. Requested Change To prepare and publish a new and robust housing trajectory, amended to reflect realistic delivery rates at the strategic sites, to demonstrate that the proposed housing target can be met during the plan period.

Table 3.5 relates to housing delivery, and acknowledges that the DULP must allocate sufficient deliverable and developable land at a range of scales and locations in order to ensure that a five year supply is maintained. In summary, the existing strategic commitments and any potential strategic allocations made in DULP must take into account the following: the highest annual delivery rates nationwide from a single strategic site of 320 dwellings; comparable housing delivery rates in settlements where urban extensions are proposed; comparable housing delivery rates at new settlements at urban extensions elsewhere; and, the close proximity of other strategic scale developments. As set out in our representations to Table 3.4 we are concerned about predicted housing delivery rates assumed for land at the strategic sites (e.g. North Uttlesford), and have requested that realistic delivery rates are applied. The potential strategic allocations at North Uttlesford, Easton Park and West of Braintree are complex developments which require substantial new infrastructure from the outset, which is likely to affect the delivery of policy compliant levels of affordable housing. We request that realistic start dates and delivery rates are applied to these potential developments. If these sites cannot be delivered during the plan period, or can only be partially delivered, then alternative or additional sites will need to be allocated in FDLP to ensure that the housing target is met. Paragraph 47

of the NPPF seeks to boost significantly the supply of housing. A development strategy which was based on assumptions about housing delivery which are too optimistic would not comply with national guidance contained in Paragraph 47. Requested Change To prepare a robust housing trajectory for DULP which reflects realistic delivery rates at the strategic sites, to demonstrate that the proposed housing target can be met during the plan period.

- The Council has failed to accommodate their own objectively assessed housing need, see report into housing land supply that concludes that the council risks five year supply shortfall of 737 dwellings a plan period shortfall of 3,726 dwellings and needs to allocate additional sites in order to remain sound when national and local evidence is considered regarding delivery rates and commencement timescales. In addition, a further report into the Objectively Assessed Housing Need that also forms part of the representations concludes that the Council has under estimated the requirement at 14,100 dwellings where in reality it is 14,388 dwellings. The Council has therefore failed to comply with the NPPF and the plan as currently drafted is unsound.

Insufficient sites have been allocated to meet the Council own assessment of the housing need, see report into housing land supply that concludes that the council risks five year supply “shortfall of 737 dwellings a plan period” shortfall of 3,726 dwellings and needs to allocate additional sites in order to remain sound when national and local evidence is considered regarding delivery rates and commencement timescales. A further report into the level of need concludes that the council requires 14,388 dwellings rather than the 14,100 dwellings currently allowed for in the Plan. Further allocation are requirement to meet housing requirements and delivery targets and as such a further allocation of approximately 180 dwellings should be made on the land south of Beldams Lane, Bishop's Stortford (call for sites reference 03GtHal15).

- OBJECTIVELY ASSESSED HOUSING NEED (OAN)

The process of undertaking an OAN is clearly set out in the Framework, principally in Paragraphs 14, 47, 152 and 159 and should be undertaken in a systemic and transparent way to ensure that the plan is based on a robust evidence base.

The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing markets cross administrative areas as detailed in Para.159 of the Framework. The Framework goes on to set out factors that should be included in a SHMA including identifying: the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which: Meets household and population projections taking account of migration and demographic change; Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and

Caters for housing demand and the scale of housing supply necessary to meet this demand.

Key points that are worth noting from the above are that the objective assessment should identify the full need for housing before the Council considers undertaking any process of assessing the ability to deliver this figure. In addition, Para. 159 specifically relates to catering for both housing need and housing demand within the authority area. It is also worth pointing out that any assessment of housing need and demand within the SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, offsetting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in the area.

Of particular importance is the need to consider market signals. The consideration of market signals is one of the core planning principles considered in Para. 17 of the Framework, which states: Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.

Of critical importance is what the Framework goes on to say in Para.158 in the section discussing Plan Making. It states here that: Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

Market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land.

The Planning Practice Guidance (PPG) gives further explanation to what the Framework means with regards to market signals, and sets out in a range of paragraphs the way in which local planning authorities should go about factoring in relevant market signals in arriving at their OAN. Paras. 19 and 20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extract identifies some particularly pertinent points: The housing need number suggested by household projections (the starting point) should be adjusted to reflect the appropriate market signals, as well as other market indicators of the balance between demand for and supply of dwellings. Prices of rents rising faster than national/local average may well indicate particular market undersupply relative to demand.

The paragraph goes on to indicate that these factors would include, but should not be limited to land prices, house prices, rents, affordability, rates of development and

overcrowding. However, given what the Framework says at Para. 17, quoted above, it seems clear that particular consideration should be given to affordability.

In order to consider how market signals should be taken forward Para.20 identifies some key concepts: Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.

It is therefore clear that where market signals are apparent (in any of the indicators assessed) there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is also clear that both the level of change and the rates of change are considerations and that local planning authorities need to carefully benchmark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman is firmly of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and the PPG are trying to tackle with regard to housing.

What is of further importance, when considering these issues, is the period of time analysed when considering both relative and absolute change. It has become apparent in our consideration of a number of plans that many local planning authorities choose to look at periods of time which are not fully representative of the depth of the housing crisis which we are currently in.

Gladman is of the view that local planning authorities must take a long-term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess as a constituent part of their OAN, how they can improve affordability over the lifetime of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period which would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.

The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in *Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited* where it was considered that arriving at a housing requirement was a two-stage process and that first the unconstrained OAN must be arrived at. In the judgment, it was stated: The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy's methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies.

The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, here, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies.

Therefore, following the exercise to identify the full OAN for housing in an area: Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate. (NPPF 52)

This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable, should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.

The final stage of the process is outlined in the paragraph above and involves a planning judgement as to whether, following all the stages of the process outlined above: Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or specific policies in this Framework indicate development should be restricted.

It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include: sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.

Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.

Obviously, the Government intends to standardise the calculation of housing need as set out in the White Paper on housing. As yet, we are unaware of what the new methodology will involve but the Council will need to keep the evidence base of the Local Plan under constant review to ensure that it reflects the latest guidance as the White Paper is implemented.

- Comments on Housing Requirements - Table 3.4 sets out the housing requirements and supply for the period 2011 to 2033. We note that under the supply for this period the council has included a windfall allowance of 70 dwellings per annum. Our concerns with such windfall allowance are twofold. Firstly, windfalls should be treated very much as a bonus as opposed to being part of the strategic allocation. It is perhaps unwise to plan for windfalls over the period to 2033 for the very reason that delivery of the same are uncertain and often beyond the control of the LPA. Barn and office conversions may occur as permitted development not requiring planning permission but should a future Government revoke such rights then control will be handed back to the LPA, which may or may not be so accommodating to allow such development. Secondly, the table at 3.4 states a windfall allowance of 70 dwellings per annum (1190 dwellings from 2016-2033). Our view is that such a large allowance is too high because the number of windfall sites over the longer term is likely to recede. For example, brownfield land redevelopment and changes of use of buildings (eg barns, offices, etc) for housing will reduce as the availability of such land sources starts to diminish. As stated there is no guarantee that permitted development rights for changes of use to dwellings will continue in the future. Given all of the above, our view is that it is dangerous for the Local Plan (as part of a Plan Led system) as required by the NPPF, to include a windfall allowance. This is especially the case when 1190 dwellings - a significant figure - are included as part of the housing supply to 2033. Accordingly, we suggest that the no windfall allowance (or at least a much reduced windfall supply figure) is adopted as part of the supply and that corresponding increases are made in the housing requirement. In turn, this will require additional housing allocations to be made elsewhere in the District. The same will bring increased certainty to the Plan regarding delivery and represents a more prudent approach.

- Suitable Sites Available to Reduce Reliance on Windfall

It is entirely unnecessary for the DLP to identify such a significantly greater number of dwellings to be identified through Windfall than through allocations. This is especially concerning as the Council has identified a range of suitable sites within its Villages, including Land west of Mill Lane, through its SHLAA site assessments.

The Council is therefore relying on the delivery of 1,190 dwellings from windfall sites. Paragraph 48 of the NPPF states that: Local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens (emphasis added).

The DLP places significant reliance on windfall to meet housing need. By definition, there is considerable uncertainty as to how much of a contribution windfall will be able to make towards housing delivery. It is far from clear that it will be able to make the level of contribution that Policy SP3 and Table 3.4 assume. The scale of windfall development is presumably based on the assumption that historic levels of windfall

provision will continue, but provides no evidence as to why this is the case, certainly nothing that can be considered compelling as required by the NPPF.

While the Council may be able to demonstrate a consistent historic windfall for the purposes of its five-year supply, there is no rationale for concluding that this will continue to provide a reliable source of supply throughout the Plan. Historic windfall will have been achieved during a period when the Council had an out of date Local Plan and as such sustainable sites not identified in the 2005 Local Plan will have been delivered. In addition, these sites are largely made up of brownfield and infill, both of which are in limited supply. Therefore, as they are developed the availability of further sites is reduced; meaning that it is highly unlikely that the such high levels of windfall supply will continue.

The Local Plan 2011-33 should seek to meet the full OAHN by allocating sufficient land for housing. If the council rely on a significant windfall allowance to meet the OAHN, without clear justification in accordance with Paragraph 48 of the NPPF, the Plan will be unsound.

The glossary to the NPPF confirms that Windfall Sites are those that: have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available. Relying on a high level of windfall is contrary to the definition of windfall and should be avoided, so that these sites provide a genuine boost above the identified need.

Further, the Council's evidence base indicates that it is able to identify a sufficient number of available, suitable and achievable sites in sustainable locations to meet the full OAHN. To rely on windfall sites, which are by definition those not identified in a local plan, may result in the Plan being unjustified and unsound.

Additional sites should be identified to deliver the 1,190 dwellings indicated to be achieved through Windfall, such as site 04HHea15 and land to its north.

Five Year Housing Land Supply

UDC have consistently overestimated the rate of delivery of approved schemes and as a consequence now only have approximately 3.1 years supply currently on a downward trajectory. UDC following a recent appeal at Land off Little Walden Road, Saffron Walden appear to only be able to demonstrate 3.1 years supply which continues the following trajectory. The Spatial Strategy proposed will inevitably guarantee that this situation will continue for most of the plan period. Even at current build out rates. Should however there be a downturn in the property market the 4 or 5 major national housebuilders who will feature strongly in the delivery due to the reliance on predominantly large schemes and new settlements, delivery rates will slow further in effect giving UDC next to no control over housing distribution, this is not a sound policy. Further, the Spatial Strategy discriminates against small to medium sized builders by providing an insignificant supply of land for small schemes of 1-30 houses. In 2008, small and medium sized builders accounted for some 28% of the home built nationally. It is today approximately 8%, this is due entirely to shortage of suitable land. It is recognised that small-medium sized builders have the following benefits: - They produce more varied and interesting homes.

- They are quicker and more inclined to adopt new renewable technologies.
- They provide a higher percentage of apprenticeships
- They do not normally land bank and approved sites are delivered
- The houses are delivered in a shorter timeframe as little or no infrastructure is required.
- They are generally locally based and both the land value for the smaller plots, the income and wages involved in construction works its way in the local economy.
- Journey times are generally shorter and this is far more environmentally friendly. ∅ Less embodied energy is required in items like highway improvements and access roads.

The average requirement per annum in the DLP is 641 dwellings Housing Dwellings in outstanding planning permissions at 1st April 2016 and dwellings to be provided in the new allocations in the DLP 2016-2033 for existing settlements is as table 3.5 below.

Table 3.5 Housing Supply Distribution for the Towns and Villages -

Dwellings in Outstanding Planning Permissions at 1 April 2016 Dwellings to be provided in New Allocations in this Draft Plan 2016-2033 Saffron Walden 548 240 Great Dunmow 2258 743 Elsenham 542 40 Great Chesterford 52 31 Newport 274 0 Stansted Mountfitchet 215 62 Takeley 98 42 Thaxted 47 54 Type A & Type B Villages 392 44 The total of the two categories being 4,426 plus 1,256 total 5,682. It is only by a combination of:- Introduction of SHLAA proposals that were considered delivery available and sustainable that are not currently included in the Spatial Strategy.

Increased use of small-medium sized builders - Provision of low cost and starter homes in the smaller settlements and a significant increase in self-build and custom homes that the 5 year shortfall can be rectified in a sensible time frame. Please see page 20 for suggested Spatial Strategy. Some houses have been constructed between April 2016 and September 2017 assuming 500 per annum would total 666no. this would reduce to a total available for the plan period from 5,682 to 5,016 (approximately 5,000). Approximate number of houses with approvals not yet completed 5,000no. 5 years 3.1 years = 1.9 years needed to make up current shortfall 1.9 x 641 (annual target) 1,218no. Balance houses 3,782no. Conservatively it will be a minimum of 7 years from today that any housing from the proposed new settlement will be complete, therefore, $3,782 / 2 = 540$ p/a, assuming all approved schemes are completed in that timeframe which is most unlikely. $3,782 / 7 = 541$ p/a (641 p/a needed) If UDC predicted that 70 windfall houses per year will be granted that would increase the total number but not in year one as time to build is required. Therefore, maximum delivery over 6 of 7 years would be $70 \times 6 = 420 / 7 = 60$ p/a. $540 + 60 = 600$ total (641 p/a needed) Therefore, it is inevitable that the currently proposed Spatial Strategy will result in a continued 5 years supply shortage which is an UNSOUND PLAN.

Comments by Individuals

Para. 3.46

- I object to the use of out-of-date statistics: why does Uttlesford DC not have up to date figures for planning consents it has itself granted? The document provides numbers only to 1 April 2016. That is 16 months ago.
- The first sentence should make clear whether it means the period from 1 Jan 2011 to 31 Dec 2016. You should be using more recent data than as at 1 April 2016 A definition of a windfall site is needed. Is it considered to have a maximum size?

Para. 3.47

- So the real need is only 270 new houses per year? So why rush to build so many now? UDC seem hell bent on building the entire 22 year stock now.
- I think the windfall allowance is a gross under estimate The windfall estimate used is 70 dwelling per year across the district. The evidence for the 70 is in 'Topic Paper: Consideration of a Windfall Allowance for Uttlesford March 2017' <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=3615&p=0> The windfall allowance appears to be sites between 1 and 10 houses. This allowance excludes: Houses built in gardens - average over 10 years is 25 pa. These bizarrely are excluded from the count by para 48 of the NPPF. Actually the para relates to the 5 year supply. It doesn't say we cannot include them in the Local plan projection. Including would increase the supply by 500. Rural exception site are excluded - average built over 10 year is 10 pa. NPPF says nothing about excluding these. The paper claims they are too random to include. But the statistic takes account of 10 years worth, and the plan period to be covered is 20 years, so the variations will even out. So these should go in. This increases the supply by 200. But where is the windfall allowance for all the larger sites not included in the plan allocations? Where for example in windfall is the Saffron Walden Little Walden Rd site and the Dunmow brownfield site just given? These were not in any plan or draft plan or existing permission. NPPF says nothing about windfall being only small sites. Everything not planned over the ten year assessment should be counted in the windfall estimates. With no five year housing supply it is now open season for developers who will have little interest in difficult and less profitable Garden villages, so 'expected future trends' will continue following historic pattern. This would add very substantially to the supply figure. Developers wanting larger Plan figures could not at the same time argue that they were suddenly going to stop putting in applications on non Plan sites. Below is para 48 NPPF. Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.

- If the remaining housing requirement is 5,929, why is the council putting forward proposals for 3 new garden communities with a combined total home build of 18,500 homes or over 3 times the requirement outlined? If the council intends to ensure that all infrastructure such as GPs, roads, transport, schooling etc is in place to meet the 5,929 shortfall identified it will actually need to treble this requirement if it (as outlined) intends to build 18,500 homes.
- Please ensure correct, up-to-date information is quoted here for final submission.
- How has Brexit been factored in to these assumptions. Firstly in terms of numbers of people in the UK generally needing homes and secondly in terms of a slow down in the economy.

Para. 3.48

- Before the start of this current round of major development, Elsenham had circa 980 dwellings. Built or approved for building is a further 600. As part of previous planning approvals various new facilities were promised and seemed to form part of the approval process - a new home for the elderly and improvement to the playing fields. Nothing has been or will be delivered meeting this requirement. Therefore, it is clearly just a housebuilding for profit exercise with no benefit for existing or future residents. On that basis, and the lack of any transport improvements, there is no justification for any further development.
- The total figure for Newport should be 365 instead of 293. The first error is on the site for care home and retirement flats. Shown on p216/217 as 81. The text and site plan are incorrect, see later comment. But the outline permission is for 140, so understatement of 59. The second error is that already built should be 32 (Carnation Nurseries/ Granta Mead Close 21 and The Maltings 11) The s18 doc says 19 but gives no detail so not possible to further identify difference. Overall Newport and therefore the Total Supply figure is understated by 72.
- The information in this section is misleading. A significant amount of development has taken place in villages since 2011 where sites have been for less than 10 dwellings or there have been business to residential conversions under PDR.
- There does not seem to be any way of verifying the data in the first column of Table 3.5, Dwellings Built 2011-2016 (+10 units). No explanation is offered for the gross disparities in the last column between different key villages. Clearly these are so large that any further development in Elsenham cannot be justified. Hatfield Heath is allegedly a key village, and yet it is not shown, with its zero allocation. Is it so very privileged that no indication is to be included that it is privileged?
- Support.

- This seems an appropriately low number for Thaxted.
- The tables ignore planning approvals already given but not implemented.

Para. 3.49

- The target of 14,100 additional homes is excessive. Its calculation is a mystery with dubious evidence and no audit trail. See my detailed comments on Policy SP3 regarding the "foundation stone" SHMA which is riddled with errors, weaknesses and unclear thinking. The SHMA has not been subjected to the kind of review that it demands, especially given the detailed explanations I have provided on its faults. Uttlesford has failed to consider alternatives, seemingly motivated only by a desire to maximise growth. This is unacceptable.
- As a Takeley resident, I can only comment on my own area. Given the dwellings to be provided in New Allocations 2016-2033 is indicated as 42 for Takeley, what does the council propose to do with UTT/16/3565/OP (proposal for a minimum of 275 residential dwellings). Will it reject this application on the basis that only 42 are required for Takeley? It should also be noted that there is also a further application UTT/17/1852/FUL for 20 residential properties in Takeley currently being considered.
- Obviously good to plan ahead but in the panel of the document of the proposed allocations and in particular with reference to Stansted Mountfitchet 317 homes already built 2011-2016, homes with planning permission 215 and homes needed in the new allocations 62. In the period since 2011 nothing has been done to improve the local traffic conditions congestion is regular on the Cambridge rd and also in Lower street all the planning forward must include measures to put this right.
- How was the figure of 14100 dwellings calculated? Residents should be given the opportunity to see and comment on the assumptions behind these calculations, which will lead to a planned population growth of 43%.

Sustainability Appraisal June 2017

Not Applicable

Policy SP3 - The Scale and Distribution of Housing Development

This policy and supporting text was responded to by 170 people/organisations.

	TOTAL
Support	40
Object	106
Comment	24

Overarching Summary

- Highways England note that the development in Saffron Waldon and Great Dunmow will have a severe effect on the road network, suggesting that UDC should consider opportunities to link infrastructure to the airport and Easton Park.
- Thames Water consider that upgrades may be needed to the sewerage treatment works at Bishop Stortford.
- ECC suggest that it may be beneficial to allow some development in the Type A & B villages. ECC also suggest that clearer highway and transport mitigation measures are needed.
- Broxted, Great Chesterford and Stebbing Parish Councils suggest that the OAHN has been over-estimated.
- A number of developers suggest that the OAHN has been underestimated, which undermines the evidence base of the plan.
- CPREssex question the evidence base behind the new garden communities.
- EFDC support the policy, as it is in accordance with the Memorandum of Understanding on OAHN.
- The Woodland Trust has concerns regarding the locations of the site allocations in proximity to ancient woodland.
- HCC consider that ECC will provide new secondary schools to cope with the demand arising from new housing proposed in Uttlesford.
- A number of representations are concerned that the Memorandum of Understanding does not include Brentwood, which cannot meet its housing need.
- A number of developers suggest that more housing should be proposed for Type A and B villages to support sustainable development and help to ensure that there is not a housing shortfall in the District.
- A number of developers suggest that UDC will not be able to demonstrate a 5-year land supply of housing, as the Garden Communities will take longer to deliver than expected.
- Many individuals support the exclusion of NE Elsenham from the Plan.
- A number of individuals object to the Plan on the basis that new development will result in problems with traffic congestion.
- It is suggested that Stansted Mountfitchet should be allocated more development.

Statutory consultees and other bodies

Great Canfield Parish Council

Supports new development at Takeley which is bordering Great Canfield is limited to 42 dwellings in the new allocation. Concerned that the development proposed for Dunmow is excessive when compared to the rest of the District.

Concerned that additional housing and employment including 21,000 square feet of employment space will be required in Great Dunmow will put a significant strain on the already overloaded highway network, including M11 junction 8 and other local services such as healthcare and schools. Great Canfield residents already have to contend with traffic using the narrow village lanes when there are traffic delays on the A120 route.

Requires existing issues relating to highways, education and access to healthcare are resolved before further significant housing is permitted and that consideration is given to a greater spread of the development across the District including Saffron Walden, rather than the concentrated approach.

Bartlow Parish Meeting

Suggest traffic impacts on Barlow should be carefully considered. Traffic which passes into and out of Saffron Walden on the Ashdon Road mostly passes through Bartlow along a narrow road and dangerous cross roads. And many of those vehicles as well as those entering or leaving via Hadstock add to an already challenging A1307 with severe congestion during rush hours and has a poor safety record.

Highways England

Development in Saffron Walden and Great Dunmow of the scale planned is, on its own unlikely to have a severe affect upon the Strategic Road Network. M11 J8 is sensitive to further expansion of Stansted Airport and growth in the surrounding villages of Takeley, Stansted Mountfitchet, Elsenham Bishops Stortford and surrounding villages in East Herts. Needs to consider the significant opportunities to link public transport and other infrastructure particularly to the airport and Easton Park.

Thames Water

May require upgrade of the existing sewage treatment works at Bishops Stortford and Stansted Mountfitchet or alternative options such as the provision of a new sewage treatment works may need to be considered. Currently producing the new business plan for the period from 2020-2025 and assessing current and future capacity of assets in more detail. Until this work is complete our view on capacity is limited. However, an updated position statement by mid September will be produced.

Essex County Council Environment, Sustainability and Highways

The quantum of development anticipated in Type A and Type B villages is low, and it may be beneficial to accommodate further residential development to support the maintenance of the rural economy and long-term viability of community facilities. Seeks further discussions with UDC to determine the localities (if any) where additional development may be appropriate.

A clearer highway and transportation mitigation measures is needed to ensure sustainable travel is maximised. There are no new accessibility expectations for Uttlesford Type A and Type B villages given the already permitted developments and future growth.

Bishops Stortford Town Council

Concerned that Bishops Stortford as the main town will suffer from pressure given the increase in dwellings in the proposed developments in the local plan and planning development by East Herts. Concerned that bus service will not be adequate and proposes

a new rail link from Stansted Airport to Easton Park, Great Dunmow, Braintree and beyond, possibly to Chelmsford.

Broxted Parish Council

Objects to the objectively assessed housing needs of 14,100 and the need for 5,929 new houses which grows by 43% based on up-dated figure. With extremely low unemployment in the district, and above average house prices for the region, there is no need for such a large increase in houses. Over 4,500 outstanding planning permission for dwellings indicates develops that not shares the vision of additional housing.

CPRE Essex

Object to the three new garden communities in greenfield locations which has no sound evidence. Agrees the general spread and allocation of housing development throughout the district existing towns and villages. But concerned about urbanisation of open countryside, the loss of high quality agricultural land and the loss of integrity for existing settlements. The basis for three new settlements is the modelling of population growth largely based on an assessment of housing needs driven by the likely expansion of Stansted Airport. Land of poorer quality and in more sustainable locations should be given the priority to develop as required by NPPF.

Takeley Parish Council

Objects to allocation of more than 43 dwellings in Takeley (30 houses stated by Takeley Parish Council before). The size of the settlement has already increased by 121% and existing traffic infrastructure issues regarding the volume and types of traffic in the main route into Takeley. 15,020 movements on the B1256 junction over a 13 hour period on the 13th June 2017 was recorded in a traffic survey carried out by Essex County Council. Highways England also expressed similar concern.

Wendens Ambo Parish Council

Objects to the proposed housing mix and density. The proportion of 1 and 2 bed houses just 9% is too low and the number of 4+ bed houses is too high at 47% of proposed dwellings given the increasing number of population aged 65+, and very large number of people on its housing register and unaffordable housing price. And the density of development on a number of sites in Saffron Walden is too high and will bring an adverse impact of quality or life for residents.

Concerned about the potential for congestion along the B1383 and the safety of junctions with Saffron Walden given large number of developments have been taking place.

Concerned the location of school place for Wenden children and the need of free transport for parents and the children.

Henham Parish Council

Supports the developments to meet the housing needs. Given the extent of development already carried out or committed, any further development in Henham would not be warranted.

Stebbing Parish Council

The Council considers that the housing need can be met without adverse impact on policies in the National Planning Policy Framework (NPPF). No neighbouring authority has requested that Uttlesford should accommodate some of its need. It is evident from examination of the trajectory that housing delivery is expected to peak in 2018/17 then drop off for a few years before rising above the annual housing target in 2025/26. Concerned that the provision of settlements (the garden communities) takes longer than originally envisaged, so there is a risk that the emerging Local Plan will fail to deliver the required dwelling numbers (including affordable housing) within the plan period.

The OAN requirement is 13,332 dwellings and not 14,100 as stated in the draft Local Plan, and a greater proportion of this need should be met elsewhere in the HMA where the needs are more pronounced.

The need for affordable housing has also been reassessed as outlined below. SHMA: Affordable Housing Update July 2017. Paragraph 3.62 of the SHMA Affordable Housing Update identifies the overall affordable housing need for the full Plan period 2011-2033 (which is included within the Full OAN figure identified immediately above), as being around 13,600 dwellings. Fig 21 in the Update identifies an annual need for affordable housing of 127 dwellings. It is particularly noteworthy that in terms of the West Essex and East Hertfordshire Housing Market Area, Uttlesford has a lower affordable housing requirement than other local authorities. This raises the important question of whether a greater proportion of the HMA's housing requirement should be diverted elsewhere to assist local authorities who have a much more substantive and pressing affordable housing need (e.g. Harlow).

Great Dunmow Town Council

Lack of transparency on how sites were chosen, it should not be because owners offer them up.

Battlement Trust

National policy seeks to boost significantly the supply of new homes; the figure of 14,100 homes is a minimum figure, not a maximum. Uttlesford's neighbours also include Brentwood Borough, which has an unmet housing need. It is unclear from the DLP as to how this has been considered and addressed through the preparation of the Local Plan. In order to be sound, the Local Plan is required to consider unmet needs of its neighbour and whether it is in a position to deliver a proportion of such needs.

The NPPF is clear that the Local Plan must contain policies that are sufficiently flexible to ensure a constant supply of housing. In this respect, the DLP's proposal to meet the exact number of new homes that is stated to be the objectively assessed need, and failure to incorporate suitable flexibility to ensure housing needs will be met in full, renders it contrary to the NPPF. No allowance is made for sites failing to come forward as and when currently expected.

The DLP's strategy of seeking to provide for exactly the number of homes required to meet need without any flexibility will leave the Council on the brink of being short of a five-year

housing land supply for the entirety of the plan period, resulting in a significant risk that the District could consistently find itself without an adequate supply at various points in the plan period. This is contrary to national policy. The lack of any buffer is particularly problematic given the reliance on windfall to help meet housing need.

Over half of the District's housing need from 2016 is expected to be provided through either windfall developments or garden communities. Requirements for the garden community will take a considerable amount of time, and are particularly likely to do so in the case of garden communities given their complexity and scale. It is considered improbable that garden communities will begin to contribute towards housing completions from 2021-22 as the DLP suggests.

The current adopted Development Plan identifies Stansted Mountfitchet as a Main Urban Area. Stansted Mountfitchet benefits from a range of services and facilities and a rail connection, which serve not only the settlement itself but also surrounding villages. Only a mere 62 homes will be delivered in Stansted Mountfitchet. The limit this entails on the potential growth of the settlement is considered wholly unjustified, particularly within the context of the District's unsustainable overall housing need.

Epping Forest District Council

The policy is in line with the figures identified in the Memorandum of Understanding on Distribution of Objectively Assessed Housing Need across the West Essex/ East Hertfordshire HMA and are also compatible with Epping Forest District's Draft Local Plan.

Great Chesterford Parish Council

GCPC objects to housing target of 14,100 in light of East Herts DC Housing Topic Paper UDC required to amend housing target to lower OAN figure of 12,500 dwellings Objection to NUGC as part of housing supply GCPC notes no significant impact in meeting reduced target when NUGC is removed from potential sites.

If NUGC were to remain in the draft LP, the correct figure for Great Chesterford is 2,033 (1,900 plus 133). Until NUGC is built, those houses are being built in our community.

The Woodland Trust

The Trust is concerned about the potential adverse impacts that the proposed site allocations will have in relation to areas of ancient woodland within and/or adjacent to site allocations. Ancient woodland should not be included in areas that are allocated for development, whether for residential, leisure or community purposes as this leaves them open to the impacts of development. The Woodland Trust objects to the inclusion of the below site allocations in the Uttlesford District Council Draft Local Plan as they are likely to cause damage and/or loss to areas of ancient woodland within or adjacent to their boundaries. For this reason, we believe the sites in the table below are unsound and should not be taken forward. Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.

Hands off Thaxted

We are pleased that UDC recognises the importance of Thaxted as an historic village. We are concerned at the huge amount of development anticipated in Uttlesford especially at Little Easton, and believe that the housing need numbers for Uttlesford have been over estimated.

Hertfordshire County Council

The most relevant residential allocations proposed that may have an impact on school places in Hertfordshire are Stansted Mountfitchet, Takeley, Clavering and Little Hallingbury.

It is suggested in the consultation document that approximately 62 dwellings could be provided in Stansted Mountfitchet and 42 dwellings in Takeley. Both settlements have a relationship with Hertfordshire with children resident in these areas attending schools in Bishops Stortford. At primary level, HCC has in recent years increased capacity on a temporary basis to ensure sufficient reception places have been available to meet local demand. HCC is also proposing to expand St Joseph's Primary School in Bishop's Stortford to 2fe from 2018 which will increase places for local children by 0.5fe. HCC is planning new school provision to meet the anticipated yield arising from the new development of around 2,500 homes at Bishops Stortford North. This development will provide additional primary schools and new secondary provision to meet the needs of these new communities. We would anticipate that any increase in demand arising from new housing proposed in Uttlesford is managed in that local area with new school places being provided where required as part of Essex County Council's school planning strategy.

With regard to secondary school places, the six schools in Bishop's Stortford and Sawbridgeworth are all full, and capacity has been increased temporarily in recent years across the town to meet forecast demand from the local community. The County Council is planning new 6fe secondary provision in the heart of the Bishops Stortford North development to meet future needs of both the existing community and the new communities that will move into those new homes. HCC would anticipate that any increase in demand arising from new housing proposed in Uttlesford will be managed locally with new school places being provided where required as part of Essex County Council's school planning strategy. This will ensure that sufficient local school places are provided in tandem with the additional housing proposed in those areas to prevent additional pressure being placed on existing schools in Hertfordshire where there are already capacity issues.

Harlow District Council

The scale and distribution set out matches the OAHN of 14,100 with no buffer for possible under-delivery over the life of the Local Plan. The Garden Communities may be dependent on the implementation of strategic infrastructure projects with long lead-in times.

The Thaxted Society

The Society assumes numbers are verifiably correct.

Stansted Neighbourhood Plan Steering Group - The overall spatial strategy seems sound with one new settlement to the north of the district, one to the south and one to the west, however, we cannot comment on the sustainability of individual sites outside Stansted Mountfitchet.

WeAreResidents.Org

- Since the R18 draft was produced, an additional 85 permissions have been granted on the east of Saffron Walden under appeal on the Gladman site on Little Walden Road (UTT/16/2210/OP). This needs to be reflected in the next draft of the Plan, reducing the allocation for Saffron Walden by 85 dwellings (and increasing the extant permissions by the same number).

- There is an error in the existing permissions in Saffron Walden. There are 42 independent dwelling units as part of the care retirement village on the Radwinter Road site in Saffron Walden that were approved and so need to be included in the numbers. They are listed in the most recent 5-year supply delivery report, but have been omitted from the R18 draft Plan. That means that the number of overall existing permissions increased from 4513 to 4555, permissions in Saffron Walden should to be increased by 42 from 548 to 590, and the number of dwellings to be allocated in Saffron Walden reduced by 42 from 204 to 198. These changes should be reflected throughout the plan.

High Easter Parish Council

- We have strong reservations about the amount of housing development that is proposed around Great Dunmow – including the proposed new Garden Community at Easton Park, just to the west of Great Dunmow. As a percentage of the total number of dwellings that Policy SP3 seeks to provide (5,926) between 2016 and 2033, the total for Great Dunmow (including Easton Park) is 2,543 – or 43%.

While we appreciate the Council's need to meet their 'objectively assessed' housing requirement, we believe that the proportion of new houses proposed to be allocated to Great Dunmow, when compared to Saffron Walden for example, which is only allocated 240 dwellings, is excessive and disproportional. In addition, we believe that the total amount of development proposed for Great Dunmow, including Easton Park, will result in the following detrimental impacts:

Coalescence with Great Dunmow, Stansted Airport, Takeley and Canfield to create urban sprawl from west of Bishops Stortford to east of Great Dunmow.

Housing in close proximity to Stansted Airport with attendant noise and health issues for residents of the proposed new 'garden community'.

Loss of heritage and a unique asset in Easton Park, a deer park that was recorded in 1302 and dates from centuries before.

Damage to the heritage of The Little Easton Conservation area and the surroundings of The Gardens of Easton Lodge.

Destruction of valuable arable land and environmental diversity.

Lack of infrastructure (transport, health etc) to cope with the resultant increase in population.

Increased pressure on schools and GP surgeries.

Grid lock on key transport links compounded by the growth in Great Dunmow and developments at Braintree and Marks Tey notably at Junction 8 of the M11 which is already congested and cannot cope with further airport expansion and housing.

We believe that the Council should therefore reconsider the split of new housing development between Saffron Walden and Great Dunmow so that it is more proportionate, given the status of Saffron Walden as the main centre of the District. The 'traffic constraints' of Saffron Walden are cited as a reason for not allocating any significant development on the edge of the town, however such development could help to resolve the existing traffic problems through S106 contributions to new infrastructure. The allocation of only 240 dwellings for Saffron Walden will not 'maintain and enhance the town's function as the main centre of the District.

Little Chesterford Parish Council

The scale of housing growth is based on flawed assumptions:

The housing numbers in the report take as their basis a period of rapid development at Stansted Airport that is atypical. The overall forecasts differ significantly from those used by adjoining districts. The projected growth rates do not take account of current economic forecasts. Indeed, the GLA has recently forecast significantly lower housing growth projections than those used as the basis for the plan, and the market slow down already being experienced has not been included in the forecast.

Focusing housing provision into three main sites is not sustainable and deliverable:

Successfully managing the delivery of a single large site within a district would be challenging. Relying on just three large sites to provide nearly all of UDCs housing places an unacceptably level of risk on the likelihood of delivery.

The distribution of housing need at northernmost boundary of the district is based on flawed assumptions:

Growth patterns in the South of the area should not be used for North Uttlesford housing needs where growth due to Stansted Airport do not apply.

Housing provision at the NUGV will serve South Cambridgeshire not Uttlesford housing needs:

The promotor of the NUGV has made it clear that the target market for the development is those employed at South Cambridgeshire Science Sites, and the location of the site abutting the South Cambridgeshire facilitates this.

However, in their response to the Uttlesford Local Plan, South Cambridgeshire District Council raises serious concerns about the NUGV proposal as the most appropriate to meet this need , for example they state “ *[the proposal] could also prevent or reduce potential for consideration of whether there are better alternative housing-led options to support the growth of the life sciences cluster south of Cambridge*” and “*We are aware of potential employment-led proposals being worked up to the north of Uttlesford in South Cambridgeshire. If they come forward they will be relevant considerations for the Uttlesford Local Plan.*”

Whether it is required or not, targeting provision at this sector does not, of course serve Uttlesford housing needs.

The plan does not appear to take account of planned development in neighbouring areas:

No account appears to have been taken of other planned housing development in the wider area when planning housing provision or accompanying infrastructure requirements. For example, Appendix C of *Economic Viability Study for Local Plan New Settlement and Neighbourhood Proposals, Revised October 2016*, does not mention any existing planned development in North Herts (Royston Area), South Cambs or West Suffolk (Haverhill area), all of which have potential impacts. Neither can any reference to these planned developments be found in any other supporting documentation.

Great Dunmow Town Council

We query the requirement of 14,100 net additional dwellings in Uttlesford during the plan period. The latest (revised) calculation of the objectively assessed housing need by UDC's consultants show a total housing figure of 13,332 dwellings, taking into account the latest government projections on growth and migration. Why has this not been reflected in the Draft Local Plan's housing figures?

Elsenham Parish Council

Elsenham Parish Council does not agree that a further allocation of houses to Elsenham can be justified. Senior members of Uttlesford District Council are on record as saying that allowance would be made for all allocations since 2011, and that communities such as Elsenham and Takeley have already taken their fair share. There can be no justification for the gross disparity between an increase in Elsenham of 65% and the significant but much more modest increases for other 'key villages'.

It is relevant to draw attention to the rejection by the Inspector in December 2014 of the previous draft Local Plan. Central to the rejection was the inadequacy of the road links to Elsenham; the Inspector stated that Elsenham cannot 'overcome the connectivity disadvantages of its location'. The Inspector into the appeal against rejection of the proposed plan for up to 800 dwellings between Henham and Elsenham accepted the approach of the Local Plan Inspector, and concluded that the adverse impacts on the surrounding road network was sufficient in itself to refuse the appeal. It is apparent that these two recent appeal decisions in effect amount to a repudiation of the methods used in assessing road access in previous housing applications, and point to the fact that approvals for housing in Elsenham already granted must be reckoned to be excessive.

At the meeting of the Planning Policy Working Group on 6 April 2017, it was stated that the updated Strategic Land Availability Assessment would be available for the meeting on 17 May 2017. It is understood, however, that it remains unavailable at the time of writing, with the result that the statuses of sites in Chapter 12 are given as of 1 April 2016. It is not possible to determine why various sites which were included at website are excluded from the current proposals. The consequent lack of audit trail is a serious deficiency in the current consultation.

Developers/landowners/site promoters

Objects that only 62 new homes in addition to any permitted schemes are expected at Stansted Mountfitchet. There is no clear evidence how much these permitted scheme will be delivered in Stansted Mountfitchet the housing trajectory at Appendix 3 of the Plan only provide an overall figure. And the supply of affordable housing in Stansted Mountfitchet will unlikely to meet the needs for different communities.

The policy is not based on thorough assessment of reasonable alternatives. SA only identify alternatives based on testing the plan-wide housing target. Requires a testing of housing target for each settlement to explore alternatives.

Increased housing provision should be allocated at site 15Sta15 in Stansted Mountfitchet.

Concerned that not enough flexibility for housing delivery required by NPPF, paragraph 14. The housing trajectory at Appendix 3 of the DLP states that 14,102 dwellings will be delivered over the plan period with a minuscule buffer of 0.02% of total need. And there is a risk of under-delivery for the 5-year housing supply.

Object to the number of dwellings proposed for Type A and B village. It should be significantly increased from say 44 to 1,000 dwellings in the plan period with a reduced the provision for Great Dunmow and the 3 Garden Communities. Allocation should be provided at land East of Seward End (attached map 1).

Housing need calculations will fluctuate, and it would be prudent to continue to plan based on an objectively assessed housing need of 14,100 dwellings. Instead of 13,332 units under an updated assessment (the West Essex and East Hertfordshire SHMA Establishing the Objectively Assessed Housing Need (July 2017))

The neighbouring Brentwood Borough currently has an unmet housing need, the draft local plan should consider whether to help meet such needs.

Concerned that not there is not enough flexibility for housing delivery as required by NPPF, paragraph 14. The housing trajectory at Appendix 3 of the draft local plan states that 14,102 dwellings will be delivered over the plan period with a minuscule buffer of 0.02% of total need.

It is considered improbable that garden communities will begin to contribute towards housing completions from 2021-22 two years from the current anticipated Local Plan adopted date to meet the 5-year housing supply. Of the 11,629 dwellings to be delivered between 2016 and the end of the plan period, 4670 are proposed through Draft Policy SP3 to be provided in garden communities which equates to 40% of the total. However, a long lead-in time for the completion of development is expected. This will involve preparing and adopting development framework as required by Policy SP5, which requires significant community participation and stakeholder engagement (most likely) Strategic Environmental Assessment, undergo an examination process (in the case of those adopted as part of the development plan). Also, it is likely to require outline applications followed by reserved matters, discharge all necessary conditions, meet S106 obligations and agree S278 requirements prior to commencement.

Additional sites allocation to deliver housing in the shorter/medium term, such as the site at London Road (south), Quendon is needed which is consistent with the Draft Local Plan Policy SP3 Rural Vitality.

The site is located within Quendon & Rickling which is a Type A Village in the draft local plan. However, more than 44 new homes should still be supported. Because there is sufficient infrastructure such as Primary School, Church, Local Retail, Bowling Club and 2 Public Houses and can help maintain these services and facilities viable as supported by NPPF Para 17, 55 and National Planning Practice Guidance (ID: 50-001-20160519)

Supports the allocation of Easton Park as a new Garden Community of 10,000 dwellings and associated supporting uses.

Concerned that a windfall allowance of 70 dpa is provided in the draft Local Plan housing requirement calculation. as only 50 dpa was accepted by the Inspector examining the withdrawn 2014 Local Plan.

Suggests that the Easton Park Garden Communities to be 250 dpa instead of 150 dpa estimated by UDC. The over-delivery may serve to address any shortfall in the windfall supply or delays to commencement of other strategic allocations, for example in the event that the early phases of delivery of the West of Braintree Garden Community take place in Braintree District.

Object to lack of growth to rural settlements including Leaden Roding. Because there is sufficient infrastructure such as a primary school, a village hall, a car garage and a local convenience store and can help maintain these services and facilities viable as supported by NPPF Para 17, 55 and National Planning Practice Guidance (ID: 50-001-20160519). Suitable sites should be allocated for new homes within the village. And release of greenbelt is supported under this special circumstance.

Concerned that there is not enough flexibility for housing delivery as required by NPPF, paragraph 14. The housing trajectory at Appendix 3 of the draft local plan states that 14,102 dwellings will be delivered over the plan period with a minuscule buffer of 0.02% of total need. More deliverable sites should be identified to meet the housing needs.

Concerned that the garden communities will take longer than expected to deliver (the first homes to be delivered in 2024). The council should allocate additional sites that would be able to deliver dwelling capacity in the shorter- term, which would be more likely to come forward within the corresponding 5-year period (2021 - 2025).

It is also noted that cumulatively there is a significant amount of infrastructure, needing substantial up- front investment, required to be delivered at an early stage, which may give rise to viability concerns, before consideration is additionally given to the wide range of social infrastructure likely to be necessary to ensure establishment of balanced communities. In light of the anticipated infrastructure requirements, we do not consider that North Uttlesford or Easton Park's Garden Community would be in a position to contribute to the housing trajectory from as early as 2021/2022. As such, we do not consider the plan to be deliverable or achievable in this respect. We would suggest that a better mix of both short-term and long-term sites should be allocated within the emerging Local Plan to ensure the continued provision of dwellings in the District

The Council should be aiming to plan positively, in line with the NPPF, and should avoid restricting development in Type B villages. Concerns over the un-deliverability of the housing targets in the garden communities. The Inspector recently rejected the Eastleigh Borough Plan as large development was been restricted to 2 developers, rather than spreading development out over a number of developers. We consider that it is imperative for the Council to aim to adopt a balanced supply position between large and small sites, as indicated by Inspectors at other Local Plan examinations. At present, we consider that the overall objectively assessed housing need cannot be met with the current land supply strategy in place. The Council should look to identify further allocations, broadening their search for sites in sustainable villages such as Little Dunmow. The Local Plan is, therefore, not currently effective in this respect and cannot currently be deemed sound. The Council cannot demonstrate a 5-year land supply.

We consider that the identified housing requirement of 14,100 homes is not sufficient to meet the Council's housing needs over the plan period. We consider that the SHMA (2015) and SHMA Update (August 2016) have failed to appropriately assess housing need in the Housing Market Area (HMA) in accordance with both the NPPF and PPG.

There is insufficient evidence to justify a 10-year migration period and adjustment to the baseline figure to the DCLG projections. If an adjustment is not made, this adds an additional 26 dwellings per annum (dpa) to the OAHN for Uttlesford.

The SHMA does not consider suppressed household formation amongst younger people; this would suggest a further 22 dpa should be added to the OAHN for Uttlesford.

In order to address affordability issues in Uttlesford, a 60% uplift from the household projections is considered more appropriate than the 20% proposed in the SHMA . This would add a further 232 dpa to the OAHN for Uttlesford.

The 2016 SHMA Update does not provide sufficient evidence to support its conclusion that additional workers are not needed in the HMA to fill the expected new jobs.

London overspill has not been fully explored in the SHMA or draft Local Plan. When considered, the OAHN for Uttlesford should increase by around 64 dpa to help address London's needs.

Uttlesford will not be able to demonstrate a five-year supply of housing land early in the plan period. There is an over reliance on new settlements later in the plan period. Two recent appeal decisions have confirmed that Uttlesford cannot currently demonstrate a five-year housing land supply. Given this current shortfall in housing land supply, and with reference to the Housing Trajectory in light of this, it is evident that the Council is unlikely to be able to demonstrate a five-year supply of housing land early-on in the plan period, contrary to the requirements of paragraph 47 of the NPPF.

The Council has also assumed that all sites (existing commitments and allocations) will deliver within the plan period. There is no sufficient justification to conclude that all sites will be delivered, and thus we consider that a lapse rate should be applied.

It is considered that the Spatial Strategy and the unrealistic nature of the housing trajectory puts at serious risk the ability of the plan to deliver housing to meet its Objectively Assessed

Housing Need within the plan period up to 2033. The evidence to demonstrate that the Garden Communities will be delivered to the planned timescales is weak.

There is a risk that the Garden Communities will perpetuate car borne out-commuting and not deliver the modal shift referred to in the Local Plan. This is also referred at page 201 of the Sustainability Appraisal which concludes 'it would also be expected that there would be a large amount of commuting outside of the district for jobs would be by car.'

Uttlesford must ensure that it meets its housing needs over the plan period. Persimmon Homes does not consider that there is sufficient evidence to conclude that the proposed Garden Communities will make the proposed level of contribution to housing supply within the Plan period.

A greater emphasis on Type A villages would not be at odds with the emphasis placed within part 3 (1, 2, and 3) of draft policy SP2.

Insufficient sites have been allocated to meet the council own assessment of the housing need, as such the council risks five year supply shortfall of 737 dwellings, a plan period shortfall of 3,726 dwellings and needs to allocate additional sites in order to remain sound when national and local evidence is considered regarding delivery rates and commencement timescales.

A further report into the level of need concludes that the council requires 14,388 dwellings rather than the 14,100 dwellings currently allowed for in the Plan. It is considered that an annual average windfall allowance of 50 dwellings is considered more appropriate.

Further allocations are required to meet delivery targets, and as such a further allocation of approximately 180 dwellings should be made on the land south of Beldams Lane, Bishop's Stortford.

The reliance on 3 larger garden communities does not contribute to a sustainable approach to development. The removal of certain sites from the plan lacks justification: Watch House Green, Hartford End, Bannister Green, 2 sites on the edge of Felsted Village. This significantly impedes the potential to deliver housing in the short term and as a direct consequence the council's inability to demonstrate a 5 year land supply.

Essex Farms supports the policy and the overall principle of the ambition to create a new Garden Community to the west of Braintree.

Support for the garden community, however consider that allocations may not be delivered on time. The development of these Garden Communities must not be seen as a reason for not allocating appropriate sites around existing sustainable communities. Such sites will deliver more quickly than those in the Garden Communities enabling the Council to secure a consistent supply of homes and maintain a strong supply of development land for new housing across the plan period. The Council must ensure that it includes contingencies within the Plan to ensure that any delays in delivering the Garden Communities are compensated, such as through smaller sites across the borough.

We consider that proposing no new allocations for Felsted itself given its service base is unsustainable. Further, we do not consider that there is environmental capacity within Uttlesford for a new freestanding settlements or garden communities that would have the

critical mass required to generate their own employment, shopping, and public services to make it sustainable and accord with the NPPF presumption in favour of sustainable development. Suggestion of a site in the north-west of Felsted village that is accessed via Station Road which runs along the southern and western boundaries of the site linking the site to the village. The site itself measures approximately 6 hectares in overall area and is currently used as agricultural/paddock land. As a consequence, we would request that the status of Felsted is changed to a key village, and that our client's land is allocated.

Tables 3.4 and 3.5 need to be clarified. In Table 3.4 the already built dwelling figure should be confirmed as in table 3.5 it refers to (+10 units) it should refer to all completions as a known figure. It is unclear why in Table 3.4, sites with Planning Permission at April 2016, are identified as 6+ or 10+ units. In Table 3.5 Dwellings Built 2011 to 2016 refers to 10+ units, this should be a known completion figure. In Table 3.4 the Windfall Allowance covers the period 2011 to 2033, this should be amended to reflect the actual completions for the period to 1 April 2016. There are discrepancies between column totals in Table 3.5 and the figures in Table 3.4 which should be explained, it is assumed they relate to permission and dwellings built outside of these settlements. These anomalies call into question the soundness of the scale of development the plan seeks to deliver.

Policy SP3 states that provision will be made for about 14,100 net additional dwellings, over the plan period the total number of dwellings identified in the policy is 14,097 dwellings. Such a policy allowance is neither ambitious nor flexible. The strategy for housing delivery, based on the information contained in the respective tables and Policy SP3 is not considered to be sound. It indicates a significant reliance on the delivery of additional homes in Great Dunmow (3,001 dwellings) along with some 4,670 in the proposed new Garden Communities. If this is then balanced against the remaining allocations in Policy SP3, of 1,256 dwellings in the two Towns, Key Villages and Type A & B Villages, is considered to represent an extremely high-risk strategy. It is considered that there is a significant pool of evidence which demonstrates that new settlements are notoriously slow to deliver on the basis of the significant challenges they face in terms of their ability to frontload infrastructure. The Local Plan must ensure that there is a sufficient flexibility to ensure that housing needs are met in full over the plan period, but that at each point in the plan period there is a five-year supply. The Plan's strategy of seeking to provide for exactly the number of homes required to meet need without any flexibility will leave the Council in a precarious position throughout the plan-period in respect of its five-year housing land supply position.

It is considered that the policy approach should be to seek to encourage development in or adjacent to small settlements, in recognition of paragraph 55 of the NPPF which acknowledges that in rural areas: housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Simply excluding development in a settlement because, for example there is no primary school, does not take into account that such development may support a nearby primary school in a neighbouring settlement which is part of the catchment area. CIL can support services in the wider catchment area.

The adopted Development Plan identifies Felsted as a settlement with a settlement boundary, which currently restricts the potential growth of the village. Felsted is home to a range of facilities and services, including restaurants, shops, café, gym, community hall,

public houses, and post office which serve the local community. The DLP recognises such villages are suitable for a scale of development that reinforces their role as a local centre. It is important to the vitality of Felsted that such services and facilities remain viable.

The local plan should include smaller scale development sites in order to be sustainable.

Gladman objects to Policy SP3 in that it fails to identify the full need for housing in Uttlesford. This suggests that the approach taken by the latest SHMA to reduce housing needs to reflect long term migration rates is not robust. There is also evidence that household formation rates have been suppressed in the past and therefore an adjustment to the demographic assessment of housing need is required which is not undertaken in the SHMA. The latest projections set out a need to deliver 545 dwellings per annum (dpa) between 2011 and 2033. The demographic starting point should be 570dpa. This would prompt a 20% increase to the demographic start point to address these issues increasing the housing need figure to 684dpa.

Economic growth forecasts have also been analysed and it was found that no additional adjustment would be necessary to meet the demand for increased labour force. Therefore, the full need for housing in Uttlesford between 2011 and 2033 should be 684dpa. We have considered the figures included in Tables 3.4 and 3.5 of the Local Plan and consider them to be a little confusing. Table 3.4 has a row which includes sites of 6+ or 10+ units with planning permission which seems contradictory. It is also difficult to relate the information in Table 3.5 back to Table 3.4. It is therefore suggested that for clarity, this should be simplified in future versions of the Plan.

Gladman is concerned with the level of windfall sites that the Council is including within the housing supply going forward. The Framework states that local planning authorities may make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply going forward. Any allowance should be realistic having full regard to the Strategic Housing Land Availability Assessment (SHLAA). Therefore, in order to include a windfall allowance in the Plan, Uttlesford will have to provide robust and credible evidence on this source of supply to justify the 1,190 units which is included in the Local Plan.

These representations build on previous site promotion initiatives that sought to identify the land at Chelmer Mead for housing. The Local Authority should amend its Local Plan to make allowance for development at Chelmer Mead, specifically: 750 homes to be brought forward at Chelmer Mead within the next 5 years; and a further 2,250 homes at Chelmer Mead during the remainder of the plan period.

Baker and Metson Ltd have substantial wider land holdings, not least land to the north and west of the A120. This includes a site that has a current planning permission for a 5MW solar farm. Subject to further discussions with the Local Authority, this land could also be brought forward for development to bring the quantum of housing at Chelmer Mead to 5,000.

It appears that notwithstanding Appendix 3 of the emerging Local Plan the Local Authority cannot demonstrate a five year housing land supply even with a 5% buffer, and the shortfall is accordingly greater once a 20% buffer is applied. This evidently calls into question the soundness of the Local Plan and confirms the need for additional housing allocations to be identified, particularly those that can deliver housing in the short term.

Whilst Appendix 3 of the consultation Local Plan claims that Uttlesford can meet its 5 year housing land supply through sites that have already been granted permission, there is a lack of evidence to support the claim and the Local Authority are elsewhere unable to demonstrate a five year supply. As such, the plan cannot be considered sound in its current form. The Local Authority needs to find and allocate additional sites in the interests of ensuring that the Local Authority meets its housing need, and to allow housing to be brought forward in the short term. It is clear that the Local Authority has not identified sufficient housing land within the consultation Local Plan. There is little or no development of any scale anticipated in the next 5 years and there are question marks about the deliverability of the other allocated sites within the plan period. As a result the Local Authority should be identifying at least one additional major development site that has the ability to bring forward housing in the next 5 years. Therefore, in order to ensure that the emerging Local Plan is sound, additional land should be identified for housing development.

SBS Ltd/ Kier do not object to the scale or nature of the proposed housing distribution. However, the identified housing requirement should be expressed and identified as a minimum. This approach would accord with Paragraph 4.7 of the NPPF which states that local authorities should ensure that their Local Plan meets the full, objectively assessed housing need.

E&A does not consider that a number of the sites identified for development are located in the most sustainable locations, nor are they capable of delivering the amount of development identified for each site within the draft local plan period as a result of the upgrade requirements for infrastructure in the local area. We consider that the following changes are required to make the plan sound:

Provision of enough sites to cater for Uttlesford's share of a potential further 9,100 homes across the whole of the Housing Market Area (HMA);

The delivery timeframes for the delivery of the Garden Communities are unrealistic and a more robust programme supported by evidence on infrastructure delivery should be provided before the Council formally agrees it is a suitable strategy for the quick delivery of housing;

The proposed sites are multifaceted and require significant infrastructure investment from the offset to begin to deliver the required housing units;

The distribution of development sacrifices the delivery of housing in rural settlements (44 units over the whole plan period) in the pursuit of delivery at the Garden Communities. This is detrimental to rural sustainability and the inability to meet affordability issues as early as possible in the plan period. More development is required in the Type A Villages, including at the demonstrably sustainable Land to the West of The Cricketers (see enclosed Sustainability Appraisal);

The Council does not currently seek to deliver a five year supply of housing inclusive of its previous shortfalls which is unacceptable and not in accordance with national guidance i.e. the Sedgefield approach. The Council should also be seeking to use a 20% buffer as per the recent appeal decisions at Saffron Waldon and Felsted;

The Regulation 18 Plan is at an early stage and includes potentially controversial proposals for meeting the deficit. UDC considers that it can be adopted in Spring 2019 but even that seemingly optimistic timescale would mean that the deficit is likely to persist for some considerable time.

Thaxted has many services and facilities including a primary school, church, surgery, public house and pharmacy. The village can support a much greater number of dwellings that would contribute to both the overall dwelling provision, whilst utilising and sustaining the existing facilities. Objection to Policy SP3, as Thaxted should be allocated a greater number of dwellings in line with its Key Village status. We are promoting land at Copthall Lane which is a sustainable, available and achievable for 54 dwellings.

This Policy also states that the three Garden Communities of Easton Park, North Uttlesford and West of Braintree will provide a combined total of 4,670 dwellings over the Plan period. Given the scale of the Garden Communities, the infrastructure required, their complicated delivery, and the length of time before the Plan is adopted, we suggest that it would be very unlikely that this quantum of development will be delivered as is set out in this Policy and Draft Local Plan. We therefore object to Policy SP3 and believe the Council should look to allocate additional sites that would have a greater chance of being delivered over the short-term, within the next five years of the Plan Period.

We object to the provision of growth planned for by this policy and its proposed distribution. We do not consider the OAN for the District has been appropriately assessed and provision has been made for sufficient homes in the District. The Council therefore need to identify further sustainable sites to meet its full OAN. Amend Policy SP3 as follows: the OAN should be reassessed and the Council's needs met in full. The correct number of completions (1,914 dwellings) should be identified As a minimum, provision should be made for 6,480 dwellings 150 new homes should be provided in Elsenham.

The identification of Elsenham as a Key Village remains soundly based. FFE consider that the allocation of only 40 dwellings to Elsenham as a key village singularly fails to reflect the suitability of Elsenham as a location for sustainable growth. On this basis, it is proposed that land to the east of the village can be allocated for up to 350 dwellings and supporting uses. Such an allocation would be entirely consistent and compatible with the spatial strategy, and would promote an appropriate scale of growth to the village that would help meet properly assessed OAN. Such growth could be designed to integrate with any wider garden settlement proposal, and would be consistent with land promoted during the Call for Sites exercise.

It is recognised that the proposed target in the DLP of 14,100 homes has been informed by discussions with other authorities within the housing market area - Harlow, Epping Forest and East Hertfordshire Councils – and that a Memorandum of Understanding was signed by the Council and these other authorities in March 2017.

However, it should be recognised that Uttlesford shares a strong functional relationship with Brentwood Borough. We understand that Brentwood Borough currently has an unmet housing need. However, it is unclear from the DLP as to how this has been considered and addressed through the preparation of the Local Plan. In order to be sound, the Local Plan is required to consider unmet needs of its neighbour and whether it is in a position to help meet such needs.

A further concern with the DLP in regards to the proposed housing target in draft Policy SP3 is its flexibility. The National Planning Policy Framework (NPPF) is clear that the Local Plan must contain policies that are sufficiently flexible to ensure a constant supply of housing – policies that can respond to changing circumstances. The NPPF requires Local Planning Authorities to maintain delivery of a five-year supply of housing land to meet their housing target. The DLP's proposal to meet – with no buffer – the exact number of new homes that is stated to be the objectively assessed need means that it fails to incorporate suitable flexibility to ensure objectively assessed housing needs will be met in full, rendering it contrary to the NPPF.

The DLP should identify additional, sustainable and deliverable sites for housing development to ensure there is flexibility in the housing delivery strategy; and that the District is not left with a housing shortfall in the event any sites fail to be delivered, or simply fail to deliver the number of new homes currently anticipated.

In addition, it should be recognised that the Planning Practice Guidance is clear (Paragraph 30 Reference ID: 3-030-20140306, Revision date: 06 03 2014) that Local Planning Authorities should have an identified five-year supply at all points during the plan period. Having regard to this, not only must the Local Plan ensure that there is sufficient flexibility to ensure that housing needs are met in full over the plan period, but that at each point in the plan period there is a five-year supply.

Officers and Members will also be aware that Uttlesford is currently incapable of demonstrating a five year supply of deliverable housing supply, as confirmed by the Planning Inspector for APP/C1570/W/16/3156864. It is therefore important for the Council to identify sites in sustainable locations that are immediately deliverable to resolve this shortfall.

Concerns over the proposed level of growth to rural settlements as it may impact rural vitality. The NPPF makes clear that one of the core planning principles that should underpin both plan-making and decision-making is the need to support rural communities, stating at paragraph 17 that planning should support thriving rural communities within the countryside.

It appears that Uttlesford District Council is now suggesting the OAN is no longer 14,100, but 13,332. We would suggest that housing need calculations will fluctuate, and that it would be prudent to continue to plan based on an objectively assessed need of 14,100 dwellings, particularly within the context of the requirement to meet needs in full, and to boost significantly housing land supply.

A further concern with the Plan is with the flexibility of the proposed housing target in draft Policy SP3. The NPPF requires Local Planning Authorities to maintain delivery of a five-year supply of housing land to meet their housing target. In this respect, the Plan's proposal to meet, with no buffer, the exact number of new homes that is stated to be the objectively assessed need means that it fails to incorporate suitable flexibility to ensure objectively assessed housing needs will be met in full, rendering it contrary to the NPPF.

In addition, it should be recognised that the Planning Practice Guidance is clear (Paragraph 30 Reference ID: 3-030-20140306, Revision date: 06 03 2014) that Local Planning Authorities should have an identified fiveyear supply at all points during the plan period.

It is recognised that the proposed target in the Plan of 14,100 homes has been informed by discussions with other authorities within the housing market area, namely Harlow, Epping Forest and East Hertfordshire Councils, and that a Memorandum of Understanding was signed by the Council and these other authorities in March 2017.

However, it should be recognised that Uttlesford's neighbours also include Brentwood Borough. We understand that Brentwood Borough currently has an unmet housing need. However, it is unclear from the Plan as to how this has been considered and addressed through the preparation of the Local Plan. In order to be sound, the Local Plan is required to consider unmet needs of its neighbour and whether it is in a position to help meet such needs.

The Plan proposes through Draft Policy SP3 that out of the 11,629 dwellings to be delivered in the District between 2016-2033, a mere 240 will be directed to Saffron Walden.

The limiting of growth to the settlement for the entirety of the plan period is considered wholly unjustified, particularly within the context of the District's overall housing need. Furthermore, not only does such a small number represent a missed opportunity to direct growth to a highly sustainable location, but it also gives rise to doubts as to whether this number will be sufficient to sustain the long-term vitality of the community.

If the Local Plan is to be sound, it is evident that a significantly greater number of new homes should be provided for Saffron Walden than currently proposed through the Plan.

It is entirely unnecessary for the DLP to identify such a significantly greater number of dwellings to be identified through Windfall than through allocations. This is especially concerning as the Council has identified a range of suitable sites within its Villages, including land at Cox Ley, through its SHLAA site assessments.

The Council is therefore relying on the delivery of 1,190 dwellings from windfall sites.

Such a high reliance on windfall sites throughout the Plan indicates that the Council are not seeking to meet the OAHN, as required, and are purposefully meeting only a portion of the need. The Council have also spread the past under delivery over the entire Plan rather than over the first five years, as required. The plan will therefore be immediately unable to meet the OAHN as currently drafted.

The NPPF and PPG are clear that the Local Plan must contain policies that are sufficiently flexible to ensure a constant supply of housing – policies that can respond to changing circumstances. In this respect, the DLP's proposal to meet – with no buffer – the exact number of new homes that is stated to be the objectively assessed need means that it fails to incorporate suitable flexibility to ensure objectively assessed housing needs will be met in full, rendering it contrary to the NPPF.

The Local Plan should identify additional, sustainable and deliverable sites for housing development to ensure there is flexibility in the housing delivery strategy; and that the District is not left with a housing shortfall in the event any sites fail to be delivered, or simply fail to deliver the number of new homes currently anticipated.

Suggestion that the wording of SP3 should be amended to remove any ambiguity over the importance of meeting the housing need and therefore commend the following change to paragraph 1 of Policy SP3:

'Provision will be made for A MINIMUM OF 14,100 net additional dwellings in Uttlesford during the Local Plan period 2011 to 2033.'

Bidwells report upon the Full Objectively Assessed Needs for Uttlesford (Bidwells, September 2017) attached, found that the need would be 14,280 dwellings, and therefore broadly in accordance with the minimum target housing need adopted by the Council when considering this as a difference of just 8 additional dwellings per annum.

Grosvenor support the allocation of 1,900 homes to be provided by 2033 at the North Uttlesford Garden Community which will clearly represent a significant contribution towards meeting the Full Objectively Assessed Needs of the District and support Policy SP7 in reflecting this as a minimum target which might potentially be exceeded, subject to providing satisfactory supporting infrastructure, to boost the delivery of Housing in the Plan in order to meet changing need or in the event that other major allocations are unable to deliver to the extent anticipated within the Plan period.

Suggests a revised objectively assessed housing need for the District of 13,332, it is recognised that housing need calculations may fluctuate and that it would be prudent to continue to plan based on an objectively assessed need of 14,100 dwellings.

It should be recognised that Uttlesford District's neighbours also include Brentwood Borough. We understand that Brentwood Borough currently has an unmet housing need. However, it is unclear from the DLP as to how this has been considered and addressed through the preparation of the Local Plan. In order to be sound, the Local Plan is required to consider unmet needs of its neighbour and whether it is in a position to help meet such needs.

The NPPF is clear that the Local Plan must contain policies that are sufficiently flexible to ensure a constant supply of housing – policies that can respond to changing circumstances. The NPPF requires Local Planning Authorities to maintain delivery of a five-year supply of housing land to meet their housing target (paragraph 47), and to produce Local Plans which are flexible in this respect, stating:

3. In this respect, the DLP's proposal to meet – with no buffer – the exact number of new homes that is stated to be the objectively assessed need means that it fails to incorporate suitable flexibility to ensure housing needs will be met in full, rendering it contrary to the NPPF.

The Local Plan should identify additional, sustainable and deliverable sites for housing development to ensure there is flexibility in the housing delivery strategy; and that the District is not left with a housing shortfall in the event any sites fail to be delivered, or simply fail to deliver the number of new homes currently anticipated.

It is considered improbable that garden communities will begin to contribute towards housing completions from 2021-22 – from two years from current anticipated Local Plan adoption date. This further demonstrates the need for additional sites to be identified for housing – sites that have the potential to deliver housing in the shorter / medium term.

In part, the DLP appears to recognise a number of the characteristics of Stansted Mountfitchet which make it a highly sustainable location for housing development. However, notwithstanding all of the above, the DLP proposes through Draft Policy SP3 that out of the 11,629 dwellings to be delivered in the District between 2016-2033, a mere 62

will be directed to Stansted Mountfitchet. The limiting of growth to the settlement for the entirety of the plan period is considered wholly unjustified, particularly within the context of the District's overall housing need. Furthermore, not only does such a small number represent a missed opportunity to direct growth to a highly sustainable location, but it also gives rise to doubts as to whether this number will be sufficient to sustain the long-term vitality of the community.

If the Local Plan is to be sound, it is evident that a significantly greater number of new homes should be provided for Stansted Mountfitchet than currently proposed through the DLP.

This policy is the result of SP2 and therefore the criticisms of policy SP2 are relevant to this policy and are not repeated.

Stansted Mountfitchet is expected to deliver just 62 new homes over the planned period in addition to any permitted schemes that are yet to be built. The housing trajectory at Appendix 3 of the Plan indicates that 68% of these permitted schemes (the existing commitments) will all be delivered by 2021. It is not possible to see how much of this is delivered in Stansted Mountfitchet as only total figures are provided but it is inevitable that the supply in this settlement over the period of the Plan will dramatically reduce. At the same time, the supply of affordable housing for this settlement will reduce over the period of the Plan with the majority of affordable housing needs being met by the new Garden Villages and causing those with a connection to Stansted Mountfitchet to relocate. This concentration of affordable housing will mean residents of Stansted Mountfitchet (and other villages across Uttlesford) who require affordable housing will have little option or opportunity to obtain housing in their respective communities. This is particularly acute in Stansted Mountfitchet where only 62 additional dwellings are to be allocated of which only a proportion will be affordable. MGH and BH do not consider that this is an appropriate strategy for a settlement with the facilities that Stansted Mountfitchet has to offer and therefore objects to this approach.

The SA identifies that reasonable alternatives were restricted to the testing of the plan-wide housing target. There has not been any testing of the level of housing that is attributable to each settlement and MGH and BH consider this is a major flaw in the exercise.

For the reasons explained under policy SP2 and above, MGH and BH consider that the policy is not based on a thorough assessment of reasonable alternatives, and is therefore unjustified. It is also considered to prejudice the vitality and viability of Stansted Mountfitchet and undermine the likelihood that future needs will be met. This is not considered to represent sustainable development.

To remedy this objection, the Plan should allocate increased housing provision in Stansted Mountfitchet and this should be delivered at site 15Sta15.

Land at Birchanger. In assessing whether the Draft Local Plan is sound and sustainable in line with the NPPF, it appears a number of assumptions have been made in the delivery of the proposed Garden Communities. Three garden communities will not deliver housing in the timescales necessary to fulfil the current plan requirements. It is fundamentally important that the Council takes into consideration the following issues in determining to pursue the garden community option:

The delivery of much needed new housing would occur, at best, late in the timescale of the Plan. Any proposals for housing delivery at Easton Park, Great Chesterford or West of Braintree should therefore be considered as a long term opportunity to be implemented following the realisation of the relevant strategic infrastructure;

There is existing infrastructure in Stansted Mountfitchet that could be used more efficiently than it is currently, and improved as more homes are delivered in phases; and

The impact of the proposals on the landscape and character, including ancient woodland, local wildlife parks and listed buildings.

It is therefore considered unrealistic that development can be brought forward from the three proposed communities within the plan period. The effect of this will be to further exacerbate the land supply issues faced by the Councils and thereby worsen the housing land supply in the authority.

Ptarmigan maintains that the Council's most sustainable option for the delivery of housing would be to designate more Green Belt around increasingly constrained locations, to provide for sustainable growth as an offset to the use of Green Belt at Stansted Mountfitchet for development.

Policy SP3 notes that there are no new housing allocations in Newport.

We have previously provided full details of our clients' interests in the response to the Call for Sites and to the Issues and Options Consultation. These included land on the southern edge of the village which was included within the Submission draft Local Plan as the 'Newport Policy 3' site, currently subject of a planning appeal; and land off Bury Water Lane on the western side of the village. It is noted that proposed site 'Newport Policy 3' has now been deleted.

Newport is rightly highlighted as a Key Village as it has good public transport services, pubs, shops, post office, restaurants, church, and a highly-regarded secondary & primary school, and is a major focus for development in the rural area.

We do not consider that there is environmental capacity within Uttlesford for a new freestanding settlements or 'garden communities' that would have the critical mass required to generate their own employment, shopping, and public services to make it sustainable and accord with the NPPF presumption in favour of sustainable development. The constraints of the large scale Elsenham expansion were noted by the Examination Inspector into the withdrawn Local Plan, and reflect this.

Indeed, paragraph 52 of the NPPF makes clear that local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development, and given the settlement hierarchy proposed with a good range of towns and villages with both good existing service provision and environmental capacity, a new settlement is clearly not the best way of achieving sustainable new development within Uttlesford.

As such we object to the deletion of Newport Policy 3 from the consultation, and to the non-allocation of the Bury Water Lane land. These sites should be included within policies SP2 and 3.

The Council are proposing that 40% of all new development, and 78% of dwellings from new applications, between 2016 and 2033 will come through the three Garden Communities. Whilst we support the allocation of these major sites for new housing we are concerned that this forms a sizable proportion of new development that will come forward later in the plan period. The development of these Garden Communities must not be seen as a reason for not allocating appropriate sites around existing sustainable communities. Such sites will deliver more quickly than those in the Garden Communities enabling the Council to secure a consistent supply of homes and maintain a strong supply of development land for new housing across the plan period.

The scale of these communities, and its supporting infrastructure, will take time to implement and the Council must not be optimistic in their delivery expectations. Even with an allocation in the Local Plan the scale of development proposed in the Garden Communities will still require considerable work prior to a planning permission being submitted and makes the Council assessment that two of these communities will deliver their first homes by 2021 unlikely. The Council must therefore ensure that it includes contingencies within the Plan to ensure that any delays in delivering the Garden Communities are compensated. This could be through further allocations of small sites across the Borough or through trigger points in policies that will require a further allocations due to delays in delivery on any of the three Garden Communities.

We are also concerned that no discount rate has been applied to the outstanding permissions. It is good practice to consider a likely lapse rate for these permissions of around 10%. This ensures that the Council's consideration of land supply remains robust by recognising that not all planning permissions will be commenced or built out as envisaged by the applicant or the Council.

The housing provision set out in Policy SP3 and at Appendix 3 is contrary to paragraph 47 of the NPPF and if adopted in its current form, would render the Local Plan's housing policies "out-of-date", as soon as they come into force. Realistically no Inspector would countenance such a situation and this alone is likely to lead to the Local Plan being found "unsound" at Examination in Public (EiP).

In order to solve this problem, Policy SP3 should identify additional housing sites that are capable of delivering another 1,320 new homes in the period 2018 to 2023.

The Landowners submit that their land could make a significant contribution towards this additional supply and, in combination with other adjoining land, could accommodate a new Garden Community to the north of Flitch Green and east of Little Dunmow.

We consider the strategy relating to the scale and distribution of future housing development to be seriously flawed for the following reasons:-

Of the new provision of 5,926 dwellings during the Plan period within the named settlements in Policy SP3, the Draft Plan envisages 4,670 or nearly 79.0% of these to be delivered within the three Garden Communities. This envisaged capacity is critical to the delivery of the housing strategy over the Plan period. There is insufficient evidence to provide the necessary level of assurance that the promotion of Garden Communities is capable of delivering housing on this scale to meet such a large proportion of the District's objectively assessed housing need for the Plan period. Any large scale or significant failure or delay in

housing delivery via the Garden Communities will have severe repercussions on the ability to meet objectively assessed housing needs.

The lead-in time for the Garden Community projects will be lengthy and no housing is likely to be delivered until the mid or later stages of the Plan period. Having regard to the residual capacity outside the Garden Communities within the identified settlements in Policy SP3, (namely only 1,256 dwellings), and even allowing for the capacity of land with planning permission, (4,513 dwellings) as well as windfalls whose delivery is conjectural (1,190 dwellings), there still may be future housing land shortages.

The anticipated delivery of 3,500 dwellings via the West of Braintree Garden Community, of which 970 would be built prior to 2033, is highly speculative as, according to the Publication Draft of the Braintree Local Plan (June 2017), this would represent only one part of a cross-border Garden Community of 7,000-10,000 dwellings.

The Uttlesford Issues and Options Plan published in October 2015 only included an area of search in relation to a Garden Community to the west of Braintree and therefore it remains uncertain as to the ultimate extent of any future allocations and the relationship of housing allocations to provision farther east within Braintree District. The programming of development within the West of Braintree Garden Community is unknown and it remains a possibility that the phases of development in any future Masterplan would not reflect the early release of housing land within the geographical confines of Uttlesford. There is therefore no certainty that Uttlesford's portion will come on stream prior to 2033 or otherwise separately and in advance of other parts of the wider Garden Community site.

Uttlesford is a separate housing market area from the three collaborating Districts of Braintree, Colchester and Tendring and is not party to their Shared Strategic Plan. It therefore remains unclear in relation to the West of Braintree Garden Community how Uttlesford will influence or manage the phasing and delivery of its housing, employment and other allocations within its own borders given that this will only constitute the western fringes of a much larger project.

We have registered separate objections regarding the inordinate scale of proposed Garden Communities and have noted the problems associated with the provision of infrastructure – problems which appear very likely to impede, constrain or delay housing delivery. We consider funding concerns will afflict the delivery of the West of Braintree Garden Community as this project could involve infrastructure investment estimated at £572,368,000 at May 2016 prices. (Source: North Essex Garden Communities : Concept Feasibility Study : Volume 3 : AECOM). Development may also need to be programmed to await a new alignment for the A120 from east Braintree to the A12 - the route for which is yet to be finalised or programmed in any national trunk road investment programme. There is therefore not only uncertainty as to the ability of this Garden Community to progress at all but also serious questions in relation to the timing of housing delivery even if its implementation does eventually prove possible

With regard to the quantum of housing provision within the settlements in Policy SP3, we regard the total of 44 dwellings to be found within all the Type A and Type B Villages to be derisory and inadequate. This miniscule capacity for the period 2016-2033 covers 19 Type A

Villages and 23 Type B Villages plus other smaller villages and hamlets and would not even meet the needs of people currently on the Council's Housing Register. Even allowing for windfalls and the flexibility introduced by Policy H5, we consider the provision of additional rural housing to be overly constrained.

We therefore consider that the Spatial Strategy in Policy SP2 and its expression in Policy SP3 to be seriously flawed, with undue reliance on the delivery of housing via the proposed Garden Communities and insufficient provision being found within the villages. We consider there is a serious risk that arising from the long lead in times to deliver housing within the Garden Communities due to their scale and infrastructure costs together with inadequate provision outside the Garden Communities, the Spatial Strategy could lead to inadequate housing land availability during the Plan period. We do not consider that robust evidence has been adduced to demonstrate that a Spatial Strategy so heavily reliant on capacity within Garden Communities is a sound strategy in an area where there are major and foreseeable pressures to deliver housing in the shorter term. Nor do we consider that the case for Garden Communities as a sustainable and sound alternative to a strategy based on the expansion of existing settlements has been justified.

In order to address the above concerns, we advocate the following:-

Review the role of Garden Communities and their ability to contribute to objectively assessed housing needs - with any retained schemes not to exceed 5,000 dwellings or otherwise of an appropriate scale capable of being delivered or substantially delivered during the Plan period.

Redistribute the removed or reduced capacity of Garden Communities to other sustainable sites in and around existing settlements.

Delete all the Uttlesford housing capacity within Policy SP3 forming part of the West of Braintree Garden Community, namely 3,500 dwellings of which 970 were to be delivered during the Plan period.

Transfer some or all of the 970 dwellings earmarked for the West of Braintree Garden Community to alternative allocations, including nearby Stebbing and at Bran End in particular in order to maintain housing land supplies in this part of the District in or close to the A120 corridor.

Upgrade Stebbing to a Key Village in the Spatial Strategy.

Increase provision by the release of additional sustainable sites within the Type A and Type B Villages

SP3 allocation for Stansted Mountfitchet needs to be increased to include 70 units at Pines Hill. There should be a change in strategy to reduce the reliance on new settlements to ensure the plan is deliverable and a 5-year land supply is achievable. Over reliance on new settlements will continue a trend for hostile applications and could make the plan unsound. As written the Council will not have a 5-year supply for the entirety of the Plan.

We object to policy SP3 – ‘The Scale and Distribution of Housing Development’:

The plan does not provide for a five years supply of housing, contrary to NPPF paragraph 47 bullet point 2. Moreover, the plan does not address existing housing shortfall within the first 5 years of the Plan period, contrary to guidance set out within the NPPG. Adopting a sound approach to 5 year housing land supply indicates that deliverable sites for a further 1,300 dwellings will need to be allocated.

The plan adopts a windfall allowance of 70 dwellings per annum. The evidence provided to justify this number adopts a different methodology to that which was found sound by the 2014 Inspector, which returned a windfall allowance of 50 dwellings per annum. Adopting a rate of 50 dwellings per annum windfall reduces the contribution such sites will make to housing supply by some 340 dwellings.

The Plan envisages that the Garden Communities will deliver the first houses within three years of adoption. Evidence from other large scale housing sites shows this to be optimistic. Adopting more realistic assumptions reduces the contribution these Communities will make to housing supply during the Plan period by 1,500 dwellings.

Uttlesford should take a cautionary approach to the findings of the 2017 SHMA, recently made public through the Examination process for the East Herts Plan. Questions and comments by the Inspector indicate that the assumptions will be under close scrutiny and this could result in an upwards revision of housing numbers. This, together with the forthcoming introduction of a standardised methodology for the calculation of housing need, suggests Uttlesford should allocate a contingency of housing land in order that the Plan has sufficient flexibility to adapt to rapid change, as required by paragraph 14 of the NPPF.

The Council’s Spatial Strategy is not considered to be sound as it places too greater reliance on the Garden Community Sites and has failed to demonstrate that the Objectively Assessed Housing Need can be satisfied through the identification of available and deliverable sites. This is specifically the case given that the Council already has a significant housing land supply shortfall with the recent appeal at Little Walden Road, Saffron Walden (APP/C1570/W/17/3168869) demonstrating the Council’s housing land supply shortfall amounts to a shortfall of 1.9 years or 1,216 dwellings (with a 20% buffer). Additional deliverable sites need to be identified that provide a more balanced Spatial Strategy. These additional sites need to be able to deliver housing throughout the plan period but specifically within the early years to ensure that the Objectively Assessed Housing Need can be satisfied.

As is set out within our corresponding representation, Turnstone St Neots Ltd have an interest in land at Ashdon Road. This land which is currently zoned for employment use has been the subject of an extensive marketing campaign. This marketing campaign has confirmed that there is no reasonable prospect of this employment land coming forward for employment use. The land is brownfield land and is well connected to the already consented residential development at site SAF2. The site is to be directly served by a bus service and enjoys pedestrian and cycle links into the town centre and the facilities and services provided within it (including active and occupied employment sites). This land is entirely suitable for residential use and should be brought forward for new housing. The

development will be highly sustainable and, given the land is available now, will help address the Council's housing land supply shortfall which, as confirmed in the recent Little Walden Road appeal decision (APP/C1570/W/17/3168869) is substantial (a shortfall of 1.9 years or 1,216 dwellings with a 20% buffer)

Object to the draft local plan allocating only 44 dwellings in total across 19 Type A villages to serve the plan period. Given the number of large housing allocations with long lead in times in the larger settlements, the Council will need to demonstrate early delivery on smaller sites in order to maintain a five year housing land supply as required by the government.

Many of the housing allocations identified in the draft local plan already have planning consent so how can these constitute new housing allocations? These are already commitments and need to be identified as such throughout the next iteration of the draft plan.

It should be emphasised in this section as well that the figures quoted for housing supply are minimums, not precise 'targets'. For the West of Braintree Garden Community the 970 figure could potentially be exceeded subject to satisfactory supporting infrastructure. This would boost delivery particularly in the event that other major proposed allocations are unable to deliver to the extent anticipated within the Plan period.

The overall scale of housing development within Uttlesford District is supported, as set out within Policy SP3.

Furthermore, the scale of development identified by Policy SP2 to be delivered at the West of Braintree Garden Community (WBGC), at 970 dwellings by 2033, is supported by the Andrewsfield New Settlement Consortium.

Housing to be delivered at the WBGC will clearly represent a significant contribution towards the Full Objectively Assessed Need for Housing in Uttlesford in the region of 13,332 (606 per annum) for the Plan period 2011-33.

Individuals

Support

- The proposed strategy is well-supported by technical evidence including the transportation and housing assessments.
- Supports new settlements to meet housing needs to avoid exacerbation of traffic and air pollution in Saffron Walden and destruction to existing towns and villages.
- More social housing and early delivery of key infrastructure should be provided.
- Supports the exclusion of NE Elsenham from this plan. X13
- Support for the Garden Communities.
- Supports that no major settlements are designated for the South West corner, due to the congestion that this would create.
- Support the development sites.

Objections

- Concerned about the need for building of residential dwellings in Saffron Walden town and the amount of infrastructure in it etc.
- Concerned that the Plan serves the needs of developers rather than individuals. Concerned that there are no plans for infrastructure such as roads, schools, and medical facilities, let alone shops and offices
- Concerned by the recent rate of growth of Elsenham. Concerned that Elsenham has been designated as a key village, as it does not have the required infrastructure to support development.
- Objection to policies SP3 and SP8, because the distribution of development is heavily weighted towards the south of the District.
- Lack of evidence to explain how housing targets have been established, and whether housing targets take into account that growth rates will be lower than in the past.
- Scale and distribution of housing is flawed. 79.0% of homes are to be delivered within the three Garden Communities, however there is insufficient evidence to provide the necessary level of assurance that the promotion of Garden Communities is capable of delivering housing on this scale to meet such a large proportion of the District's objectively assessed housing need for the Plan period.
- The distribution of housing does not reflect need.
- SP3 allocation for Stansted Mountfitchet needs to be increased to include 70 units at Pines Hill. There should be a change in strategy to reduce the reliance on new settlements to ensure the plan is deliverable and a 5-year land supply is achievable.
- Concerned that the assumptions on which the projections and evidence are built are flawed, derived from a period of exceptional growth and not taking account of the Government's own goals of reducing net migration and the impact of Brexit. It overstates demand and risks creating half empty housing estates.
- Concerns over the garden communities. Separate stand-alone developments should have been used. Questioning the reliance by UDC on the use of private sector developers to deliver a new single site settlement on the scale required by the Council.
- Concerned that there is no justification for more development given the amount of housing proposed for Elsenham. There is a very good case for the inclusion of Felsted as a key village
- Existing residents are not being protected against the loss of facilities and the inconveniences which will be experienced over the next few years under the Local Plan.
- Great Dunmow has already had homes built or with planning permission for 2520 units. This represents nearly 40% of the total given by Uttlesford. Why are 743 homes needed in Great Dunmow between 2016/33 which is 60% of the total needed over this period. Great Dunmow will have 3262 new and existing properties by 2033 this again represents over 42% of the total for all of Uttlesford. North Uttlesford has better connections to the M11, A11, Cambridge and train connections via Audley than South Uttlesford.
- Objection to the Scale and Distribution of Housing Development set out as the Objectively Assessed Housing Market Need (OAHN) and associated Sustainability Assessment as it is not representative of housing needs in the north of the District.
- The plan does not provide for a five years supply of housing, contrary to NPPF paragraph 47.

- Concerned that there is too much development proposed for Elsenham.
- Concerned that the infrastructure at Takeley school cannot support development.
- Development should not take place at Thaxted due to its historical merit.
- A thorough review of the SHMA is necessary since the forecast numbers are over estimated. Jobs at Stanstead Airport are overestimated.
- Concerned that the infrastructure does not exist to support development. X4
- Policies SP2 and 3 are not sustainable. Concerned that the garden communities will generate too much traffic and pollution. The railway does not service these locations and is already overcrowded.
- The Council's housing figures do not add up in Policy SP3. If our development site in Hatfield Broad Oak is not going to be included as a housing allocation within the Draft Local Plan, we need to be assured that there will a sufficient amount of windfall housing that can be relied upon, in order to ensure that we can justify such a development in this sustainable Type A village location.
- The plan does not provide a 5-year land supply and will not be able to maintain this throughout the plan.
- Concern that the developments are destroying countryside.
- Concerns over the evidence base for population expansion.
- Policy SP3 should identify additional housing sites that are capable of delivering another 1,320 new homes in the period 2018 to 2023, including land at Chelmer Mead.
- Concerns over the evidence base of job creation. Footpaths and cycle routes are required to encourage healthy activity.
- Questioning the evidence base for an additional 14,100 dwellings.
- The amount of development proposed is not required.

Comments

- Support the new settlement in principle. But concerned that the plan is based on the highest population growth in the past, and unnecessary development will bring detriment of the district and those who live and work here.
- Concerned that there are no figures provided on the occupancy of the houses to be built in the district.
- I cannot comment on any areas apart from Saffron Walden area. You state page 6 that 240 new homes will be needed 2016-2033. I feel this is grossly short sighted.
- Requests clarification of the OAHN figures. This plan is more sustainable than the previous one, given the need for affordable housing.
- North Uttlesford Garden Community is the most ideally placed as it has good road access both north and south as well as access to the railway line. Easton Park does not have good road and rail links. NUGC should be allocated the most housing.
- The proposals for Thaxted seem appropriately low.
- Development will worsen the Air Quality in Saffron Walden which is already above the EU limits in three locations around the town.
- The Southern part of Uttlesford, particularly Great Dunmow, Takeley and Little Canfield have had a good share of recent development. Consequently the density is too great heavily relying on the use of cars.

- Hatfield Broad Oak could be classified as a smaller village where development could be allowed. Concerned that there is a developer who is considering building on the land at Great Chalks.
- Concerns over the evidence base in Tables 3.4 and 3.5.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

It is important to assess the sustainability implications of planning for different housing quanta. Whereas a Strategic Housing Market Assessment (SHMA) has the purpose of identifying need over a Housing Market Area (HMA), the SA should identify the sustainability benefits and issues that are likely to arise from different housing numbers over the plan period and beyond. This SA appraises a range of housing quanta that have been explored to date and throughout the plan-making process. The appraisal is necessarily high level and broad within the context of how the District could possibly meet the various levels of housing growth.

Alternatives Considered

For the purposes of a focussed appraisal, the following different quanta have been identified (with associated assumptions as to delivery related to any new settlement providing a maximum 1,400 homes over the plan period based on expected start-dates and delivery rates):

- Alternative SP3(a): A higher indicative figure than that within the SHMA (>14,100 dwellings from 2011-2033 (identified as 15,500)) - In order to deliver this quantum, the District would require the allocation of four new Garden Communities.
- Alternative SP3(b): The lower end of the OAN figure within the SHMA (12,500 dwellings from 2011-2033) - In order to deliver this quantum, the District would require the allocation of two new Garden Communities.
- Alternative SP3(c): A lower indicative figure than that of the lower OAN figure (<12,500 dwellings from 2011-2033) - In order to deliver this quantum, the District would require the allocation of one new Garden Community.
- Alternative SP3(d): A total of 8,750 dwellings over the plan period – as identified by the Local Plan Inspector in his report on the (withdrawn) Submission Local Plan December 2014 - In order to meet this quantum, it can be expected that the District would not need to allocate any new Garden Communities.

Summary of effects

It should be noted that, crucially, those options for less than the OAN will have a significant negative impact on delivering housing need in the District. In light of this, the options can be considered 'unreasonable alternatives' yet have been assessed here for comparison purposes, more specifically in relation to other sustainability objectives and impacts. Alternative SP3(a) can be said to have positive impacts on housing need in so far as this option will deliver the largest quantum of new homes. Despite this though, impacts are limited in relation to the increased likelihood that an increased number of new settlements would have to be delivered in the A120 corridor. This has three key issues; such a

concentration could impact on the local housing market, not offer a range of choices for homebuyers in a geographic sense, and also such a concentration could ensure that barriers exist for each new settlement to meet their maximum potential beyond the plan period, in regard to scale, ancillary infrastructure benefits and thus in consideration of deliverability. As a result, SP3(a) offers the best possible balance of meeting housing needs whilst ensuring the best possibility of geographic dispersal across the District whilst not limiting eventual scales of new settlements beyond the plan period. That principle established, it should be noted that in practice a more flexible option could be to plan for above the OAN figure to some extent, in order to ensure future land supply is maintained in the event that any other allocated sites do not come forward for development as expected. An assessment of new settlement combinations elsewhere in this SA Report demonstrates that options are explored that seek to deliver housing with appropriate buffers.

The various quanta of housing have been assessed as broadly correlating with more significant impacts on biodiversity, in so far as growth can be seen as notionally in conflict with environmental protection. Despite this, strong arguments can be made for ensuring biodiversity gain through Garden Community proposals should they be sensitively located and / or through policy requirements. For this reason, impacts are not identified as negative for those options of above the OAN figure. It is considered that in so far as Garden Communities have the ability to mitigate impacts in the majority of cases, significant effects can not be highlighted in a quantitative manner regarding the condition of assets present in the District and beyond (where relevant).

The landscape character, and more specifically its sensitivity to development, varies throughout the District. To this extent, the notion of any different number or combination of new settlement options in the District will not be any more or less harmful at different housing quanta. Similarly, any impacts of Garden Community permutations may be less significant than those of the existing commitments and non-strategic allocations, particularly related to the focus of growth to the District's historic existing settlements; much of the landscape being intrinsically linked to the historic environment. This appraisal therefore focuses on assumed impacts related to geographic distribution in particular areas, for comparison purposes only. SP3(a) has been assessed as having negative impacts in so far as the likelihood of an enhanced concentration of new settlements along the A120 can be expected to have cumulative negative connotations; the landscape character in this broad area having a largely moderate to relatively high sensitivity to change / development. Impacts are not significant in the context of new settlements; however due to an assumed ability to retain any existing features that contribute to landscape character through sensitive masterplanning; in addition to ensuring sensitive design through Garden City principles should these be integrated into the Plan. SP3(b) has been assessed as having largely uncertain impacts due to the possible permutations of any number of new settlements in the A120 corridor. Uncertain impacts are also highlighted for SP3(c), in so far as the location of any single new settlement is undetermined. To this extent, the appraisal of new settlement options will offer more detail on landscape issues in this context.

The majority of Garden Community options explored are predominantly within Grade 2 agricultural land, and those scenarios that reflect a need for increasing numbers of Garden Communities can be expected to correlate with increasing negative impacts. Despite this however, a pragmatic approach to such losses should be taken within the context of meeting

the District's housing needs and as a result no impact should be identified as significant in balance with the positive social impacts of housing growth.

Regarding pollution, assumptions can be made regarding SP3(a), regarding the increased possibility of a concentration of Garden Communities in the A120 corridor, which can be expected to have a higher potential of negative air quality impacts. With the exception of SP3(a), which would not be deliverable without at least three new settlements within the A120 corridor, all Options have been assessed as uncertain on the balance of both site specific detail being required, and all requiring growth in more sensitive areas (such as for air quality in Saffron Walden) in line with the existing commitments and non-strategic allocations.

It can be expected that provisions for walking and cycling infrastructure will be integrated into each new settlement and be a foremost consideration in any forthcoming masterplans. The provision of public transport infrastructure can be ensured, however particular services will depend on the attractiveness of proposals to operators. With this in mind, it has additionally been assumed that SP3(a) is the most likely to ensure positive impacts in so far as the requirement of a concentration of new settlements in the A120 corridor would both utilise existing bus links and could also be more attractive to service providers. That said, it should be acknowledged that the majority of new settlement options will benefit from some level of existing public transport in so far as they are all well related to either the A120 or rail links in the case of Great Chesterford. Similarly, SP3(d) and the 'constant components' of the housing quanta can be expected to have some degree of existing public transport links, as expected from existing settlements and the Plan's predominant focus of growth to higher tiered settlements in the settlement hierarchy.

In the assessment of the housing quantum options, it has been assumed that each new settlement will progress to be largely self-sustainable in terms of the provision of a sufficient amount of infrastructure, services and facilities. In addition, all options reflect the allocation of land for development in broadly sustainable locations, in so far as they are all broadly in accordance with the principle of directing growth to existing settlements or areas in close proximity to the strategic road network or rail links. It has additionally been assumed that SP3(a), representing the alternative with the highest growth from Garden Communities is most likely to ensure positive impacts in so far as such growth will meet necessary thresholds for infrastructure delivery, though appropriate contributions. It is also considered that this would have less likely affect viability through possible economies of scale with a possible focus of growth in the A120 corridor and pooled contributions to deliver necessary infrastructure and services. In contrast, the lowest growth option (SP3(d)) will benefit from ensuring accessibility to existing services, however without the critical mass to warrant significant delivery of new infrastructure or services in any one scheme. This level of growth is however a constant throughout all options, and without the critical mass of a new settlement it is unlikely that such growth would ensure wider benefits; for this reason uncertain impacts have been highlighted. Options SP3(b) and SP3(c) will have positive impacts on regard to the self-sustainability of Garden Communities, however with limited additional benefits in comparison to the higher growth options.

It could be expected that SP3(d) would resemble the most likely growth quantum to be met by existing infrastructure in so far as existing commitments and the non-strategic allocations identified represent a distribution of growth to existing settlements only. This can be seen to

spread housing needs to those areas where it can be more readily accommodated, however where infrastructure capacity does not exist, this is likely to exacerbate issues surrounding the costs of provision without the critical mass to deliver wholly sustainable developments. For this reason, in addition to the lack of wider benefits to address current District-wide infrastructure concerns, negative impacts have been highlighted. With this in mind, it is important that infrastructure benefits are ensured through growth of such a scale as is appropriate to benefit the whole District. This is reflected in the appraisal, with positive impacts highlighted for those Options that look at delivering the District's OAN and above, however with the general caveat that some level of dispersal geographically is sought to support the Plan's non-strategic site allocations and other elements of Sustainability Appraisal the 'constant components', which are themselves geographically dispersed, and also to offer wider inclusive social benefits. Positive impacts are identified for options that seek to deliver one to two new settlements, however it should be noted that SP3(b) is likely to have slightly more benefits than SP3(c) in consideration of a consistent approach to appraising such high level options.

It can be expected that with higher levels of housing growth there will be an increased level of new school provision. Those alternatives that require new settlements will therefore meet the threshold for new primary education on site. In contrast, SP3(d) can be expected to increase pressure on school capacities, however with the caveat that the specific commitments and allocations that form that this work's existing commitments and non-strategic allocations have not been specifically taken into account. In so far as Secondary provision will be required from the higher levels of growth explored, any concentration of new settlements can be expected to meet the threshold for new Secondary school provision in the plan period through pooled infrastructure contributions, whilst also meeting accessibility criteria. Despite this, any assumed focus on the A120 corridor is unlikely to address existing accessibility concerns regarding Secondary school provision in the wider District.

For the purposes of assessing broad housing quantum options for their impacts on employment provision, a general assumption has been made regarding the delivery of employment provision as part of new settlement options. In consideration of the strategic importance of the A120 corridor and Stansted airport in this regard, it can be said that quanta options that would ultimately lead to a concentration of new settlements in this area can be expected to ensure the viability of any associated employment development to be integrated into proposals. Despite this, question marks will exist as to whether viability is affected by such competition, and also in sustainability terms, whether such a concentration represents a suitable dispersal of employment across the District both in terms of inclusive employment opportunities and sustainable transport. As a result, SP3(a) will have uncertain impacts for comparison purposes and pending further specific work on employment specific elements of the growth strategy. Alternatives SP3(b) and SP3(c) will have uncertain to negative impacts on this objective in so far as housing and employment factors are both essential to the principle of sustainable growth and new settlements. To this extent, it can be expected that the District not meeting OAN over the plan period, will have similar repercussions regarding sustainable employment growth.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed at this stage.

Provision of Jobs and Employment Land Paragraph 3.50-5.54 and Policy SP4

This policy and supporting text was responded to by 28 people/organisations.

Support	5
Object	12
Comment	11

Overarching Summary

- The policy is supported by our SHMA partners
- Over reliance on a small number of allocations for employment land. A range of additional sites for employment development should be allocated
- Over reliance on Stansted Airport to deliver jobs
- Employment statistics not accepted
- Concern that policy will not reduce out commuting.

Statutory consultees and other bodies

Chelmsford City Council supports the Plan and notes that Uttlesford is committed to meeting its employment needs in full within its administrative boundary.

Epping Forest District Council confirms that the policy is in line with the figures identified in the Memorandum of Understanding on Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire HMA (signed March 2017) and are also compatible with Epping Forest District's Draft Local Plan (October 2016). The approach to future jobs and employment provision set out within the Plan is noted and broadly supported. However, it should be noted that Uttlesford, together with Epping Forest District, Harlow and East Herts District Councils are working together to produce updated evidence in relation to employment needs and future distribution across the Functional Economic Market Area.

Harlow Council welcomes the authority's recognition of Harlow's role as major location for economic growth and the importance of the Enterprise Zone. Harlow would be willing to continue to work with Uttlesford Council to further quantify the employment land requirement to support strategic housing allocations. Where the number of jobs has been specified, e.g. Policy SP4, land take for employment could be inserted.

Little Chesterford Parish Council comments that Employment for North Uttlesford Garden Community residents is primarily intended to be for South Cambridgeshire Science sites, rather than Uttlesford.

Littlebury Parish Council considers that the District already has high numbers of out-commuters. It is our view that this reflects both the high local skill base mentioned in the plan but also the limited local employment opportunities. Significant numbers of extra jobs will need to be provided throughout the District to avoid the planned additional housing simply increasing out commuting. Appendix 4 states that at least one new job should be created in new settlements for every home built. Increasing the number of jobs beyond the numbers of new homes would enable out commuting to be reduced, improving job opportunities for all residents and the sustainability of the local economy.

CPREssex considers that the provision of local jobs needs to capitalise on existing strong economic sectors and promote the growth of expanding industries including food production, life sciences, pharmaceuticals and technology sectors. Diversification of the rural economy to provide new job opportunities in these sectors and in locations which have suffered from the decline of employment in agriculture and other traditional industries is to be welcomed. In particular, the reuse of redundant farm buildings for new economic uses is supported along with other initiatives that reduce the need to travel for employment. In a district with large levels of out-commuting, getting a better balance of local jobs and housing is of paramount importance.

Thaxted Society considers that the encouragement of employment is both much needed and laudable for a strong and fulfilled community. At Thaxted we hope to encourage a revival in working crafts as educational, commercial, and interest points in the town. This policy stems from Thaxted's legacy and long held 'raison d'être'

Both **Stansted Mountfitchet Neighbourhood Plan Group** and **Saffron Walden Neighbourhood Plan Group** comment that there is no mention of where these will be located. This policy should apply to all areas and not just Stansted Airport Suggestion: Include location of jobs (designated employment areas)

Developer, Agents, Landowners

- Support Policy. Bidwells report upon the Full Objectively Assessed Needs for Uttlesford (Bidwells, September 2017) considers that actual job creation during the period may well prove higher when factors including the economic multiplier effect associated with expansion of existing major employment centres can be assessed and the increased ability for working at home, including the flexibility this provides for setting up small businesses without the need for dedicated workspaces for which the East of England is recognised for its high number of start-ups occurring each year. The assessment concludes that the targeted net increase of 14,630 jobs is supported and that the balance between jobs and housing is sustainable.
- Work on the Joint Economic Report is incomplete. No consideration has been given to the changing economic environment or taken account of the latest housing need or proposals from distribution in the Local Plan.
- The strategy fails to reflect the a recommendations of the ELR that new sites are identified to provide flexibility for additional employment growth other than at Chesterford Park, Stansted Airport and the Garden Communities. The plan fails to provide the required range and choice of land for employment development.
- there is no evidence that the needs of Bishop's Stortford, which is constrained by any proposals within Uttlesford (as well as other factors), have been taken into account or meaningfully discussed and a strategy to address those needs agreed with East Hertfordshire.
- Concerned that the Council has allocated only one significant employment site, being at Stansted Airport. History has shown that it is not a priority of the airport owners to bring forward commercial development land. There is a shortfall of good quality employment accommodation close to the M11 and the A120/B1256, especially for small to medium sized businesses. Similarly there is no additional employment provided within the areas of Great Dunmow, Great Chesterford and Saffron Walden beyond that consented.

- There is inadequate employment provision, and despite the evidence base reducing the potential demand for employment accommodation, it seems to us that this is based on a false premise as it is directly related to numbers of houses in the district and not to the number of people, and specifically the number of businesses.

Individuals

- Support. An imaginative and highly resourced initiative will be required to attract employers to the District.
- Note that the support evidence has not yet been completed
- The level of future employment at Stansted Airport and its projected impact on future housing need should be forecast independently, explicitly and transparently
- There seems to be over-reliance on Stansted Airport to deliver jobs. Various figures are stated for the anticipated increase in jobs at the airport, up to around 10,000 additional jobs. Given that there has been little change in job numbers over the last ten years, the uncertainties around BREXIT and high dependence on one Irish airline, this is a high risk strategy.
- I do not accept the statistics on employment. Even prediction of high growth at 675 jobs locally how does this equate to 5,000 new homes. There is not the supply of non-service jobs locally. The new houses will just encourage further commuting to London or Cambridge. These figures need reassessing to reflect current vacancies and opportunities. The data presented by LSCC is inaccurate!
- Please clarify whether you mean these 4 FEMA councils were the ones with whom the Local Draft plan was developed? Why no involvement of Cambridgeshire?
- I do not see how mathematically medium growth is only 10 JPA(or a total of 170 jobs) lower than high growth when the baseline is 322 JPA. This must be an error which then goes through the whole Plan.
- Please indicate where the FEMA and ELA can be found and explain what is meant by EEFM and JER.
- Object to Policy in relation to North Uttlesford Garden Community due to the potential conflict of interest associated with Chesterford Research Park and the Local Plan projection that a sustainable balance of housing and District jobs will be provided for North Uttlesford Garden Community.
- There is currently insufficient employment in the area for current residents. Most residents currently travel to London, Braintree or Cambridge for suitable employment. The local stations are not suitable to take more commuters due to their lack of parking, the A120 even with improvements cannot take such a concentrated influx of cars and the routes into Cambridge are already experiencing bottlenecks at peak times. The creation of new jobs will not be ring fenced for residents nor will they be sufficient for the number of increased residents in the proposed developments. The employment is limited to particular skill sets, therefore the majority of residents will need to work outside of the immediate area causing increased pressure to the struggling existing infrastructure.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

A general notion of sustainability is to ensure that increases in housing are matched with employment opportunities in the broad area and Garden City Principles (TCPA) set an aspiration of 'one job per household.' With a housing target of 14,100 dwellings within the plan period, the provision of 14,600 jobs can be seen to have significant positive benefits for the District. A number of employment and mixed-use allocations are included within the Plan's site allocations, including those of the Garden Communities. In addition to this, infrastructure policy exists and compliments this high level policy in regard to super-fast broadband to support home working, which can be expected to increase exponentially throughout the plan period and beyond. The Preferred approach considers needs, as identified in the Employment Land Review and the Objectively Assessed Economic Need (OAEN) of the Functional Economic Market Area (FEMA) and supports the Council's Economic Development Strategy (2016-18). It similarly identifies need in relation to the potential continual loss of B1a (office) floorspace as a result of permitted development rights.

Alternatives Considered

Two alternative policy approaches have been identified.

- Alternative SP4(a): A higher indicative increase in jobs (>14,600)
Notionally, and at the strategic level, the District adopting a higher jobs target than that of the preferred policy approach would have similar impacts to Policy SP4 above. The preferred policy provision target is identified in response to OAEN and the findings of the Employment Land Review. With this in mind, the alternative has been rejected as potentially unachievable.
- Alternative SP4(b): A lower indicative increase in jobs (<14,600)
There are likely to be similar impacts to the preferred approach resulting from this alternative, albeit notionally less significant positive impacts on employment growth. The alternative is less likely to achieve the aspiration of one job per household through planned growth and for this reason is a comparatively less sustainable option and has been rejected.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed at this stage.

Garden Communities

Paragraph 3.55 – 3.58 and Policy SP5

This policy and supporting text was responded to by 104 people/organisations.

	TOTAL
Support	13
Object	52
Comment	39

Overarching Summary

- The principles of the TCPA for Garden Communities cannot be fulfilled or complied with for development of GCs in Uttlesford.
- The infrastructure which will need to be implemented to support each new settlement has not been forecast or planned for in anyway which will in turn put major strain on the existing infrastructure services.
- Due to the rural nature of the district and location of the proposed sites, there is no possibility for a reduction in car use, but instead there will be a significant increase due to typography, location, railway station locations and commuter nature of settlement inhibitors.
- Rail links should be included in the design of each new GC to alleviate the use of private car and connect the towns property to other areas of the district and country.
- Employment land to provide local jobs and attract skilled workers to the area should form part of the plan for each GC settlement.
- Clarification on the term 'community land value capture' and what this means/results in.
- Rural character and distinctive landscape of the district will be ruined and public open countryside. Will be sacrificed.
- The timescales of the plan and implementation of homes is unrealistic and undeliverable. The SPDs required as per the plan will take longer then envisaged to adopt and put into practice.
- Affordable housing has already been cut down and what will be don't to require developers to implement this as per the plan and TCPA principles?
- Who is accountable for the delivery of the garden cities and associated infrastructure delivery?
- The plan needs to be aligned with and seek engagement with/of neighbouring authorities.
- As the timeframe for implementing development is contested there should be more smaller sites included to provide shorter term housing provision and retain 5YHLS.
- Suggestion that smaller sites should also be considered to meet the OAN.
- Concerns about the effect of the new settlements on the road infrastructure.
- A number of responses from land owners suggest too greater a reliance on new settlements and that there should be a greater role for Key Villages and/ or Type A Villages.
- Some responses from landowners with potential sites for employment land.
- Concern that development frameworks may take too long to prepare, particularly in the form of a DPD due to the need for Examination.

Statutory consultees and other bodies

Thaxted Parish Council - Should cross reference to UDC's Corporate Plan to further support this.

South East Education and Skills Funding Agency - Suggestion that the Plan should provide further detail about these site-specific requirements for schools, based on the latest evidence of identified need and demand in the Infrastructure Delivery Plan and Essex County Council's 10-year plan for meeting the demand for school places. This should include clarifying where possible the requirements for the delivery of new schools, including

when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary.

The ESFA recommend the council consider highlighting in the next version of the local plan that: - specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery.

Uttlesford Futures (Employment, Economy, Skills, Environment and Transport) - Suggestion that maximum pressure should be put on developers to provide additional community facilities and fund activities, through section 106 or CIL agreements.

Clavering Parish Council - Clavering Parish Council support the garden village principles in that the infrastructure will be put in place prior to house occupation.

Essex Bridleways Association - Objection that no reference has been made to recreational access or green spaces, and a clarification of the accessibility for all users, including equestrians. Green infrastructure is an important part of any community, and must be accessible to all user groups, to conform to national policy and be consistent with other policies within this document. Suggestion that this policy is amended to include equestrian users.

CABO Essex and Cambridgeshire British Horse Society - The British Horse Society (BHS) supports the comments made by Essex Bridleways Association with regard to the provision of equestrian access within the proposed Garden Communities.

Great Dunmow Town Council - Easton Park cannot meet the criteria set in this policy, and therefore SP5 is in conflict with SP6.

The Thaxted Society - The Society sees that these issues are critical, degree of buffer and setting, that allows for that essential Uttlesford narrative to continue. Uttlesford is an area where villages and towns have remained small and historically isolated, to provide several new communities appears to chime with the areas narrative growth. However, it will be the critical degree of buffer and setting that allows for that essential narrative to continue.

Clare College Cambridge - The proposed development at North Uttlesford does not comply with the Garden Community principles in respect of transportation. The scale of housing delivery proposed at North Uttlesford Garden Community (NUGC) will increase traffic on already busy roads and junctions without the necessary infrastructure in place to support increased traffic movements. The Draft Plan requires the settlements to meet Garden City principles.

The Town and Country Planning Association's guidance states that a 'Garden City's design must enable at least 50% of the trips originating in the Garden City are to be made by non-car means, with a goal to increase this over time to at least 60%' and 'should be located only where there are existing rapid public transport links'. The high-level Transport Study (December 2016) and Addendum Report (June 2017) indicate an approximate 6:1 modal split is likely in preference of the car over other vehicular journeys and states that 'the predominantly rural nature of the district with a dispersed pattern of small settlements,

relatively long journey distances that preclude walking and cycling' (para 4.6.1 of the Addendum). There is no reason to expect that a modal shift away from car use can be delivered in NUGC.

Epping Forest District Council - Epping Forest District Council supports the inclusion of Policy SP5 of the Uttlesford Regulation 18 Local Plan which aligns with the approach set out in the Epping Forest District Draft Local Plan (October 2016).

CPREssex - There is no indication of how the garden communities will be delivered - ie the form and function of the local delivery vehicle. The fundamental garden city principle of capturing land value for the benefit of local communities (rather than for the shareholders of national house-builders) is therefore absent. The quality of agricultural land is an important consideration to be taken into account in allocating land for development - as well as the longer-term issue of local food production and food security to meet a growing demand. In this respect, it is considered that the Plan is undermined by the fact that the proposed development of all three stand-alone garden communities would result in the loss of large areas of high quality and versatile agricultural land.

Sustainable Uttlesford - Support for the new garden communities. Suggestion that UDC produces an Implementation Plan to go alongside the Local Plan to ensure that infrastructure is provided when it is needed not at the end of the development process. Suggestion that UDC should adopt the CIL approach rather than the use of S106s. More accountability and transparency is required on infrastructure provision in the proposed Plan, the Implementation Plan that we propose will help achieve this.

Suggestion that sustainability should be at the core of the local plan, and that the housing provided caters for the whole population and that the district community should benefit financially and through community infrastructure provision as part of the development. Sustainable Uttlesford expect that there will be an extensive master planning stage for all three Garden Villages with the community and service providers especially in health and education.

Suggestion that consideration should be given to the inclusion of a policy in the Local Plan to safeguard the Carver Barracks site following the announcement by Dept of Defence about the possible closure of the barracks in the early 2030s

Saffron Walden Neighbourhood Plan Steering Group - Assuming the development frameworks are prepared by the developer, what is the scrutiny and revision process prior to adoption? This policy is too vague but needs to be cross-referenced to policy M1.

Stansted Neighbourhood Plan Steering Group - Assuming the development frameworks are prepared by the developer, what is the scrutiny and revision process prior to adoption? Suggestion: This policy is too vague but needs to be cross-referenced to policy M1

Braintree District Council - The criteria within the TCPA principles do not appear to have been covered in sufficient detail and the policy may benefit from expansion. The North Essex authorities have created a Charter which takes the TCPA principles and applies these to the 21st century North Essex context. BDC would be supportive of UDC looking to adopt the same Charter principles across all its garden communities and in particular the garden community to the West of Braintree. The Charter could be referenced within the text and

adopted as part of the evidence base. In particular the charter principles of Innovative Delivery Structure and Active Local Stewardship are not covered in either policy SP5 or SP8.

Littlebury Parish Council - The plan envisages three new “garden communities” providing much of the new housing. If well planned and executed this would be preferable to yet more opportunistic housing development, with few or no facilities, being added to existing communities. The plan does not say whether the Special Purpose Vehicle will be used, or set out any alternative method to achieve these, to ensure these will be economically and socially successful planned communities. It would be appropriate to establish a SPV to oversee their development. There is a case for doing so jointly with other Essex councils, to give economies of scale and making it easier to recruit suitably qualified staff. In the absence of an SPV, the release of enhanced land value to enable the timely provision of good community facilities will be dependent on very stringent planning conditions being specified and enforced. We do not believe this would be as effective. It is unlikely that the communities will be successful in the long term unless adequate infrastructure and facilities is provided early in their life. The planned new communities should include local heat and energy grids, serving both residential and commercial areas and supported by local generation, to maximise their efficiency.

National Trust - Reference should be made to the need for the inclusion of public open space and green infrastructure.

Harlow District Council - There is concern that the potential cumulative impact of housing and employment development proposed in the Garden Communities on the highway network is not clear at this point. The uncertainty is increased as the employment allocations are not fully explained in terms of location, scale and type. Additional clarity would provide transparency to developers, stakeholders, remove the risk of possible competition with Harlow’s Enterprise Zone and allay possible concerns regarding air quality.

Historic England - Whilst the local plan sets out that the proposed developments will follow Town and Country Planning Association (TCPA) Garden City Principles, there is no specific consideration for the historic environment within these principles.

Evidence: The local plan should contain a framework to guide how the boundaries and extent of the garden communities are determined. Historic Impact Assessments (HIA) should be undertaken in accordance with our advice note “Site allocations in Local Plans” for each of the proposed locations to determine the appropriateness for development, the potential capacity of the sites, the impacts upon the historic environment and any potential mitigation measures necessary. Appropriate criteria for the protection of heritage assets and their settings need to be included in each of the policies and supporting text for the Garden Communities. It is imperative to have this robust evidence base in place to ensure the soundness of the Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or intervisibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable. Cumulative effects of site options on the historic environment should be considered too. The HIAs should assess the

suitability of each area for development and the impact on the historic environment. Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and a strategy diagram which expresses the development criteria in diagrammatic form.

Strategic objectives: The purpose of the Garden Communities appears to be housing led rather than considering the landscape and heritage assets and delivering development that has regard to these assets and which would not allow development in certain constrained areas. A positive strategy for the historic environment should be embed throughout the plan, as such it is expected that strategic new settlement policies refer to the historic environment and the need for its conservation or enhancement. In order to help refine which garden community allocations to take forward and their extent, we would suggest that a full Heritage Impact Assessment (HIA) is undertaken of each of these sites. It is noted that brief HIAs have been provided as part of the Plans evidence base but these identify a number of negative impacts and it is recommended that more comprehensive assessments are undertaken. With all three garden community sites it is difficult to provide detailed comments on the impact of the proposed settlement and the potential harm to heritage assets without precise boundaries being shown, the proposal plans show only abstract notions of development lines and not fixed boundaries.

Little Chesterford Parish Council - The principles as written are aspirational, but do not provide sufficient direction to determine whether a proposal adheres to the principles. Neither is this direction provided elsewhere in the local plan. We therefore have to conclude that these principles are practically meaningless.

Currently available information, including Promoter's presentations and site allocations do not give confidence that principles will be upheld. Whilst we appreciate that the promoter's presentations do not form part of the local plan, the information contained do not give confidence that the aspirations outlined in principles will be upheld. For example it is clear that very limited employment opportunities will exist within the NUGV and that private car journeys will be needed to commute, as well as to access many services until later phases of development.

Environment Agency - We support the thrust of this policy. We particularly welcome the principle that phasing, infrastructure and delivery plans will form part of the development framework. We note that there is no reference to the benefits of open space for sustainable drainage and here we consider either the policy or supporting text should make reference to "multifunctional" open space and identifies the provision of flood mitigation and wastewater measures as a principle requirement in place shaping. Surface water management is likely to be a key factor in the development framework and with this in mind we recommend that opportunities for incorporating natural flood management techniques should be sought.

Such techniques could include tree planting as a means of retarding/ retaining water flows both upstream in the catchment and in green infrastructure spaces within each garden community. Tree planting has a number of multiple benefits, not only serving as a natural flood management techniques, but provides additional biodiversity benefits and natural environment enhancements.

We recommend that the following wording be inserted as additional supporting text after paragraph 3.55: “Measures to promote environmental sustainability should addressing the provision of appropriate wastewater and flood mitigation measures, including use of open space for sustainable drainage systems.”

Opportunities to enhance the natural environment should also consider the use of natural flood management techniques, which combined with the creation of green infrastructure can provide multiple benefits in the form of additional biodiversity, more natural forms of surface water managements and improvements to the natural environment through landscape betterment. You may be aware that AECOM have been commissioned to carry out an integrated water management strategy (IWMS) study of the three garden communities that comprise the North Essex Garden Communities under the auspices of the Braintree, Colchester and Tendring District Councils. The West of Braintree Garden Communities is one of the three garden communities proposed by the aforementioned Councils. The executive summary of the Stage 1 Report highlighted that the scale and location of development across the Garden Communities poses significant challenges around provision of water supply, wastewater services and management of flood risk. It goes on to add that the full potential quantum of growth that the garden communities could deliver does not have identified solutions for the treatment of wastewater, provision of water supply and assessment of impact and compliance with water based environmental legislation. The purpose of the strategy is to identify solutions which we consider should as a matter of course be sustainable. We understand the IWMS Stage 2 will develop a range of delivery option strategies for each garden community based on a series of potential wastewater, water supply, and surface water and flood risk measures. Our expectation is that work on the IWMS Stage 2 will be completed and agreed sufficiently in advance of the submission of the respective local plans to the Planning Inspectorate for the examination in public. Ideally the IWMS Stage 2, and where considered necessary, an IWMS Stage 3 will provide the necessary evidence to support the development of the respective garden communities without impacting on the environment. The Inception Stage 1 Report discusses the application of water neutrality but without explaining in specific detail what water neutral actually means and how it can be met in terms of various techniques. It is a little disappointing to note that the principles do not make any references to water infrastructure, notably availability of water resources. We appreciate that there is a reference to water efficiency under Policy EN13, but consider the importance of this aspect should also be directly emphasised in relation to the proposed garden communities in Uttlesford. Paragraph 154 in the National Planning Policy Framework advises that Local Plans should be aspirational. With this in mind, we recommend that the following short supporting text should be inserted: Water efficiency “in order to promote water efficiency in new residential developments in the Garden Communities, the optional Building Regulation water efficiency standard of 110 litres per occupier per day will be applied. Non-residential development should adopt BREEAM or similar standard for the application of water efficiency components and water recycling.

Essex County Council (Environment, Sustainability and Highways) - ECC recommends that more detailed analysis is required by UDC to determine whether the simultaneous provision of three Garden Communities is viable, deliverable and cost effective.

It is noted that the initial costs for three Garden Communities will be high given the need for timely provision of key physical and social infrastructure e.g. highways and transportation,

educational establishments (primary and secondary), early years and childcare and employment.

The phasing and delivery of these aspects will be critical to successful place making and rely on an effective delivery mechanism. ECC seeks further information and detailed discussions to determine whether two settlements would be more sustainable. It should be noted that ECC along with Braintree District Council, Colchester Borough Council and Tendring District Council are working together at both an officer and member level through North Essex Garden Communities Ltd (NEGC) to deliver three Garden Communities across these three local authorities, collectively known as "North Essex". The proposals were included in each of the respective local planning authorities Draft Publication Local Plans (June 2017) and public consultation has now finished. The Draft Plans are scheduled to be submitted to the Planning Inspectorate in October 2017. NEGC have developed and incorporated Local Delivery Vehicles (LDV) that could be used to deliver the 'North Essex' garden communities. The Councils are aware of the emerging Government proposals for locally led new town development corporations that may offer an alternative means of delivery. Other delivery models are also being considered, and an appropriate tailored approach will need to be used in relation to each community. The Councils are confident that the LDV models are viable and can deliver successful and sustainable garden communities, but will continue to explore other ways of achieving the vision that offer similar levels of confidence that the right quality of development will be delivered at the right time. The NEGC Charter has provided a good starting point in creating a framework for this approach. While ECC strongly supports the statement in Policy SP5 of the Garden Communities being 'underpinned by high quality urban design and placemaking principles' and the requirement for 'comprehensive development', the policy mentions 'development frameworks' which will include 'phasing, infrastructure and delivery plans, establishing the scale and pace of growth, where development will take place and when'.

ECC would not support these development frameworks as supplementary planning documents (SPDs) and questions whether SPDs are in any event of sufficient weight to reflect the Garden Community classification. In light of the above, ECC seeks further discussions with UDC on the deliverability and delivery mechanism of the three Garden Communities proposed in the Uttlesford Draft Local Plan. ECC needs clarity on how UDC intends to deliver 'garden community' principles, particularly the provision and funding of required infrastructure, and the role to be played by UDC and ECC in delivery, and what links need to be made to NEGC. It is noted that there are references to land value capture within the supporting text but not within the policy. The latter is an essential element of delivering 'Garden City principles' and distinguishing this form of development from a large scale housing led development. It is considered there is a need for more strategic delivery mechanisms.

It appears the Garden Communities proposed within Uttlesford District are being treated as normal large 'strategic' sites within the Draft Local Plan. It is apparent from the TCPA Garden City principles that successful delivery of the Garden Communities will be predicated on strong political support and leadership, with a clear vision and firm commitment.

This commitment should be highlighted and reinforced from as early as possible in the planning process. Having robust planning mechanisms in place is essential, and therefore articulating this vision in a Development Plan Document, supported by an appropriate

Garden Community specific governance structure, is strongly recommended. ECC would also urge the preparation of an economic strategy for each of the Garden Communities, and ECC can assist in its preparation. Garden Communities need to be more than 'dormitory' communities.

Ensuring a detailed holistic approach is undertaken in developing these communities will deliver a sense of place. ECC aims to ensure that the Garden Communities should be as much about employment as they are about housing; not just quantity but the quality of employment with the Garden Communities, which can provide a real opportunity for economic aspiration. Such a strategy should also ensure that the existing businesses in the area are encouraged to grow through the opportunities that Garden Communities and the enhanced infrastructure present to them. The economic strategy should identify the ways in which the public sector bodies can begin to assist these businesses with their growth. NEGC commissioned SQW and Cambridge Econometrics to carry out a North Essex Garden Communities Employment and Demographic Study. The purpose of this commission was to understand the likely future demographic patterns of the Garden Communities to ensure the appropriate provision for services is made and to develop quantified scenarios for future employment growth to inform job creation targets. UDC should refer to this study and may seek to commission something similar for its evidence base to inform and aid delivery. ECC seeks immediate and on-going discussions with ECC on the above matters given ECC's role as a provider of strategic infrastructure and our involvement in NEGC. In terms of the Garden Communities proposals put forward in the Draft Local Plan, ECC needs a clearer understanding of cumulative costs and phasing to ensure effective delivery. Policy SP5 does not, but should refer to the need for early or timely delivery of infrastructure (transport, education, etc.), to encourage the policy requirement of high levels of self-containment from the outset. Transportation and Highways ECC acknowledge that Garden Communities provide a means of enabling a more sustainable approach to the longer-term implications of growth on the highways network on the basis promoted by Government. However, it is recommended that the Garden Communities be taken forward using the same modal split principles as being used in the North Essex Garden Communities to achieve a real step change in sustainable transport (40% of trips by sustainable means "walking, cycling - 30% by private vehicle, 30% public transport). Early investment in these measures will be essential to delivering higher levels of sustainable travel, but the impacts of the remaining transport modes need to be accounted for. It is also recommended that developments should consider the 'wider picture' of passenger transport and links between the Garden Communities and beyond to Stansted, Bishop Stortford and Braintree. ECC welcomes continued ongoing engagement with UDC and their engaged consultants, including White Young Green (UDC's transport consultants) in taking this forward. Flood and Sustainable Urban Drainage (SuDS) ECC in our role as the Lead Local Flood Authority recommends that the overarching policy setting out the Garden Communities principles includes reference to sustainable drainage. This will ensure that it is consistent with the overarching Draft Local Plan Objective 1e which ECC have recommended include specific reference to SuDS. It is essential that SuDS infrastructure is considered from the outset when planning any new development, and therefore the policy should contain wording that provides for the delivery of sustainable drainage.

ECC recommends that the following wording is included as an additional point in Policy SP5: "Provision, management and on-going maintenance of sustainable surface water drainage

measures will be included to manage and mitigate the risk of flooding on site and which will reduce the risk of flooding to areas downstream or upstream of the development”.

Landscape ECC recommends that the third paragraph of the policy includes the word ‘landscape’ so it reads as follows (Policy SP5, 3rd paragraph): “The garden communities will be underpinned by high quality landscape, and urban design and placemaking principles” and “including key landscape and urban design principles that will guide development” (page 32). This will be important in terms of the provision of green space, landscape elements and the landscape setting of the new communities, which clearly implement ‘Garden City principles’.

Public Health- The Town & Country Planning Association (TCPA) have been working with ECC on helping to shape our understanding/ thinking in relation to Garden Communities and ECC are pleased that the TCPA Garden Community principles are included within the Draft Local Plan. It is important to note that the TCPA are working closely with other localities to support the planning for and delivery of 10 ‘Healthy Garden City’ principles of which ECC would recommend to UDC to apply as set-out below. Actively promoting and enabling community leadership and participation in planning, design and management of buildings, facilities and the surrounding environment and infrastructure to improve health and reduce health inequalities. Reducing health inequalities through addressing wider determinants of health such as the promotion of good quality local employment, affordable housing, environmental sustainability and education and skill development. Providing convenient and equitable access to innovative models of local healthcare services and social infrastructure, with the promotion of self-care and prevention of ill health. Providing convenient and equitable access to a range of interesting and stimulating open spaces and natural environments (‘green and blue’ spaces) providing informal and formal recreation opportunities for all age groups. Ensuring the development embodies the principles of lifetime neighbourhoods and promotes independent living. Promoting access to fresh, healthy and locally sourced food (e.g. community gardens, local enterprise) and managing the type and quantity of fast-food outlets. Encouraging active travel, ensuring cycling and walking is a safer and more convenient alternative to the car for journeys within and without the development and providing interesting and stimulating cycle/footpaths. Creating safe, convenient, accessible, well designed built environment and interesting public spaces and social infrastructure that encourages community participation and social inclusion for all population groups including: older people, vulnerable adults, low income groups and children. Embracing the Smart Cities agenda by incorporating and future-proofing for new technology and innovation that improves health outcomes across a range of areas both at an individual level and also within the public realm. Ensuring workplaces, schools, indoor and outdoor sports and leisure facilities, the public realm and open spaces are well designed in ways which promote an active and healthy lifestyle, including regular physical activity, healthy diet and positive mental health. ECC also recommends strengthening the engagement in relation to Public Health, and engage early to inform the next iteration of the Local Plan with both NHS England and Community Health Partnership with regards to all the Garden Community policies where primary care service facilities are mentioned.

ECC wishes to draw UDC’s attention that when projecting health care need, the NHS now work on square metres of space and not the traditional population per head General Practitioner model. ECC recommend that UDC adopt the multi-functional specialised hub models as the preferred model of health infrastructure delivery. To ensure that a consistent

approach is adopted across Essex, it is recommended that UDC engage with ECC to ensure that emerging policies and justification text appropriately reflects the ECC future vision for Public Health provision.

Hertfordshire County Council - Easton Park and North Uttlesford Garden Communities are potentially the most significance in terms of influence/impact upon Hertfordshire. The County Council is concerned over the proposed cumulative impact of development in and around Great Chesterford on the Hertfordshire network. In particular, the A505 runs to the north of the site providing east west connections to the A10 and A1. Junctions are already operating close to capacity in the Royston area and M11 junction 10 is a constraint. The Easton Park proposal similarly has potential to exacerbate issues on the A120 and Bishops Stortford. The Transport Study accompanying the consultation identifies capacity issues both in the reference case and in all development scenarios on the A120 Bishops Stortford bypass and on the A505 west of the M11. In traffic terms scenario 10, which includes new garden communities west of Great Dunmow and West of Braintree along with smaller scale development spread across the other towns and villages, produces the best results overall. High levels of stress are however evident on the A120 corridor and there is a recognition that the current short- medium term junction improvements proposed at M11 junction 8, A120/A1250 and A120/B1383 will not be sufficient to accommodate the levels of growth proposed. The report identifies the need for further mitigation measures including the implementation of a Smart Motorway on the M11 and major improvements to M11 junction 8. No clear funding mechanism is identified so deliverability is uncertain at this stage. The preferred scenario from the transport study does not include housing growth at Great Chesterford, although employment growth is assumed here. This is shown as leading to increased traffic flow and stress on the A505 west of the M11 (section in South Cambridgeshire which is at capacity). There is no information in the study on the impact at the junctions north of Royston.

Great Chesterford Parish Council – The Parish Council objects to any reference of NUGC in policy and requests the deletion of and reference in both Policy and supporting text. The Parish Council regards SP5 as aspirational since there is no evidence to support deliverability. For reasons set out in these representations, Policy SP5 should be deleted in regard to NUGC.

(Para. 3.56) Concern over the use of S106 agreements to deliver natural environment and biodiversity enhancements and use zero-carbon and energy-positive technology, because the S106 has already failed to deliver affordable housing on viability ground. Suggestion that land should be sold to UDC instead of developer at no more than 1.5 times of current land value. Uncertain about how the integrated and accessible transport system can be delivered in the NUGC.

(para 3.58) – Disagree with the proposed residential development of 5,000 units beyond the proposed plan period as no evidence has been provided for housing needs and infrastructure.

Anglian Water Services Ltd - Reference is made to the proposed development frameworks for the garden communities including phasing, infrastructure and delivery plans. We support this requirement as it is important that proposed garden communities are phased to ensure

that they are aligned with Anglian Water's water recycling infrastructure which is required to serve new development.

Developers/landowners/site promoters

- Garden communities will commence in 2020/21. This is totally unrealistic, most new communities take circa 10 years to occupation of the first house. The DLP has not been approved, the communities have not been designed, planning approval has not been granted. A Judicial Review is highly likely. No other new settlement has been delivered in 2-3 years from a District Plan being approved. Even if delivery commences sooner than 10 years, say 2024, leaving only 11 years of the DLP period remaining. The DLP is unsound as a five-year housing supply will not exist for most of the DLP period, thereby giving limited control to UDC. Limited control is NOT a plan. See 5-year housing supply on pages 17-18.

- The Council are proposing that 33% of all development will be delivered by three Garden Communities. This is a significant proportion of new development that is projected to deliver from 2021 onwards. These are large scale new communities with a need for land assembly, utility connections and new infrastructure to be delivered alongside the employment space and homes that make the fabric of the new communities.

Policy SP5 sets out the expectations for these communities. Detailed development frameworks for each of the garden community will be prepared as development plan or supplementary planning documents and adopted by the local planning authority, demonstrating how the development accords with the TCPA garden city principles and wider definition of sustainable development as per NPPF. Each garden community will demonstrate high levels of self-containment.

Given the stage of the Local Plan, the requirement for examination prior to implementation of such a strategic and critical policy, it is considered to be highly likely that the consideration and adoption of DPD or SPD to meet Policy SP5 will result in a delay to the initial delivering of the Garden Communities. Appendix 3 of the DLP identifies these as delivering from 2021. It is considered that this is an optimistic position for the DLP to take.

The additional allocation of medium scale sites across the Borough, in sustainable locations such as Key Villages, would be appropriate to offset the risk associated with these schemes.

- ANSC supports Policy SP5 as well as the supporting paragraphs 3.55 to 3.58. ANSC has previously submitted to both Uttlesford and Braintree Councils, via call for sites and Local Plan consultations, a development vision and master plan for Andrewsfield Garden Village. The proposals from ANSC have set out in some detail the objectives of achieving a high quality development adhering to each of the nine garden city principles developed by the TCPA and as set out at paragraph 3.55 of the Reg. 18 Uttlesford Local Plan. ANSC supports the identification of the West of Braintree Garden Community (WBGC) via the Reg. 18 Key Diagram and the Policies Map, as confirmed by paragraph 3.56. ANSC also supports the requirement, as set out by Policy SP5, for the Garden Communities to be underpinned by high quality urban

design and placemaking principles. These principles may most appropriately be set down and established through Supplementary Planning Documents, or frameworks.

- Galliard Homes, as one of the principal deliverers of the anticipated homes at West of Braintree Garden Community, supports the development of the site to garden city principles.
- We are broadly in agreement with the Council's policy on the garden community sites, save that we would prefer to see some additional employment facilities generated within the design of these sites.
- Within the policy reference is made to the strategic sites that make up the Garden Communities. As stated within these representations, it is considered that the proposed settlement at North Uttlesford should not be put forward as an allocation. Furthermore, it is noted that each proposed settlement will need a 'development framework'. This planning intervention, along with wider consultation, will add to the complexity of delivering the sites, and should be reflected within the delivery of any subsequent detailed trajectory.
- Support the Principle of Policy SP5 in seeking to deliver high quality new garden communities and, as set out in accompanying representations to Policy D4, recognise the importance of preparing a strong local vision and principles for each of the new communities through a Development Framework. It should be made clearer that Development Frameworks should be prepared in accordance with Policy D4, demonstrating how the development will embed key garden city principles, as informed by the TCPA and other guidance, in support of the Spatial Vision and Objectives of the Plan and wider definition of sustainable development, and provide a clear and distinct identity for each new community. Grosvenor has been appointed by the landowners as development partner for the North Uttlesford Garden Community and support the Council in proactively acting to designate the allocation for up to 5,000 new homes, alongside new infrastructure and amenities needed for a thriving new community. As the early proposals for the North Uttlesford Garden Community are developed, Grosvenor will work closely with the Council, local stakeholders and the community to get the principles for success right.
- Support with modifications Policy SP5 requires detailed development frameworks for each of the garden communities to be prepared as development plan or supplementary planning documents and adopted by the local planning authority prior to the consideration of a planning application. Such frameworks must be prepared in consultation with residents, wider stakeholders and interested parties and will be required to address cross-boundary matters. It is unclear whether the Local Planning Authority will prepare the frameworks or whether the intention is for developers to do this. Comments made below in respect of Policies D4 and D5 will influence these framework development plans.
- (Two responses with details of two sites attached) - Policy SP5: Garden Community Principles - The Council are proposing that 33% of all development will be delivered by three Garden Communities, equal to around 40% of all new development. These are large scale new communities with a need for land assembly, utility connections

and new infrastructure to be delivered alongside the employment space and homes that make the fabric of the new communities.

With regard for the content of Policy SP5 - Given the stage of the Local Plan it is considered to be highly likely that the consideration and adoption of a DPD or SPD to meet Policy SP5 will result in a delay to the initial delivery of the Garden Communities. Appendix 3 of the DLP identifies these as delivering from 2021. It is considered that this is a highly optimistic position for the DLP to take. The requirement for examination prior to implementation of such a strategic and critical policy is in itself likely to delay this implementation date.

The additional allocation of small and medium sites across the district, in sustainable locations such as Key Villages, would be appropriate to offset the risk associated with these schemes.

- Essex Farms supports the policy and the overall principle of the ambition to create a new Garden Community to the west of Braintree.
- Gladman notes the proposal to establish three new Garden Communities which are north of the A120. Gladman supports the concept of new Garden Communities in principle as they represent a potentially sustainable means of providing new homes, jobs and associated community infrastructure in the long term. We are however concerned that the scale, complexity and development requirements of the Garden Communities proposed are such that their anticipated deliverability may be questionable and consequently, the Plan may contain unrealistic expectations for the delivery of new housing on such developments.

Gladman therefore commissioned Boyer to undertake a review of the Uttlesford Garden Communities (Appendix 2). The conclusions of the report found: a. In view of the relatively early stage of the Local Plan preparation process, the clear requirement for secondary planning documents to provide crucial additional details for these allocations, and the scale and complexity of the Garden Communities envisaged, the Council cannot rely upon delivery from this source within the early/mid years of the plan period to extent currently set out in the Housing Trajectory. b. It is considered that the Council should review their Trajectory and reduce the reliance upon the Garden Communities to the order of some 738 dwellings from years 2021/22 through to 2024/5. c. It is conceivable that the shortfall could be more significant than this, for instance in the event that there are unforeseen delays to the processes of preparing and adopting either the Local Plan and/or secondary Development Framework documents. d. As such it is felt that a more realistic assessment of the likely timescales should be undertaken by the Council, and that greater flexibility should be sought through the identification of additional smaller sites capable of delivering within the early part of the Plan Period.

The work undertaken by Boyer highlights that greater flexibility in the Local Plan should be sought through the identification of additional smaller sites capable of delivering within the early part of the Plan Period. If this is the case, then these sites should offer something different from the large scale strategic allocations to ensure

competition in the market and to ensure that small to medium sized housebuilders have an opportunity to deliver sites within the district. Smaller scale housing sites will therefore be required to plug the inevitable gap in housing supply and Gladman considers that the site included with these representations at Land at Great Canfield Road, Takeley offers a suitable, available and deliverable alternative which should be allocated in the Uttlesford Local Plan (See Appendix 3).

- - Whilst we recognise the sustainability benefits of the garden communities approach to provide employment within these Garden Communities, it is important that there is not an over reliance placed on new garden communities to deliver employment and economic growth for the District, and that existing communities continue to be supported and enabled to thrive.

Furthermore, it is considered that the Policy, in seeking to provide exactly the level of employment land estimated to be required over the Plan, does not provide flexibility for a situation where an allocation may not be delivered, or fails to be delivered at the right time. Accordingly, it is considered that, where appropriate, the DLP should allocate additional land either immediately or reserved for release according to market signals, or a further review of the Plan.

Suggestion that a Reserved Land designation would be an appropriate policy response to enable flexibility in the DLP, to deliver further opportunities for employment, without a need to review the entire Plan. The Land at Slamsey's Farm would benefit from the location, infrastructure, access and services provided from the initial development, limiting the need to deliver significant infrastructure in advance of an immediate need for employment sites.

For the reasons set out above, we would seek an amendment to Policy SP5 to enable additional floorspace to be provided across the site at Land West of A131, Great Notley, which is already allocated for employment use in the Braintree District Local Plan and for the allocation to represent the whole site, including that which is located in Uttlesford District Council, as illustrated on the Site Location Plan at Appendix A.

- - Concern that the Plan places significant reliance on the delivery of new garden communities to meet housing needs. Concern that the development framework process can take a number of years. Once (and if) development plans / supplementary planning documents for the garden communities have been successfully adopted, planning applications will still be required to be made before development can commence. Once (if) such applications have been approved, prior to the commencement of development it will still be necessary to discharge all necessary conditions, meet S106 obligations, and agree S278 requirements prior to commencement. Such requirements normally take a considerable amount of time, and are particularly likely to do so in the case of garden communities given their complexity and scale. Delivery of garden communities will require significant infrastructure enhancements, and the cooperation and effective working of multiple agencies. Inevitably, there will be long lead in times for the delivery and completion of development. Concern that garden communities will begin to contribute towards

housing completions from 2021-22, just two years from current anticipated Local Plan adoption date. This further demonstrates the need for additional sites to be identified for housing, which have the potential to deliver housing in the shorter / medium term.

- Concern that the DLP proposes to place significant reliance on the delivery of new garden communities to meet housing needs. Concern that the process of preparing development frameworks can take a number of years. Concern that garden communities will begin to contribute towards housing completions from 2021-22 from two years from current anticipated Local Plan adoption date, as indicated at Appendix 3 of the DLP.

This further demonstrates the need for additional sites to be identified that have the potential to deliver housing in the shorter / medium term. Sustainable sites in established villages would be entirely deliverable and well placed to meet this need in the first five years of the plan.

Concern that the DLP places significant reliance on windfall to meet housing need, as it is unclear that it will be able to make the level of contribution that Policy SP3 and Table 3.4 assume. It is entirely unnecessary for the DLP to identify such a significantly greater number of dwellings to be identified through Windfall than through allocations. This is especially concerning as the Council has identified a range of suitable sites within its Villages, including land at Henham, through its SHLAA site assessments. The Local Plan 2011-33 should seek to meet the full OAHN by allocating sufficient land for housing. If the council rely on a significant windfall allowance to meet the OAHN, without clear justification in accordance with Paragraph 48 of the NPPF, the Plan will be unsound.

- The Plan proposes to place significant reliance on the delivery of new garden communities to meet housing needs. Development frameworks for each will have to be prepared, which can take a number of years, requiring significant community participation and stakeholder engagement, Strategic Environmental Assessment, as well as having to undergo an examination process. Once (and if) development plans / supplementary planning documents for the garden communities have been successfully progressed through to adoption, planning applications will still be required to be made before development can commence. Given the scale of development, this is highly likely to take the form of outline applications followed by reserved matters. Once such applications have been approved, prior to the commencement of development it will still be necessary to discharge all necessary conditions, meet S106 obligations, and agree S278 requirements prior to commencement. Such requirements normally take a considerable amount of time, and are particularly likely to do so in the case of garden communities given their complexity and scale. Delivery of garden communities will require significant infrastructure enhancements, and the cooperation and effective working of multiple agencies. Inevitably, there will be long lead in times for the delivery and completion of development. Having regard to all of the above, it is considered improbable that garden communities will begin to contribute towards housing completions from 2021-22, just two years from current anticipated Local Plan adoption date. This further

demonstrates the need for additional sites to be identified for housing, which have the potential to deliver housing in the shorter / medium term.

- Policy SP5: Garden Community Principles - The Council are proposing that 33% of all development will be delivered by three Garden Communities, equal to around 40% of all new development. These are large scale new communities with a need for land assembly, utility connections and new infrastructure to be delivered alongside the employment space and homes that make the fabric of the new communities.

With regard for the content of Policy SP5 - Given the stage of the Local Plan it is considered to be highly likely that the consideration and adoption of a DPD or SPD to meet Policy SP5 will result in a delay to the initial delivery of the Garden Communities. Appendix 3 of the DLP identifies these as delivering from 2021. It is considered that this is a highly optimistic position for the DLP to take. The requirement for examination prior to implementation of such a strategic and critical policy is in itself likely to delay this implementation date.

The additional allocation of medium scale sites across the district, in sustainable locations such as Key Villages, would be appropriate to offset the risk associated with these schemes.

- Policy SP5 introduces the requirement for Development Frameworks in relation to the new Garden Communities. The Policy indicates that, in part at least, the Development Frameworks may take precedence over some of the Development Management policies contained in the Local Plan, namely Policies H1 housing density and H2 housing mix. Additionally, reference is made within Policy D4 to the Development Frameworks setting out details relating to self and custom build housing, which creates a potential overlap with Policy D7, while for affordable housing (Policy H6) and accessible and adaptable homes (Policy H10) the relevant policies appear to be those contained in the Local Plan only. For consistency and clarity, the Plan should be modified to make clear the relationship between the Development Frameworks and the Local Plan Development Management Policies. Policy SP5 advises that consultation on Development Frameworks for the new Garden Communities will need to extend beyond the district boundaries to address cross-boundary matters. We note the importance of addressing such matters, which we consider will be of particular relevance in relation to the new Garden Communities proposed at West of Braintree and North Uttlesford as these communities are located close to or crossing the district border. Easton Park, however, is located centrally within the district, so is less likely to encounter cross boundary issues.
- The response notes that the new garden community west of Braintree straddles the District boundary with Braintree District Council. As well as homes there will be a range of local employment opportunities and services. As stated in the Publication Draft Local Plan the garden community will be located close to the A120 this garden community will be conveniently located to Braintree and London Stansted Airport for employment opportunities. The Council will work closely with Braintree District

Council to ensure that this garden community is jointly master planned and delivered. A site was submitted in May 2015, under the Call for Sites Exercise, with further details submitted in February 2016 for B8 Storage or Distribution (Council Reference 03Fel15). The submission included the Master Plan reference NC_15.199-P-200, showing approximately 9,550 square metres of floor space and a landscape Nature Reserve. The site is situated between the B1256 and the A120. The Publication Draft Local Plan states that the three new Garden Communities will each deliver a range of B-use class employment opportunities on site. The exact scale and nature of the employment opportunities will be determined through the master planning of each new Garden Community (Paragraph 5.35 and EMP 1 refers). Draft Braintree Council Policy SP 10 of the Publication Draft Local Plan in respect of the new Garden Community Proposal states at paragraph C Employment and Jobs: This may include space for B1, B2 and B8 businesses in the southern part of the community close to the A120 as well as on non-employment park locations throughout the Garden Community to provide for a wide range of local employment opportunities. Under the BDC Proposals Map the site access and frontage sits partly within this southern area. (The access to the site). Currently in the Uttlesford Plan the site abuts the Garden Community. Land to the west and east of the site is also excluded. In planning terms it seems illogical to exclude these areas given the proximity to the A120 for access, that the land will become isolated between the B1256 and the A120, and its usefulness for any agricultural purposes will be diminished due to isolation and proximity to surrounding large scale infrastructure and comprehensive commercial development within the Garden Community and the likely B1, B2 and B8 uses. Although the Call for Sites Form specified B8 this was completed at a time when the Garden Community had not formally been put forward. The proposed will be capable of delivering a range of B-use class employment. Matters of access to the A120 in both directions are addressed at Uttlesford Policy SP 8, point 5 advising that reconfiguration and improvements to the junctions on the A120 in this area will allow access in all directions. That enhancements and contributions will be sought for this and other highway infrastructure proposals. The proposed site will be able to make a positive contribution to support this. It should also be noted that the proposal also includes the provision of a landscape Nature Reserve which can contribute towards the overall public open space for the Garden Community. Even if the Garden Community does not come forward there are strong planning arguments for the allocation of the site for employment use because of its location abutting the A120. It is requested that we are contacted and involved in the discussions with land owners, developers, stakeholders, consultees and the Council in the master planning of the Garden Community and the relationship of my clients land to the Garden Community. Similar submissions have been made to Braintree Council under their Publication Draft Local Plan

- Policy SP5: Garden Community Principles - The Council are proposing that 33% of all development will be delivered by three Garden Communities. This is a significant proportion of new development that is projected to deliver from 2021 onwards. These are large scale new communities with a need for land assembly, utility connections and new infrastructure to be delivered alongside the employment space and homes that make the fabric of the new communities.

With regard for the content of Policy SP5 - Given the stage of the Local Plan it is considered to be highly likely that the consideration and adoption of a DPD or SPD to meet Policy SP5 will result in a delay to the initial delivery of the Garden Communities. Appendix 3 of the DLP identifies these as delivering from 2021. It is considered that this is a highly optimistic position for the DLP to take. The requirement for examination prior to implementation of such a strategic and critical policy is in itself likely to delay this implementation date.

The additional allocation of small and medium sites across the district, in sustainable locations such as Type A Villages, would be appropriate to offset the risk associated with these schemes.

- These planned communities are highly complex and long term projects that are likely to generate huge levels of public opposition. These should not be pursued as the sole means of delivering the District's objectively assessed needs.
- Note the reference to the garden city principles espoused by the TCPA but these do not form part of formal Government guidance. The policy sets out a number of considerations which may be desirable but are not necessarily easily achievable, if at all. Suggest that it is not appropriate to plan for longer than 2t5 years ahead due to uncertainties e.g. household projections. It also raises questions about the thresholds for essential facilities, the degree of self-containment which can be achieved and the quality of life for residents in the early years. With regard to the statement "Each garden community will demonstrate high levels of self-containment" attention is drawn to the difficulties encountered with the delivery of the New Towns including service provision and the lack of self-containment. It is considered that new settlements are likely to lead to greater levels of reliance on and use of the private car, which is not sustainable. In summary, it is considered that Policy SP5 is unsound and does not provide an appropriate foundation for the three specific proposals. It is considered that new settlements should generally be the last resprt option. In the light of the annual requirement it is considered that the justification for a strategy largely dependent on new settlements is weak. Propose redrafting of the first sentence of the policy to read: "A new garden community will be delivered at Easton Park". Amend the rest of the policy to refer to garden community in the singular.

Individuals

Para 3.55

- Concern that the community will not benefit from part of the increase in the value of the land, because they benefit from the land being open countryside. Concern that the plans are unsustainable. To date the affordable housing provided in Uttlesford has not been truly affordable. Concerned that UDC will not ensure developers and individuals stick to the agreements put in place at the time of planning permission. Concern that there is not a wide range of local jobs within commuting distance, as the only jobs are at Stansted, or Chelmsford, or Cambridge, or London, which are

only accessible by car. Concern about traffic congestion. Concern that homes will not be imaginatively designed homes with gardens. Concern that development will not enhance the natural environment. Concern over the loss of countryside which people use to walk their dogs. Concern that the existing public transport system does not tie in with your proposed areas for development. Concern that the existing train service into Chelmsford and London is appalling. Concern that the A120 is already at capacity. Concern that the plans do not incorporate sustainable energy solutions such as green roofs, recycled waste water, solar panels and wind turbines. Concern that the amount of housing does not reflect local need. Suggestion that development should focus on brownfield locations and should integrate existing transport links and jobs.

- Concern that "Garden Communities" is just a nice sounding name for small houses crammed together in large developments, interspersed with 'landscaped' patches of grass which will be largely unused as residents drive to real areas of countryside as they attempt to escape the urban sprawl created by these developments. Suggestion that the existing countryside should not be developed on. Concern over increased traffic congestion, flooded and potholed roads and strain on local services.
- The Garden Communities policy claims the developments will be 'using zero-carbon and energy-positive technology to ensure climate resilience' and be served by: "Integrated and accessible transport systems, with walking, cycling and public transport.' Questioning where the specific strategies are in the plan to deliver on this, as there is no policy to insist on zero carbon technology.
- Concern that the towns will ruin the environment. Concern that they are just commuter towns and will not benefit the local area. Concern that there is not enough high paid skilled work in the area, so people will commute to London and Cambridge. Suggestion that the council should already be putting resources into attracting high paid / skilled work in the area for existing residents so that they no longer need to commute and thus take the pressure off the transport infrastructure. Concern that these new garden communities will only include retail and other low paid jobs.
- Concern that mixed-tenure homes and housing types that are genuinely affordable for everyone will not be delivered, as some people cannot afford anything at all. Suggests that rigorous standards will be needed in order to achieve imaginatively and well-designed homes.
- Concern that housing will be delivered before the infrastructure, which will badly affect the existing residents.
- New, fabricated large-scale communities are inappropriate and ignore the historic pattern of settlement growth. Concern that these artificial communities will destroy the green nature of Uttlesford.
- Clear strategies need to be laid out when comments such as 'zero-carbon and energy positive technology' are made and if there is to be 'easy commuting' then the road systems need to be re-evaluated and new train stations built as those available

already have full car parks. Concerns over cycling being added to narrow roads, as it is dangerous. Concerns that the housing will not be genuinely affordable.

- Challenges the statement that houses will be "genuinely affordable for everyone" because: -"We have so many people/families living in extreme poverty in the country in 2017. According to the latest figures, there are 10-15 million people living in 'Absolute Poverty' in the UK. And this doesn't even include homeless people living rough or in bed and breakfast accommodation".

Comments

- The stated Garden Community Principles are a watered-down version of those stated in section 19, Appendix 4. Specifically, regarding employment.
- No evidence to show UDC has understood the Garden Community Principles within the plan.
- Uttlesford's track record of overseeing past large residential developments, notably Flitch Green and Foresthall Park, does not give confidence that the district would be able to raise its game to deliver those principles.
- Opportunities to promote walking and cycling should also include opportunities for horse riders especially since Uttlesford is a predominantly rural district with a thriving riding community.
- Stewardship: how long-term and by whom? It should be by a publicly accountable body.
- Questioning the logic behind the statement "A wide range of local jobs within easy commuting distance from homes", as if they are 'local' jobs they don't require people to 'commute'.
- Concern that developers will not adhere to the principles. Infrastructure and employment opportunities should be delivered in a timely manner. New developments, and in particular Garden communities, must provide genuinely affordable housing for those on lower paid jobs. Given the desire to own property rather than rent, a proportion of these affordable homes should be market houses. Innovative ways of providing these should be sought, and design should not be sacrificed to economy.
- Cross-reference to UDC's Corporate Plan should be made to further support this.

Para 3.56

Objections

- Objection to only walking and cycling has been mentioned. Suggestion to include horse riding and bridleways. Horse riding is mainly undertaken by women and children and without including this the plan is biased.
- Questioning how the a North Uttlesford Garden Village promotes public transport as the most attractive form of local transport, as its close proximity to the M11 / A11 and roads to Cambridge are only going to further encourage the use of private transport which is in opposition to the aims of a Garden Village. Questioning how much control Uttlesford have over Public Transport and how they will deliver "integrated and

accessible transports systems.” Questioning the definition of local jobs, and whether they are in walking or cycling distance.

Support

- These are suitable locations for the new growth

Para 3.57

Objections

- Concern that the garden communities will not be delivered in the timescale.

Comments

- Concern over population growth in a largely rural district.
- By permitting the Garden Villages to develop beyond the life of the draft District Plan the Planning department will lose control of the development criteria for a Garden Villages.

Policy SP5

Objections

- Concerns about the majority of people still commuting to London and no transport infrastructure being provided to anticipate this.
- Policy claims that the Garden Communities will ' reduce reliance on the car ', and yet none of them are within walking distance of a railway station. Sustainability surely means that new communities are planned, first and foremost with direct access to the most sustainable forms of transport (rail).
- We are concerned that Garden Village principles cannot be met as the settlement will be car-dependent, as the new settlement is separate to the transport infrastructure in the surrounding villages. Expecting people to walk or cycle is unrealistic when the settlement is located on a long and demanding hill.
- Concerned that Uttlesford is not planning for longer term population trends, not just the exceptional period of airport related construction. Concerned that the stated Garden Community Principles are a watered-down version of those stated in section 19, Appendix 4. Specifically, SP5 fails to commit to provide employment opportunities on site.
- People have paid a high premium to live in the countryside, not urban sprawl. Concerned that there is no infrastructure and that arable land is needed to sustain families with food. Suggestion that UDC should build on brownfield sites, not arable countryside.
- Suggestion that provisions should be included to protect the night sky from light pollution in order that the night sky can be seen and therefore form part of the part of the education opportunities and wonderment for residents of all ages.
- Concern that the garden communities will be badly designed and that the policy does not protect against this.
- Concerned that UDC cannot provide assurances that all the necessary infrastructure for NUGV can be provided in a timely manner.

- The SA of Strategic Spatial Options for West Essex and East Hertfordshire Housing Market Area (HMA) (September 2016) assesses the sustainability of OAHN across the functional HMA, which is established from the SHMA. This SA is not considered fit for purpose for assessing the market need and planning for future growth in relation to NUGV for the following reasons:
 - a) The ongoing evaluation into the accuracy of the allocation of 14,100 dwellings for Uttlesford by Opinion Research Services (ORS).
 - b) The SHMA report (2015) defines the HMA as a 'best fit' and extrapolated from where the Harlow and Stortford Broad Rental Market Area (BRMA) intersects with the Harlow commuting zone. Whilst commuting patterns may suggest that North Uttlesford and NUGV would sit within the HMA, NUGV lies within the Cambridge sub housing market area and the transport infrastructure, social and culture networks in this predominantly rural area are different to that in the HMA. NUGV should not be included within the functional HMA on which the housing need for this Local Plan is based.
 - c) The absence of any evidence of the Duty to Cooperate or dialogue with South Cambridgeshire District Council and Cambridge to consider cross boundary housing market needs as recommended by the SHMA (2015) report.
 - d) The OAHN proportion of housing disaggregated to the District is not accurate or representative, particularly in relation to the need for NUGV.

For options assessment in all its different forms and applications, it is important that the following principles are followed:

- a) a systematic and transparent approach is used with clear definitions of the criteria that are being considered as part of the assessment;
- b) options are described at similar levels of detail and account taken of the levels of maturity of different options;
- c) adequate time is allocated in the project programme to enable the generation of options descriptions of adequate quality;
- d) the assessments are evidence based and the evidence is available to support the conclusions reached;
- e) options deliver comparable outcomes;
- f) risks and uncertainties with respect to individual options are taken into account.

The Spatial Options Assessment in Appendix 1: This assessment is very simplistic and open to misinterpretation because it is difficult to assess each option (comprising of three sites) transparently and objectively against the sustainability criteria only, particularly as there is no presentation of the site selection criteria per sustainability objective and as to what constitutes a positive or negative score. Cumulative impacts between sites in each option are only considered on occasions and no account is made of any impacts from other significant development (e.g. Wellcome Genome proposals near to NUGV). For each sustainability objective, there are also a high proportion of 'unknown' impacts being scored for some options, which essentially indicates a gap in knowledge and a risk to decision making. In light of the failure of the 2014 Local Plan and the potential contentious nature of an approach comprising three settlements, further broad stakeholder engagement or expert decision panel assessment would have been more appropriate than consultant judgement. There is no conclusion to the site selection assessment; no clear analysis of evidence gaps;

no plan for how this will be incorporated into the sustainability work and no clear risk assessment for how this might affect the Local Plan. The decision for the three settlements to comprise Easton Park; West of Braintree and NUGV appears to have been made regardless. A more transparent and evidence based approach would have been to assess each site and their deliverability scenarios individually in turn against the sustainability criteria/site selection sub-criteria. This enables the positives, negative and more importantly the risks (the unknowns) to be flagged with each site and allow the preferred and best combination of a three-settlement option to be identified and created.

- Concerned that infrastructure will not be delivered to support the garden communities.
- Garden Community has no formal status. UDC has to spell out what it means and not use vague terminology. Concern that UDC is relying on developers to manage and deliver these sites without insuring that garden community principles are met. Concerned that there is no strategic plan to improve infrastructure in the district to match the planned increase in population. Concerned that UDC will not be able to deliver the garden communities.
- Concerned that the garden communities will result in urban sprawl from Dunmow to Hertfordshire.
- Concerned that the garden communities will not reduce reliance on the car, as its proposed location is on top of hill.
- Suggestion that smaller-scale and more detailed maps should be provided indicating the precise locations of the garden communities which would give respondents a better idea of the road linkages (local as well as major). The areas and topographies of the 3 proposed sites should also have been shown. Suggestion that the percentage of affordable housing, the housing densities, the percentage of the working in local employment, and the percentage of car users should be specified. Not everyone will track down the mentions of how housing densities must be 30-50/ha outside Saffron Walden and Great Dunmow (p54), or that developments of sites of 11/more dwellings must be 40% affordable (p60).
- Opposition to the whole Plan. The 3 garden communities do not enhance. This plan will not benefit the community.

Support

- Garden communities sound interesting although there is no mention in your list of amenities that these communities will have larger gardens. Suggestion that there should be a stipulation of a minimum size.
- The Draft Local Plan is supported because UDC has fully taken on board the two Inspector's and Secretary of State's Reports that Elsenham and Henham are not suitable locations for development. The Plan's evidence base, including the transportation and housing assessments, fully supports the strategy now proposed. It is to be hoped that any speculative planning applications for housing development, especially in Elsenham and Henham, will be refused permission unless the site is allocated in the Draft Plan. North East Elsenham This is not a proposal of the Plan but its exclusion deserves strong support, it has twice been rejected by Inspectors and the Secretary of State.

- Supported if all principles are followed, especially concerning supporting infrastructure.
- I would like to support the Draft Local Plan. The three large developments have been placed in areas where there is good road access and I fully support the concept of a 'Garden Village'.

Comments

- I can see no mention of doctor's surgeries being provided in the plans for garden communities and the existing surgeries are already overstretched.
- Support for the majority of houses being built in new settlements so as not to ruin the character of existing settlements. Support for the three new settlements chosen for the plan. It is essential that all services and infrastructures are fully upgraded/provided during the early stages of development as should be Junction 9 of the M11 to allow access & exit both north and south and sufficient parking be provided at/close to Great Chesterford Rail Station along with a dedicated cycle path.
- The principles are excellent of course, however UDC will need to demonstrate that they can guarantee to deliver them, particularly the infrastructure demands needed early in the development, which come with no obvious financial benefit to the developers.
- There is no reference to the development of employment within the garden communities, yet self-sufficiency and sustainability seem to be fundamental aspects of garden cities.
- Questioning how high quality urban design will be achieved, and questioning what is meant by placemaking principles.
- All the garden community proposals are for sites in the countryside and as such should include provision for equestrians to avoid being discriminatory.
- UDC's rewording of the Garden City principle relating to affordability of housing is unsatisfactory. The land value capture is supposed to ensure that all the homes are more 'affordable' generally. UDC has reworded affordability & affordable housing this so that '50% of those 'classified' as affordable must be for social rent' that is, 50% of UDC's 40% affordable housing policy, i.e.20% of the total.
- Support for large developments if they are self- sufficient in schools, surgeries, shops and other services. Suggestion that this must be a condition of their planning approval.
- Support for the garden communities, but questioning whether Uttlesford have enough staff and the necessary expertise to deliver them effectively. The majority of homes in a new Garden City must be 'affordable' for ordinary people (they recommend 60-70% minimum). At least 50% of the homes that are classified as 'affordable' must be for social rent. Concern that developers will not deliver this. Suggestion that a robust range of employment opportunities in the Garden City itself is needed, with a variety of jobs within easy commuting distance. Concerned that developers are not that excited by self-built homes, homes with good sized gardens and open space for both allotments and community gardens and orchards to provide for healthy local food. It is easier and more profitable for a developer to build identical, 4 and 5 bed houses than small affordable homes. Concerns that developers will not deliver tree-lined streets, strategic networks of green infrastructure and habitat creation, a surrounding belt of countryside to prevent sprawl, and a mix of public and private open spaces.

Concern that the developments will result in traffic congestion in Saffron Waldon as people will shop there. Uttlesford does not have good transport links to support the garden community as rural bus routes are being axed. Further amenities such as village shops, post offices and pubs are closing and so for the majority of people car-use is vital to being able to live in the district.

- It will be essential to adhere to the principles, and not to allow developers to dilute these. As with all developments, infrastructure and employment opportunities should be delivered in a timely manner.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Impacts are only expected to be realised in the long term, in line with the expected commencement and delivery of the initial phases of the Garden Communities in the latter stages of the plan period. The Policy is high level, and not implicit of specific requirements from any forthcoming Garden Community schemes / applications. Separate policies exist relevant to each Garden Community allocation. The Policy will nevertheless ensure that required ancillary development and infrastructure to housing growth will be secured, resulting in significant positive impacts on sustainable travel, housing and employment related objectives. Minor secondary positive impacts will be realised on biodiversity, landscape, the sustainable use of land, access to services, health, infrastructure and education in so far as positive outcomes will be required however are not specifically implied within the policy.

Alternatives Considered

In so far as the place shaping principles of the Policy reiterate sustainable land use requirements as espoused in the NPPF and PPG, it is considered that there are no reasonable alternative approaches that could be considered distinctively different yet still meet tests of soundness. As such the preferred policy approach has been selected.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed at this stage.

Easton Park Garden Community Paragraph 3.59 and Policy SP6

This policy and supporting text was responded to by 1,218 people/organisations.

Support	9
Object	1183
Comment	26

Overarching Summary

- Key issues amongst the statutory consultees are about addressing the evidence base in relation to Sports Provision, the need for a detailed Water Cycle Study and a full Historic Impact Assessment. Manchester Airport Group expressed concern about potential impacts on Stansted Airport. The need to work with our partners on the transport impacts of the Garden Community is recognised, including Essex County Council, Hertfordshire County Council and the Highways Agency.
- Local communities are concerned about the impact of the Garden Community on the surrounding area. The main planning reasons for objecting to the development are:
 - inadequate existing transport infrastructure, especially existing highways and public transport, and concern that new infrastructure will not be able to solve these problems;
 - Concern that there may only be one access into the development;
 - sensitive landscapes and impact on the countryside;
 - important historic buildings and assets that will be adversely affected, most notably the Gardens of Easton Lodge;
 - noise and safety impacts from Stansted Airport;
 - adverse impact on wildlife, SSSIs and ancient woodland;
 - loss of high quality agricultural land;
 - lack of existing infrastructure and problems in funding and delivering new infrastructure, including education, health and shops;
 - relative remoteness from existing jobs and likelihood this will result in increases in car commuting;
 - concerns relating to coalescence with existing communities;
 - concern that negotiations may delay the start date for development on the Garden Community; and
 - concern that other new homes in the area are not selling already.

Statutory consultees and other bodies

Diocese of Chelmsford

The policy should make reference to places of worship at bullet point 3, in line with paragraph 70 of the NPPF.

Highways England

Broad support this proposed development although impact upon the A120 and its junctions will need to be thought about, a significant opportunity to link to the airport and access to destinations, locally, nationally and internationally by public transport exists.

Sport England

Welcomes the provision of leisure and recreation in this Garden Community, although point to other representations to INF2 about the evidence base for sport that supports the plan.

Great Dunmow Neighbourhood Plan Steering Group

Strongly objects to this proposal for a number of reasons, due to the impact on existing infrastructure, including during the early phases when new residents would use facilities in Great Dunmow. Unacceptable access arrangements: single access to the site at existing congested roundabout. Junction 8 on the M11 must be addressed prior to further development. Additional car parking should be provided for Great Dunmow to cope with the increase in population and to support local businesses. It is imperative that a master plan for Easton Park is presented with the Regulation 19 stage of public consultation. The proposal contravenes clause 97 of the Great Dunmow Neighbourhood Plan which seeks to prevent urban sprawl and the amalgamation of Great Dunmow with Little Easton.

Broxted & District Community Association

Object to the proposed scale of the development which would swamp Great Dunmow, and contribute to the suburbanisation of the rural area between Bishops Stortford and Braintree. Increased traffic would lead to congestion and pollution. The new settlement is likely to become a dormitory town for London or Cambridge. A large number of highly skilled jobs being created near Cambridge means the northern part of the district could be allocated more housing.

Essex Bridleways Association and CABO Essex and Cambridgeshire British Horse Society

Consider that existing bridleways should remain unchanged or enhanced, and new bridleways should be provided accessible to all vulnerable road users. A safe link to the Flitch Way is particularly important. The Country Park should be accessible to all users including equestrians.

Great Dunmow Town Council

Objects to SP6 and the Reg 18 draft local plan. The Easton Park Garden Settlement (SP6) is not justified, effective nor consistent with the NPPF. This is not surprising: the Land Securities (LS) site at Easton Park has consistently been judged by UDC as unsuitable (going as far back as 1993) and as recently as 2014. In summary GDTC's objections include: Unsustainable location due to lack of sustainable transport, high landscape impacts and adverse heritage harm; Physical and operational constraints – north, south, east and west of the site; Inadequate transport and access arrangements; Proximity to the safeguarded land at Stansted airport; Airport noise from Stansted operations; Adverse landscape impacts; Adverse harm to designated heritage assets; Impact on Great Dunmow residents. The final section of this objection sets out recommendations to mitigate the adverse environmental effects of SP6 in the event the allocation is carried forward to the submission draft stage. These recommendations are made on a without prejudice basis in light of the strong objection to inclusion of SP6 in the UDC proposed plan.

Stop Easton Park

Concerns relating to the call for sites, the lack of economic analysis, the lack of a masterplan and the lack of detail more generally. Easton Park is too close to Great Dunmow and Stansted Airport, will cause urban sprawl, has limited access, and will place excessive burdens on infrastructure, notably M11 junction 8. Development will also result in a loss of heritage in the form of one of the great historic parks of Essex. Development will not conform to garden city principles, in particular UDC will not be able to capitalise on land value capture. The future probable availability of Carver Barracks is not accounted for.

Essex Gardens Trust

State that this is an area with heritage assets (the Gardens of Easton Lodge, Little Easton conservation area, the many listed buildings and the houses near Maynard crest) which score highly on communal, aesthetic, historic and evidential value. Their setting would be substantially damaged by development on this scale which would totally erase what is left of the historic character of the area.

The Thaxted Society

Considers it critical that a degree of buffer and setting is incorporated that allows for the continuation of villages and towns that have remained small and historically isolated. This is essential for Uttlesford narrative to continue.

Little Easton Parish Council

Objects for the following reasons: Heritage – Easton Park would destroy an ancient deer park with exceptional heritage; the site is an integral part of the surrounding area which comprises 19 listed buildings, a Conservation Area, the listed Gardens of Easton Lodge, the SSSI woodlands of High Wood and the other woods that surround it.

Coalescence – as the settlement is so close to Great Dunmow.

Proximity to Stansted Airport –Exposure to noise and pollution for the new residents will harm their health.

Environment and Landscape Harm – the proposal will have a significant detrimental impact on the character, appearance and significance of the Little Easton Conservation Area, including the listed buildings contained therein and will damage views in and out of the conservation area, resulting in a loss of overall character and historic significance of the Conservation Area. The Landscape and Visual Appraisal commissioned by UDC concluded that the landscape sensitivity and visual sensitivity to a new settlement within the site would be moderate to high, with the highest sensitivity to development in the northern part of the Site. The proposal will also result in the loss of best and most versatile prime agricultural land. The site is in close proximity to a working gravel pit, and there will be safety issues on the shared access road.

Transport –Critical that the road infrastructure is capable of coping with the increased stress of new developments along the A120 corridor at Easton Park and West of Braintree. The A120, B184, B1256 and the M11 are currently heavily congested at peak times. The Local Plan has no details on how roads will be improved. Improving the rail network is not realistic or feasible and a change in modal share is not deliverable.

Employment and Housing Need – there is no independent assessment of employment opportunities and constraints. No guidance is given on the business sectors to be promoted nor on the relationship with other business clusters. An economic strategy covering these

areas is essential. Job growth at Stansted and housing growth in Uttlesford is exaggerated. Economic Strategy – an economic analysis should be completed covering housing, employment, transportation, communication, commercial and retail aspects and support the formulation of a strategy to attract required funding. The analysis should also cover the relationship of proposed developments, notably the new settlements, with existing centres. The Plan makes no provision for capturing the uplift in value that would arise on adoption of the Local Plan. Deficiencies in the UDC process – the increase in population is too high; Carver Barracks will be available for development; a call for sites limits UDCs options in deciding where development goes; the site selection criteria are arbitrary; and there is no masterplan.

Great Dunmow Town Council and Little Easton, Broxted, Thaxted and Takeley Parish Councils

Consider that this is an unsustainable location, with poor road and public transport links, coalescence between the villages, and urban sprawl westwards towards Stansted Airport. The proposal will cause significant harm to the landscape, ancient woodland and wildlife and the setting of Easton Park Estate heritage, which impacts on all the surrounding villages and which are inextricably linked with the history and identity of this unique area. The cumulative harm will be at its highest due to phasing of the development needing to avoid gravel extraction areas so that the homes would need to be built in the most visually sensitive part of the site, closest to numerous heritage assets and two miles distant from the single access point to the A1 20. There is also concern that the housing would be too close to the expanding Stansted Airport where new residents would suffer from noise and disturbance from overflying aircraft and ground operations. Even if housing can be delivered at Easton Park before 2033, the harm would overwhelmingly outweigh the benefits.

Thames Water

State that they are in discussions with the Council, Environment Agency and site promoters regarding the provision of wastewater infrastructure required to support the proposed garden community.

Hands off Thaxted

Concerned about development at Little Easton. They believe the housing numbers are overestimated, and consider overdevelopment will destroy the district and waste prime agricultural land.

Epping Forest District Council

Support the policy, in particular improvements to the A120 and M11 junction 8, in addition to providing transport choice, including the delivery of a direct high quality, frequent and fast direct public transport link to London Stansted Airport and Great Dunmow in the early delivery phase and a network of safe walking and cycling routes both within the garden community and beyond to other nearby destinations.

CPRE Essex

Considers this will cause significant harm to the valued landscape, ancient woodlands and the setting of Easton Park Estate and Little Easton Conservation Area. The proposed settlement is also in an unsustainable location, with poor road and public transport links. A development at this location would also result in coalescence of Great Dunmow and Little Easton, leading to the loss of identity of the two settlements. To date, the planning history of

Easton Park shows that it has not been considered suitable for development. A key issue is the phased timing of the development. The ongoing quarry works in the southern part of the site means that the developer would be unable to deliver a large swathe of the development on what has been identified as the least sensitive land.

Fritch Way Action Group

There is little acknowledgement of Fritch Way as an important asset which will need to be protected and enhanced in the Local Plan. Our concern is that the stretch of the Fritch Way that was severed years ago will not get reconnected unless it becomes a strategic initiative for ECC and Uttlesford.

Saffron Walden Neighbourhood Plan Steering Group

Bus services will not be adequate. Reliance on cars and existing evidence that many residents in Dunmow drive to Bishop's Stortford. Suggestion: Build road and rail links within the district. Train links are needed from Stansted Airport to Easton Park, Great Dunmow, Braintree and Chelmsford. Community provision should also include land, sports facilities and pavilions.

Broxton Parish Council

The Garden Community Principles were developed for stand-alone, self-sustaining developments, not for sprawling housing estates tacked on to well established and attractive market towns. The ten principles must be met in full, not cherry-picked and interpreted to meet the needs of the developer. E.g. one job per household and good facilities and infrastructure.

Great Easton & Tilty Parish Council

The development is in the Green Belt and would harm the open rural landscape, natural wildlife and historical gardens. Lack of infrastructure to support this development, poor public transport links, one access road and congestion on the M11 junction. Noise and disturbance from Stansted, loss of agricultural land, urban sprawl in close proximity to Great Dunmow, phase 1 would be isolated and reliant on the facilities of Dunmow, and the impact on medical and education infrastructure would be unacceptable.

Stansted Neighbourhood Plan Steering Group

Bus services will not be adequate as they get caught up in congestion and do not attract people out of cars, railway links are needed. Requires sports facilities. Too close to airport in terms of health and noise impacts.

The Gardens of Easton Lodge Preservation Trust

Ask that UDC strengthen its reference to the Gardens in the draft Local Plan and that any future planning agreements (S106 or CIL) be directed at enhancing the Gardens to enable them to fulfil their role in tourism, recreation and heritage. The Gardens of Easton Lodge are registered with Historic England as Park and Gardens (Grade II*) and are listed on The Heritage at Risk Register for the East of England. The Trustees are concerned about potential impacts of such a large development on the Gardens, and other local heritage assets within the vicinity, and consider that if there is to be development in the vicinity of the Gardens, measures must be taken to preserve and enhance the original features of the

Estate and Gardens. The Trustees whose long-term aim would be to have ownership, or security of tenure in the form of a long lease, in order to attract sustainable finance to develop and secure public access to the Gardens in perpetuity.

The Trustees request the 'buffer zone' between the Gardens and new development serves to preserve and enhance the existing entrance and setting of the Gardens. The Gardens currently have no services, the provision of water, sewerage and electricity would be essential to the long-term development and enjoyment of this amenity asset. Drainage - Page 9 indicates a SuDS scheme with attenuation ponds, part of which will affect the existing Gardens which are of particular historic interest. Car Parking and Access - The new development would cover a large area of car-parking used by the Trust on open days. Access by foot and cycle pathways to the Gardens would also be desirable. The possibility of turning the rural roads closest to the Gardens of Easton Lodge into quiet roads, with priority for cyclists and pedestrians, should be explored. The access road to the Gardens is currently designated a public footpath and the Trustees consider that this should not be used as an access road for the new housing.

Saffron Walden Town Council

Community provisions should also include land, sports facilities and pavilions. Proposed Action: This should be included in same paragraph 3 of Policy.

Anglian Water Service Ltd

AWS owns the Great Easton Water Recycling Centre and are currently in discussion with Uttlesford District Council and the site promoter in relation to sewage treatment for this site and would wish to have further discussions on this issue prior to the Local Plan being finalised. We are currently in the early stages of developing a 25 year growth forecast for our area of responsibility and are developing long term integrated strategies to manage growth. Reference is made to connections, networks upgrades and reinforcements being made to the public sewerage network to accommodate the foul flows from this development. Foul network improvements are generally funded/part funded through developer contribution via the relevant sections of the Water Industry Act 1991. The cost and extent of the required network improvements are investigated and determined when we are approached by a developer and an appraisal is carried out.

Manchester Airport Groups (MAG)

The Council needs to fully assess and make evident how it has addressed the impact of the forthcoming aviation strategy and the modernisation of airspace, on the Local Plan and the Easton Park proposed allocation. It is not apparent that there has been any work undertaken to understand the feasibility of direct high quality, frequent and fast direct public transport link to London Stansted Airport and whether it can be delivered. Crucially, the operational impact on both the airport, local and strategic roads needs to be fully investigated and clarified so that judgement can be made as to the suitability of such a link. Provision of the main vehicular access from the A120, including improvements to the A120 and M11 Junction 8 is supported and is vital for the successful delivery of development in the south of the district. The provision of SUDs drainage solutions requires careful design.

The Sustainability Appraisal's assessment of Garden Community Permutations / Options does not demonstrate that there has been adequate assessment of the implications of

national aviation policy in respect of the Local Plan and the Easton Park housing allocation. Page 230 contains the following inconclusive statement for the SA objective to reduce and control pollution. Those options that concentrate new settlements along the A120 corridor will have in contrast uncertain impacts associated with air and noise quality in so far as cumulative negative impacts cannot be ruled out at this stage. Further assessment needs to be undertaken in detail before the plan should progress, in order that interested parties can review and comment accordingly.

Key Diagram: the 'Strategic Employment Site' appears to be located over the airport terminal area, as opposed to Northside. SP2: This explicit support for the growth of the airport based on its compliance with environmental criteria is welcomed and supported. The ability for the plan to deliver this ambition is however conditional on the appropriateness of the criteria contained within SP11 (a submission to that policy is made separately).

Historic England

Significant concerns regarding development in such close proximity to Grade II Registered Park and Gardens at Easton Lodge as well as to the Little Easton Conservation Area and nearby listed buildings, in particular the Grade II* listed Stone Hall and Easton Glebe, all of which respond to a wider rural setting which contributes positively to their significance. There should be policy references to the heritage assets. The Brief Heritage Impact Assessments (HIAs) identify harm and the need for further work to be undertaken. The Sustainability Appraisal (SA) identifies negative impacts upon heritage assets as a result of this policy proposal, however this is not acknowledged in the policy or the supporting text. The Plan should make reference to the need to have appropriate regard to the existence of heritage assets in the areas and the need for proposals to have no unacceptable impact on them. The use of mitigation measures such as buffer zones should be considered.

The Thaxted Society

Consider Uttlesford to be an area where villages and towns have remained small and historically isolated. The degree of buffer and setting will be crucial to allow that essential narrative to continue, in the provision of new settlements

The Woodland Trust

Type of woodland affected (e.g. ASNW, PAWS, secondary) & grid reference Easton Park Garden Community. Within ASNW Philipland Wood/The Leys 6.5ha in 3 parcels Grid Ref: TL582245, TL584243 and TL582247.

Dunmow Town Council

Concern about the loss of natural habitat, it is a historical site, ancient woodlands with wonderful gardens and green spaces. More noise, traffic and pollution in the proximity of the airport. Lack of insight into how the local roads will cope.

A complete lack of infrastructure provision whilst site is built, exacerbated by problems stemming from Takeley and Canfield, Flich Green and the 3,000 promised but not yet built, all having to rely on the overstretched services on Dunmow. There has been no scoping reports on how Dunmow will cope when homes are occupied, or on parking. Concern that when shops are built and residents will desert Dunmow.

Tilty Parish Meeting

Object to the proposed Easton Park Garden settlement and urbanisation of rural Essex. Disproportionate level of development in this area will lead to urban sprawl of Great Dunmow. Why not spread the new development more equitably around the Uttlesford area, by adding additional housing to existing towns and villages? Local resources are already over-stretched, and the lack of any details about the provision of additional essential infrastructure. Contest the housing numbers being imposed on UDC by Central Government.

Takeley Parish Council

Has a number of concerns: coalescence with Little Cranfield and Takeley. Traffic impact on the B1256 and Parsonage Road, the A120 and junction 8; and strategic highways improvement models need to be assessed and include all planned development. Concern over impact on facilities at Dunmow. Phase 1 should consist of a mix of uses with infrastructure, not just residential development. Water pressure in the area is a major concern. Takeley must not be excluded from S106 Highway monies due to the cumulative impact on the surrounding area. Healthcare provision must be identified at Easton Park (or elsewhere). Shops particularly smaller units must be put on the open market to be sold. A large food outlet should be within easy access as well as a variety of other retail outlets to minimize car journeys and increase employment. All amenities must be in place in early in the development. It is a rural location, not suitable for high density housing. The conservation area in Little Easton will be encroached upon. Concern not enough parking to be provided at Easton Park and in surrounding areas. Concern regarding impact on funding for elderly care, bus transport, and other services (e.g. refuse, social services, police etc.)

Thaxted Neighbourhood Plan Steering Group

Concerned about the scale of proposed Easton Park development and impact on Thaxted's heritage and landscape. Concern that it will become a dormitory settlement for people employed in other locations. It is indicated that it would be serviced by an access point at the major junction on the A120 adjacent to Highwood Quarry. Traffic concerns - Amount and size of through traffic (HGVs) travelling through Thaxted; Request to see a road network specifically designed for heavy traffic, directed straight onto the A120 and also to see weight restrictions imposed on the B184 through Thaxted, preventing large delivery and construction vehicles using this route. Alternative option to develop new housing development around Birchanger – here traffic would be almost bound to use the motorway routes. The pressure on retail and other services would also be better spread between Harlow and Bishop's Stortford rather than on the much smaller Great Dunmow. The proposed Little Easton site is of great value in both heritage and landscape terms whereas the damage done at Birchanger would be considerably less.

Environment Agency

Generally supportive, however, concern over water infrastructure. The existing Uttlesford Water Cycle Study needs further detailed work. Item 7 of the policy wording should be reworded so as to emphasize that any enhancements, or new water recycling centres, are in place before any development takes place. Enhancements to the water recycling centre at Great Easton, or the construction of any new water recycling centre, new connections, network upgrades and reinforcements to the sewerage network must be in place ahead of the occupation of residential development.

Essex County Council - Environment, Sustainability and Highways

Supports future growth at the airport, and given there are known business vacancies it is welcomed that UDC is seeking to ensure that new communities are developed within the south of the district. There is no recognition that the Easton Park Garden Community is adjacent to High Wood, Dunmow SSSI, which will be enclosed from the surrounding countryside, creating habitat isolation of a nationally important site. The effects of this must be assessed appropriately. All education land allocated within the Local Plan will need to meet the criteria set out in ECC's Developers' Guide to Infrastructure Contributions (the Guide). Two smaller secondary schools would be a better fit with the Garden Community principles of reducing the need to travel (as set out in appendix 4 of the Draft Local Plan). Within the Easton Park community including the wards of Thaxted and the Eastons there are no vacancies in Early Years and Child Care provision. There is no consideration given to the impact on the potentially nationally important Roman complex on the western side of the development area or the impact on the setting of the registered gardens, or the potential of reflecting the World War II history of the site within any development proposals. ECC questions whether the measures to enhance Easton Lodge Park and Garden have been set out and costed in an on-going management and enhancement plan for the park and gardens. ECC and LS have [jointly agreed] a Statement of Common Ground, to support the UDC Local Plan at examination and beyond, by confirming the delivery of the Garden Community in line with the Essex Minerals Local Plan policies.

Thaxted Parish Council

Provisions should also include land, sports facilities and pavilions.

Natural England

Concerned that the strategic site at Easton Park and other allocations in the vicinity of Hatfield Forest may have the potential for an adverse effect, in combination, on the SSSI, in terms of visitor pressure. Consideration needs to be given potential adverse effects on the SSSI and this will need to be reflected in the SA. To be found sound we would expect the plan to demonstrate that the housing allocation proposed can be delivered without impact on the SSSI. This will likely require the identification of a zone of influence and the proposal of a mitigation package agreed with both Natural England and the National Trust.

Hertfordshire County Council

The Easton Park proposal has the potential to exacerbate issues on the A120 and Bishops Stortford. The Transport Study accompanying the consultation identifies capacity issues both in the reference case and in all development scenarios on the A120 Bishops Stortford bypass. In traffic terms scenario 10, which includes new garden communities west of Great Dunmow and West of Braintree along with smaller scale development spread across the other towns and villages, produces the best results overall. High levels of stress are however evident on the A120 corridor and there is a recognition that the current short-medium term junction improvements proposed at M11 junction 8, A120/A1250 and A120/B1383 will not be sufficient to accommodate the levels of growth proposed. The report identifies the need for further mitigation measures including the implementation of a Smart Motorway on the M11 and major improvements to M11 junction 8. No clear funding mechanism is identified so deliverability is uncertain at this stage.

Dunmow and District Chamber of Trade and Commerce

This will turn Great Dunmow into total urbanization yet you say that you want to retain the character of our town. Concern over the capacity of the doctor's surgeries, hospitals, schools and roads (A120 and M11). Concern over the loss of Grade 1 agricultural land. Concerned that the community will serve London commuters.

Developers/landowners/site promoters

Supports the concept of Garden Communities, but has concerns with various aspects of their deliverability. Policy SP6 also sets out a comprehensive and detailed list of requirements (including affordable housing, employment provision, a package of transport improvements new healthcare facilities, new local centres, 2 secondary schools, 7 primary schools and early-years facilities amongst other requirements). The need for these provisions is likely to lead to protracted S106 agreement negotiations which may well cause additional delays in the delivery of the scheme.

The SA shows that the Easton Park new settlement site is subject to a range of constraints to development. The development of the Easton Park site has the potential to limit future opportunities for growth at London Stansted Airport and has potential noise impacts from existing flight paths. The location may also have implications for any future expansion of the airport beyond its existing single runway. The proposed settlement will be entirely dependent upon road transport and bus services, which are highly unlikely to provide a suitable or attractive alternative to the private car for most journeys. This will maintain high levels of car use and will increase pressure on M11 J8. The settlement is detached from jobs growth at LSA will be poorly connected by public transport. The site will have acknowledged impacts Little Easton and designated heritage assets and their settings that cannot be fully mitigated (see Heritage Impact Assessment). The site will put significant pressure on Great Dunmow and its services and its remoteness will put particular pressure on car parking in the town. Existing minerals interests affect delivery, but also leave unanswered questions regarding the safeguarding of wider mineral assets across the site. There is and will remain a lack of modal choice for public transport, particularly towards higher level service centres such as Bishop's Stortford.

This it is not considered to be a suitable or sustainable location for a new settlement. This new settlement will significantly eclipse Great Dunmow in size and population by nearly two thirds. This could have a significant impact on the vitality of Great Dunmow which currently serves as the key focal point for the south of District. Furthermore, a new town in this location in addition to west of Braintree will result in 5 towns (Bishop's Stortford, Easton Park, Great Dunmow, West of Braintree and Braintree) and Stansted Airport located within 20 miles along the A120 which will significantly change the character and landscape of the area. Only one new vehicular access is proposed to serve 10,000 new homes. This is not considered appropriate to serve any strategic site and in particular a new settlement for 10,000 homes. This is noted within the Council's IDP which states unless an additional access point onto the strategic highway network can be identified and delivered, access to Easton Park is a risk to scheme delivery. This policy should be removed from the Plan, and the proposed 1,800 homes redistributed across sustainable and deliverable sites in District's key villages.

Individuals

The key points raised by individuals are:

- The infrastructure and public services required to sustain this settlement is not there or planned for, there are existing problems with school places, hospitals, GP surgeries and local police stations.
- The development will have an impact on local shops and facilities.
- The existing transport situation on the A120 and M11 is already congested, this development will exacerbate this.
- The existing traffic situation in surrounding settlements is already congested (e.g. Dunmow and Takeley), this development will exacerbate this.
- The existing rural road network cannot cope with the additional traffic.
- Each house will have at least two cars.
- The site has poor links to the rail network.
- The site has poor public transport links.
- The provision of community facilities and places of worship should be considered early.
- There should be genuine engagement with the local community.
- The local community does not want this development.
- The existing rural and historic location will be harmed.
- Dunmow's identity as a small country town will be harmed.
- Coalescence with Great Dunmow and Little Easton.
- The size and nature of the proposed development is inconsistent with the rural nature of the area, and will result in urban sprawl between Bishops Stortford and Braintree, dwarfing the individual discrete villages and hamlets that are part of the identity of the area.
- The development will result in the loss of high quality farmland, we should avoid importing food if possible.
- The development will destroy on wildlife habitats.
- The development will disrupt a delicate ecosystem.
- The development will result in the loss of countryside and harm an area of beauty.
- Destruction of beautiful landscape of historic significance.
- The site is a greenfield site, brownfield sites should be built on first.
- The development will impact on the historic assets in the area. These are grade I and grade II listed buildings, ancient woodlands, and Little Easton Conservation Area.
- The area is already suffering water shortage / water pressure issues, this development will make it worse.
- The development will harm the setting of the Gardens of Easton Lodge.
- The Gardens of Easton Lodge will not cope with the additional population.
- Concern that these people will not work locally, leading to increased traffic congestion.
- Concern that the new jobs will not be for local people, bringing in more commuters.
- The development is not needed, new houses in the area are already not selling.
- Dunmow has already taken 3,000 new houses.
- The development will result in overdevelopment in the area.
- The development will overshadow the picturesque Great Dunmow and Little Easton.

- The air quality near Stansted is poor.
- Noise and pollution from Stansted will make the homes here unattractive.
- Security risk for Stansted.
- The fact that the homes will be almost right under the flight path will make the unattractive and unsafe.
- Concreting over the countryside will create and / or exacerbate flooding issues.
- The area needs better bus and rail links to jobs in London and Cambridge or people will commute by car.
- The plan seems to rely on businesses relocating and so needing land to base themselves in.
- More houses will mean more waste, increasing the noise, smell etc at Dunmow Waste Transfer Station.
- The development is contrary to the Great Dunmow Neighbourhood Plan.
- The promoters will not meet Garden Community Principles.
- The Council will not achieve land value capture.
- The need for fewer larger developments rather than a greater number of smaller developments has not been proven.
- Throwing unrelated people into forced communities is social engineering.
- Easton Park is an area of outstanding natural beauty.
- The area should remain as green belt.
- I moved here to move to the countryside.
- The Council will not be able to negotiate with Land Securities in an effective way.
- Modern townhouses are not appropriate for the countryside.
- Social housing must be built.
- The government housing figure should be challenged.
- The housing apportioned to Great Dunmow is disproportionate.
- There are better sites elsewhere.
- Parking is an existing problem in the area.
- The consultation period is too short, coincides with school holidays and has not been widely advertised in the media.
- Good quality broadband needs to be put in place in the new development.
- How will rented homes with realistic rents be built into the development?
- Affordable homes are a joke if you're on normal wages.
- Younger people already have to move away as they can't afford to live in the area.
- Compulsory Purchase Orders will be a considerable cost to the taxpayer.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy can be seen to address the majority of those potential concerns raised in the 'policy off' appraisal of the site (later in this report). Significant positive impacts are realised for housing, employment, sustainable travel and access, education and infrastructure.

Positive impacts will be realised for the sustainable use of land, minimising flood risk and health and social inclusion. The Policy does not specifically mention the presence of a number of Local Wildlife Sites and two SSSIs in the area. As a result, uncertain impacts are highlighted for biodiversity at this stage, where the provision of natural and seminatural green space is included within the policy alongside ecological benefits from SuDS, which can enhance green infrastructure in the wider area, should existing designations also be protected and enhanced through the policy. Uncertain impacts have also been highlighted regarding landscape, where the location has a (partly) relatively high sensitivity to change / development and this is not addressed in the Policy as a criterion related to Garden City principles.

Alternatives Considered

The principles and requirements of this Policy are specific to the Garden Community, to which this policy relates, ensuring that aspirations surrounding sustainable development will be met from any successful proposal. In so far as the Policy ensures sustainable development, it accords directly to the presumption in favour of sustainable development of Policy SP1 and more critically, the NPPF. As such no other alternatives can be considered reasonable and the preferred policy approach has been selected.

Proposed Mitigation Measures / Recommendations

It is recommended that acknowledgement of a number of Local Wildlife Sites and two SSSIs is included within the policy, with enhancements sought where possible to enhance wider green infrastructure and networks.

It is also recommended that specific landscape evidence work is prepared to inform the development framework / masterplan for this Garden Community.

North Uttlesford Garden Community

Policy SP7 and Paragraphs 3.60 and 3.61

This policy and supporting text was responded to by 747 people/organisations.

	TOTAL
Support	20
Object	673
Comment	54

Overarching Summary

- Great Chesterford Parish Council considers there is no evidence that the NUGC site has potential or capacity for up to 5,000 dwellings given the site constraints of landscape, transport and heritage.
- Concerns that the cap of 3,300 dwellings before the strategic highways improvements is implemented will undermine the ability for the new garden community to sustain services or to be self-sufficient. Also, the highways improvements should be implemented before the development takes place.
- Details of the strategic transport improvements should be included in the Local Plan.
- Concerns about the timing of development bearing in mind the lead-in time required to prepare technical evidence and the provision of infrastructure.
- The site is not considered suitable or necessary in this location as it far from the employment sites at Stansted Airport which is where the housing need originates. There are limited jobs at Great Chesterford Science Park.

Highways England consider this site probably has the least impact upon the SRN, although M11 J10 is a site of peak time congestion caused by capacity on the A505/not the junction itself. HE support the council in its requests to improve the A505 particularly between M11 J10 and the service area at the junction of the A1301.

The Environment Agency are generally supportive of the thrust of this policy although existing Uttlesford Water Cycle Study needs further detailed work (phase 2) prior to submission of the plan to be sound

Anglian Water Services Ltd note reference to enhancements being made at Great Chesterford Water Recycling Centre in Anglian Water's ownership to accommodate the foul flows. Note role of Asset Management Plan (AMP) in provision/suggest amendment to take account of long term provision/enhancements/SUDs.

Essex County Council notes NUGC is in north of Uttlesford/close proximity to Little Chesterford, and therefore seeks to strengthen the delivery and success of Chesterford Research Park. It supports London-Stansted-Cambridge Corridor, ensuring that skilled labour force in sectors have opportunity to locate in close proximity to employment. Need early delivery of a new secondary school. Need assessment of the historic

environment/understand impacts such as on Roman Temple/its relationship to the Roman Town/conservation area.

Cambridgeshire County Council object to NUGC on transport impacts/reliant on large-scale improvements to the A505/ no scheme identified/no firm timescales for study work to begin. Also comment: The proposals for a new garden village at North Uttlesford do not raise significant education concerns.

Hertfordshire County Council is concerned over cumulative impact of development in and around Great Chesterford on the Hertfordshire network. In particular, the A505 runs to the north of the site providing east west connections to the A10 and A1. Junctions are already operating close to capacity in the Royston area and M11 junction 10 is a constraint.

Natural England given the scale of development proposed in this area expects to see consideration of impacts on Hildersham Woods and other nearby SSSIs and for avoidance/mitigation measures to be included in the policy as recommended in the SA.

Historic England welcomes the requirement for a Heritage Impact Assessment but Brief HIA (2017) already indicates site could not be developed without causing significant harm. It is unlikely that this can be satisfactorily mitigated/objection.

Harlow District Council refers to Policy SP6.1 - delivery of 10,000 new dwellings, of which a minimum provision by 2033/corresponding sentences for SP7 and SP8 do not specify figures as minima.

South Cambridgeshire District Council expressed concerns specially to the proposed North Uttlesford Garden Community regarding the sustainability of the proposal. The main issues are transport – impacts on A505, landscape, water supply, and ability to deliver facilities especially a secondary school

National Trust not clear no provision for a new country park/proposed for the other two garden villages. A new Country Park would reduce pressures on Hatfield Forest.

Most of the remaining bodies including Town/Parish Councils, developers, land owners and individuals consider North Uttlesford Garden Community as unsustainable and unsuitable, causing a number of concerns:

- **Size** - considered too large, there are several objections to the suggestion that a development of 5,000 houses can be called a village. Its footprint is considered too large compared to other existing settlements.
- Invalid basis for selecting NUGV **location**. The proposed location lacks any infrastructure to provide amenities within easy access and will instead require the need for cars. It is considered that the site will not going to meet the needs of Uttlesford residents as the site is on the northern edge of Uttlesford too far from the centres of **employment** in Uttlesford (Stansted and south towards Harlow).
- Not aligned with **Garden City principles**.
- Housing **affordability**.
- Increased housing supply for **commuters to London and Cambridge**, which will benefit more than the current residents.
- **Not serving local employment needs**.

- **Pressure on existing facilities and infrastructure** (some of them already under significant pressure): schools, health services, rail stations, parking around stations, highway network. Surgeries are understaffed, and the doctors and nurses are overworked.
- A1301/A505, M11/A505, and the A1307/Fourwentways, Junction 9 of M11/A11 require comprehensive study, and guaranteed financial commitment to the improvements.
- It is considered unrealistic to achieve 50% non-vehicles travel in the proposed new development, given high car ownership, poor bus services and lack of well-connected cycling lanes in rural area, and difficulties to cycling due to the topography.
- **Environmental impact:** flooding risks, including flooding caused by building 5,000 new homes on the upper slopes of a hill, extra sewerage, air pollution caused by road congestion and light pollution. Impact on the existing aquifer.
- **Negative impact on existing landscape**, wildlife, local rural character and heritage (particularly the Romano-Celtic Temple).
- The impact of such a large-scale development on the **water supply** or whether there will be sufficient capacity to sustain supplies in the future. The water in this area is from an aquifer.
- **Loss of agricultural land.**
- **Poor parking** for cars and bicycles around rail stations. The site is beyond reasonable walking distance from the station and there is no parking available there.
- The rural area has **no proper cycle lanes**, cycling is already hazardous and difficult due to the topography.
- **Cooperation with South Cambs considered to be poor and ineffective.**
- **Potential conflict of interest of councillors:** Uttlesford District Council is a 50% shareholder in Chesterford Research Park, and therefore it is considered that it has a vested interest in providing nearby housing and facilities to support and encourage the growth of the research park, and hence increase its return on investment
- More **transparency** is expected from Uttlesford DC. Some individuals consider that there is **very limited information currently** available to the public and the wider community directly affected by the proposed development is lacking and local residents are owed much greater detail in relation to detailed housing plans, environmental impact, funding, infrastructure and transport impact to be able to reasonably form a view of the viability of this new town. There are several concerns regarding the lack of a full and published Traffic Impact Assessment, released prior to the consultation period.
- Some concerns that the proposals would appear to be a hastily prepared submission with **minimal time for consultation** and reflection of the consequences. Some responders consider there has been an **insufficient consultation** period which took place over the summer holiday period when many people are away.

Statutory consultees and other bodies

Clare College Cambridge - Refers to NUGC housing delivery commencing in 2021/22 and that growth can continue up to 3,300 new homes before the strategic highway improvements are implemented. It is considered that highway improvements should be implemented much earlier. Furthermore, a number of the highway improvements identified, including the dualling of the A505 and works to the M11 are outside of the control of the local planning authority and cannot be relied on to support growth.

Great Chesterford Parish Council – Reference to “the potential” of NUGC is wholly unsubstantiated. There is no evidence that the proposed site for NUGC has potential or capacity for up to 5,000 dwellings in terms of landscape, transport and heritage provided by both Great Chesterford Parish Council (and indeed UDC itself) shows that it does not.

Saffron Walden Town Council - Details of the strategic highway improvements should be included the Local Plan.

Thaxted Parish Council - Details of the strategic highway improvements should be included the Local Plan.

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 - Some concerns that the proposals would appear to be a hastily prepared submission with **minimal time for consultation** and reflection of the consequences. Some responders consider there has been an **insufficient consultation** period which took place over the summer holiday period when many people are away.
 - Concerns are raised if UDC has complied with the **Duty to Cooperate** in terms of provision of housing to meet the strategic housing market areas and commitments on highway improvements with **South Cambridgeshire City Council**.
 - Some representations propose **reduction of scale of development and spread** the into established villages and small towns of area near employment sites such as Chesterford Research Park and Stansted
 - Some however noted that the north of the district was isolated for secondary schooling and that NUGC could assist in strategic provision/infrastructure
 - Bidwells and Grosvenor Britain & Ireland are the main supporters of the policy.

Statutory consultees and other bodies

South Cambridgeshire District Council (Cllr Tony Orgee)

I wish to challenge four of the assumptions in relation to the consultation, and register my objection to the inclusion in the Plan of a new Garden Community at North Uttlesford.

The Assessed Housing Need Consultation document uses a figure of 14,100 for the 'objectively assessed housing need' in Uttlesford in the period 2011 to 2033. This figure has been subject to change during the preparation of Uttlesford's Local Plan and is higher than that used earlier in the plan development process. However, following recent work, I understand that a figure of 13,332 for Uttlesford's 'assessed housing need' now seems to more justified than the 14,100 in the Consultation document.

The timeline for the final approval of this Local Plan as given in public presentations would appear to be highly optimistic. The Uttlesford projection that its Local Plan be fully approved within a year from now seems unduly optimistic.

Local Plan proves to be optimistic, then this, in turn, casts doubt on whether houses in new communities would start to be delivered to the timescale set out in the Consultation document.

The Consultation document assumes a build out rate of about 175 houses per annum for a new community at North Uttlesford. I would argue that the Uttlesford area is not typical of the whole country in regard to the national setting of build out rate. Cambourne and Cambridge Fringes, as opposed to predicted rates of build out, is relevant here, seen in this context, the build out rate projected at North Uttlesford seems unduly low.

Does the Uttlesford Local Plan need to identify sites for three new settlements or would two sites be sufficient? Can a new settlement of about 5,000 dwellings that takes about 30 years to build be sustainable and/or viable?

If Uttlesford's Local Plan is approved later than its timeline suggests then this puts back the time when houses would be built and so puts more pressure on delivering the assessed housing need by 2033. If one accepts the build out rates as in the Consultation document then it would take about 30 years to build a new settlement of about 5,000 dwellings at North Uttlesford. For a new settlement to be sustainable it needs to have new local centres for retail, business and community uses that are available at a very early stage in that new settlement's development. But with low housing numbers in the early years of development, how are retail outlets going to be viable, how is public transport [other than that already in place] going to be viable, and how expensive would it be to provide education and health services in the early years of development? Such a new settlement would appear to be heavy reliance on facilities and services at an existing larger and nearby settlement. Slow build out rates would therefore result in creating a new settlement that would be unsustainable and unviable for many years before it reached an appropriate size.

The figures given for housing growth and jobs growth in the Plan period are very similar. Principles of sustainable development mean that houses and jobs should be situated near to one another. It is hardly unexpected that Stansted Airport wishes to expand and grow, and this is possible without the need for a new runway. At or near the airport is therefore likely to

be the area of greatest jobs growth in Uttlesford over the next 15 years. It is no surprise therefore that earlier versions of the Local Plan suggested the need for two new settlements and that both of these should be along the A120 corridor. Siting new settlements within easy and close access to the airport area should therefore be a major policy in the Local Plan.

The site would have a cumulative and negative impact on South Cambridgeshire. Lack of any account taken of likely / possible local developments such as the Sawston Trade Park or growth in Haverhill, and the lack of any proposals for high quality public transport to serve the proposed new community. The site of the proposed North Uttlesford settlement lies within a Groundwater Source Zone (Zone 2) with two areas close by in Hinxton and Great Abington parishes classified as Zone 1, which gives added weight to the points made by parish councils about groundwater quality and supplies. I agree with the views of these parish councils and fully support their well thought out and clear reasons for objecting to the inclusion of a North Uttlesford Garden Community site.

Residents of a new North Uttlesford settlement would access these jobs via the A11 and A1307 (with the unstated implication that these will be jobs at the Cambridge Biomedical Centre, Granta Park and the Babraham Campus). If the proposed North Uttlesford settlement were to be built then some residents would want to access West Cambridge sites, and this could only result in increased rat running through villages such as Duxford, Hinxton and Ickleton, as has been pointed out by the relevant parish councils, because of congestion along the A505 and at its junction with the A1301, and the lack of any north-bound access onto the M11 at Stump Cross. The new Haverhill residents will want / need to access Cambridge, and this can realistically only be along the A1307, a road that is already at capacity but which the proposed North Uttlesford settlement depends on for its residents to access Cambridge. Rail stations only served by stopping trains only and fast trains on the Cambridge – Liverpool Street line stop at Whittlesford Parkway and Audley End. There are no plans in the foreseeable future to upgrade Great Chesterford Station. Future rail commuters in the Great Chesterford area would continue to have to travel to Whittlesford or Audley End, with the resulting congestion, to access fast rail travel north or south. The lack of any rail upgrade, any upgrading of motorway junctions at Stump Cross or Duxford or any high quality transport proposals, means that, rather than being a sustainable location, the proposed new North Uttlesford settlement would have a sustained and negative impact on its surrounding area.

The consultation has taken place over the summer. The outcome of the consultation is likely to lack credibility with the public. We would strongly urge the local authority to ensure that any future consultations are timed so that they can be genuinely meaningful and effective offering realistic opportunities for comprehensive public engagement.

South Cambridgeshire District Council

South Cambridgeshire District Council (SCDC) welcomes the opportunity to comment on the emerging draft Uttlesford Local Plan. The main proposal with implications and impacts for South Cambridgeshire is the proposed North Uttlesford Garden Community (NUGC) and comments are focused on that proposal. Engagement has taken place between officers and Members of the two Councils and with Cambridgeshire County Council to seek to understand the emerging proposals and their potential impacts for South Cambridgeshire

and the adequacy of the supporting evidence. A number of questions about the evidence and rationale for the proposed NUGC are raised in these representations to ensure the Council has a better understanding of the case for the new settlement. At this stage, the Council is not convinced that the evidence provided clearly supports the proposal and is concerned that there could potentially be negative implications for South Cambridgeshire. However, the Council wishes to continue to engage positively and productively with Uttlesford District Council (UDC) to develop a clear understanding ahead of the next stage in the plan making process. As such, no view has been expressed to date on the principle of the emerging NUGC proposals.

Local Planning Authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. These duties apply to both UDC and SCDC. As stated above, SCDC is engaging at officer and Member level with UDC and will continue to do so. A key consideration for SCDC in considering whether the Uttlesford Local Plan is soundly based, is whether it is 'sustainable' in terms of its environmental, social and economic impacts as required by national policy guidance in the NPPF and whether it is supported by robust evidence. Part of this consideration includes taking a strategic view on whether there are potential advantages for South Cambridgeshire arising from the NUGC proposal as well as any potential disadvantages, and also considering the local impacts and implications of the proposal. The NUGC would provide new homes close to existing and planned jobs in regard to the three nearby research institutes and science parks in South Cambridgeshire (Wellcome Genome Campus, Granta Park, and Babraham Institute) and SCDC is aware that they have plans for continued growth. The life sciences cluster extending south from the Cambridge Biomedical Campus is widely recognised as being of international importance and appropriate continued sustainable growth (which the provision of nearby homes could assist), is considered to be important for both the local and national economy, notwithstanding that some emerging proposals are yet to be considered through the planning process. These new homes have potential to contribute to meeting housing needs in the area, providing local supply of market housing and providing choice. The NUGC could also potentially help to reduce pressures for strategic growth south of Cambridge in the context of next Local Plan for Greater Cambridge, to be prepared jointly between SCDC and Cambridge City Council, work on which is due to commence by 2019 as promised in the Greater Cambridge Partnership (formerly the Greater Cambridge City Deal) agreement. Alternatively, the Council considers that there is a risk that the NUGC could constrain the future growth of the three nearby research institutes and science parks in South Cambridgeshire by overloading local transport infrastructure, taking up additional capacity that could be created in the local road network in South Cambridgeshire through more local mitigation measures (as opposed to strategic improvements, particularly to the A505 for which there is currently no scheme or committed funding). All of the sites have growth aspirations, for example the Wellcome Trust Genome Campus have published a 25 year vision for growth on land located to the east of the existing campus. There is also a risk that NUGC could prevent or reduce potential for consideration of whether there are better alternative housing-led options to support the growth of the life sciences cluster south of Cambridge. SCDC is of the view that even if the NUGC were demonstrated to have considerable advantages for both districts, it should not be allocated for development unless it can be demonstrated that its allocation in the Uttlesford Local Plan would be both sound and sustainable. SCDC recognises that the emerging Uttlesford Local Plan is positively

prepared in the sense that it seeks to meet objectively assessed development needs, but considers that questions remain in particular over the transport and landscape implications and impacts of the proposal. SCDC has outstanding concerns that the NUGC proposal may not be able to deliver all the necessary transport infrastructure to enable its development, both in relation to the complete 5,000 dwelling garden community or for the 1,900 dwellings proposed by the emerging Uttlesford Local Plan for delivery by 2033. It is particularly important that any new settlement is supported by appropriate transport infrastructure and that the impacts of development can be adequately and appropriately mitigated. This view is informed by considerable experience in South Cambridgeshire in planning and delivering new settlements. A number of concerns have been identified with the transport evidence supporting the NUGC which, unless capable of being satisfactorily addressed, would in SCDC's view call into question whether its inclusion in the Local Plan would meet the NPPF tests of being justified or effective. SCDC is involved in ongoing discussions with Uttlesford District Council, and including Cambridgeshire County Council, which aim to fully understand the assumptions made and their potential implications for understanding the transport impacts on South Cambridgeshire. SCDC considers it important that transport evidence for the emerging Uttlesford Local Plan takes full account of the fact that the highway network in this area of South Cambridgeshire already experiences severely congested conditions at peak times, with the A505 between Royston and the A11 being one of the most heavily trafficked routes in Cambridgeshire. In addition many of the junctions in the area are already extremely congested at peak times, particularly around the junction with the A505 and A1301 and at Junction 10 of the M11. This congestion already results in rat-running through local villages to avoid the A505 including in the villages of Hinxton, Ickleton and Duxford. The transport studies informing the emerging Uttlesford Local Plan should also take full account of growth that is already planned not only in Uttlesford but in the area surrounding the NUGC and potentially affected by it, in order to properly understand the impacts arising from the new community. Based on our understanding of the transport evidence, it currently appears to SCDC that the district wide Transport study and the South Cambridgeshire Junction Study have not taken account of the full extent of planned employment growth in Cambridge and South Cambridgeshire. The junction study states that it has taken account of 24,042 new jobs across the two districts, whereas the two Local Plans are planning to provide for the 44,100 jobs forecast by our economic evidence. This means that the transport studies that are intended to support the emerging Uttlesford Local Plan appear not to have taken account of 20,058 planned extra jobs in Cambridge and South Cambridgeshire. SCDC is concerned that this is potentially a significant flaw, especially in the context of the growth aspirations of the three research institutes and Science Parks in the south of the district. It seems that the studies have not taken any account of planned growth in West Suffolk at Haverhill on the A1307 for 5,000 homes over the plan period, much of which will rely on the A1307 to access jobs in the Greater Cambridge area and especially at the Cambridge Biomedical Campus. The importance of this link and its inadequate capacity explains its inclusion in the Greater Cambridge Partnership's A1307 project. This is important because the NUGC is also stated to rely on the A1307 for the majority of vehicle journeys to the north towards Cambridge. Those residents who need to access the employment areas to the west and north of Cambridge via the A505 and M11 will add to the pressure on the A505 and lead to additional village rat-running. SCDC also notes that the junction study does not seem to take account of planned growth around Royston in North Hertfordshire when it does take account of distant growth in Harlow, Chelmsford and Epping Forest. There are therefore a number of technical queries in relation to the transport

evidence SCDC wishes to follow up with Uttlesford District Council through continued engagement, which we consider could have implications for the soundness of the evidence and influence our other comments. SCDC has also considered the proposed NUGC proposal in the context of the NPPF requirement for Local Plan proposals to be deliverable and viable. The South Cambridgeshire Junction Study states that road mitigations exist to support the delivery of 3,300 homes at the NUGC site, for which it provides initial costings of £7.5m to £11m. However, no mitigations for the full 5,000 home site have been identified which in SCDC's view raises questions about its deliverability and therefore the effectiveness of the Local Plan. It also seems clear that the viability evidence supporting the NUGC site has not taken account of up to £10m of mitigation measures. Setting aside questions about the robustness of these figures, it appears that the viability study has not taken account of a considerable additional expense and SCDC urges UDC to consider carefully whether there is robust evidence to show that the NUGC is deliverable and that the plan including the NUGC is effective. The delivery of these 3,300 homes would remove any 'spare' capacity on the Cambridgeshire highway network close to the Uttlesford border, with implications for future growth in this successful and dynamic part of South Cambridgeshire, ahead of considerations of the development strategy looking beyond the current emerging South Cambridgeshire Local Plan time horizon of 2031. The Mayor of the new Greater Cambridge and Greater Peterborough Combined Authority has identified as a priority preparation of a non statutory spatial plan for the area and Cambridge City and South Cambridgeshire District Councils have committed to starting work on a joint Greater Cambridge Local Plan by 2019. UDC recognises that for the full NUGC development to come forward it is likely to require a major upgrade to the A505. Upgrading of the A505 is recognised as being an important scheme for the southern part of South Cambridgeshire, but there is currently no scheme or identified funding and therefore no certainty that major improvements will come forward in the time frame to deliver the full NUGC. Under these circumstances SCDC understands that only a smaller new settlement would be able to be delivered. If this were to be the case, SCDC has questions about the sustainability of a smaller settlement, including whether it would be able to support a secondary school, which the council regards as a fundamental requirement of achieving a sustainable new settlement. SCDC acknowledges that the proximity of the NUGC to the station at Great Chesterford is a potential advantage; however the station currently supports only a limited number of stopping services unlike the stations at Whittlesford Parkway and Audley End. SCDC considers that development of NUGC could be expected to add to the pressure on those stations and on the local roads providing access to them. The development of the NUGC, according to the evidence supporting the draft Uttlesford Local Plan, would have significant negative impacts on landscape. SCDC does not consider that it has been demonstrated at this stage that these can be appropriately mitigated or that it is possible to develop the new community avoiding ridgelines and elevated valley sides. The Council considers that major development on the site could appear to be an alien and intrusive element in the local landscape which would be visible in long distance views. SCDC has not been able to identify anywhere in the evidence supporting the emerging Uttlesford Local Plan where it has been demonstrated that reasonable alternatives do not exist which would have a reduced impact on the landscape. For SCDC, these points call in question whether a Local Plan including the NUGC would meet the NPPF test of being appropriately justified. Turning to other infrastructure issues. There are known downstream flood risks below the NUGC site and potential impacts on the aquifer which underlies the site. Both are matters which are the statutory responsibility of the Environment Agency who will consider both

matters in their comments on the Local Plan. The potable water supply for Cambridge and South Cambridgeshire delivered by the Cambridge Water Company is all derived from groundwater supplies and SCDC considers that it must be demonstrated that the NUGC would not jeopardise or reduce this supply. The Council does not yet consider that the consistency of the NUGC proposal with the environmental policies of the NPPF has been demonstrated. The Water Cycle Study reports that a new or extensively upgraded water recycling centre will be required to serve the NUGC but there appears to be no mention of this in the New Settlement Economic Viability Study entry for the NUGC, nor is any allowance made for the cost of supplying potable water to the site. A sustainable garden community would have a secondary school at its heart. As referred to above, it is unclear to SCDC whether a development capped at 3,300 homes by the capacity of the local roads would be large enough to support a secondary school or that its provision would be viable and so deliverable. This would be important for the consistency of the NUGC proposal with the social and place making policies of the NPPF to be demonstrated. The timing of delivery and implications for existing secondary schools in the area, including on South Cambridgeshire is not clear. SCDC is concerned that if a secondary school is not provided early in the NUGC development some children would need to travel to Cambridgeshire Village Colleges in Sawston and Linton (if they have any capacity to accommodate them), adding to the traffic on local roads especially in the morning peak. SCDC notes that the Uttlesford Local Plan Housing Trajectory assumes that no more than 175 dwellings a year can be delivered at the NUGC and Easton Park Garden Communities and 150 dwellings on Land West of Braintree. It has been said that these rates are supported by evidence but it remains unclear at this stage what this evidence consists of. The annual delivery rates assumed for large scale developments that will build out beyond the plan period are an important consideration because of their implications for overall housing delivery. NUGC is located in a desirable location and SCDC considers it is worth questioning carefully whether the assumed annual average completion rates are the most appropriate. The site developers state that they can deliver homes at higher annual rates. SCDC's own demonstrable evidence from Cambourne shows that average rates of around 220 homes a year over several economic cycles can be justified for South Cambridgeshire. This evidence was accepted by objectors at the South Cambridgeshire Local Plan Examination who proposed that 250 dwellings a year would be a reasonable assumption in relation to Northstowe, Waterbeach and Bourn Airfield new settlements. It is also noted that the emerging Braintree Local Plan itself allows for 250 completions per year on its portion of the Land West of Braintree garden community site. One implication of the build-out rate assumed for NUGC is that NUGC residents will remain dependent for longer upon Saffron Walden and other settlements for access to services and facilities. The Local Plan is unclear on how this impact is proposed to be mitigated. SCDC suggests that a reasonable alternative option which could be explored would be to increase the delivery rate at Easton Park to 250 homes a year which could boost delivery by 675 homes by 2033 which in combination with other alternative sites could mean that the NUGC site would not be needed. This may not prove to be the most appropriate strategy for the Uttlesford Local Plan but this has not yet been demonstrated as part of evidence supporting the NUGC proposal. It could also potentially allow for first completions on one or both of the other new settlements proposed for first completions in 2021/2022 to be set back by a number of years to be more realistic and in alignment with evidence from elsewhere on the time taken to get first completions at major new settlements. At the earliest, adoption of the Uttlesford Local Plan is not expected until Spring 2019, and it is not clear whether any decision has yet been made whether NUGC

policy SP7 will be supplemented by preparation of an Area Action Plan or a Supplementary Planning Document (the preparation of which will take up at least a year). Whilst some time can be saved by twin tracking planning processes there are practical limitations to what can be achieved by doing so. SCDC is also expecting first completions on new settlements at Bourn Airfield and Waterbeach New Town in 2021/22. However, the South Cambridgeshire Local Plan was submitted for examination in 2014, adoption is expected in Spring 2018, the site promoters have been in place for many years, and SPDs are already in preparation for both sites. SCDC suggests that UDC gives further consideration to these questions and whether it is realistic to depend upon first completions at the NUGC in 2021/2022. If the NUGC allocation is retained in the emerging Uttlesford Local Plan moving forward, SCDC proposes that the following changes to Policy SP7 should be considered by UDC:

Paragraph 4 - include a requirement for 'reliable and high quality' public transport services and make explicit mention of Granta Park, the Babraham Research Campus and Whittlesford Parkway Station as destinations and employment parks.

Paragraph 5 - make explicit reference to junction improvements at junction 10 on the M11, and also to improvements to the junction of the A1307 and A505 that may be required once proper consideration has been given to growth at Haverhill and job growth in Cambridge and South Cambridgeshire. The wording that transport contributions 'will be sought' is also not a clear requirement and should be strengthened. The policy should commit to the development mitigating its impact on these junctions, and also to the provision of mitigation measures in villages all around the site. Paragraph 5 should also be clear it is referring to Babraham Park & Ride.

Paragraph 7 – amend to commit to providing sustainable drainage systems which limit downstream runoff to existing greenfield rates as a minimum and to providing appropriate betterment as a planning gain for communities downstream.

Paragraph 11 - include a policy requirement to prevent the development of ridgelines and elevated valley sides, given that the NUGC proposal is not supported by evidence which demonstrates that it would have an acceptable impact on the local landscape. SCDC intends that the above comments are constructive and helpful to UDC as it moves forward with the emerging Local Plan, and wishes to continue to engage with UDC during the plan making process. Policy SP7 (point 1 (page 36) Comment: This state's 5000 homes but on page 35 paragraph 3.61 notes restrictions to 3,300, this is contradictory? Proposed Action: UDC to clarify this point. Policy 7 (point 4) (page 36) Comment: Transport Choice, how will this be achieved? What preventative measures will be put in place to reduce or mitigate against increased traffic flow from development from the rural footprint connecting Dunmow or the newly proposed little Easton garden village through to Thaxted? Proposed Action: Policy should include some mitigation for increased traffic in/out of SW & Dunmow and its surrounding rural villages and towns. Policy SP7 (point 5) (page 36) Comment: Access strategy, refers to northbound traffic but what about southbound traffic? This directly relates to the over-use of the B184 and its lack of provisions to host additional traffic flow between the proposed Little Easton Garden village and its neighbouring villages and towns travelling towards both Cambridge and Saffron Walden. Proposed Action: There needs to be contributions towards capacity improvements in Saffron Walden and Southbound traffic too (i.e. cutting cross country to Stansted/Thaxted/Gt Dunmow and beyond).

Saffron Walden Town Council

Access strategy, refers to northbound traffic but what about southbound traffic? Proposed Action: There needs to be contributions towards capacity improvements in Saffron Walden and Southbound traffic too (i.e. cutting cross country to Stansted/Gt Dunmow and beyond) Comment: Community provisions should also include land, sports facilities and pavilions Proposed Action: This should be included in same paragraph 3 of Policy Comment: Transport Choice, what is this and how will it be achieved? What preventative measures will be put in place to reduce or mitigate against increased traffic flow from development into / out of Saffron Walden? Proposed Action: Policy should include some mitigation for increased traffic in/out of SW

Duxford Parish Councils (Hinxton, Ickleton, Pampisford, Sawston and Whittlesford)

We consider the basis on which the site of NUGV has been chosen for your Local Plan to be a travesty of the planning process. It is a gross neglect of civic responsibility to pick on a site for a new town which is intended to grow to the size of Saffron Walden, the largest town in Uttlesford, simply on the basis that the landowners in question wish to sell the land. The fact that the proposed perimeter of the NUGV is largely defined by the Essex/ Cambridgeshire county boundary underlines the arbitrariness of this decision. There has been no commitment from either the developers or from Uttlesford DC that the proposed development would be consistent with accepted Garden City principles and obligations. We cannot see that the proposal has any merits. It is portrayed to help meet the housing needs that Uttlesford DC has to deliver, but in practice it will not do so appropriately because, as outlined by Bidwells at a recent parish council meeting, the majority of the expected new residents would be employed in South Cambridgeshire rather than in Uttlesford. It will overwhelmingly serve as a bedroom community for Cambridgeshire. As such, would not serve Uttlesford, but it would have a huge impact on South Cambridgeshire. The implications for South Cambridgeshire of a large new town on this site on the county boundary would be profoundly damaging. The B184 is wholly inadequate to provide access southwards towards Saffron Walden. There is no proposed access to the east. Access to the north and west and the northbound M11 would directly impact upon an already overburdened A505 (and, particularly during commute hours, the A1301) and substantially increase rat-running through the villages of Hinxton, Ickleton, Duxford, Whittlesford and beyond. The large hilltop and hillside site proposed for NUGC is totally out of character for the region. It would have a serious negative impact on an otherwise attractive rural landscape. It would be entirely inappropriate to site a new settlement above the main aquifers for our area, which is 97 per cent dependent on artesian water. As a major part of its watershed, it would alter the water run-off of the River Cam in unpredictable ways for our villages downstream which are already vulnerable to flooding. It would also be South Cambridgeshire that would have to deal with the very substantial sewage disposal and pollution implications of the proposed new town.

Elmdon & Wendens Lofts Parish Council

Location: It is difficult to justify why this location has been chosen for a new town. It does not fall within UDC's definition of the Strategic Housing Market Area. There has been no demonstrable need for 5000 houses other than as an overspill for Cambridge and London. There appears to be no serious studies for the provision and upgrading of utilities currently

available. Who will fund the upgrading of the supply of water, electricity and sewerage? This will be in addition to requirements of other projects such as the Agritech site in the same area. One suspects that these issues would be addressed after the problem has arisen, but at whose expense.

Saffron Walden is already overcrowded with vehicles and badly in need of a bypass, plans for which do not seem to be forthcoming. The notably poor maintenance of the road surfaces in the centre of the town are an embarrassment and clearly indicate that no expense will be available for improving the existing road structures. There is no mention of the developers having to put in any infrastructure. Additionally any improvements to access the M11 will not be considered until after there is shown to be a need and Essex Highways are on record that they will not fund them.

After the 7.04 am Audley End to Liverpool Street, commuter trains have no spare seats. Parking at Audley End and Whittlesford stations are at capacity (Great Chesterford has about 15 parking spaces) and Network Rail will not and probably cannot provide more capacity.

There appears to be no proposals to provide capacity for primary or secondary education or medical facilities from the day one. Local schools are at capacity, in fact with the closure of the Walden School (Friends) potential capacity must be reduced. Similarly, primary medical facilities, Addenbrookes and the Saffron Walden Community hospital are at capacity. In addition with the downsizing of the Police station in Saffron Walden, yet still with 36 crimes recorded for Uttlesford in the Police Partnership report dated 19 August 2017, lack of policing will become even more of an issue.

The new town will be built on a hill, clearly visible for miles - a blot on the landscape. Archaeological Heritage - Apparently not investigated. There is an underground water aquifer between Sawston and Great Chesterford. Drawing on these supplies could cause serious and detrimental effect to local businesses and residents. Further 461 hectares of prime farm land with ancient drainage systems will be disrupted and partly concreted over creating potential for rapid runoff and flooding, as already experienced in parts of Saffron Walden where new housing developments have taken place. There is misnomer in calling a development of 5000 houses, a Garden Village. This is a town and should comply with the Garden City Principles of the Town and Country Planning Association. This proposal fails to comply with just about all of their 9 principles. To summarise: Elmdon and Wenden Lofts Parish Council are very much against this proposal.

Pampisford Parish Council

Strongly opposes the inclusion of this site for such a large development in the Uttlesford District Local Plan. The choice appears to have been made because landowners are willing to sell agricultural land relatively near junction 9 of the M11. It is not realistic in a rural area to expect residents to use only bicycles and public transport. There will therefore be an enormous increase in car journeys, as well as vans, and heavy goods delivery vehicles using already crowded South Cambridgeshire roads. There are no detailed plans included on what changes could be made to the current road system nor how they would pay for in Cambridgeshire and Essex. Assumptions have been made that vehicles can use the A1301 and A505 to access the M11 at junction 10, to travel north. The 'McDonald' roundabout

cannot cope with the current traffic which already backs up from all direction over several miles, this includes regular queuing on the hard shoulder of the M11 at junction 10. In the driest part of country, using Anglian Water's calculations, water consumption for this settlement would be at least 2 million litres a day. The site is planned for the chalk hills, which provide water for surrounding communities. 97% of the water supplied by Cambridge Water comes from boreholes drilled into the chalk strata south of Cambridge. Siting a large community here will reduce the recharging of the aquifer and so reduce the water available locally to existing residents as well as any future ones. Landscape character: 'New growth does bring environmental pressures and these need to be planned for in a strategic way to minimise undesired impacts' ...Department for Communities and Local Government Green Paper: Homes for the future: more affordable, more sustainable, July 2007 There is no evidence of this being considered. To destroy the existing uplands and valleys, and in a manner which is likely to permanently scar the sky-line; reworking the present siting of the development to make it less obvious from Great Chesterford will merely expose the development to settlements in South Cambs, in particular Hinxton and Ickleton. Though acknowledging that Uttlesford District Council have to include a large number of new dwellings in the Local Plan, Pampisford Parish Council consider that placing such a settlement on the border of their district inappropriate. It will have adverse impacts on the lives of all local residents. There is no indications on how the changes in infra-structure will be funded. This development is not appropriate for the needs of current or future residents of Uttlesford.

Little Chesterford Parish Council

As part of the Regulation 18 consultation I wish to submit the following observations and objections to the UDC draft Local Plan relating to the proposed development outside Great Chesterford: Housing need (e.g. number of houses required, location, affordable housing for Uttlesford residents) Detail within the draft local plan (e.g. amount of detail included for in draft local plan consultation document) Garden Village Principles (e.g. concerns regarding compliance to Garden Village Principles) Transport infrastructure (e.g. issues with the draft proposal relating to road, rail, bus, cycle, pedestrian transport) Schools (e.g. current capacity, impact of new residents on school provision and the timescale for building of new facilities for nursery, primary, secondary schools and further education) GP surgery, community and hospital healthcare provision (e.g. current capacity, impact of new residents on healthcare provision and the timescale for building of new facilities) Employment (e.g. new and existing employment opportunities for potential residents, catering for those employed in Uttlesford and requiring housing, catering for those employed and living outside Uttlesford) Retail and Leisure provision (e.g. detail of retail and leisure infrastructure and timescale for development in draft local plan) Landscape considerations (e.g. agricultural land usage, visual impact for local villages in Uttlesford and South Cambs, building on natural ridge, damage to local rural landscape) Archaeology (e.g. considerations for protection of an area rich in archeological heritage) Flood risk, water availability and sewerage considerations (e.g. building affecting water run off into Cam valley, natural chalk aquifer serving South Cambs villages, pressure on sewerage facilities) Pollution and air quality (e.g. congestion and construction related pollution and poor air quality, light pollution).

Quendon & Rickling Parish Council

We have some concern, particularly with regard to the Great Chesterford site, that if easy access to the M11 is not provided there would be a substantial increase of traffic on the B1383 to the south.

Hadstock Parish Council

We have not had the opportunity to meet and discuss the Plan. Hadstock village centre is about three miles from the proposed Garden Village in Great Chesterford parish. I am concerned that its development could have detrimental effects on natural and environmental characteristics in Hadstock and the surrounding area. I request that you permit any such comments to be considered after our meeting on 7 September.

Hadstock Parish Council resolved that the proposed development named North Uttlesford Garden Community could have long term detrimental effects to the natural and environmental characteristics in Hadstock and surrounding area

Sawston Parish Council

It is a gross neglect of civic responsibility to pick on a site for a new town which is intended to grow to the size of Saffron Walden, simply on the basis that the landowners wish to sell the land. The fact that the proposed perimeter of the NUGV is largely defined by the Essex/Cambridgeshire county boundary underlines the arbitrariness of this decision. Nor does the Local Plan's attribution of Garden City status appear to have any validity. There has been no commitment from either the developers or from Uttlesford DC that the proposed development would be consistent with accepted Garden City principles and obligations. We cannot see that the proposal has any merits. It is portrayed to help meet the housing needs that Uttlesford DC has to deliver, but in practice it will not do so appropriately because, as outlined by Bidwells at a recent parish council meeting, the majority of the expected new residents would be employed in South Cambridgeshire rather than in Uttlesford. It will overwhelmingly serve as a bedroom community for Cambridgeshire. As such, would not serve Uttlesford, but it would have a huge impact on South Cambridgeshire. The implications for South Cambridgeshire of a large new town on this site on the county boundary would be profoundly damaging. Let us summarise very briefly the key points. With regard to traffic, the B184 is wholly inadequate to provide access southwards towards Saffron Walden. There is no proposed access to the east. Access to the north and west and the northbound M11 would directly impact upon an already over-burdened A505 (and, particularly during commute hours, the A1301) and substantially increase rat-running through the villages of Hinxton, Ickleton, Duxford, Whittlesford and beyond. The large hilltop and hillside site proposed for NUGC is totally out of character for the region. It would have a serious negative impact on an otherwise attractive rural landscape that dominates much of South Cambridgeshire (and North Uttlesford, for that matter). It would be entirely inappropriate to site a new settlement above the main aquifers for our area, which is 97 per cent dependent on artesian water. As a major part of its watershed, it would alter the water run-off of the River Cam in unpredictable ways for our villages downstream which are already vulnerable to flooding. It would also be South Cambridgeshire that would have to deal with the very substantial sewage disposal and pollution implications of the proposed new town. The site falls within the OAN of South Cambridgeshire. Uttlesford lies outside the Greater Cambridge Housing Market area and the area covered by Cambridgeshire and West Suffolk Homelink. Affordable housing provided in this development would not therefore

be available to South Cambridgeshire residents. On the other hand, most of the transport infrastructure pressures would fall on Cambridgeshire, yet Cambridgeshire would not have access to the substantial yield of New Homes Bonus from these dwellings, to fund any mitigations beyond the minimal ones suggested in the South Cambridgeshire Junctions Study.

Paragraph 4 of Policy SP7 refers to the provision of ' high quality, frequent and fast public transport services to Saffron Walden, Cambridge, Great Chesterford rail station and nearby employment parks '. It is far from clear how these would be provided, bearing in mind that they would be bus dependent and the supporting South Cambridgeshire Junctions Study (SCJS) accepts that the A1307/A505 'McDonalds' Junction south of Sawston is currently close to capacity, experiences significant congestion at peak times and only offers improvements on a 'nil detriment' basis up to 2,800 dwellings at Gt.Chesterford, after which further works would be needed (SCJS., p.33, 8.3.4) . The current, hourly, CITI7 service has scheduled journey times of 72 to 79 minutes between Great Chesterford and central Cambridge, a direct journey of 16km, but peak hour delays can extend these journey times considerably. Diversion of the route into the new settlement and possibly nearby employments parks is likely to add significantly to these already excessive journey times. Whilst it would be possible to increase frequency, the resultant service would be neither ' high quality ' nor ' fast '. Although rail is not specifically mentioned in this paragraph, its contribution to the overall transport strategy is implied by the aspiration to provide a transport link to Gt. Chesterford Rail station and suggested in the promoters' prospectus. Gt. Chesterford is the least used rail station within Uttlesford (Uttlesford Local Plan Transport Study, (ULPTS) Table 13, p.45) and enjoys few facilities (ULTPS, Table 12, p.43). It currently offers an hourly service at peak times with a journey length to Liverpool Street of around 70 minutes. Faster and more frequent services are accessible from Audley End and Whittlesford Parkway. The ambition of the promoters of carrying out a major upgrade of Gt. Chesterford and improving the frequency of service (North Uttlesford Garden Village Response to Councillors' Questions (RCQ) on 27/03/2017, Question from Cllr. Dean, 6.0) are subject to significant site constraints and are highly dependent on a satisfactory outcome to negotiations with Network Rail and the train operator. It is very likely therefore that Audley End and Whittlesford Parkway will be the stations of choice for rail commuters to London and Cambridge respectively, at least in the early stages of the development and possibly much longer, putting additional traffic onto the A1301, A505 and B1383. We note the promoters' suggestion of a contribution towards a station at Addenbrookes (RCQ Para 5.3 Bullet Point 9), but question whether, without track doubling, there is sufficient rail capacity North of Shepreth Branch Junction to accommodate a stopping service of sufficient frequency to make this an attractive option (Transport Strategy for Cambridge and South Cambridgeshire, 2014, p. 4-14).

Point 5 of policy. The SCJS is quite clear that not only are the relevant sections of the A1301 and A505 currently at over 90% capacity, but that the suggested improvements will be 'nil detriment ', (SCJS., p.38, para. 9.2.14) only meeting the projected increased flows generated by NUGC. The calculations also assume a 15% modal shift away from the car as a means of travel to work (SCJS, p.33, para. 8.3.5) and so if this figure is not achieved, the congestion will be worse than it is at present, despite the junction upgrades, and will certainly be no better. Little consideration appears to have been given to the effect of developments already permitted at Granta Park (S/1109/15/FL, S/2254/15/FL &

S/2738/16/FL) and the Babraham Research Institute (S/1676/14/OL – reserved matters & discharge of conditions approved in 2017), let alone further proposals currently being actively promoted in South Cambridgeshire i.e. Sawston Trading Park, Pampisford redevelopment, ~1,000 employees, outline application S/2284/17/OL submitted to SCDC, 30/06/17, Smithson Hill Agritech and Wellcome Trust, The Campus Vision , p.6). It is also likely that the unoccupied former Spicers site adjacent to the A1301 Sawston bypass, (218 Ha, 37,160 m² current employment space) will come back into use during the plan period. This is one of the largest employment sites in South Cambridgeshire and could potentially accommodate over 2,000 employees. Consideration should also be given to the effect on the A1307 and the Fourwentways Junction of the traffic generated by the 3,910 houses allocated in Haverhill in the adopted Haverhill Vision, 2031 (p.24), part of the St. Edmundsbury BC Local Plan. The suggested junction improvements are minimal, unambitious, and are insufficient to cope with the full extent of development proposed (SCJS., p.33, 8.3.4). A dual level junction between the A505 and A1301 would be required to offer sufficient capacity in the long term. The SCJS in referring to a potential dualling of the A505 between M11 Junction 10 and Fourwentways appears to ignore the physical constraints along the section between OS Grid References TL 48851 47300 and TL 48036 47059 (the Eastern access to Whittlesford Parkway to the junction with Moorfield Rd., Duxford). It is also surprising, given the size of the proposed development, that very little thought appears to have been given to an upgrade of M11 Junction 9 to all movements. It is noted that at Cambourne, two km of dual carriageway and a two level junction was obtained as part of the S106 for a development with an original design size of 3,300, 66% of that proposed at Gt. Chesterford. We consider that the M11 Junction upgrade should be a precondition of development on this scale in this location. We are also concerned that the SCJS was limited to the A505 corridor between M11 Junction 10 and Fourwentways. No consideration appears to have been given to the effect on the wider network, especially traffic flows on the A1307 towards Cambridge, the A1301 North of Sawston and on M11 Junction 11 (Trumpington), Hauxton Rd. and Addenbrookes Rd. which already experience severe congestion at peak times.

Point 11 of policy: The Landscape Assessment accompanying this proposal accepts that the site is of high sensitivity (Land at Great Chesterford, Landscape and Visual Appraisal, June, 2017.(LVA), p.8, para 3.3.4 & p.16, para.6.2.2), defined as development ‘ being unlikely to be capable of being absorbed, and a presumption against development unless overriding need’ (LVA p.8, para.3.3.5). It notes that the site is located ‘ on sloping land which forms part of the slopes and plateau of a ridgeline formation ’ and that levels within the site rise from 45m to 100m above datum (LVA, p.10, para. 4.2.1, 4.2.2). The land falls off to the North, West and South. Land to the North is flat , making the site potentially visible as far away as Magog Down, Stapleford, (7.5 km) to the North and the Western slopes of the Cam valley (~4km). The LVA suggests that any development proposals should be restricted to the valley slopes and the ridgeline plateau (LVA, p.15) and the promoters have responded by producing an outline illustrative masterplan which appears to show the bulk of development concentrated in three shallow re-entrants facing West. This pattern of development would be highly visible from the West, the B184 and M11 and locations along the West side of the Cam valley. A major settlement in this location is therefore in conflict with the Local Plan ‘Spatial Portrait Vision and Objectives, Objective 3a, Bullet Point 2 ‘ Conserving and enhancing the natural environment and varied landscape character, reflecting the ecological and landscape sensitivity of the District. It is also in conflict with Local Plan Policies SP10

(loss of high grade agricultural land) , EN8, C1 and since it is likely to result in a significant increase in light pollution, Policy EN19,. The site lies over a chalk aquifer which is described in the Uttlesford District Water Cycle Study Stage 1 (WCS1) Table. 7-10, p.63, as being major and of high to medium sensitivity. The chalk aquifers South of Cambridge are a major source of potable water for the entire sub-region and are important to preserve. Development clearly reduces the permeability of the site and whilst runoff may be captured and returned to the aquifer, such water is likely to be contaminated. Chalk contains fissures which would potentially reduce the filtering ability of the rock and allow pollution to enter the aquifer. It is important therefore that a thorough understanding of groundwater flows throughout the site is obtained before development is permitted. (Uttlesford District Water Cycle Study Stage 2 (WCS2), pp.34-5.). Indeed, the Sustainability Appraisal Environmental Report, June 2017, p.75 notes that ‘ Uncertain impacts are highlighted for water related criteria, in response to the site being within groundwater source protection zone 3, and there being no direct mention of water related issues within the Policy. The Policy also does not specifically mention a need to address an area of high fluvial flood risk in the middle of the site and an area of flood zone 2 and 3 on the south eastern section of the site .’ It is also noted that a very extensive upgrade of the Great Chesterford waste water treatment works would be needed to accommodate this development. This has clear implications for the overall viability of the development and the speed with which it can be brought forward.

We are concerned that there appears to have been little communication between UDC and SCDC since the emergence of Gt. Chesterford Garden Community as a main contender for inclusion the UDC Local plan. It is clear from the SCJS that the infrastructure implications of this development for SCDC are profound and greater than for UDC. It is also illogical that a development which is being justified, in part, by housing demand generated by employment sites in SCDC should not contain affordable housing accessible to applicants from SCDC. It thus seems odd that there appear to have been only two minuted meetings between officers of the two authorities since the pausing of the UDC local plan process in late 2016. We are also concerned that there appears to have been no discussion between UDC and the Greater Cambridge Partnership (GCP) during the current GCP consultation on the A1307, Three Campuses to Cambridge Scheme, which clearly has major potential implications for a sizeable new settlement in this area. There is a substantial risk that decisions taken independently by SCDC, UDC, GCP and Cambridgeshire and Essex County Councils could lead to uncoordinated development on opposite sides of the border leading to a significant urbanisation of the A1301 and A11 corridors without any holistic consideration of the cumulative infrastructure or landscape implications. Potential development along these axes would be best brought forward through the medium of a cross border supplementary planning document (SPD) and for this reason alone, the Great Chesterford Garden Village proposal is untimely and unsound.

Wendens Ambo Parish Council

WAPC was disappointed at UDC’s decision to hold the consultation period to coincide with the holiday period of most Parish Councils. The timing raises questions over the District Council’s desire to engage with Parish Councils and may result in a poor level of response and a consequent lack of useful commentary and evidence from local people. There is a significant lack of evidence of strong provision of accompanying infrastructure in the Plan to the proposed NUGV. Concerns that supporting evidence does not match the proposed housing needs in the area, with the proposed number of small dwellings set far too low. Lack

of supporting evidence to confirm why NUGV has been selected as a viable option. WAPC believes UDC may not have adequately fulfilled its 'duty to co-operate' as a result of the apparent lack of communication between UDC and South Cambs District Council when Harlow, Braintree and Hertford District Council have been consulted. The current draft of the Local Plan insufficient attention has been given to potential risk factors eg. what will be the likelihood of any accompanying infrastructure given the low number of houses it is anticipated will be built by a developer annually on the NUGV site (150 per annum). There is a perceived conflict of interest over the NUGV proposal has been created by Uttlesford District Council's recent purchase of 50% shares in Great Chesterford Science Park.

1.Spatial Strategy (Policy SP2) This is the policy which indicates where growth is needed or where growth needs to be restricted. The draft plan (2.17) says, "It is clear from this spatial portrait of Uttlesford District that there is a need to focus new development in locations where there are opportunities to reduce travel between homes, jobs and services and facilities and where there are alternatives to using the car. A strategy based on these principles will reduce the overall environmental impact whilst helping to meet local housing and employment needs". WAPC is concerned that the chosen location for NUGV may not meet the above. The environmental impact of building a small town on what is currently high-quality agricultural land, and where the most likely form of transport is the car, does not fit in with the aspirations of 2.17. We note the proposal here is to create a wholly separate community from Great Chesterford, delivering a minimum of 1,900 homes by 2033. WAPC has real concerns about the eventual size of the proposed community. We also question the deliverability of the infrastructure needed for a development of this size, the likelihood that sufficient affordable homes would be included in the project (while the aim of 50% is a laudable one, our experience is that developers frequently water down the allocation of affordable housing or elect for a payment rather than building what is needed. WAPC is particularly concerned about the impacts on local roads and railways. It is most likely that many of the new residents at NUGV would choose to drive to Audley End Station, given the paucity of parking available at Great Chesterford. The Cambridge-Liverpool Street line is already severely stretched with little additional room for capacity and no prospect of extended platforms, an increased number and length of trains. We see increased pressure on the B1383 and on the junction with Wenden. The roads into the station are already very busy with potential for accidents and a very poor state of repair. Essex County Council, including Highways, already has a very low spend in north Uttlesford and we cannot see why this would change, particularly given the siting of the other two proposed garden communities. We worry that much of the proposal for NUGV, whilst aspirational, is heavily dependent on other authorities and organisations and may prove a low priority. We are very concerned at the apparent lack of contact and co-operation between UDC and South Cambs District Council/ Cambridgeshire County Council. Without this the proposal lacks conviction. We are concerned that the character of the landscape may be adversely affected (Policy C1).

Great Chesterford Parish Council

GCPC notes UDC's lack of evidence to deliver NUFC in accordance with Garden City principles

Land value capture for the benefit of the community GCPC notes lack of evidence of land value capture achievability No evidence to support view that key infrastructure is affordable and that it can be financed by land value capture Section 106 contributions seen as

inadequate and unreliable solution as mechanism for land value capture GPCPC reckons full compliance with principle only achievable if UDC is significant shareholder with NUGC promoter in a Special Purpose Delivery Vehicle

Strong vision, leadership and community engagement UDC seen as failing to engage constructively with local community. No evidence that UDC has dedicated planning and delivery team.

Mixed – tenure houses and housing types that are genuinely affordable for everyone GPCPC queries developer's commitment to provide 60-70% minimum affordable housing with at least 50% of those available for social rent. A robust range of employment opportunities NUGC unlikely to create one job per new household. NUGC residents likely to commute to work to science parks, Cambridge or London

Development which enhances the natural environment GPCPC challenges this due to adverse impacts of NUGC on local and historic environment.

Integrated and accessible transport systems (See Appendix 2) GPCPC notes that Great Chesterford railway station not easily accessible from NUGC site, limited car parking facilities etc.

No credible proposals to increase capacity or improve stations and transport links to them and capacity of roads. Justification of the allocation is not based the full 5,000 units at NUGC. UDC's evidence shows considerable stress of routes around Great Chesterford by 2033 even without the planned settlement. Impacts on village not tested and mitigation measures not developed.

There is no evidence that Uttlesford's Housing needs can or will be met by a 5,000 house development in this location. The employment needs of Uttlesford are centred around Stansted Airport, and NUGC will simply serve as a dormitory town for Stansted, with people commuting, by car, through Saffron Walden or down the M11. There is no direct train link from Great Chesterford to Stansted Airport and given the nature of shift working there, the vast majority of journeys will not be made by train. Statements associating the development with the biotech centres in South Cambridgeshire make it self-evident that NUGC is being designed to cater for South Cambs' housing need, yet there has been no meaningful co-operation between South Cambs and Uttlesford and as far as we are aware, South Cambs have not expressed an interest in NUGC going ahead and indeed have reservations as to the benefits vs the clear negative impacts of it.

Policy SP7(b) - Given both the Welcome Campus and Chesterford Research Park have expansion plans of their own, it is highly likely that they will not support such a venture. As set out elsewhere, sustainable transport links to both of these establishments are likely to only consist of motor vehicles (including buses). Analysis of modal shift presented by UDC is inadequate and highly questionable.

Policy SP7(c) - This will in our experience of other major developments in East Anglia and wider afield not detract from the overwhelming truth that Saffron Walden will be the destination for retail trips from NUGC. These trips will overwhelmingly be made by car. As set out elsewhere, school delivery cannot be solely left to s106 to sort out. Land value capture (and the lack therefore of a huge land purchase cost to the developer) is the only

way such infrastructure will be provided before such facilities are required. All schools in this area are at, or over, capacity.

Policy SP7(d) - This is undeliverable. Fast high quality transport links to Saffron Walden will consist of vehicle journeys, whether by bus or car. There is simply no other option. Busses and car journeys into Saffron Walden will exacerbate the already significant traffic and pollution problems in Saffron Walden. Public transport links to Great Chesterford Station needs to be dropped straight-away. Great Chesterford has no parking, no ability for busses to turn around and no space to expand. Trains do not all stop at Great Chesterford and there is no access to north-bound platform other than via a steep footbridge including many steps. Any transport links will need to be to either Audley End or Whittlesford to overcome this. Whilst we would welcome cycle access to Chesterford Research Park and to the Genome Campus, the reality of commuting (NUGC is clearly a very large bespoke commuter town) is that most will use a car.

Policy SP7(e) - We see no evidence of this access strategy. There is no evidence of it being realistic and no direct access onto the A11. No link is proposed north to the A11 and Granta Park, which would in our view be essential to the strategy of delivering the housing needs of South Cambridgeshire. "Contributions" towards A505 and A1301 is farcical. No studies have been carried out as to impact, cost, timing and analysis with the proposed hugely significant developments at the Genome Campus and Smithson Hill. "Contributions" will be huge, but delivery is far from certain. This work must be undertaken now, before NUGC can be given the go-ahead, not afterwards, leaving everything completely uncertain as to what might be proposed and when, and how effective that might be.

Policy SP7(k) - Mitigation of a scheme which is entirely incongruous with the landscape, settlement type, history, impact on heritage assets and wider impact on the Cam Valley simply cannot be achieved, and UDC has provided no evidence at all that it could. See GCPC landscape and historic environment / heritage assessments.

Absence of mitigation scheme regarding ecology landscape or heritage and therefore full impacts cannot be properly taken into account. UDC's assessment noted high sensitivity in landscape terms. UDC's SA considers no landscape impact.

UDC's heritage evidence is of poor quality and lacks sufficient detail, UDC has not yet carried out further recommended heritage work. Great Chesterford PC have carried commissioned an assessment that identifies considerable heritage impacts resulting from the proposal. Heritage not considered appropriately within the SA.

The Environment Agency identified parts of Great Chesterford as at risk of flooding, and flooding and drainage is an area of concern.

UDC has failed to take account of developments across the border e.g. Welcome Genome Campus, development at Sawston Trade Park etc.

Considerable strain on limited infrastructure of Great Chesterford e.g. schools, parking, rail capacity

UDC failure to take account of considerable cost of requisite road mitigation measures in viability study.

Hertfordshire County Council

The County Council is concerned over the proposed cumulative impact of development in and around Great Chesterford on the Hertfordshire network. In particular, the A505 runs to the north of the site providing east west connections to the A10 and A1. Junctions are already operating close to capacity in the Royston area and M11 junction 10 is a constraint. In traffic terms scenario 10, which includes new garden communities west of Great Dunmow and West of Braintree along with smaller scale development spread across the other towns and villages, produces the best results overall. High levels of stress are however evident on the A120 corridor and there is a recognition that the current short – medium term junction improvements proposed at M11 junction 8, A120/A1250 and A120/B1383 will not be sufficient to accommodate the levels of growth proposed. The report identifies the need for further mitigation measures including the implementation of a Smart Motorway on the M11 and major improvements to M11 junction 8. No clear funding mechanism is identified so deliverability is uncertain at this stage. The preferred scenario from the transport study does not include housing growth at Great Chesterford, although employment growth is assumed here. This is shown as leading to increased traffic flow and stress on the A505 west of the M11 (section in South Cambridgeshire which is at capacity). There is no information in the study on the impact at the junctions north of Royston.

Historic England

The proposed site allocation adjoins the existing settlement and conservation area of Great Chesterford. The conservation area covers a large part of the settlement and contains over 65 listed buildings including the Grade I listed Church of All Saints and Grade II* Old Vicarage. There is also a large scheduled monument to the west of Great Chesterford adjoining the river, which contains a Roman fort, Roman town and Roman and Anglo-Saxon cemeteries. Another scheduled monument is also situated to the east of the settlement just outside the area of search and contains a Romano- Celtic temple (both monuments are on Historic England Heritage at Risk Register). There is a third scheduled monument on the south-east edge of the area of search consisting of a moated site in Paddock Wood. Given the presence and scale of these scheduled monuments, it is conceivable that the area of search will contain further sites of archaeological interest that are of regional and/or national importance. Finally, the Grade II listed Park Farmhouse lies within the site. The supporting text of policy SP7 makes no mention of these heritage assets. Impact of development Unlike the site at Easton Park, the North Uttlesford site is an entirely green field site which is prominently located in a wide undulating landscape. Long views of the site can be achieved from beyond the M11 and the train line and from as far away as Duxford IWM given its elevated and open position. The Brief HIA finds that the immediate and wider setting of the heritage assets identified inform and contribute to their significance. The landscape informs an important aspects of the heritage assets character, their historical context and their setting as well as being an important historic landscape in its own right which has a role in containing and defining the extent of built form in the area. The proposed site allocation would result in the formation of a settlement many times the size of Great Chesterford itself, and even with planting and landscaping would result in the coalescence of this historic settlement into the new development preventing its original form to be appreciated. The introduction of such a heavily developed settlement into what is currently open land would have irreversible, wide reaching detrimental effects on the character and appearance of the area. The Sustainability Appraisal (SA) identifies negative impacts associated with this policy

proposal, stating that it is uncertain at this stage whether suitable mitigation could be provided without affecting the developable area whilst still adhering to wider Garden City principles. Point 11 of policy SP7 does acknowledge the need for development to respond to the landscape and historic value of the location but does not require development to conserve or enhance the historic environment of the settings of heritage assets. Additionally, the policy contains no indication as to how the extent of the garden communities will be determined. The requirement for a Heritage Impact Assessment is welcomed in principle but it must be acknowledged that The Brief HIA (2017) already compiled indicates that the proposed site could not be developed without causing significant harm to the significance of the numerous heritage assets detailed, a more detailed HIA is unlikely to result in a different outcome. A site allocation in this location would result in severe harm to the character and historic significance of the area and would irreversibly impact upon the setting of nearby heritage assets. It is unlikely that this can be satisfactorily mitigated given the scale, extent and position of the allocation.

Highways England

This site probably has the least impact upon the SRN, although M11 J10 is a site of peak time congestion this is caused by capacity on the A505 and not the junction itself. We support the council in its requests to improve the A505 particularly between M11 J10 and the service area at the junction of the A1301.

Natural England

Given the scale of development proposed in this area we would expect to see consideration of impacts on Hildersham Woods and other nearby SSSIs and for avoidance/mitigation measures to be included in the policy as recommended in the SA.

Environment Agency

We are generally supportive of the thrust of this policy. However, our earlier comments on water infrastructure apply (see attached) to this garden community. We consider that the existing Uttlesford Water Cycle Study needs further detailed work to be carried out in relation to this growth area. Item 7 of the policy wording should be reworded so as to emphasize that any enhancements, or new water recycling centres, are in place before any development takes place. Enhancements to the water recycling centre at Great Chesterford, or the construction of any new water recycling centre, new connections, network upgrades and reinforcements to the sewerage network must be in place ahead of the occupation of residential development.

Essex County Council (Environment, Sustainability and Highways)

ECC notes that the North Uttlesford Garden Community is located in the north of Uttlesford's administrative boundary, in close proximity to Little Chesterford, and therefore seeks to strengthen the delivery and success of Chesterford Research Park. ECC also considers that future development within this area supports the London-Stansted-Cambridge Corridor, ensuring that a skilled labour force in sectors such as health, life sciences and pharmaceuticals, advanced engineering and aerospace have the opportunity to locate in close proximity to employment opportunities. Education and Schools All education land must meet the criteria set out in ECC's Developers' Guide to Infrastructure Contributions

(the Guide). Little Chesterford is over three miles from its priority admissions area school, Saffron Walden County High, meaning transport must be provided. Early delivery of a new secondary school must be facilitated to avoid significant revenue costs for ECC. Saffron Walden County High is a large school which will have to respond to other growth set out in table 3.5. Dealing with the demand that is generated before a new school is open will likely need temporary places to be created at other schools. ECC notes that paragraph 3.61 states “it is proposed that a cap of 3,300 new homes is placed on any allocation at North Uttlesford Garden Community to ensure that development over this figure does not take place until strategic highway improvements have been implemented” (page 35). ECC seeks further and immediate discussions with UDC on the precise phasing of delivering the North Uttlesford Garden Community, as this highways constraint may damage the long term viability of a new school if not overcome. Early Years and Child Care ECC supports Policy SP7 requiring the provision of Early Years and Child Care facilities. It is important to note that, where new development is planned, that consideration is given to Early Years and Child Care provision. The North Uttlesford Garden Community proposes 1,900 dwellings throughout the Plan Period, which equates to 171 child places for Early Years and Child Care. ECC will require further reference to the phasing, funding and delivery of future Early Years and Child Care facilities as part of any development framework and Development Plan Document prepared for the Garden Community. Community facilities. ECC supports Policy SP7, Point 3 that requires the provision of community facilities, which should be a key component of the local centres. However, reference should also be made to ‘community hubs’, which cater for a number of local services and community groups. Whilst ECC retains the operation of some existing youth centres there are no plans to build new centres in existing areas, however there will need to be facilities in major new developments. These are likely to take the form of multi-purpose community spaces, but must take account of the specialised requirements of youth provision. Reference to youth centres should be amended to ‘youth facilities’. Historic Environment. ECC notes that development at North Uttlesford will have a major impact on the scheduled monument of a Roman Temple, significantly affecting the setting of the Roman Temple and its relationship to the Roman Town as well as well as having a visual impact on the conservation area. There is no assessment of the historic environment which is recommended to fully understand the impact and appreciate how the policies of the local plan impact on the locational setting. Passenger Transport ECC consider that UDC should provide information in relation to the degree to which it has anticipated and indeed investigated the need to work with Hertfordshire and Cambridgeshire County Councils in terms of cross border services, where their future housing / employment developments may place additional aspiration for journeys into/ out of Uttlesford District either from a housing or employment perspective. Further, it is likely that the growth of employment in Harlow in particular will encourage additional trips to be made from Uttlesford parishes (and Great Dunmow). ECC would be keen to understand what plans are in situ for encouraging these to be made sustainably. Equally there are plans for a major employment area at Little Chesterford, however this is relatively inaccessible to the majority of Uttlesford District residents, unless they are to use private vehicles. ECC would welcome information regarding the extent to which ‘sustainable’ workers are likely to be brought from further afield by the rail network and potentially a shuttle bus service.

Policy SP7 refers to enhancements being made at Great Chesterford Water Recycling Centre in Anglian Water's ownership to accommodate the foul flows from the North Uttlesford development. The water industry operates on five-yearly cycles called Asset Management Plan (AMP) periods. The current asset management plan period (known as AMP6) covers the period 2015 to 2020. Customer charges will be set following submissions from Anglian Water about what it will cost to deliver the business plan. In general, water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan. We are currently in the early stages of developing a 25 year growth forecast for our area of responsibility and are developing long term integrated strategies to manage growth. These will be published and consulted on in our new Water Recycling Long Term Plan and as part of the PR19 business planning process (next business plan period). It is expected that this strategy will be published in Summer 2018. It is therefore proposed that Policy SP8 is amended as follows: 'Enhancements to the water recycling centre at Great Chesterford, new connections, network upgrades and reinforcements to the sewerage network to be aligned with the phasing of development and that proposed post 2033 .' Reference is made to connections, networks upgrades and reinforcements being made to the public sewerage network to accommodate the foul flows from this development. Foul network improvements are generally funded/part funded through developer contribution via the relevant sections of the Water Industry Act 1991. The cost and extent of the required network improvements are investigated and determined when we are approached by a developer and an appraisal is carried out. Reference is made to Sustainable Drainage Systems (SUDs) being incorporated as part of the North Uttlesford Garden Community which is supported. It would be helpful if reference was also made to SUDs being considered at an early stage as part of the design process.

Ickleton Society

The Ickleton Society objects to the North Uttlesford Garden Community. It seems NUGC was added to the sites in the Local Plan at a late stage when the numbers went up by 1600. NUGC went in at 1900 houses in the Plan period, presumably as 1600 would not have been viable for a new settlement. You have acknowledged that the number of houses you are required to build by 2033 has now gone down by 768. We have also read that there are alternatives ways of calculating the numbers which give an even lower figure. These should be properly considered and if they are not adopted, the reasons should be explained. In any event, as the numbers have gone down, NUGC should be removed from the Plan and any remaining smaller shortfall made up at other sites. It would be totally wrong to continue to include NUGC which would eventually grow to 5000 houses if only 768 were required by 2033. The proposed rate of build for the 3 new settlements is low (150-175) by comparison with new settlements in other areas such as South Cambridgeshire. NUGC would not be required if the rate was increased to 250 at Easton Park and West of Braintree. This would also make it easier for you to oversee the building of the new settlements and those settlements would reach a sufficient size to get services such as schools and shops more quickly. The Local Plan states that the first houses at NUGC would be delivered in 2021/22.

The housing target would not be met over the Plan period. There would also not be a 5 year housing supply at the start of the Plan period and so UDC would be at the mercy of speculative developers. UDC would be committed to the new settlements but the district

could end up speculative developments as well. New settlements should not be relied on for such a very large proportion of the required housing.

We question whether UDC will be able to manage the delivery of 3 new settlements in the Plan period, particularly as it has stated that they must be built to Garden City Principles. Developers may well challenge adhering to all these Principles and it will take considerable manpower and expertise to ensure developers meet them. Building only one or two new settlements would be far less risky. It is not sufficient to state that meeting the Principles will be a condition of granting planning permission. It should be demonstrated that it is possible for them to be met and this has not been done. In addition, while the Principles are set out in the draft Local Plan, the Town and County Planning Association's underlying guidance appears to be ignored even though it is summarised in Appendix 4 to the Plan.

The housing provided for in the Local Plan should meet the needs of the district. However, Bidwells have promoted NUGC as meeting the housing needs resulting from the growth in the biotech clusters which are mostly in Cambridge and South Cambridgeshire. Cambridge City Council and SCDC have provided for these housing needs in their own Plans. We understand that employment growth in Uttlesford is mostly around Stansted, some 19 miles from NUGC. NUGC, situated at the northern edge of Uttlesford, will do little to meet the housing needs of Uttlesford in any sustainable way. Rather it will encourage commuting to Cambridge, London and the science and biotech clusters in South Cambridgeshire. Indeed SCDC has acknowledged that NUGC could relieve pressure on its required housing in the next Plan period supporting the view that NUGC would be providing housing for South Cambridgeshire. As noted in Appendix 4, paragraph 5, one of the Garden City Principles is that a full range of employment opportunities must be in the Garden City itself. They should aim to provide no less than one job per new household and aim to reduce the need to travel to work as far as is practicable. While the Plan suggests there will be retail and business employment in NUGC, there is no detail of what it will be or how many jobs will be created.

Affordable housing – as noted in Appendix 4, Paragraph 4 the Town and Country Planning Association recommend that a minimum of 60-70% of the houses in a Garden City should be affordable and 50% of those should be for social rent. However, there does not appear to be any commitment in the draft Local Plan to anything more than 40% affordable homes – the same percentage as for any other development of 11 houses or more. It should be clearly stated in the Plan that 60-70% of houses in the new settlements should be affordable. The proposed site is as far north and as close to Cambridge as one can get in the district. Being close to Cambridge, land prices are high and the landowners, promoters and developers of NUGC stand to make very significant financial gains. The market prices and rents for the new homes will also be high, higher than if they had been built in some other parts of Uttlesford, and so the affordable housing will also cost more and in all probability will not be affordable for many people.

The hillside location has been acknowledged to have high sensitivity to change. We understand that it is being designed to mitigate the impact on Great Chesterford but it will be highly visible from South Cambridgeshire and from the opposite side of the environmentally sensitive Cam Valley, even if building is mainly on the plateau. It will permanently destroy the uplands, the skyline, good quality agricultural land and add to urbanisation of what is currently essentially a rural landscape. The Leader of the Council has said that the developers will have to mitigate the landscape impact. However, in our view, this abrogates

the responsibility of the Council as it will simply not be possible to mitigate the impact. No amount of landscaping and tree planting will hide the new town and at night its lights will be visible for miles. The sites of the other 2 new settlements have been deemed to be less sensitive to change.

The critical issues around transport mean that the settlement cannot be sustainable. Detailed transport assessment work has not been undertaken prior to deciding to include the settlement in the Plan. Many of the assertions about modal shift to non-car journeys and traffic impacts are not based on factual evidence. Bidwells propose a network of foot and cycle paths and claim that the science clusters in South Cambridgeshire could be accessible by walking, cycling, and rail and bus services. For most people, the distances for walking or cycling are too far, and buses will take too long and be too infrequent. It cannot be assumed that the partners of these residents will also work in the science clusters. People are most likely to travel by car. Car ownership in this area is significantly above national average – why should it be any different in this settlement? The Town and Country Planning Association's guidance states "A Garden City's design must enable at least 50% of trips originating in the Garden City to be made by non-car means, with a goal to increase this over time to at least 60%" and "Garden Cities should be located only where there are existing rapid public transport links to major cities, or where plans are already in place for their provision." These conditions cannot be met. There is no northbound access to the M11 at junction 9. The draft Local Plan states that the preferred route for northbound travel to Cambridge would be the A11 and hence to the A1307. The A1307 is already heavily used as a route to Cambridge from Haverhill and Linton and there have been a number of fatalities along it. The transport assessment appears to ignore planned growth in Haverhill. In any event, direct access to the A11 from NUGC is not planned so how will this be the preferred route? For anyone travelling to the Biomedical campus, west and north Cambridge, the M11 is the obvious choice and as traffic will exit NUGC on to the B184 and A1301, rat running through Hinxton, Ickleton and Duxford to M11/J10 (already a severe problem) will increase significantly either from residents of NUGC or vehicles that currently use the main roads but will try to avoid the increased congestion. The only way in which this can be mitigated is by making the M11 junction 9 a full junction. This should be a condition of granting permission for any significant housing developments in this area together with direct access northbound to the A11. It is suggested the settlement will not significantly add to congestion on roads south of Cambridge, particularly the A505 and junctions with the A1301 and M11. It assumes mitigation measures would be in place at the M11/A505 and A505/A1301 junctions. In our view, these assumed improvements will not be sufficient to mitigate the congestion caused by the additional traffic from NUGC. While funding is being sought for a study of the A505, improvements are likely at best many years away. This stretch of the A505 is already at or beyond capacity at peak times, and simply will not cope with the extra traffic generated. Essex County Council has made it clear it will not pay for infrastructure. Rail stations are too far away for most people to cycle. Bus services between the settlement and the stations cannot be so frequent and reliable as to make them preferable to car journeys. Commuters who choose to park their cars will be adding to the traffic on local roads and parking is already problematic at all local train stations, especially Audley End and Great Chesterford, which are already at full capacity with no consideration of any expansion.

The costs of infrastructure improvements that would fall on the developer have been significantly underestimated. The South Cambridgeshire Junctions Study identifies the costs

of the junction improvements as £7.5m and £11m. However, as stated above, in our view, these will not be sufficient to mitigate the increase in traffic. The only way in which it can be properly mitigated is by making M11 Junction 9 a full junction and the cost of doing that should fall on the developer. The developer should also fully fund rapid and frequent bus service to the rail stations, Cambridge and Stansted.

At the planned rate of build, it will be several years before a primary school is built. Local primary schools are already at or over capacity. Likewise GP surgeries. The draft Local Plan states that NUGC will not grow beyond 3300 unless the A505 is dualled. The A505 between the M11 and A1301 cannot be dualled along its current route because of development close to the road and as there is no funding for improvements there is no certainty that they can be made. It therefore seems the ultimate size of NUGC might be constrained and it will never be large enough to support for a secondary school unless children are 'bused in'. If children of NUGC have to go to schools elsewhere, once again the local secondary schools do not have capacity to take them. Both of these options add to the unsustainability of NUGC. 13. Flooding and water – there are well known flood risks downstream of the NUGC site. The outline plans for NUGC include rain water run off ponds but it has not been demonstrated by evidence that these would mitigate the flooding risks. The site is above the Cambridge aquifer and Bidwells have stated that 55% of it would be hard impermeable surfaces. Clearly this will have a significant detrimental reduction in rainwater reaching the aquifer.

Sustainable Uttlesford

In addition there is concern about the viability of the North Uttlesford Garden Village of the scale proposed (half the size of the two Garden Villages along the A120) to provide the infrastructure suggested especially the proposed secondary school.

Little Shelford Parish Council

It is likely that residents will work in the Cambridge area and generate vehicle traffic flow given the distance between the proposed development and employment sites. No improvements in transport infrastructure is proposed. Access to the north and west and the northbound M11 would directly impact upon an already over-burdened A505 and A1301. It will substantially increase rat-running through the villages of Hinxton, Ickleton, Duxford, Whittlesford and Gt & Lt Shelford.

The large hilltop and hillside site proposed for NUGC would have a serious negative impact on an otherwise attractive rural landscape that dominates much of South Cambridgeshire.

It would be entirely inappropriate to site a new settlement above the main aquifers for our area, which is 97 per cent dependent on artesian water. A substantial area of hard landscaping will inevitably affect water levels in the aquifer. The development will alter the water runoff of the River Cam and may lead to increase risks of flooding in villages downstream including Little Shelford.

Little Abington Parish Council (LAPC)

Our comments relate specifically to the proposal for a Garden Village near Great Chesterford - the North Uttlesford Garden Village (NUGV).

Lack of detail in the draft plan - The Parish Council notes that policy SP7 appears to consider a broad range of points associated with the proposed development in North Uttlesford. The Parish Council is very concerned about the lack of specific information and detail, including timescales.

Scale of the development - The proposed development would be on the border with South Cambridgeshire. It would be completely out of proportion with existing communities in the area which are small /medium villages and a small town, i.e. Saffron Walden, in Essex and with existing nearby settlements in South Cambridgeshire which are also predominately villages.

Transport infrastructure - The Parish Council is extremely concerned about the lack of information on proposals for improving the local transport infrastructure. This includes roads, footpaths, cycleways and public transport links. The proposed layout would exacerbate transport problems, as the major exit from the proposed new settlement is to the west - putting a huge amount of pressure on a few roads. If this plan receives any further consideration we would expect there to have been demonstrable and effective consultation with the County Highways teams in Essex, Suffolk and Cambridgeshire and the Highways Agency on road capacity and Sustrans for advice on cycle routes and also with rail service providers. Roads in this area are already running very close to full capacity. We note that it is anticipated that some residents from NUGV would work on the local science parks including Hinxton, Babraham and Great Abington. The A505 is frequently at a standstill from Duxford (the M11) to the A11. We are not aware of any plans to improve the road to accommodate planning proposals in South Cambridgeshire let alone the impact of any developments in Uttlesford and further afield. The A11 is a busy route and local trunk roads such as the A1301 and the A1307 are also already congested in peak periods. If any residents were to commute down the M11 towards Stansted airport, London and towns en-route consideration would need to be given to improving the capacity and traffic flows at the junction at Stump Cross and the M11. Traffic is often slow or stationary at busy times. The capacity of the A1307 between Haverhill and Fourwentways is subject to discussions with the Greater Cambridge Partnership (The City Deal). The Uttlesford Plan might provide an opportunity for collaborative working and investment to enhance road transport links between Haverhill and the M11 at Stump Cross and hence to relieve the pressure on the A1307. Cycling from NUGV to the local science parks and to local public transport hubs should be a consideration. Options for safe cycling routes would also need to be developed. It is likely that some of the residents of NUGV would commute by train into London. Commuter rail services between Whittlesford and London are already very popular and operate close to capacity. Commuters often park in Whittlesford rather than at the railway station and the station car parks are usually full before the rush hour is over. The Uttlesford plan must consider improvements in rail services from Great Chesterford to prevent any further pressures on services to and from Whittlesford.

Strategic oversight and collaboration with South Cambridgeshire District Council and Cambridgeshire County Council - The Parish Council is very concerned about the lack of evidence of collaboration with South Cambridgeshire District Council despite the proposed development being so close to South Cambridgeshire. Several significant housing and commercial developments are already being considered at Hinxton and Sawston. It is vital that the local authorities work together to develop the necessary strategic vision and

oversight to deliver a robust plan that is sustainable and adequately resourced. This could include some consideration of what contribution the NUGV development might make to addressing any potential lack in housing supply in South Cambridgeshire thus reducing pressure and the potential for speculative development on undeveloped green spaces in South Cambridgeshire. Also, as outlined above there must be some potential for joint investment decisions between the local authorities in South Cambridgeshire, Uttlesford and St Edmundsbury to enable robust and sustainable strategic development.

Provision of education and health facilities at NUGV - The scheduling for development of schools and health facilities is not included in the proposals. It does not seem unreasonable to assume that new housing developments would attract young families with children. Schools will be required. Based on the assumption that many of the residents will be travelling into South Cambridgeshire to work parents may have an expectation of access to educational facilities in Linton, Great Abington, Sawston and elsewhere. This is unlikely to be possible. Even without the completion of the proposed developments in South Cambridgeshire schools in the area are full. The Uttlesford plan must include details and a timetable for provision for education locally. We would also expect that a proposal for such a large development would have clear plans and timetables for the provision of local health and social care facilities. What discussions has Uttlesford District Council had with local National Health Service providers and commissioners of health and social care in Essex and South Cambridgeshire?

Water supplies - East Anglia is the driest part of the UK and water supplies need to be actively conserved. Groundwater resources are critical to the public water supply in South Cambridgeshire. The chalk aquifer to the south and east of Cambridge, which includes the area around Great Chesterford is an important strategic resource and the principal source for the Cambridge Water Company. It is highly vulnerable to any development which could pollute it or prevent it from re-charging. LAPC would expect the Environment Agency to be included in any discussions about such a massive housing development that could impact on ground water supply.

CONCLUSION. Based on the information in the draft local plan Little Abington Parish Council can find little evidence that the development of NUGV can be justified or that there has been any effective planning and consideration of the infrastructure requirements and impact on the natural environment associated with such a large-scale development. The apparent lack of collaboration and strategic working with South Cambridgeshire District Council and other agencies is a major concern. It gives the impression of an opportunistic development rather than a properly developed and thought through planning proposal. The consultation has taken place over the summer. The outcome of the consultation is likely to lack credibility with the public. We would strongly urge the local authority to ensure that any future consultations are timed so that they can be genuinely meaningful and effective, offering realistic opportunities for comprehensive public engagement.

Great Abington Parish Council

Great Abington Parish is located within South Cambridgeshire adjacent to Great Chesterford Parish and the proposed new town on the Cambridgeshire/ Essex border at Great Chesterford. We believe that this proposal comprising 5,000 homes for around 20,000

people with the intention of phasing the development over a period up to 2033 is unacceptable and we therefore object to it. Whilst we recognise that there is a need for housing it appears that this phased approach is not supported by infrastructure improvements, this will lead to significant increases in: Traffic on A1301 towards Cambridge through Sawston, Shelford and Stapleford particularly impacting the roundabout at the A505 junction. Traffic to Whittlesford Station and the M11 North through Ickleton also significantly impacting the roundabout at the A1301/ A505 junction. Traffic on A11 North and 1307 going to Granta Park, Babraham and Addenbrookes particularly impacting the A11/A1307 junction, Fourwentways. Pressure on already busy commuter trains at Whittlesford Station. There is very little evidence to support the sustainability of this proposal with no infrastructure improvement or additional facilities. We feel that this development should not go into the Local plan unless a new relief road could be built linking Haverhill, Saffron Walden and Chesterford directly to the M11 Northbound and significant improvements can be made to Great Chesterford Railway Station.

Duxford Parish Council

Our principle reason for objection is the inability of the local transport infrastructure to be able to cope with the increased demands placed upon it by the development. To access the M11 northbound from the site (or vice versa) will require the traffic to travel along the A505 and A1301, both of which are extremely congested. The A505 is the second busiest road maintained by Cambridgeshire County Council Highways Department, beaten only by the A47. Even a small increase to the traffic on these roads will push them closer to grid lock. With the increased pressures on these roads there will be increased “rat-running” through the villages of Ickleton, Hinxton and Duxford as the traffic tries to avoid the junction of these two roads at the “McDonald’s” roundabout. No consideration appears to have been made by the plan for other developments proposed immediately over from the UDC border at the Wellcome Genome Campus, by Smithson Hill and the Sawston Trade Park. To access rail transport from the site, the “stopping” nature of the services at Great Chesterford station and it’s almost complete lack of parking will encourage resident to drive to either to Whittlesford Parkway or Audley End stations. Both of these stations 2 have experienced significant growth in passenger number over the last ten years and are now extremely busy. This growth is predicted to continue even without any further local development. Any proposals for additional bus routes will provide negligible benefit as they will be constrained by the capacity problems of the very same road system. Without coordination with other transport, such as the railway, the private car will always seem more attractive. The current Citi 7 service from Cambridge through Great Chesterford takes an hour and ten minutes to get between the two, a distance of only ten miles. In conclusion whilst we realise that Uttlesford District Council have a requirement to provide a significant housing land supply in their Local Plan, Duxford Parish Council feel that the proposed location and will be a significant detriment to the north of Uttlesford and will have a significant negative impact upon the immediately adjacent South Cambridgeshire.

Cambridgeshire County Council

– Cambridgeshire County Council welcomes the opportunity to respond to the draft Uttlesford Local Plan. These comments have been prepared by Officers of the Council and submitted in accordance with the instructions and timescales set out by Uttlesford. It should

be noted that the same comments will be reported to the next meeting of the Economy and Environment Committee (12th October) for formal endorsement by this Council.

Each representation is prefixed with 'support', 'object' or 'comment' to clarify the status of each comment.

COMMENT: The proposals for a new garden village at North Uttlesford do not raise significant education concerns for the Council as whilst there is currently no surplus capacity within the adjacent school catchment areas in South Cambridgeshire, it is expected that development of this scale, in Essex, would provide appropriate on site mitigation to meet the growth in demand resulting from the proposed development.

COMMENT: As adjacent education authorities, officers already work closely with colleagues from Essex County Council, who are the statutory education authority in this case, in planning for strategic development. If, as part of any Essex County Council review on the impact of the proposed development, there is a need to give wider consideration to the pattern of provision of Secondary, Post-16 and SEN provision, then Cambridgeshire County Council officers would assess what the implications of any changes would be and consider what patterns of cross border movement may exist, or emerge, and how the two authorities can work together to best meet the needs of children and young people in their areas. 2.3 Any impact on Cambridgeshire infrastructure would need to be fully funded by the development.

COMMENT: The highway network in this area of South Cambridgeshire already experiences severely congested conditions at peak times, with the A505 between Royston and the A11 one of the most heavily trafficked routes in Cambridgeshire. In addition many of the junctions in the area are already extremely congested at peak times, particularly around the junction with the A505 and A1301 and at Junction 10 of the M11. Council officers have welcomed the opportunity of involvement with Uttlesford District Council on its transport evidence base - its Traffic Study and the South Cambridgeshire Junction Assessments work to investigate these issues. However, to date, Council officers have not been satisfied with the conclusions drawn from these studies with regards to improvements to junctions on the A505 in Cambridgeshire and the ability of any development to mitigate its impact in transport terms.

OBJECTION: Cambridgeshire County Council (and South Cambridgeshire District Council) officers jointly share the concern that the development at NUGC is reliant on large-scale improvements to the A505 for which no scheme has been identified and no firm timescales are in place for study work to begin.

COMMENT: The draft Local Plan states that the proposed developer funded highway improvements could accommodate up to 3,300 homes at the proposed development. Development beyond that would depend on strategic highway improvements e.g. upgrading the A505 between the M11 and A11.

COMMENT: The Council wishes to continue dialogue with UDC regarding the proposed cap on development of 3,300 homes until strategic highway improvements are implemented, as well as on the detail of the proposed infrastructure improvements. It would seem that even the delivery of these 3,300 homes would remove any 'spare' capacity on the Cambridgeshire

highway network close to the Uttlesford border, and officers are already aware of growth aspirations of employment sites in this part of South Cambridgeshire.

COMMENT: The Council firmly believes that development in Uttlesford should demonstrate that its impacts on the Cambridgeshire transport network could be mitigated, and would urge that all new development proposed should take account of existing congestion issues and aim to promote travel by non-car modes.

COMMENT: Council officers are keen to continue to work with UDC on the development framework for the North Uttlesford Garden Community and wishes to be consulted on any planning applications under the duty to co-operate, as well as on any travel plans for the proposed site.

COMMENT: Given the high levels of car ownership in Uttlesford District and a high proportion of travel to work journeys being made by car (around 70%), Council officers would question the assumptions made about the high levels of self-containment anticipated at the site.

COMMENT: Related to this, the draft Local Plan states that the A11 and A1307 would form the main route from the proposed site towards Cambridge, and that around 32% of work trips are estimated to be towards Cambridge. The A1307 already experiences congestion at peak times and has a long history of safety issues. The Council requires reassurance that these issues have been taken into consideration and also that liaison has taken place with Suffolk County Council and neighbouring districts regarding growth plans for Haverhill and the surrounding area.

A505 Strategic Study

COMMENT: In 2016 the Council bid for funding for a for a strategic transport study of the A505 corridor. However, the bid was unsuccessful. The Council still intends to undertake a study to look at the A505, however, currently there are no timescales for when this work could start. Officers would like to work with UDC as we take this study forward.

COMMENT: Recently, the Department for Transport has published proposals for a Major Roads Network. It is possible that the A505 may form part of this network in the future and this may provide access to a national funding pot. Greater Cambridge Partnership - A1307 scheme development

COMMENT: As part of the Three Campuses to Cambridge Scheme options are being developed to improve connections along the A1307 between the major employment sites of Granta Park, Babraham Research Campus and the Cambridge Biomedical Campus for bus, cycling and walking journeys and there may be opportunities for any developments bordering Cambridgeshire to contribute to these transport interventions as they develop.

COMMENT: Officers from Cambridgeshire County Council (and South Cambridgeshire District Council) welcomed the opportunity for early dialogue with the promoters of the NUGC site and their transport consultants at a meeting on 9th August, but do not share the view that relieving pressure on the M11 junction 8 is a good enough justification for

development in the north of Uttlesford district, when transport mitigation of this site has not been demonstrated.

COMMENT: Officers do agree, to an extent, that there are opportunities at the NUGC for improving travel by sustainable modes, with rail stations at Great Chesterford and Whittlesford Parkway and opportunities for bus travel improvements and more local journeys made by foot and bicycle. However, evidence to demonstrate such sustainable travel patterns would be required. Transport Evidence Background Growth

COMMENT: The transport evidence has compared growth rates from the industry transport modelling tool 'TEMPRO' with dwelling growth from Uttlesford's own growth assumptions, as set out in its 'uncertainty log' (a record of assumptions made in the model that will affect travel demand and supply). In instances where TEMPRO projects a higher growth rate than the uncertainty log, the evidence has assumed TEMPRO level of growth. For housing, by using TEMPRO, substantially more housing is assumed as committed development across Cambridge and South Cambridgeshire by 2033 than if Objectively Assessed Need as set out in Cambridgeshire local plans (+3,386 in Cambridge, -558 in South Cambridgeshire) was used. This represents a robust future year assessment though has the potential to underestimate the proportional impact from Uttlesford developments. For employment TEMPRO generates a figure for jobs across Cambridge and South Cambridgeshire of 24,042 by 2033 which is 20,058 fewer than the objectively assessed need for jobs from our Local Plans (44,100 extra jobs), which is a significant difference and causes concern to CCC that assumptions regarding background employment growth are not robust

Hinxton Parish Council

This submission relates to the proposal of Uttlesford District Council (UDC) (paras 3.60, 3.61 and Policy SP7 of the Local Plan) The NUGC would also adjoin over a mile of Hinxton's parish boundary and would come within half a mile of Hinxton's High Street. As Hinxton is a village of only about 150 homes, the NUGC would have a profound impact on our community.

This submission summarises the grounds on which Hinxton Parish Council opposes the proposal.

Inadequate consultation

There has been no community engagement and no observance of due process. When the UDC published its evaluation in response to its call for sites in 2016, Hinxton formally submitted comments which challenged material matters of fact related to flooding, traffic, landscape character and infrastructure [1] . We have received no response to these comments. The current Local Plan and associated evidence neither addresses nor contradicts any of the factual points we made. There appears to have been no significant consultation by UDC with South Cambridgeshire District Council (SCDC) despite the substantial impact the NUGC proposal would have on South Cambridgeshire. The process of inserting NUGC in Uttlesford's Local Plan has totally ignored the representations and interests of Hinxton, the second most affected village after Great Chesterford.

Traffic

The proposal would result in excessive traffic burdens on Hinxton and neighbouring South Cambridgeshire villages without offering any mitigation such as funding. Access proposed to and from the NUGC site is unusually restricted. It is to be exclusively from the A1301/B184 Walden Road, primarily from Stump Cross roundabout with the A11. No access is proposed from the east. Access from the south is heavily restricted by being either through Great Chesterford and Littlebury or via Saffron Walden's High Street on the Walden Road. Junction 9 on the M11 does not permit access to or from the north or west. Proposals from the promoters claim that traffic from the NUGC into Cambridge would use the A11 to Fourwentyways and then the A1307 into Cambridge, but the latter will be heavily overburdened by traffic from the new developments in Haverhill which receive no mention in the NUGC traffic consultancy report. As a result, apart from the A11 to the north-east, all site access to and from the north and west has to be by the A1301 and A505. This would encourage rat-runs through the villages of Hinxton, Ickleton and Duxford. The A505 and A1301 are already severely congested at peak times. The Local Plan is not based on any adequate traffic analyses. It takes no account of other nearby developments in prospect along the A1301 such as the expansion of the Wellcome Trust's Genome Campus, Sawston Trade Park, and the Spicers site by Whittlesford. It offers no sources of funding to improve the roads of South Cambridgeshire which would carry the major traffic burden of the NUGC.

Flooding

The NUGC poses a major flooding risk to the villages of South Cambridgeshire immediately down-stream. No comparable threat is presented by the Draft Plan's other two proposed 'garden communities' in the south of Uttlesford which are on flat land associated with old airfields. The proposed site of the NUGC is on hilly ground exclusively in the watershed of the River Cam. The villages of Ickleton, Hinxton, Duxford and those further down-stream, and the Wellcome Trust's Genome Campus, are already all vulnerable to flooding despite having substantial water meadows [2] . Listed buildings such as Hinxton Mill are at risk as well as domestic houses. There is no weir or water control point on the Cam in Uttlesford downstream of Great Chesterford by which increased water flow could be regulated. A town of up to 5000 houses would have massive implications for the speed and volume of water run-off. This is crucial to both flood risk and adequate aquifer recharge. The proposal for NUGC asserts that use of ponds and absorbent surfaces could moderate this but offers no evidence on the present hydrological position, let alone on the consequences of proposed water management. The pattern of water-flow for the River Cam downstream would be altered fundamentally and unpredictably.

Water supply and sewerage

The NUGC jeopardises both the quality and supply of our fresh water and the disposal of our waste water. For Cambridge Water, which supplies South Cambridgeshire, 97 per cent of the water 'comes from boreholes drilled into the chalk strata south of Cambridge' [3] . The recharge of the aquifers tapped by the boreholes depends on rainfall infiltrating into the soil and percolating into the rock below. Uttlesford proposes to site the NUGC, with over a square mile of largely impermeable surface, on top of these strata. This would decrease infiltration and consequently, as well as increasing flood risk downstream, would reduce groundwater recharge. But Uttlesford's own electorate would not be affected because they rely on a different water supplier, Affinity Water, whose ground and surface water sources

will not be directly affected by NUGC [4] . The 2017 Uttlesford Water Cycle Study finds that a major impact of NUGC would be variations in water quality and quantity, discharged to receiving watercourses from the NUGC site itself and from the water recycling centre that would serve the site. The present shared sewerage facility that serves Great Chesterford, Hinxton and Ickleton is at full capacity and would require major upgrades to both the treatment processes and associated sewerage networks. [5] There is no proposal that the NUGC would support this investment.

Landscape and amenity

The view of the NUGC hillside site from substantial tracts of Cambridgeshire, Hertfordshire and Essex would be damaged by the placing of the NUGC on the raised land. It would be in marked contrast to the valley settlements that characterise the area. The land rises from 50m to 100m in less than a mile and can be seen for many miles across the Cam valley. It is mainly Grade 2 (very good) agricultural land, accessed by well-maintained and well-used public footpaths. When planning permission for housing was recently applied for on the disused Little Walden airfield, just one mile along the ridge to the east of the NUGC site and at the same height above sea level, it was rejected on appeal. The Planning Inspector (G D Jones) in 2015 judged that an aspect with 'significant weight' was that 'the proposed residential development would be a discordant addition to the rural landscape at odds with and harmful to the character and appearance of the area' [6] . Exactly the same comment could be made about the proposed NUGC development, which would be over one hundred times larger.

Other infrastructure and funding

The NUGC would make substantial demands on the infrastructure of South Cambridgeshire but the proposal offers no provision or assurances as to their financing. The schools and surgeries and other facilities of South Cambridgeshire, like those of north Uttlesford, are currently at full capacity. A development on the scale of NUGC, larger in number of houses than Hinxton, Ickleton, Duxford and Great Chesterford combined, would make enormous demands over the 2020s as it grew; there are no significant proposals to install infrastructure in advance. The proposal repeatedly refers to TCPA 'garden community' principles, but these have no legal significance. Such statements would only be worthy of consideration if they provided specific guarantees of (a) the percentage of the added land value that was to be 'captured' for infrastructure, (b) the amount of this that was to be made available for infrastructure in advance of house building, (c) the extent to which Uttlesford would share this with South Cambridgeshire, on which the greatest cost burden would fall, and (d) an arrangement whereby affordable housing would be made available to people currently living in South Cambridgeshire as opposed to being exclusive to Uttlesford. Without such assurances, any promises to mitigate the infrastructural burden of the NUGC have no substance. In the view of Hinxton Parish Council, the proposal for the NUGC in the Uttlesford Local Plan (2107) is flawed in terms of both procedure and evidential justification. The proposal fails to offer any adequate provision for the very substantial external costs that would largely fall on South Cambridgeshire.

[1] Submission from Hinxton Parish Council 26 March 2016

[2] <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?easting=549644&northing=244978&address=100090171955&map=RiversOrSea>

[3] <http://www.cambridge-water.co.uk/customers/about-your-water-supply>

[4] <https://stakeholder.affinitywater.co.uk/docs/WRMP-Annual-Review-June-2015.pdf>

[5] http://sercle.org.uk/wp-content/uploads/2017/06/Uttlesford_waterWCS_Update_-_24.01.17_1_FINAL_low_res.pdf

[6] Appeal decision, The Planning Inspectorate, APP/C1570/W/143000725 & 3000780, para48

The Icknield Way Association

I write as Secretary of the Icknield Way Association specifically to the proposed development of 5000 houses on site 10GtChe15 in Great Chesterford, on land south-east of the A11 and north-east of the B184 and incorporating the site at Field Farm (09GtChe15). The Icknield Way itself can claim to be 'the oldest road in Britain', consisting of pathways and tracks dotted with archaeological remains and running for 110 miles across the chalk 'spine' of southern England. The Icknield Way Path largely shadows the ancient Icknield Way and was awarded Recreational Route status in 1992. There is also an Icknield Way Trail for riders which runs, for large parts, concurrently with the walkers' Path. The proposed development on site 10GtChe15 has potential implications for both the Path and Trail. The Icknield Way Path and Trail run along public footpaths and public bridleways through Great Chesterford from the southwest and, having passed through the existing settlement via Church Street and Rose Lane, run south of the proposed development up to Burtonwood Farm and on to Linton. (The route is shown on your map of proposed sites). Although not encroaching directly onto the Icknield Way Path and Trail the proposed development would, nevertheless, adversely affect the character and environment of this historic route. In that context, it is a matter of concern to the Association that there is no reference to the Icknield Way Path/Trail in the site assessment report, which states only that a public right of way traverses the northern sector of the site and another adjoins its eastern boundary. The site assessment report also states that the proposed development land benefits from existing direct access from the B184 at Park Road and Cow Lane. The Association understands that the possibility has been raised of Cow Lane serving as a bus route from the new development. Given that Cow Lane runs alongside a section of the Icknield Way/Trail, the Association takes the view that such a potentially enormous increase in the amount of traffic (including heavy traffic) passing along that lane would have a seriously detrimental effect upon the enjoyment and safety of walkers and horse riders in that area. Should any planning permission for this huge development be granted, it is the view of the Icknield Way Association that it must carry a formal requirement to preserve the ability of walkers and rides to pass freely along the route at all times during the building process and that screening work should be instituted to preserve the health and safety of both human and animal users of the Icknield Way Path/Trail. Should a temporary diversion of the Icknield Way Path/Trail prove to be necessary during the actual construction works, reinstatement of the original route must occur as soon as that construction work is finished. The Association

would also wish to be consulted on any proposals for temporary re-routing of the Path/Trail during construction works.

CABO Essex and Cambridgeshire British Horse Society

This development will link the Rights of Way networks of Essex and Cambridgeshire, including the bridleway network yet no mention is made of equestrian access – only cycle and pedestrian routes. Transport includes all journeys including leisure. The influx of residents from this site will require an improved RoW network. Both Essex' and Cambridgeshire's policy is to provide safe, off road access for all NMU (non-motorised user groups) unless it is not possible to do so. It is incumbent upon LA's to maximise the benefit of public money and this is best achieved by including all NMU's on new access. The comments made by Essex Bridleways Association on this Policy are supported by the BHS.

Harlow District Council

Policy SP6.1 refers to the delivery of 10,000 new dwellings, of which a minimum of 1,800 will be delivered by 2033. The corresponding sentences for SP7 and SP8 do not specify figures as minima.

Para. 3.61 refers to a cap of 3,300 new homes for any new allocation at North Uttlesford Garden Community; this has not been referenced in Policy SP7.

National Trust

It is not clear why the policy for this settlement does not include the provision of a new country park. As a Country Park is proposed for the other two garden villages. A new Country Park would reduce pressures on Hatfield Forest.

Littlebury Parish Council

Policy SP7 Concerned the impact of increased traffic flow on B1383 between the new settlement and Saffron Walden, Audley End Rail Station, Stansted and possibly Great Dunmow. Because of increase in commuters and lack of local services such as schools, shops and GP is provided in the garden community timely. The traffic passing through Littlebury is already heavy. Speeding through the village, especially on entry and exit, is a considerable safety issue.

It is unrealistic to assume rail commuters from NUGV will travel solely from Great Chesterford station. Currently Audley End and Whittlesford have a greater number of fast services into London and better provision for parking. It is necessary to expand Great Chesterford station, provide easy access from NUGV, and increase parking provision. Increased use of Whittlesford Rail Station may also have a traffic impact on Hinxton and Ickleton.

Need to consider traffic calming measures in Littlebury such as reduction of the speed limit through Littlebury from 30m.p.h to 20 m.p.h and possible further should be considered.

It is not realistic to assume that the majority of northbound traffic will use the A11 as a preferred route. An upgrade to junction 9 of the M11 would be a necessity to prevent 'rat-running' through local villages.

Making spare places available to school children living in existing settlements at nil or low cost could help to reduce the impact of increased traffic on roads through the district at peak travel times.

Additional school places, medical and dental services and a new primary school should be provided at the outset of any new planned settlement. This is important to develop a sense of community. Schools in the north of the District are close to capacity. Transferring students to Dunmow would result in excessive journey times for both students and parents, and make it difficult to maintain the home/school relationship needed to support learning.

Landscaping of new developments should be designed using predominantly native species in bee and wildlife friendly corridors linked to open countryside to maximise their benefit.

Essex Bridleways Association

Comments relating to SP6 above also apply here. There are several bridleways both north and south of the proposed development, and again the opportunity should be taken to create new routes linking those existing bridleways. It is not acceptable that Policies omit equestrian access, an issue that has been successfully challenged at public inquiry for other Local Plans within Essex. We therefore request that this Policy is amended to incorporate an aspiration to include access for ALL vulnerable road users.

Downland Village Association

Schools are full in the area, the trains to London are frequently clogged, Saffron Walden is congested, and the roads are frequently busy when the M11 is closed due to accidents between J8 and J9. The one track rural roads have become high speed rat runs already. Facilities, infrastructure and amenities are all fighting with overload. An additional village of 5000 houses will harm the future and existing residents. To contemplate the development without the increase in immediately available amenities, such as schools and public transport, seems to be ill thought out particularly with The Friends closing in Saffron Walden and the Education Authority unprepared to take it on.

The run off from 5,000 houses and the residential developments on the other side of the A11 was not assessed properly. Flooding may occur along the Cam from Newport through to Shelford. Half of the local population is still struggling with 750k, it is unclear how Essex Superfast Broadband can provide "unlimited Broadband Speed for the area".

The surrounding area to Great Chesterford and its neighbouring villages is a rare, unspoilt tract of rolling countryside that stretches from Royston to Shelford, Newmarket, Bury St Edmunds Haverhill, Saffron Walden Bishops Stortford and through The Pelhams and Buntingford and back to Royston. The area is speckled with traditional villages and hamlets that represent a vital counterpoint to urban sprawl set an important piece of chalk downland adjoining its own natural waterway, the Cam. This area not only harbours wildlife including common and rare species such as Stone Curlew, Hawk Moths, various Raptors and even the downland common hare, but it is increasingly a Mecca for such activities as

recreational cycling which has dramatically increased in the last few years. A more strategic view of the housing on the Saffron Walden area and rural North West Essex is needed.

The information provided by Bidwells is insufficient. South East Saffron Walden is a better option because of the existence of Friends School and a relief road to a new intersection on the M11. More detailed should be provided to explore alternatives

It is unreasonable at such short notice to seek serious, informed and well thought out comment from stakeholders and the public who would not have enough time can be allocated to researching the implications of the proposal in any depth. The council should undertake full studies to enable the public to comment in a more weighted way.

Wellcome Genome Campus

Flooding - There is an area of flood zone 2 and 3 along the south-eastern boundary of the site. According to the Sustainability Appraisal, NUGC is the only settlement that is assessed as unlikely to be able to meet the objective to conserve and enhance water quality and that have a reasonable prospect of only partially meeting the aims of reducing the risk of flooding (Only NUGC and Takeley among all site options are assessed not to have a strong or reasonable likelihood of fully achievement aims). Concerned that if the allocation of NUGC is properly complied with the requirements of paragraph 100 of the NPPF to ensure that development is directed away from areas at highest risk of flooding and does not increase flood risk elsewhere. A sequential assessment and (if necessary) application of the Exception Test may be needed.

Clarification on some of transportation assessments is also needed:

- The South Cambridgeshire Junction Assessment assumed that there will be 36,328 houses and 24,042 jobs created by 2033 within Cambridge and South Cambridgeshire while the draft Local Plans for Cambridge and South Cambridgeshire are proposing to deliver a combined 33,500 houses and 44,100 jobs by 2031.
- The Junction Assessment has not included growth within Royston (North Hertfordshire) and Haverhill (West Suffolk). The Junction Assessment therefore does not consider the effects of the additional 500 houses on junctions within South Cambridgeshire.
- The Junction Assessment is based on 1,400 houses being delivered at NUGC by 2033 but the draft Local Plan proposes to deliver a minimum of 1,900 houses by this time. Although only 1,900 houses would come forward in the plan period, the site has a draft allocation for 5,000 houses.
- The NUGC transport evidence provided to Uttlesford District Council states that 28% of the development traffic will route via A1307 into Cambridge. The A1307 corridor is a key corridor into Cambridge and is already under pressure. The Junction Assessment makes no reference to this corridor and the effect that NUGC traffic will have on it.
- The Junction Assessment may be based on an overly robust set of assumptions (i.e. no internalisation of trips within new settlements, no peak spreading, and no route choice is referred to in the study).
- The Uttlesford Transport Study tests 12 development scenarios and shortlists three of them (Scenarios 10, 11 and 12). However, Great Chesterford, Easton Park and West Braintree and smaller settlements are not the preferred options.

However, it is based on the Junction Assessment that that a cap of 3,300 houses at NUGC has been set before strategic highway improvements are required, such as dualling of the A505 between M11 and A11 junctions. Given the limitations of the Junction Assessment, the soundness of capping houses before strategic road improvements is questionable.

Delivery Draft Policy SP5 identifies a number of principles for the Garden Communities, including the requirement for development frameworks to be developed that detail phasing, infrastructure and delivery. Other impacts of these settlements, such as air quality and noise impacts may not be properly mitigated.

The Malins (2016) Economic Viability Study for New Settlements and Neighbourhood Proposals lists the infrastructure requirements of the new settlements. A number of the requirements for NUGC are described as 'to be assessed'. It is questionable how the site has been determined to be viable. Second, the Local Plan Transport Study identifies A505 between the M11 and A11 is at stress and requires strategic infrastructure improvements such as the dualling of the A505 between the M11 and A11. However, these works are not listed in the intended infrastructure works of 'North Uttlesford Garden Village Prospectus' produced by Bidwells and in the Malins Economic Viability Study.

Stansted Neighbourhood Plan Steering Group

Village needs protection from merging with new settlement. A buffer zone should be placed at a statutory minimum 500 metre 'green corridor' between existing and new developments. Although transport links are excellent, improvement is needed for the rest of the district. Uttlesford Cycling Strategy needs to be put into practice throughout the district.

Clare College Cambridge

Walking and cycling is unlikely to be an attractive option for future residents of NUGC because of the distances and gradients involved. Access to the train station is likely to be by car because of the distance and gradients involved. A modal shift to 50 to 60% away from car use is laudable but unlikely. Improvements to the highway infrastructure will be needed earlier in the build out to relieve congestion if NUGC is implemented.

The development of NUGC is likely to cause traffic congestion and there is a lack of detail of transport and highway infrastructure improvements required early in the Plan period.

The high-level Transport Study (December 2016) and Addendum Report (June 2017) undertaken indicates an approximate 6:1 modal split is likely in preference of the car over other vehicular journeys and states that 'the predominantly rural nature of the district with a dispersed pattern of small settlements, relatively long journey distances that preclude walking and cycling' para 4.6.1 of the Addendum.

There is no reason to expect that a modal shift away from car use can be delivered in NUGC. Modal split by car journey is likely to remain high. The Draft Plan requires the settlements to meet Garden City principles.

The Town and Country Planning Association's guidance states that a 'Garden City's design must enable at least 50% of the trips originating in the Garden City are to be made by non-

car means, with a goal to increase this over time to at least 60%' and 'should be located only where there are existing rapid public transport links'.

Trains and roads are already congested. If NUGC proceeds the car parking provision at the station should be increased along with dedicated cycle routes. Even so, because of the distances and gradients involved, travel from the NUGC development to the train station is most likely by car journey, adding additional traffic to the highways. Modal split by car journey is likely to remain high.

The Transport Study undertaken is a strategic level study. A detailed study needs to be undertaken to assess the transport implications of NUGC along with the additional development planned in surrounding areas so that a holistic review is undertaken and appropriate transport mitigation can be identified and early delivery assured. This information needs to be assessed within the Sustainability Appraisal. The biotech clusters largely sit in South Cambridgeshire and Cambridge City and are likely to be a work destination for many of the new NUGC residents. Currently there is no north bound access to the M11 J9. No details of improvements to M11 J9 are proposed. The Draft Plan recommends access to the north by way of the A11 but there is no access to the A11 planned. The biotech clusters largely sit in the administrative areas of South Cambridgeshire and Cambridge City Councils and are likely to be a work destination for many of the new residents. Trains and roads are already congested. The car parking provision at the station should be increased along with dedicated cycle routes. Even so, because of the distances and gradients involved, travel from the proposed development to the train station is most likely by car journey, adding additional traffic to the highways. While it is proposed that infrastructure will be improved to accommodate the extra traffic, particularly on the routes and interchanges connecting the A11, A1301, M11 and A505 routes there is nothing specific to judge whether the proposed improvements will be enough to deal with the additional traffic. It is not clear how improved transport choice, including by public transport to railway station can be achieved given physical constraints of road network and car park capacity. Clare College reserves the right to submit further representations on the transport assessment.

J Fordham & Sons Ltd - Using all this fertile and highly productive farmland to build housing, is a travesty, surely it's about time we built more flats etc. on the outskirts of towns, on disused factory sites etc. There is unused land opposite me just scrub, and at least two other sites in the village on which you could build. I want to preserve my farm and surrounding countryside and will do all I can to pass it over to the next generation to continue growing food for my country. I suggest there is no need for this amount of housing especially sited in such a beautiful productive area and that the whole project should be reviewed more thoroughly.

Developers/landowners/site promoters

This representation is made by Bidwells LLP (Bidwells) on behalf of Mr Andrew Nicolas in Support of the Preferred Options Policy allocation SP7 known as the North Uttlesford Garden Community. Bidwells, acting on behalf of Grosvenor Britain & Ireland (Grosvenor) the promotion partner for land within the North Uttlesford Garden Community allocation

under the ownership of Messrs Hamilton, Robinson & McLaren (the Promotion Land), have been instructed on behalf of Mr Andrew Nicolas to represent support for the North Uttlesford Garden Community (NUGC) allocation and to indicate the land and buildings at Field Hall Farm, Field Farm Drive, Great Chesterford, Essex CB10 1RP (Field Hall Farm) indicated shaded Yellow on the appended Plan No.A.50,412 within Mr Chalmers ownership. As demonstrated on the attached plan, the site abuts the Promotion Land, indicated on Plan A.50,412 bound in Green, that lies within the NUGC Preferred Options allocation. Mr Nicolas confirms he is the landowner of the site which has an area of 7.89 hectares and comprises a residential dwelling, out buildings and a mixture of managed grassland and agricultural land and that this land is unencumbered by any legal or ownership issues that might affect its future use or development. Mr Nicolas supports the principle of The Spatial Vision and Policy SP2 – The Spatial Strategy 2011 - 2033 and the location of the Preferred Options allocation Policy SP7 - North Uttlesford Garden Community including the delivery of the new community with consideration to garden city principles. It is considered that a new garden community in this part of the District is essential to achieving the Spatial Vision and Spatial Strategy and is a sustainable location to meet the housing and employment needs of the District. The NUGC site is not subject to any national environmental designations that might prevent its development and is in close proximity to the strategic transport network and existing employment sites, which are planned for future growth. The comprehensive nature of an allocation of this scale will ensure that the necessary physical, social and green infrastructure can be delivered. Furthermore, delivering the NUGC in consideration to garden city principles will provide a number of benefits, including but not limited to, the delivery of affordable housing in accordance with housing needs, the provision of local employment opportunities and community facilities, access to a range of accessible transport modes that provide alternatives to the private vehicle and a high-quality design to be developed alongside community engagement which responds to the context of the location. It is therefore evident that the principle of Policy SP7 - North Uttlesford Garden Community and the location of the Preferred Options allocation is consistent with National Policy, in particular the core principles and policies of the National Planning Policy Framework, and is therefore consistent with the approach to achieving and delivering sustainable development. Mr Nicolas identifies within this representation the respective land and buildings within ownership at Field Hall Farm as available for development which is considered well related to the Promotion Land and the Preferred Options allocation area and should be considered as such by Uttlesford District Council. Mr Nicolas confirms willingness and eagerness to engage positively with Grosvenor, landowners, the District Council, Stakeholders and the Community as appropriate in relation to supporting the Local Plan Vision, Strategy and Policies. It is considered that this representation further demonstrates that sufficient available land exists to support a development of 5,000 homes for the North Uttlesford Garden Community and that there are no known ownership or legal constraints that would prevent or unduly constrain the ability to prepare an appropriate masterplan for a deliverable and sustainable new community.

Grosvenor Britain & Ireland (Grosvenor) support Policy SP7 for the inclusion of the North Uttlesford Garden Community (NUGC) as part of a robust Distribution Strategy for helping meet the District Need through sustainable new settlements as supported by National Policy and Guidance, as set out in representations supporting paragraph 3.14. Policy SP7, point 1, demonstrates that the Council have acted proactively to allocate the North Uttlesford Garden Community (NUGC) for up to 5,000 new homes, including a minimum of 1,900 homes in the

Plan period to 2033. This represents 13.5% of the overall District Housing Need and almost 50% of the allocations made in the North of the District and is therefore essential to meeting the Full Objectively Assessed Need of the District of 14,100 homes, as corroborated by Bidwells assessment in representations supporting Policy SP3. Policy SP7, point 2, will support the sustainable distribution of housing and employment opportunities across the District where job opportunities within the NUGC will compliment employment growth in the north of the District at the District market town of Saffron Walden, Chesterford Research Park and at the Wellcome Genome Campus, Granta Park, the Babraham Institute and Cambridge, as set out in representations supporting Policy SP2. Policy SP7, point 3, supports creation of a sustainable new community through provision of new infrastructure and amenities including retail, business, community, education and health. Both Primary and Secondary education will be provided at the new community and Grosvenor would support the Council amending the Policy to allow the exact number, type and scale of the schools to be determined through the provision of the Development Framework and masterplan.

Policy SP7, points 4 & 5, will support the high level of internalisation of journeys that will be achievable through the scale of NUGC providing a mix of jobs, services, schools, community facilities and retail reducing the need to travel. In particular, the ability to retain school trips within the site due to the provision of a variety of educational facilities would be a significant benefit as education related trips account for 50% of journeys nationally in the morning peak period. As the only strategic scale development in the north of the District NUGC is unique in being located less than 6km from the District centre market town of Saffron Walden and within 5km and less of Chesterford Research Park, the Wellcome Trust Genome Campus, Granta Park and the Babraham Research Campus providing opportunities to achieve a mix of sustainable travel options including walking, cycling and public transport. Access will also be provided to existing transport infrastructure in the form of the strategic road network and West Anglia Main Line. The NUGC is unique in the District in having this number of employment locations within a proximity that could be accessed by sustainable travel modes whilst being within less than 2km of a Railway station, which again could be accessed by sustainable modes of transport, therefore also allowing longer journeys by public transport to locations including Stansted Airport, Cambridge and London. The Transport Strategy for the early phases of NUGC would be based around identifying existing gaps in the transport network which reduce accessibility and mobility by modes other than the car with works identified and delivered in phases to provide modal choice to new residents and employees. This will include both on-site and off-site improvements to walking and cycling infrastructure as well as access to public transport to improve links to key destinations including footpath and cycleway provision, extension or new provision of bus services and improvements at hubs such as Great Chesterford Railway Station, as such this will in turn provide improved modal choice to existing users of the network providing opportunities to change existing travel habits and reduce pressures. Alongside these measures the development will provide improved access to the highway network to allow safe access to the highway for both new residents and traffic associated with the construction works and to mitigate predicted impacts. At a local level these will include works to the junctions of Field Farm Drive and Park Road with the B184 and to the junction of the B184, A1301 with the A11. Grosvenor support the findings of the Uttlesford Local Plan Transport Study (WYG, December 2016) which confirms that that there are no impacts that would prevent the development coming forward in the Plan period through identifying potential mitigations that would indeed achieve nil-detriment or betterment to the assessed network up to delivery of approximately 3,300

homes. As this study focuses principally on the impacts of car based travel it is considered to represent a 'worst-case' scenario and therefore provides robust evidence supporting this stage of the Plan process. When additional consideration is given to the positive factors of a high-degree of internalisation of journeys that new settlements provide and the modal choice opportunities that the NUGC uniquely offers due to its location a reduction in impact will be demonstrated. Importantly the consideration of transport impacts should recognise that, the planned growth of the surrounding employment centres will generate journeys upon this highway network, the provision of NUGC within the heart of this area allows for shorter journeys and journeys by sustainable modes and will therefore have a reducing impact upon the wider transport network.

The impacts of the employment growth in the area and of the NUGC should not therefore be considered to generate mutually exclusive journeys upon the network as the delivery of the latter can in fact reduce the impacts of the former. Policy SP7, points 8-11, will support the provision of a masterplan that responds positively to the features of the site. A review of the landscape undertaken by the Environmental Dimension Partnership Ltd (EDP) (Representations in respect of landscape Matters concerning Proposed North Uttlesford Garden Community, August 2017), attached, confirms the conclusion of the Council's landscape assessment (Land at Great Chesterford; Landscape and Visual Appraisal. Chris Blandford Associates, June 2017) that the NUGC site offers many significant opportunities for the creation of a new garden community and notes that the site is under intensive arable use, with few notable landscape features and little habitat diversity, a creative garden community planning exercise can therefore confidently be expected to deliver significant benefits to the landscape fabric and to biodiversity. EDP demonstrate that there are no statutory or designatory constraints in a landscape sense and therefore no basis for the site to be attributed any elevated value in planning terms. Within the site there are no ecological designations at any level, no ancient woodland and no Protected Trees, no registered Parks and Gardens, only one listed building and one scheduled monument, the latter with no visible evidence of remains above ground and only one Public Right of Way passing through the site. The NUGC site shares a common character with a large tract of land which extends across the north of the District and in these terms contains no features which are not common place elsewhere, it is essentially a parcel of land that is typical of its host character area and therefore neither exceptional or rare but which does offer opportunities for landscape and biodiversity enhancement, as recognised by the Council's assessment, which, combined with its locational social, environmental and economic benefits described above, will help to achieve the Council's vision for a garden community. Grosvenor has been appointed by the landowners as single development partner for the NUGC and as such can confirm that the land is available and through this collaboration arrangement is considered deliverable. Of the two sites considered by the Council for new settlements in the North of the District the NUGC represents the only one that has actually been promoted as available for development in this Local Plan period, further demonstrating the importance of the site in meeting the District's balanced development needs. As the early proposals for the North Uttlesford Garden Community are developed, Grosvenor will work closely with the Council, local stakeholders and the community to get the principles for success right.

Policy SP7 refers to the draft allocation of the strategic site identified as North Uttlesford Garden Community. It has been identified within these representations that the proposed allocation of North Uttlesford should be deleted. These comments are based on the existing

settlements that already exist to the south and to the north, which could facilitate additional housing development, and that already provide for the day to day needs of local residents.

In addition, the proposed strategic would be unlikely to meet the delivery rates identified within the DULP due to the complexity of the strategic sites, principally the strategic highway improvements, including the duelling of the A505. Requested Change We request the following changes to Section Policy SP5: Deletion of policy SP7.

We anticipate that our views will broadly concur with the analysis of South Cambs District Council. This development should not happen unless there is appropriate mitigation to protect the interests of the residents of West Suffolk and South Cambridgeshire; this could include appropriate development to meet the needs of the residents of those Districts.

We are broadly supportive of the plan and we have considerable interest in it. We are in a position to assist you with realising some significant aspects of the development.

Secondary provision - The site of the north Uttlesford development seems strategically appropriate. Currently the very north of Uttlesford around Great Chesterford has become educationally isolated. As a consequence of the priority in admissions criteria given to geographical proximity to the school children from the primary school in Great Chesterford cannot secure places at SWCHS. It is costly to bus these children to school in Newport or Stansted where places may be available and parental preference in many cases is to seek education from South Cambridgeshire schools. A new secondary school in the Great Chesterford area should be a welcome addition if the school can be associated with a successful existing education brand. Saffron Academy Trust has such a brand and would, without doubt, bid to run such a school. This school would be an 11-16 comprehensive modelled on SWCHS and linked very closely with its sixth form provision. I imagine that this would be an attractive proposition for families wishing to settle in the area. This brings me to my second point, which is that I urge the planning policy team to develop their ideas in close consultation with Cambridgeshire, who have had recent experience of growing secondary school provision in new developments. In both Cambourne and Trumpington the secondary schools were built at an early stage and were used to 'bait' family settlement. In Cambourne's case this has really worked successfully. The school is part of a MAT, is associated with the well-respected brand of Comberton Village College and has gained outstanding status in its own right. Saffron Academy Trust would seek to replicate this. I mentioned at our meeting the model of village colleges that are prevalent a few miles from Great Chesterford, in Cambridgeshire.

The Garden City philosophy and the Village College vision could be blended very successfully and sympathetically in a North Uttlesford community.

Village Colleges are built to be 'cradle to grave' hubs of education and community facilities. They benefit from residential caretaking and 24-hour security and provide not only education for 11 to 16 year olds, but crèche and playgroup facilities, community libraries, meeting rooms and leisure centres. There are economies of scale that could be benefitted from here, but also these centres generate a helpful ethos.

Gladman supports the concept of Garden Communities but is concerned about their deliverability. The need for provisions including affordable housing, employment provision, a

package of transport improvements, new healthcare facilities, new local centres, a secondary school, 4 primary schools and early-years facilities are likely to lead to protracted S106 agreement negotiations which may well cause additional delays in the delivery of the scheme.

- Persimmon welcomes the identification of these new settlements which shows a commitment to delivering housing for this plan and beyond. The spatial vision highlights that these new garden communities will be exemplars of 21st Century living providing well designed homes, and that Housing will be of high quality, with excellent accessibility and well designed for whole life living (these requirements are not carried through to the garden community policies). While Persimmon supports the objectives of delivering development which is of a high quality and design, such requirements need to be reinforced through the preparation of masterplanning and design codes for which it is envisaged through the policy that there will be community involvement. The Plan expects 4,670 homes from the Garden Communities up to 2033. Development is expected to commence and deliver housing from 2021/22 (Appendix 3 – Housing Trajectory and the number of houses at this time is calculated as 125). This is considered to be unrealistic given the work that is required including developing a framework, and SPD (which requires consultation) all prior to the submission and granting of planning permission.

Policy SP7 - North Uttlesford Garden Community I believe this proposed settlement to be too close to the principle market town of Saffron Walden. If successful in provision of service it will provide for the wider area at the expense of the viability of Saffron Walden, if it is not successful in provision of services it will overload the roads and the centre of Saffron Walden making a beautiful market town unbearable, definitely not enhancing it. If the roads of Saffron Walden are improved sufficiently (see Appendix 1) it would then be logical to significantly increase the number of houses allocated to the outskirts of Saffron Walden rendering the proposed new settlement redundant. I would also ask UDC to ensure that their proposed location of the North Uttlesford Community is not unduly influenced by UDC's indirect part ownership of Chesterford Research Park and their aim to enhance income from said ownership. The inclusion of proposed self-build and custom houses only within the proposed new settlements seems ill informed and perverse. As a specialist in this form of property it is the last place most self-build and custom builders would wish to build with the exception of self-build low cost housing that I agree should be encouraged.

Whilst we do not oppose the promotion of Garden Communities in principle, we now register objections and concerns relating to their scale and other related aspects as summarised as below:

- The proposed Garden Communities at Easton Park and West of Braintree are far too large
- Extensive tracts of greenfield land are to be sacrificed for non-agricultural development, resulting in the near coalescence of many existing settlements.
- The contribution to housing requirements within the Plan period is conjectural and, in any event, more needs to be known about post-2033 housing requirements before committing to such large scale projects.
- We consider the envisaged 5000 dwellings for the North Uttlesford Garden Community to be the maximum if Garden Communities are to be endorsed as a sound strategic approach

- Whilst Garden Communities do undoubtedly provide opportunities to “build in” many features of sustainable development, they require very high levels of infrastructure costs and represent a form of dispersed growth rather than concentrating growth within established centres.

- In the face of all these uncertainties, including the unknown level of growth in the post-2033 period and the investment and timing of improvements to the A120 in particular, large tracts of the Essex countryside will be blighted for a generation and the lives of thousands of existing rural residents will be harmfully affected. Indeed, we query whether the Local Authority has been working with the support of their existing communities in the promotion of the new Garden Communities as required by the NPPF.

- The ability of the three Garden Communities to deliver 4690 out of the remaining 5926 dwellings required during the Plan period is highly speculative and not justified.

- The expansion of existing settlements, accessible to the main urban centres of Great Dunmow, Saffron Walden and the A120, offers a viable and more sustainable alternative to large scale Garden Communities.

Why the Plan is unsound:

No clear vision of a future which seeks to address a sustainable relationship between existing and future houses and jobs. There is undue focus on long term growth when the need is for short and medium term growth to satisfy known existing needs and redress previous shortfalls in provision. Alternative strategies incorporating smaller scale Garden Communities would have lower environmental impacts, require lower levels of investment, and deliver short and medium term housing and jobs compared to larger scale Garden Communities.

Arising from inadequate assessment of the various strategic options, the Plan in its current form is flawed and will do irreparable but avoidable harm to the Essex landscape and many of its established communities.

This site is not a suitable location for a new settlement, and we have concerns surrounding its deliverability. A new settlement in this location will have a significant impact on South Cambridgeshire, and there is no evidence to suggest that it has the support of South Cambridgeshire District Council (SCDC) or Cambridgeshire County Council as the local highway authority.

Concerns regarding delivery of houses and transport infrastructure, impact on landscape, Water quality impacts; Other landscape impacts; Presence of heritage assets; Impact on heritage impacts; Potential for protection / enhancement of heritage impacts; Potential for contamination; and Bus links.

Individuals

- North Uttlesford inappropriately selected as a consequence of housing number projections related to Stansted, Uttlesford's key employer – the airport is the driver for the housing numbers but the development is as far from it as possible. The housing needs are driven by historical expansion of Stansted Airport which UDC could discount. If UDC maintains this need then it arises at Stansted not due to south Cambridgeshire. Locating the housing so far from Stansted will force employees to drive through towns and villages to the airport with no road improvements.

It is highly ambitious and unlikely given the extensive technical work and contractual arrangements which will be needed before an outline permission can be issued that the delivery of housing will start by 2021/2022. These include a detailed hydrological and geological survey of the site, a much more comprehensive transport analysis taking into account planned and permitted development in South Cambridgeshire, Haverhill and Royston and traffic flows through M11 Junctions 11, 12 and 13 and 14 which provide access to the West and North Cambridge employment sites. The establishment of an LDV will be needed if the Garden City model is pursued together with a comprehensive masterplan based on technical work, a design code and a detailed S106 agreement which fully addresses the need to fund offsite road improvements. Full permission will then be needed for the first individual parcels before house construction can commence. At both Cambourne and Northstowe it was five years between outline permission and the first dwellings being ready for occupation. On the assumption that the Local plan submission and EIP run to the stated timetable it is unlikely that NUGC could start to deliver before the mid-2020s.

- No evidence of how compliance with requirement for transport, health, education or retail infrastructure will be achieved. What is the vision for this settlement if initial phases are built but the infrastructure to support them does not materialise?
- Difficult to understand why building a North Uttlesford Garden Village is going to be necessary in order to support a few limited growth jobs at Great Chesterford Science Park, the only significant employer within this part of Uttlesford. Given that Uttlesford does not have control over public transport it is difficult to understand how the "integrated and accessible transports systems" objective is going to be achieved. In the context of local jobs what definition is being used for the term 'local'? Suggest it should be a job within walking or cycling distance.
- There is no guarantee that the transport infrastructure improvements to road or rail access can be delivered.
- Probably the worst thing a planning authority can do is to draft a plan that includes building a whole new garden village from scratch and then place a cap on the development. This will have the effect of minimising the likelihood that the garden village will be self-sufficient in services because the volume of residents necessary to support viable and diverse services will not meet a critical mass. Therefore, the most likely outcome will be creation of a dormitory village with no viable local services. Given the proposal to "cap" it would be better to reallocate housing development to existing villages and towns where services already exist and will benefit from the enhanced footfall, or can easily scale up existing services because of the expected enhanced footfall.
- Clarification is needed concerning when the first 15 -17 years of development begins and ends, given that the number by 2033 is 1,900.

- Concerned lack of evidence on delivery of 5000 dwellings is provided. It is unrealistic to anticipate housing delivery will commence in 2021/22.
- Concerned that there is no evidence that the developer is fully funding the proposed highways improvements. How would a development of 3,300 houses be sustainable if development is capped at this number due to lack of further strategic highways improvements? It is unclear why the delivery rate is assumed to be 220-194 dwellings per year in first 15-17 years of development but is only 175 per year elsewhere.

Objections

Housing

- Too Big – stop at 2,000
- Doubt the reliability of 14,100 housing needs based on updated data.
- Please confirm what criteria buyers need to benefit from affordable housing; how much each 'affordable house' will be marketed at; and how you, as a responsible council ever mindful of the present and future need for affordable housing for residents of the district, intend to maintain the original percentage of affordable housing on the site?
- Doubted the reliability of 14,100 housing needs.
- The housing figures upon which the draft LP are higher than those now established by ORS as being the Full Objectively Assessed Need (see West Essex and East Hertfordshire Strategic Housing Market Assessment – Establishing the Full Objectively Assessed Need, July 2017) Until the pause in the local plan process in November 2016 UDC was proceeding on the basis that only two new settlements were required to contribute sufficient housing numbers in the Plan period: the case for the third settlement at Great Chesterford is not now established as necessary.
- It would do little to help UDC's housing waiting list; too far from services and not likely to provide enough social/affordable housing.
- There are numerous housing developments already planned or started in Uttlesford while the housing market is currently stagnating.
- This project will end up with same depressing mock houses that we see everywhere firmly out of the reach for first time buyers or the young. If we are building for the future then new architecture and eco housing should be a top priority;
- Given the number of large houses already built or authorized, any future building should be affordable & strictly limited to those with strong local ties.
- The housing requirement by 2033 has reduced by 768 units, so residential developments can be concentrated at Easton Park and West of Braintree.
- The WYG information relating to Scenario 28 is based on 1460 dwellings not a minimum of 1900.
- Concerned no proportion of open space is provided. The proposed gap between Great Chesterford and the proposed NUNT at 0.5km is insufficient to achieve a green space Buffer.
- The proposed development would not accommodate the housing needs of Uttlesford as it would only benefit the commuters to London and workers in South Cambridgeshire or Cambridge City. This will push up price and will not be affordable to local residents.
- Concerned that the proposed development will benefit the citizens of Cambridgeshire and Suffolk more than Uttlesford given its location at the border of Essex.

- The collective plans of South Cambridgeshire and the Wellcome Genome Campus has at least partly meeting the same housing demand already. The Wellcome Genome Campus is expected to expand 1200 homes under a 20-year vision.
- Saffron Walden has fewer than 7,000 households. The scale of development with 5,000 dwellings are too much.
- The proposed development could help meet the South Cambridgeshire District Council's housing needs, so should put on hold until their local plan-making process starts in 2019.
- It does not fall within the Strategic Housing Market Area and does not supply housing for the Uttlesford housing market..It is contrary to the Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.
- Concerned no proportion of open space is provided.
- Various windfarm and smaller residential housing planning applications have been rejected over the last ten years.
- The council does not have planning and legal obligation to ensure developers to provide a specific percentage of low-cost, affordable housing. Given the significant infrastructure challenges, it would not be viable for developers to provide sufficient affordable housing.
- A reasonable alternative option which does not appear to been considered would be to increase the delivery rate at Easton Park to 250 homes a year which could boost delivery by 675 homes by 2033 which in combination with other alternative sites could mean that the NUGC site would not be needed.
- Will many properties be purchased by the science parks to rent out to their contract staff on a short term basis. What will this do to the spirit of the new community? Does the Council have the power to cap the prices of these properties in the first instance and make the first waves of the build at least be only available to existing Uttlesford residents?
- In Europe you see much more APARTMENTS. This reduces site sizes! Land Cost! Young people to get on housing ladder! Why Uttlesford not giving APARTMENT BLOCK consideration!
- The proposed development would not such to the existing employment sites. The Wellcome Trust has already planned to build their own flats nearby. And there are 2 massive developments in Trumpington and Shelford which is even closer to the Cambridge South Life Sciences employment sites.
- The number of residents living in the district who are aged over 65 is expected to increase from 15,800 to 28,000. Residential homes and specialist dementia facilities are required to meet needs of an ageing population. However, the proposed NUNT aims at providing homes for those employed in the science cluster in Cambridgeshire.
- Need to specify the reasoning for making provision of self-build and custom housing,
- Need to specify the proportion of affordable housing and how to maintain their affordability in long-term.
- Need to specify dwellings allocated to local people.

Employment

- Page 3 suggests that there will be a wide range of local jobs - what are these jobs and how will they be created/ guaranteed to exist?
- Concerned that employment opportunities provided by Wellcome Genome Campus and Chesterford Research Park will not be sufficient for population in the new settlement as STEM research in the UK faces huge uncertainty post-Brexit.

- The only science park within Uttlesford is Chesterford Research Park but this development does not help provide housing for those working in Uttlesford.
- There is not the quantity of jobs in the immediate vicinity including Saffron Walden to support the needs of this development.
- As per the GC principles 1 job per new house hold is to be provided in the GC - there is no detail of what these will be or how many jobs will be created, no local employment growth in North Uttlesford with most expansion in the area around Stansted which, as some 19 miles from NUGC, hardly qualifies as local.
- Uttlesford is so busy building homes instead of work places, we do not have the jobs available for all these new residents in the north of the district, they will be travelling out of the area.
- The majority of jobs will be in the south of the district, primarily at Stansted Airport, and I note that the plan does not even begin to deal with airport requirements arising from the recent announcement of plans for 44Mpassengers per year.
- Chesterford Research Park offers a degree of employment locally. Clearly UDC has a vested but undeclared interest in the growth of this site as part owner and claims 900 new positions could be created there.
- Underestimates employment growth in South Cambs by approx. 20,000 and the associated highways burden. Doesn't take into account any planned growth at Royston. Should make specific mention of connection to Granta Park not just Wellcome Trust and Chesterford Research Park.

Retail

- Lack of retail facilities in NUGV must be taken into consideration as residents would be extremely likely to use internet grocery shopping and other online shopping services resulting in a vast increase in delivery vehicles using all these roads.
- 1 shop is shown on the plan for 5,000 houses!! This is clearly insufficient
- Perspective residents would simply cross through Saffron Walden, congesting the centuries-old streets, to access Tesco or Aldi, on the furthest side of town from your proposed site, as the nearest supermarket shopping.

Agriculture

- Concerned the loss of the prime agricultural land. The Agricultural Land Classification map of the Eastern Region (ALC008) indicates the site is Grade 2 and 3a agricultural land – officially described as “best and most versatile”.
- The loss of 466 hectares (1152 acres) of prime agricultural land would result in a decline in wheat production (for example) of 3700 tonnes per annum. According to National Farmers Union (NFU) has reported that home grown food production has declined in the UK from 80% 30 years ago to 60% today and is likely to reduce further to 50% within the next 10 years. Self-food sufficiency will be important for national security post-Brexit.
- Loss of Agricultural Land is contrary to CPP 7 and NPPF paras 110 – 112
- The NUGV is prime agricultural land used for growing crops, SP 10 suggests that councils have a duty to protect the best and most versatile agricultural land, which would clearly include this area.

Local characters

- Concerned the destruction of local character.
- Landscape will be blighted by the urban sprawl and wind towers;
- The 2017 Landscape Appraisal commissioned by UDC for the Local Plan concluded that the land at Great Chesterford is of high landscape and visual sensitivity and development cutting across the upper valley sides and the ridgeline of the Site would be uncharacteristic of the local settlement pattern. This will cause a serious threat to important and historically significant Heritage Assets
- The development across hilltops will be highly visible from surrounding villages of Hinxton, Great Chesterford, and Ickleton. Given the topography, buildings will be constructed on land which is 90 -100 metres above ordnance datum which would be significantly higher than areas of Great Chesterford standing at 37 AOD. It will still be highly visible and dominate the landscape despite the separation from the Chesterford and building is mainly on the plateau.
- The proposed development does not follow traditional settlement patterns.
- Mitigation measures such as new planting, height limits for houses and creation of sign breaks will not be sufficient to reduce the detrimental impacts.
- Proposed plan would result in ribbon development from Cambridge to the New town and Saffron Walden, losing the identity of villages and rural character and landscape of South Cambridgeshire and North Essex. Land owners are promoting two large developments between Sawston and Great Chesterford to Great Chesterford Parish Council. The development contradicts with the Policy C1 to maintain the cross-valley views in the river valleys and the historic settlement pattern in terms of density and scale.
- Greenbelt and rural land in the border between Uttlesford and Cambridgeshire is significant given the growth in Cambridge. The proposed development would set a precedent for further encroachment.
- Lack of a strategic landscape design with ecological objectives in larger context.
- This is contrary to CPPs 5 & 7 and NPPF paras 109 – 113, 156 and 157
- The site for the new settlement is on a hillside -it will be highly visible from South Cambridgeshire and from the Cam Valley

Highway

- The South Cambridgeshire Junction Assessments commissioned by UDC does not consider employment areas west of the A505/M11 junction towards the A1 (Royston, Baldock, Letchworth, Hitchin, Stevenage and Hatfield) or North of the M11 towards the A14 (West Cambridge). It also did not consider the additional 20,000 jobs in Cambridge and South Cambridgeshire, and additional 5,000 homes in West Suffolk which much of which will rely on the A1307 to access jobs in the Cambridge area. This will generate traffic flow on the A505 between M11 junction 10 at Duxford and the MacDonaldis roundabout, which will be higher than the 7% of the traffic concluded by the PBA report. Dualling this length of the A505 would only be sufficient to ease existing congestion but would not adequately cope with the additional transport movements created by 5,000 dwellings at the NUGV.
- This site borders onto Cambridgeshire via 2 main roads. What are the proposal/assumptions for the area west and north of this site?
- The M11 is a two-lane motorway and the stretch between junctions 8 and 10 seems particularly prone to accidents because it is fairly windy and hilly for a motorway which

reduces the ability of drivers to see the traffic ahead. Extra vehicles on the roads will exacerbate the existing problems.

- The junctions of the A1301/A505, M11/A505, and the A1307/A11 ('Fourwentways') will be significantly impacted considering the growth along A1301 from Great Chesterford into Cambridge including Genome Campus expansion, the Smithson Hill Agritech development, and the Sawston Trading Park redevelopment in Pampisford, an increase in commuting to Greater Cambridge area. This is already gridlocked during peak hour. South Cambridgeshire Junctions Study (SCJS) confirms that the A1301/A505 ('McDonalds') Junction south of Sawston is currently close to capacity, experiences significant congestion at peak times and only offers improvements on a 'nil detriment' basis up to 2,800 dwellings at Great Chesterford, after which further works would be needed (SCJS., p.33, 8.3.4)
- Without traffic control at the roundabout, dualling the A505 would only be sufficient to ease existing congestion but would not adequately cope with the additional transport movements created by 5,000 dwellings at the NUGV.
- An upgrade to Junction 9 of the M11 is vital. Currently, there is no access to the north on the M11. Also, no access from the north to the A11 and from the A11 to the south is provided.
- Concerned about the impact of additional commuter traffic between Stansted airport and the new settlement.
- Concerned about the impacts on roads in Great Chesterford village, Little Chesterford, Hinxtton Village, Eccleston, Ickleton Village and Duxford Villages as increase in rat-runs at the rural route through Newport, Quendon, Ugley, Stansted Mountfitchet etc on towards the airport/Bishop's Stortford/Harlow, in order to avoid the existing traffic jams at the McDonalds roundabout on the A505 during peak times.
- As only one road is proposed in and out of the settlement and long queue is expected especially on South Street/School Street area of Great Chesterford at school start and finishing times.
- The B184 joining the new settlement with Saffron Walden is a small, country road, dangerous in places and liable to flooding and congestion. This will also cause significant safety issues for cars seeking to join the road from either Jacksons Lane or High Street Gt Chesterford.
- The traffic impacts on highway has not considered the planned added R&D facilities at the Sawston Business Park/ Iconix site (1000 or more employees) or the Spicer site (another several thousand employees),
- Required a comprehensive transport study and mitigation measures with SCDC.
- Ickleton are already suffering large traffic movements causing congestion and impacts to highways safety.
- The streets within Great Chesterford are already busy. Access to the Crocus Surgery in Great Chesterford after their recent expansion has already created problems regarding local parking restrictions
- There are only four footpaths between countryside and Great Chesterford. This new town will impact on the footpath leading to Park Farm. Instead of a walk through farmland, this will be a footpath leading into a new town.
- Congestion in Saffron Walden will worsen. At the exit/entry of the new settlement at Park Lane, there will be four junctions along a 50 MPH stretch of the B184. And there is also

an increase in demand for shopping at Saffron Walden. The Swan Meadow car park is unlikely to reduce traffic flow as customers will park at car parking area within the town.

- Failure to obtain relevant transport assessment: UDC's own transport consultants, White Young Green Consultants, confirmed to PPWG in June 2017 that "at this stage... work had not occurred at such a high level of detail to anticipate traffic growth and mitigation measures on the B184" – which is to provide the principal access/egress route via Field Farm, Park Road and Cow Lane to the local road network. This failure alone is sufficient to demonstrate that UDC cannot justify selection of NUGC as "sound" for the purposes of the NPPF.
- Failure to take account of severe transport impact of NUGC on Great Chesterford and surrounding areas: UDC's draft LP evidence base is deficient regarding unknown/unidentified impacts on any available transport mitigation measures, is uncosted, is contradictory regarding transport impacts on ecological, landscape and heritage aspects, and is entirely lacking in evidence to support the 10% modal shift and public transport provision that underlies selection on this site.
- The new development at Stanley Road had 72 vehicles parked last night (on driveways and in the roads) yet during the day today, there are only 29 vehicles in the site, meaning that although the village has a bus service and a train station at a walkable distance, residents are still using their vehicles to commute. This new town will be even further away from the infrastructure, people will use their vehicles.
- Car ownership in this area is significantly above national average – why should it be any different in this settlement?
- Adding lanes to the M11 has been in discussion for many years (to take account of Stansted Airport expansion) but with no apparent plan to revive this proposal significant additional traffic is to be added.

Sustainable travel

- The plan assumes public transport, walking and cycling will be used as the main modes of transport. This seems overly optimistic as distances to offices; the train station and shops are quite far. Infrequent bus and train service.
- 50% of journeys being other than car journeys is not realistic without major investment in transport. Car ownership within the area is above the national average. New Cambourne town has 81% of the working population drove to work.
- No public or non-motorized transport infrastructure present nor planned and its inconceivable how the 50-60% of travel by means other than car per Garden Village Principles will ever be achieved.
- The suggestion by Bidwells that the provision of foot and cycle paths will that residents will walk rather than drive is just not supported by evidence
- At least 50% of trips must to be made by non-car means and that garden cities should only be located where there are existing rapid public transport links or where plans are in place. I understand that Bidwells have not committed to meeting these principles
- The distance of the development to the school is not suitable for a young child to walk or cycle and current bus services are being cut and having their prices raised.
- The foot paths and tracks that cross the proposed site are used for walking and mountain biking, as those to the west of the village are already blighted by the M11 and railway.

- The available street parking for the station is full by 0830 on weekdays reducing the road width to a tight, single track to be shared between cars, pedestrians, cyclists and commercial vehicle activity
- The proposed development will be built in a linear form within valleys, and separated by steep slopes. It is not likely to be walkable as the long distance to the amenity from the two ends.

Cycling

- Cycling is not expected to be the main form of transport, especially in winters. The Department of Transport meanwhile predicts car journeys are set to increase by 55% over the next two decades while bus passenger journeys are continuing to decline. Living on a hillside will not make cycling their primary form of transport.
- Rail stations are too far away for most people to cycle
- Concerned the absence of any non-car route to leave NUGV to the major employment sites north including the Genome Campus and Cambridge Biomedical campus in Cambridgeshire. It is unsafe for cyclists and pedestrian and to cross Stumps Cross roundabouts.
- A proposed cycle path between Great and Little Chesterford has received planning but cannot be built due to lack of financial support and investment. This does not bode well for the optimistic idea that we will all be travelling by bike around North Uttlesford any time soon.
- A separate, segregated cycle path is needed on B184 all the way into Saffron Walden all the way into Saffron Walden but

Bus

- Concerned no adequate public transport alternatives are guaranteed. Bus routes to Cambridge and Saffron Walden already take in too many stops, irregular and slow.
- The Local bus service is not integrated with other modes of transport.
- Need a public transport service delivering residents promptly to and from the trains of their choice every day throughout the two rush hours. Anything less adds to car usage. Will a coach operator offer such a service without massive subsidies from UDC?

Railway

- Improvements to the M11, A11, A505 and A1301 need to be considered as proposed site would serve the needs of commuters travelling to Cambridge and London, rather than meeting the existing local need and prioritising those in Uttlesford.
- The trains to London and Cambridge are already running at absolute capacity, often with severe delays. Abellio Greater Anglia Railway was recently voted 4th from bottom of all rail operators in January 2017 survey.
- Railways London daily on Greater Anglia from Great Chesterford are struggling now.
- Car park at rail station in poor state as in the access road and is already at capacity. The train Commuters park on the B1383 and on the nearby grass verges.
- Abellio Greater Anglia have no desire to put in extra lines or extra fast trains.
- Extensive platform improvement works throughout the line is needed in order to extended the carriages of the trains which currently operated with 12 carriages already at peak time.
- Concerned that Network Rail will not pay for improvements.

- It is likely that commuters to London will use Audley End Rail Station or Whittlesford Station, instead of Great Chesterford Railway Station. Because Audley End Rail Station provides the fast train to London. Only one train in four actually stops at Chesterford, whilst all the trains stop at Audley End.
- As Audley End Rail Station will be more preferred, the increase in rail commuters will create over-capacity of car parking at Audley End Railway Station, and increase in traffic flow through the village of Great Chesterford.
- The increase in traffic between stations and the proposed developments would cause noise pollution from both the M11 and the B184, more on-street parking and cause dangers to pedestrians in local roads around the village, particularly Little Chesterford.

Great Chesterford stations

- The Great Chesterford Railway Station does not have a car park. Only 15 units of on street parking is provided. Excessive on-street parking lead to conflict between pedestrians and wheelchair users along Newmarket/London road. However, there is no space to create any further parking as the land is currently being developed by Enterprise Heritage for additional housing, and the land to the west of the station is in South Cambs jurisdiction.
- Station Road is the only access to the Greater Chesterford station. It is in a poor state of repair with potholes and no street-lighting.
- The station at Great Chesterford has on street parking with capacity for only a few cars. Station Road is the only access to the station, but here several businesses, in particular a removals company with HGV vehicles, require constant access to their premises.

Audley End stations

- Audley End Railway Station is also already at capacity.
- Audley End carpark has already been extended and adjacent office buildings have been demolished to provide additional carpark space. Even local pubs provide carparking for commuters.

Car parking

- Concerned increase in on-street parking due to increase in traffic and reduction of garage space required under by the Vehicle Parking Standards.

Highways

- Concerned if Uttlesford District Council and developer can commit to a S106 agreement to cover the cross-boundary traffic issues in South Cambridgeshire.
- Concerned that South Cambridgeshire Council have stated eleven million would be required to update the road network to support the increase in the population at North Uttlesford Garden Village.
- Concerned that Essex County Council, Essex Highways, UDC and central government will not pay for road infrastructure improvements.

- If traffic counts for the last 5 years are examined the current rate of increase is proof that the development would only aggravate an already unacceptable situation.
- Full Traffic Impact Assessment should be carried out now first instead of at planning application stage.
- Putting a cap of 3,300 new homes on the NUGV site is over-optimistic and irresponsible. Strategic highway improvements need to be addressed before any house-building begins.
- Proposed a plan for a ring road around Walden.
- There is no northbound motorway access at the M11 junction 9. So north bound traffic is destined to be routed via the A1301 but this isn't viable since the junction at A505 already get over congested at peak times.
- Please confirm that the Economic Viability Study, prepared by UDC allows £1m for road transport mitigations but Cambridgeshire Junction Assessment has said that the actual cost of road transport mitigations measures will be in the region of £7.5 - £11m and that may still not be enough

Utilities

- The water pressure in Great Chesterford is poor at the best of times
- Great Chesterford is subject to regular power cuts, this will surely increase with the proposed town.
- Electricity runs at full-capacity already. Local grid is unlikely to provide stable supply, as the Genome Campus is building their own generating capability

Social infrastructure

- The surgeries are over loaded and The A and E department at Addenbrookes seems to always be in crisis.
- The draft policy indicates that the new town will not have sufficient retail provision and would need to rely on Saffron Walden. This is not sustainable.
- Saffron Walden will be over-crowded.
- The local schools are already at capacity and at the rate of 150 houses a year, no new school will be available for years to mitigate this.
- Concerned no coherent and reliable strategy for the delivery of infrastructure such as childcare, schools, surgeries or shops by the council and developers. The existing provision is already at full capacity.
- Even with Fibre broadband, the existing internet infrastructure in Great Chesterford is already bottlenecked at busy times.
- Local primary or secondary schools, doctors, and hospital are already run at full capacity in Great Chesterford and Saffron Walden (e.g. For the 2017/18 academic year 42 applications were received for a total of 30 places. All local schools are already oversubscribed with class sizes over 30). The future residents are likely to pay a heavy price for them without timely provision. Particularly a large influx of young families is expected to move in.
- The downsizing of the Police station in Saffron Walden, yet still with 36 crimes recorded for Uttlesford in the Police Partnership report dated 19 August 2017, lack of policing will become even more of an issue
- Concerned provision of school and primary healthcare facilities will lag behind as the facilities will only be built when residents move in and meet the threshold of provision.

- Require a comprehensive delivery plan and financial commitment on the roads and infrastructure before any developments.
- The extra distance would put resident's health, and even lives, at risk, particularly in respect of accident and emergency services.

Flood risk

- Concerned about the flooding risk. Environment Agency described Great Chesterford at high risk from surface water flooding.
- The ponds/lakes alluded to in pages 18 and imaged in page 20 of the prospectus, we assume, are designed to handle surface water drainage. Substantial scouring and damage to the immediate landscape and its archaeology (including the ancient, Heritage protected temple site) is likely, before the surge gouges through Great Chesterford.
- The potential disruption that a heavy flash rainstorm could create - Seven O Olympic size pools of water will have to be captured and released slowly downhill in a mere 50mm (2") downpour.
- Concreting over half of the area on the hill may increase the potential risk of flooding from building. South Street in Great Chesterford has already been upgraded from Low to High surface water flood risk.
- We live on a flood plain. Property, and the land by the river, have been flooded. We rely on aquifers for our water and concreting the countryside will reduce the amount of available water.
- Serious flooding in Great Chesterford particularly along the High Street, Manor Lane and South Street towards the river occurred in the past 10 years.
- It would not be sufficient to build flood retention ponds without clarifying the ongoing maintenance responsibility.

Aquifers

- The site is located near a ground water protection zone, which is concerning. Assurances must be made that the ground water protection zone would not be impacted.
- The site is above the Cambridge aquifer and Bidwells have stated that 55% of it would be hard impermeable surfaces. Clearly this will have a significant detrimental reduction in rainwater reaching the aquifer.
- Given the proposed development is wholly sited on chalk aquifer which is a major and of high to medium sensitivity according to Uttlesford District Water Cycle Study Stage 1 (WCS1). The chalk aquifers South of Cambridge are a major source of potable water for the entire sub-region and are important to preserve.
- Requires study on aquifers and water supply
- Given the proposed development is wholly sited on chalk aquifer, it will deplete the aquifer, and increase the pressures on the Combined Essex/Cam Quse basin. No assessment of impact on replenishment of the aquifer.
- This is contrary to CCPs 5, 7 & 10 and NPPF paras 109 – 113, 117,118,123,156,157 and 165
- In the WWF report, 'The State of England's Chalk Streams,' the English chalk streams are described as so unique that they are found nowhere else in the world.

Environment

- The wildlife and habitat that would be lost if built on is too much to list, but includes Oxlips, endangered butterflies, Bluebells, nesting owls, skylarks, lapwings, and many more. Those are irreplaceable if lost, as are the ancient trees and hedges.
- Concerned about light pollution.
- The government and SP12 state that councils should protect the environment, minimising the amount of greenfield land developed.
- There is no evidence in the draft LP that the measures it proposes accord either with NPPF environment policies or that proposed policy EN 11 will be sufficient in the circumstances.
- Sewage treatment in the Hinxtton/Great Chesterford/Ickleton area is very close to capacity.
- Lack of air quality assessment. Saffron Walden was declared an Air Quality Management Area in 2012. The development would introduce or increase human exposure in areas where existing air quality does not meet the air quality standard.
- We see Roe and Muntjac deer, buzzards, kites, several types of owl, hares, badgers, foxes and newts around our property regularly. Not only will areas of habitat be destroyed, but the development would create an 'urban ribbon' stretching from Cambridge into Uttlesford, having a terrible effect on the wildlife.
- Concerned no plan to ensure the council and developers to protect the wildlife and habitats.
- UDC's own landscape officer has concluded that the NUGC site "cannot accommodate the development... without causing significant and unacceptable harm to the important visual qualities of the site and the wider landscape"
- These plans do not take into account the new crematorium being built adjacent to the site which estimates 1100 funerals per year and all the associated traffic that comes with that.
- The proposed development is situated in valley which will trap air pollutants from traffic vehicles on roads and the M11 and Airport Flight Path.

Heritage

- I have farmed in that area and have taken great pride and hard work maintaining and enhancing its beauty. It should be given "National Park" status.
- It is beautiful English countryside that so many of us enjoy, walking, running, cycling and just staring at it.
- In the UDC Landscape Character Assessment the report emphasises that area around Great Chesterford is visually sensitive and furthermore, highly sensitive to change. The report warns against the erection of new buildings which would be conspicuous on the skyline, pressure for increased use of narrow and minor roads, and urban expansions on the edges of Great Chesterford and Saffron Waldon. To achieve this the Councils own report states that the following Landscape Planning Guidelines should be followed: Conserve and enhance the landscape setting of settlements, maintain cross-valley views and ensure any new development on valley sides is small-scale and responds to the historic settlement pattern. As if more evidence on this subject were required, in June 2017 UDC commissioned a Landscape Appraisal by Chris Blandford Associates for the Local Plan. I quote the most relevant section: "The land at Great Chesterford is of high landscape and visual sensitivity, considering: its steeply sloping landform and elevated position; its open fields and limited vegetation structure; and the potential for long

distance cross-valley views into the Site. Furthermore, given the settlement pattern within the area of Great Chesterford - where settlements and road and rail infrastructure largely follow the valley floor/lower valley sides - development cutting across the upper valley sides and the ridgeline of the Site would be uncharacteristic of the local settlement pattern” From a landscape perspective alone, any development on the site proposed for the NUGV would be wholly inappropriate and contrary to all national, regional and local guidelines - including those of UDC itself.

- The East Anglian Archaeological Report no 137 (2011) confirmed that Great Chesterford was a significant strategic Roman settlement with the remains of the Romano-Celtic temple 400m south of Dell’s Farm (a Scheduled Ancient Monument) and recently unearthed Anglo-Saxon burial ground. The Heritage Impact Assessment concluded that excavation of surrounding land may cause irreversible harm to heritage assets, most notable the Romano-Celtic Temple, which could inhibit future interpretation of the site and compromise their overall significance This is contrary to CCP 10 and NPPF paras 110,126,129,132,133,156,157 and 169
- Concerned that there is lack of comprehensive assessment of impacts on a scheduled ancient monument and prehistoric paths.
- There are important archaeological remains in the countryside north of our village.
- UDC has failed to obtain a full Heritage Impact Assessment in relation to the NUGC contrary to the NPPF (at paragraph 169). The absence of any adequate assessment of heritage issues in UDC’s Sustainability Assessment is further evidence that the draft LP is not sound for the purposes of the NPPF
- Spatial Objective 3a (p14) cites the aim of “Conserving and enhancing the market towns and rural settlements” . It is hard to see how this will apply for Saffron Walden and the local villages if this development is sanctioned.
- The nationally important Scheduled Ancient Monuments have not been assessed and the proposed new town would have a significant impact on the Monuments and degrade their setting and significance.
- Please confirm that you have considered that the Heritage Impact Assessments for the other two sites proposed for development in the Local Plan do not have this recommendation?

Procedural

- The consultation has taken place over traditional summer holiday and only lasted for 6 weeks which many people are unaware of the plan and deprived of the opportunity to comment.
- Concerned that Great Chesterford had not been selected for a single settlement at previous stage of local plan preparation process.
- How is planning to control the developers? During the Stanley Road build the contractors started to rip out the hedgerow before they could be stopped. No penalty was imposed upon the developer.
- LP is not sound for the purposes of the NPPF - it fails to satisfy any of the four tests. GC Principle 3 not adhered too and no engagement with either the residents of Great Chesterford in general or with its Parish Council.
- The failure of the UDC Planning Dept in recognising the lack of infrastructure in previous planned area resulted in the Planning Inspector throwing out that proposal.

- The council needs to rebuild trust with residents and should learn Alconbury Weald which has early and extensive collaboration with local people and even subsidized parish council to hire independent experts.
- There is still ongoing work in a range of areas. Insufficient evidence has not been such as lack of Environmental Impact Study, Traffic Impact Study accrued to enable residents to make an informed decision.
- Politics shouldn't enter into such assessments.
- The draft LP provides no clear and unambiguous commitment on the part of UDC that it will deliver NUGC in accordance with all the principles, not least regarding land value capture for the benefit of the community.
- The provision as proposed of any S106 arrangement towards infrastructure costs and as a means of mitigating against any identified detriments arising from NUGC is not viable, legally secure or acceptable.
- Evidence should be proportionate and inform what is in the plan rather than being collected retrospectively in an attempt to justify the plan UDC has failed to evidence that the NUGC location/community is viable and deliverable for 5000, 3300 or 1900 houses.
- The options contained in that outline proposal were based upon several new settlement areas along with a number of potential extensions to existing towns and villages. These 'areas of interest' were effectively 'coloured blobs' put on a map of the district. No justification was offered then, or now, as to why a particular 'blob' was in the selected location. " There is little evidence from UDC that detailed data collection/analysis has been undertaken before the blobs were put on the map. Some of those blobs were clearly 'sacrificial' so that the Council could claim a due process of selection/analysis had taken place - 'New Settlement Area 2' is a clear example of this.
- Delivery of development in stated timescales is unrealistic 3.60 states that “ housing delivery will commence in 2021/22 ”, however adoption of the Plan is not projected to be until 2019, giving only 2 years to gain approval for a both a masterplan and specific planning application, plus preparatory works (eg archaeological surveys for this historically sensitive site) and building works.

Conflict of interests

- The council has vested interest to in developing new garden community in North Uttlesford for its recent investment in Little Chesterford Research Park.
- With questions already raised about transparency, I would like to be reassured that all relevant records published along with full disclosure of any potential conflicts of interest by politicians and staff involved with the proposal at UDC.

Duty to cooperate

- Concerned lack of cooperation between Uttlesford District Council and South Cambridgeshire. Only one set of minutes of a meeting on 13th January 2017 is available to view.
- Uttlesford District Council should agree with with the South Cambridgeshire District Council (SCDC) with the cost estimates of improvement road infrastructure before the local plan.

- Failure by UDC of its Duty to Cooperate adequately with South Cambs DC Only three formal meetings have been held in 2017 (January and February) between UDC and South Cambs
- The proposals should also take account of the housing planned for and by South Cambridgeshire.
- Are UDC aware that Cambridge City and South Cambs Councils have made provision for the additional housing required to support growth in their Plans?

Viability

- Uplift in land value needs to be captured and used for benefit of community. Any promises or commitments provided by the developers need to be ring-fenced in advance.
- Economic Viability Study (Pathfinder Development Consultants and Malins Associates Limited) - Revised October 2016 mentioned that investors have tightened requirements to provide finance for such projects towards achieving a profit of between 17.5% and 25% of gross development cost.
- There is no firm evidence that there is a need for 14,000 houses in Uttlesford. According to your figures, over 8000 houses have already been built or have planning permission, which leaves just over 5000 required to satisfy current housing needs.
- A considered business plan incorporating a detailed master plan, development strategy, funding strategy, delivery and sales program, logistical assumptions and market risk analysis is needed to prove the development is viable and deliverable over the medium and long term. Expenditure including sewage facilities upgrade, water supply facilities, and additional class rooms and teachers, additional health services including a medical centre and greater A&E provision; railway and station infrastructure; road transport mitigations; flood risk mitigations; the cost of extensive archaeological investigations and the measures they recommend for the protection of Historic Assets should be fully costed. It is likely that the NUGV will not be commercially viable.
- No Section 106 can deal with issues.
- UDC's own economic Viability Study qualifies its conclusions that NUGC and the other two selected settlement proposals "are financially viable and therefore able to deliver" with the warning that, in relation to transport issues at NUGC: "NB Full transport assessment would be required – i.e. standard requirement for larger schemes like this". In light of the absence of any such "full assessment" of such transport cost implications relating to NUGC - UDC has failed to provide a Sustainability Appraisal that meets the requirements of the Planning and Compulsory Purchase Act, 2004.
- There is no provision within the Economic Viability Study for a new medical centre
- Some houses at Great Knighton are left empty as they were just investments or rented out as buy to let.
- Access strategy outlined is unsupported and does not tally with assumptions in viability assessment, promoters plans and South Cambridgeshire transport plans For example, a link with the Cambridge Park and Ride stated in the policy is not included in the viability assessments or the written responses from the promoters to the UDC on this question.

Other objections

- This development is a whole new town equivalent to Saffron Walden itself, a town which is already struggling to cope with existing developments.

- Surely a sensible site for development is closer to Stansted Airport.
- There is little transparency on the analysis of housing numbers included in the draft local plan. Growth in the district has largely been a consequence of the expansion of Stansted airport, which is slowing or may indeed have stopped. Even if there is growth as a result of the airport, why build houses to meet that growth 20 miles away? And how will population growth be affected by leaving the EU and restrictions on EU citizens' free movement? UDC need to demonstrate that the growth projections in the draft local plan are based on current and realistic analysis, and not on inflated historical data.
- The new settlement is planned to grow at a slow rate (about 150 a year). It will be years before the population is such that additional essential services will be provided by mandate within the settlement.
- If another economic downturn were to happen – and we haven't felt the impact of Brexit yet - housing delivery would stop, the existing houses would have no infrastructure to support them, S.106 obligations would be renegotiated downwards before delivery recommences, and UDC could do nothing about it. How can we safeguard that investment?
- Having thousands of homes built on the edge of the district next to a large-scale development between the Wellcome Trust and the A11 raises all sorts of questions about the management of this growth, and logically the boundary would be redrawn meaning that the whole of the new developments fall under one local authority, South Cambs.
- The proposed development is specifically targeted to service the science cluster.
- The NUGV will become a satellite town for Cambridge and for London commuters and house prices will be out of reach for many Uttlesford residents.
- The Garden City is not proposed in sufficient detail.
- The Plan will cause harm to lives, and well-being both to residents of Great Chesterford, Ickelton and surrounding communities.
- The area most affected by the proposal is not the Council making it but South Cambs and it is iniquitous to impose this financial and environmental impact on others.
- A similar proposal for 'eco towns' at Hanley Grange which was planned to be built adjacent to Great Chesterford was given up due to site constraints during the last Labour administration.
- The sites are selected based on whether land is available by landowners rather than the suitability of the sites.
- As this will be a large new town I worry about the likely hood of increased crime. As seen in places like Cambourne without a decent amount of social facilities you get increased problems with alcohol, drugs and crime.
- Great Chesterford. There is no credible developer for this site. The proposal has been submitted by Bidwells. Bidwells is not a developer; its main business in this area is that of Land Management Agent. It simply does not have the resources or experience to deliver this project. Grosvenor Estates has been mentioned as being willing to adopt the role of developer. Whilst GE is undoubtedly one of the country's leading property development companies, it has no track record of building single site settlements in the UK.
- Previously (late 2016) there was a spread of smaller settlement site options that could also work alongside one to three large settlements, however, in this current (Summer

2017) proposal there are now predominantly 3 large settlements with no explanation to the public of why these were chosen, removing most of the smaller sites?

- The site does not fall within the Strategic Housing Market Area.
- The site is selected because the area adjacent to it has the smallest cohort of voters.
- The growth should be split into small residential development in the established villages and small towns of area near employment sites such as Chesterford Research Park to accommodate the housing needs and maintain the character of the area.
- Reduce the scale of development to a limit on 1,000 – 2,000 homes.
- Development should concentrate around Stansted where an increase in demand in Essex is expected.
- The new town location is contrary to the jointly produced Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.
- Existing village/ town communities should each be encouraged to expand by a small percentage on brown field sites, land of low agricultural quality or land with less sensitive natural habitat.
- It is 50% higher than neighbouring districts and one of the biggest proposed expansion rates in the country.
- No allowance has been made for the anomaly of growth when Stansted airport was built. If a truer figure were to be submitted the housing could be split equally between the major towns and villages throughout the district allowing a more natural organic growth.
- Chesterford could accommodate a more natural organic expansion, smaller developments offer opportunities for smaller 'local' developers to build. These local developers buy locally, employ local people and spend locally, therefore these smaller sites become a big multiplier in the local economy, to the benefit of many more local people.
- Any new village expansion book-ended between the two current settlements of Gt and Lt Chesterford. The flat space between the two villages has natural boundaries to prevent expansion (the railway to the west and the B184 to the east and the two village historic cores to the north and south).
- Any new settlement will need a centre including shops, community facilities, schools and places of worship. These things need to be in places as early as possible so that a community can grow together. My fear is that these things will only be added at the very end of the building of houses leaving the first residents of any new settlement living in no man's land with nothing to build a community spirit around. This lack of amenity and sense of belonging can lead to mental health issues, sense of isolation and lack of pride in your environment. Once lost these things are incredibly difficult to regain.
- Selection of GC NUGC based on UDCs wish to assist in the development of the London Stansted Cambridge economic growth area – an aspiration not identified by UDC in its Vision and Development Strategy in its Local Plan Consultation conducted in the Autumn of 2015. NUGC will be serving a purpose other than that of which UDC has previously identified and upon which it had consulted.
- Once building stops and the population/residency of this development settles down it will then face the 'aging population' problems.
- Garden Cities should only be located "where there are existing rapid public transport links to major cities, or where plans are already in place for their provision – this is apparent here.

- Require explanation why have other areas been rejected, and suggest that development near Newport, Elsenham and along the A120 would better serve the district as they are more central, have better train services, are closer to Stansted Airport and have better road connections with the A120 already being upgraded.
- The proposed site for NUGV is located in open and undeveloped rolling countryside almost immediately adjacent to the ancient village of Great Chesterford. The site occupies an elevated position, rising to around 100m above sea level, in contrast to the surrounding, historic villages of Great Chesterford, Ickleton, Hinxton and Littlebury all of which have a low-lying position within the landscape. The site has a long history of agricultural use and it forms a vital part of the rural scene, visible from many parts of the surrounding area in Uttlesford and South Cambridgeshire. It is an important contributor to the tranquility of the local area and sense of space. Uttlesford District Council's own appraisal of the Great Chesterford Conservation Area, which was approved in April 2017, states that the village is "surrounded by attractive open undulating countryside" and states that "this rolling landscape of chalky boulder clay is extensive with wide views". There are numerous ancient monuments located both within and close to the proposed development site including the remains of Roman temple within the proposed site, and other Roman remains either side of the A11, which follows the route of an ancient Roman road. The significance of these and other heritage assets is widely recognised and well documented. Landscape and historical setting – expert analysis
As a local resident I can vouch personally for the special character of the area, the natural beauty of the countryside and the overall sense of place and history that the landscape and its villages brings to the people of this area. The exceptional quality of the local landscape is a major contributor to the wellbeing and quality of life of my family and many other residents, and it is central to our community and way of life. It is well supported by numerous expert reports that Uttlesford District Council has already seen as part of the evidence presented to it:
 - (a) The Brief Heritage Impact Assessment for the proposed NUGV itself, which was prepared in connection with the draft Local Plan, presents a clear picture of the damage to local heritage that would be caused by the proposed development.
 - (b) A Landscape & Visual Appraisal dated 13 June 2017.
 - (c) Landscape Character Assessment in February 2017 in connection with the Great and Little Chesterford Parishes Neighbourhood Plan. This contains a wealth of detail as to the landscape characteristics, none of which appear to have been accounted for in the current NUGV proposals. In particular, it makes explicit its view that the Chalk Upper Slopes and Chalk Lower Slopes within which the proposed NUGV site is located have "low landscape capacity".
 - (d) The Chris Blandford Associates report prepared for Essex and Southend-on-sea, and which is appended to the Hankinson Duckett assessment identifies the area as having a "high landscape sensitivity" to new settlements due to "exposed valley sides" (of which the proposed site is a prime example), the "integrity of undisturbed valley floor and of historic parklands" (again evidenced here given the valley location and the historic deer park located within the site) and the risk of "coalescence of settlements" (which in this case would be a major concern in the case of Great Chesterford itself).
 - (e) The Historic Environment Assessment prepared by Essex County Council Place Services in connection with the Neighbourhood Plan highlights not only the importance of the area's heritage assets (both within the proposed development site and in the

immediate vicinity) but also that “the local topography makes a major positive contribution to the setting of the heritage assets”.

(f) Oxford Archaeology East prepared a report in May 2016, commissioned and funded by Bidwells, the agency promoting the development scheme, in which the risk to the historic landscape is also made plain.

- The best information available to the public at present is a proposal presented by commercial estate agents Bidwells, who are not a neutral party, having been instructed by the landowners. They appear to have brushed over several important aspects. For example: No proper infrastructure assessment has been done. The current infrastructure report takes no account of proposed schemes, including Genome, Wellcome, Sawston Business Park and the new Crematorium, nor of the impact of significant Biomed campus and associated housing development in South Cambridgeshire. It is therefore based on flawed information.
- They completely fail the definition of public planning, which involves anticipating and providing for future problems which will affect others as well as yourselves.
- I live in Cow Lane, Great Chesterford approximately 150 meters from the NUGV site boundary, yet the developer (Bidwells) has made no attempt to contact me to inform me of the plan, or seek my views.

Lack of consultation with South Cambs DC Risk of Pollution of the aquifer and sewage Flood Risk Impact on traffic Impact on wildlife Impact on schooling and medical facilities in Great Chesterford village Impact on the landscape

- I am a resident of Hinxton and wish to object to this development. This proposal is poorly thought through, has not had sufficient consultation and I cannot believe this proposal can be ratified until a detailed plan has been prepared and presented to the local communities. I understand the need for housing but a far more detail needs to be developed. At a minimum any plan to develop in this area needs to detail how the following issues will be addressed; - Transport, Local Services, Employment
- A lack of detail in the Local Plan Housing needs in the area
- This is an inappropriate site for the proposed development for the following reasons:
 - The hillside/hilltop site is visible from miles around contrary to Policy SP10
 - The location of the site only 8 miles from the growth centre of Cambridge which will inevitably mean that it will become a dormitory town for Cambridge doing little to meet the housing needs of Uttlesford.
 - Transport links are inadequate. Paragraphs 7.16 – 7.18 deal with providing transport choice with buzz-words such as “taxi-buses”, “car pools” and “tele-conferencing” but in reality these will have little impact.
- The choice of green fields farmland is a concern to me, as I value the natural environment enormously. The loss of these beautiful fields is not only a heartbreaking loss of natural beauty but will also negatively impact upon local wildlife, air quality and will increase flooding as water runs off of the concrete down the hill and into our village. Equally, I would be pleased to hear of the plans for Doctors surgeries, Fire Station, increased Policing, petrol stations, shops and all the additional infrastructure required to support such a massive development in a way that does not add extra pressure on to the existing infrastructure of nearby communities.
- I do not want this village because there would not be enough schools, and the roads would be too busy. It would take you a long time to cross the road. Jacksons Lane is

peaceful. It would be too big. Jacksons Lane was just right until now when you're building a town.

- The proposed development is not supported with coherent (or indeed any) planning for infrastructure, and Essex CC appears to be declining to pay for any infrastructure. Services in the local area are already at breaking point.
- As a Tumour Immunologist employed by AstraZeneca, I am a key part of Cambridgeshire's Biotechnology community. I commute locally to sites around Cambridgeshire by car and bicycle. My fiancée, is an airline pilot with British Airways and is sensitive to the aviation business and the possible growth in air traffic from Stansted in the coming short term. He is also reliant on the local road network to enable his frequent lengthy commute to Gatwick and occasional commute to Heathrow airport.
- Transport is a huge worry to me. I understand that detailed transport assessment work has not been carried out. Assertions have been made that people will not use cars, that cycle lanes will be built and people will cycle. This is a nonsense. I cycle myself and know that I am in a very small minority compared with car users. People may well cycle on a nice sunny day, but come winter, cold winds and wet weather very few people choose to cycle.
- Planners may prefer people to use public transport or cycle or use the A11 for north bound travel but people will find a way through the side roads.
- Opposition to the proposed North Uttlesford Garden Village from a resident of Little Chesterford. Strong concerns regarding transport and accessibility to education and health facilities.
- Objection to the proposed large housing development in North Uttlesford. Reasons: number of houses, capacity of schools roads, GP's and hospitals, potential conflict of interest.
- Objection to the proposed large housing development in North Uttlesford. Reasons: flood risks, infrastructure, facilities.
- Objection from a resident of Great Chesterford. Concerns regarding size of NUGC, transport accessibility and sustainability.
- Objections – considerations: pollution, capacity of facilities, affordability, landscape considerations (e.g. agricultural land usage, visual impact for local villages in Uttlesford & South Cambs, building on natural ridge, damage to local rural landscape). Flood risk, water availability & sewerage considerations (e.g. building affecting water runoff into Cam valley, natural chalk aquifer serving South Cambs villages, pressure on sewerage facilities) I am very concerned about the building stopping the rainwater from draining away naturally and running down the hills causing flooding. Encouraging commuters from London and Cambridge.
- Lack of eco-friendly transportation.
- I believe that the Local Plan incorporating a proposed large new housing development close to Great Chesterford (called "North Uttlesford Garden Village") has been hastily prepared by Uttlesford District Council, without undertaking a thorough evidence-based assessment. On the contrary, I believe that there is significant evidence that this is the wrong location for a development of this size. It does not fall within the Strategic Housing Market Area as defined by Uttlesford District Council (UDC) and will not ultimately supply homes for the Uttlesford housing market. The nearest railway station, Great Chesterford, is wholly inadequate to serve a new town of between 10,000 and 20,000 people.

- Clearly, the infrastructure for a settlement of this size is not in place and neither will it be in place before immense damage has been done to the surrounding areas. Parking at train stations, presumably to be used by the new Garden Village residents, is already at capacity and in Great Chestordford in particular, parking in the village is already a real problem. Also our roads are regularly congested and of particular concern is the amount of pollution the traffic situation causes.
- Reasons of opposition: 1. Location-sitting on the border of South Cambridgeshire, these houses will be for Cambridgeshire people. 2. UDC cannot justify turning Great Chesterford from a village in to a town. 3. I object most strongly to the argument presented that UDC have run out of time so therefore the Local Plan cannot be rejected. This is not a basis upon which to make a fair and just decision for all in Uttlesford.
- Housing need It is very difficult to see where the jobs will be created to support the new residential housing units of the NUGV Town. The premise that Chesterford Research Park will be a 'local employer' supporting 5000 houses is fundamentally flawed. STEM research in the UK faces huge uncertainties in the face of Brexit and a development of this scale that purports to be required to provide 'local housing at an affordable rate' for people to work locally (e.g. on the Research Park - now co-owned by Uttlesford DC) is untenable as an evidentially-supported economically-costed proposal. My principal objection is with the very short time period, over the summer holidays, being allowed for consultation. Public transport availability has not been factored in to the plans whatsoever. Transport infrastructure Transport issues are one of the principal reasons why this settlement cannot be considered sustainable. Schools 5000 additional homes will lead to thousands of additional school places being required in Uttlesford. Right now school provision across Uttlesford is extremely tight. My comments on GP surgeries are similar to that for schools - a huge new population, yet no commitment to provision of their additional services. The proposed settlement will permanently destroy the uplands, the sky-line, good quality agricultural land and effectively urbanise what is a rural landscape - the remnants of Henry VIII's hunting forest, or the Roman temple - such an integral part of life in Roman Great Chesterford.
- I write to object in the strongest possible terms about the proposed NUGV here at Great Chesterford. My reasons are summarised as follows
 - 1) Housing and jobs needs in Uttlesford not established
 - 2) Invalid basis for selecting NUGV location
 - 3) Failure to obtain relevant transport assessment
 - 4) Failure to take account of severe transport impact of NUGV on Great Chesterford and surrounding areas
 - 5) Failure to obtain the mandatorily required sustainability appraisal
 - 6) UDC incapable of providing any mitigation against landscape damage
 - 7) Failure to consult adequately on heritage issues
 - 8) Failure to identify/provide necessary infrastructure requirements 9) Flooding/drainage implications ignored
 - 10) Failure to provide absolute assurance that Garden Village principles will be delivered
 - 11) Failure to identify any mitigation measures to protect the existing settlement at Great Chesterford
 - 12) Failure by UDC of its Duty to Cooperate adequately with South Cambs DC
- The north Uttlesford proposal is devoid of any commercial analysis and should as a minimum include a considered business plan, incorporating a detailed masterplan,

development strategy, funding strategy, delivery and sales program, logistics assumptions and market risk analysis to prove that the development is viable and deliverable over the medium and long term.

- Conflict of Interest UDC's recent investment in the Gt Chesterford Science Park creates a conflict of interest with the proposed adjacent new town – as such UDC has a vested financial interest to ensure that the North Uttlesford new town proceeds, which is in direct conflict with the impartial evidence based analysis required from the Reg 18 process.
- 1 We were promised that this plan would be evidence based. It is clearly not, as evidence of sustainability and deliverability is absent in critical areas. Instead we have a political outcome in relation to NUGV. The local paper headline put it well "600 fewer houses for Saffron Walden but new village gets go ahead".
2 The Local Plan process is not an appropriate process for siting a new town of 5,500 houses
3 On specific items in the Draft Plan. In relation to the proposed new settlement, North Uttlesford Garden Village - it is not a village, it is a town It conflicts directly with the Spatial Strategy 3.7 and 3.8 viz:
4 The housing numbers being provided for in the plan are suspect. There needs to be a full and transparent audit of these numbers. The difference is significant and will affect the plan. The Council Leader cannot dismiss the difference as unimportant
5 Garden Community Principles. It would require a very significant increase in staffing levels and expertise. This makes the plan unaffordable and undeliverable.
6 Failure in duty to cooperate It would appear from the response from South Cambs DC that UDC has failed in its duty to cooperate as required by the NPPF. South Cambs has raised a number of serious objections and issues about NUGV and its impact on their district.
7 Sustainability The proposed NUGV is not sustainable. In its early phases it would be reliant on local services - schools, surgeries etc which are already a full stretch following a 25% increase in houses in the last five years. There is no spare capacity.
- The proposal stops short of providing any concrete vision of community by providing clear infrastructure intentions nor a joined up approach with neighbouring authorities. For the housebuilder, these are simply cost items that need to be reduced to the minimum - their duty is to extract value by building houses, not homes and communities. For the UDC, this is willfully neglectful in a way beggars belief and for which will provide a damning legacy on the individuals involved and for which the rest of us will suffer.
The issues here are manifold:
 - a) A consultation which is both short and well - placed to minimise community involvement.
 - b) A growth rate in the house building which delays the building of facilities until much later (at all?), when current facilities are operating at full capacity.
 - c) Garden city (this is a proposal which is twice the size of Saffron Walden, yet we call it a village) principles which are essentially ignored but which are being used to sell in the proposal.
 - d) A general lack of detail making constructive feedback difficult.
 - e) Many concerns about infrastructure, from roads, to water, to paths and cycle ways that will only lead to problems if not addressed immediately. Whilst I do not expect house builders to deliver communities with any sense of vision, I do expect the UDC to step into the visionary void for which the private sector is unable to deliver.

- The proposed settlement is circa twice the size of Saffron Walden, and will dwarf Great Chesterford, severely impacting the surrounding villages of Little Chesterford, Hinxton, Ickleton, Littlebury, Linton and Sawston. The consultation period which expires on Monday 4th September is ridiculously short, and coincides with the summer holiday period.

Transport – the critical issues around transport mean that the settlement cannot be sustainable. To suggest that people will walk or cycle to the science clusters seems unlikely as for most the distance will be too far.

Employment – when questioned at a recent Great Chesterford Parish Council meeting about where in Uttlesford the jobs are available for the residents of the proposed new settlement, the Bidwells representative responded at “Stansted Airport”. Access to Stansted from the new settlement is approx. 19 miles to the South and the transport infrastructure is inadequate to cope with additional commuter traffic, if indeed residents of the proposed settlement are to work and commute to Stansted.

Bidwells has not committed to meeting Garden City Principles. They state that some 55% of the site is expected to be hard impermeable surfaces. There will be a considerable reduction in the amount of water reaching the aquifer on which we depend for our water supply. It should be noted that run off would naturally flow into the Cam Valley, where the River Cam is prone to flooding – houses and the new Community Centre in Great Chesterford have had incidences of serious flooding in the recent past. Schools, GPs and other services –the new settlement is planned to grow at a slow rate (about 150 a year). It will be years before the population is such that additional essential services will be provided within the settlement. Existing schools in Great Chesterford and Saffron Walden and GP practices are already at capacity the new settlement cannot be viewed as sustainable.

Conflict of interest – Uttlesford District Council has recently bought a substantial holding in the Chesterford Research Park. The draft Local Plan states that the North Uttlesford Garden Community should maximise economic links with Chesterford Research Park. There appears to be a conflict here as UDC is both the part owner and the planning authority for the new settlement and the Research Park. This raises the question of whether the new settlement’s location or the rationale for its existence is based on objective evidence, particularly given the inclusion of this proposed settlement in the Local Plan has only been made at the last minute and immediately following UDC’s investment.

- Mill Lane in Ickleton is marked on the Environment Agencies flood map as at risk of flooding. Our property is just on the edge. With our next door neighbour at number 5 likely to flood. Covering a hill side up stream means that much more rain water is likely to run off directly into the river. Even if the rain water flows in the other direction towards Abbington and Linton it still flows into the River Cam further up river increasing the over all water level. The huge increase in road traffic. The rush hour traffic at the A1307 / A505 roundabout is a complete nightmare already. 3. It also causes concern as to where schooling will be provided as the village school and those in Saffron Walden are already over subscribed. This will increase class sizes or cause still more traffic at rush hours as parents ferry their children further afield.
- Resident of Whittlesford – concerns:

1. Local Transport considerations. The journey time on the faster service takes about an hour. There is no such faster service from Great Chesterford. Crossing the A505 at the junction with Duxford Road is already a dangerous undertaking.
 2. At the moment there are no proposals for any additional primary or secondary schools. Local schools are greatly oversubscribed.
 3. Although I am a resident of Whittlesford I have enjoyed many weekend walks over land which will be changed from a rural idyll over rolling hills to, frankly speaking, a new town of probably 15,000-20,000 people. It is a change of character on a huge scale unsupported by investment in infrastructure or local services.
 4. Finally, I have read the objection by George Foxwell and strongly support its content.
- Finding a parking space at Saffron Walden is already quite hard and will be a lot worse if there are more cars around. The roundabout at McDonalds takes ages to get to and this will be much worse with more people and cars. The fumes will cause pollution around our village which will cause people to get ill and animals will die.
 - Housing need - how have UDC arrived at the figure for needs? It seems extraordinarily high - indeed Saffron Walden Town Council Neighbourhood Plan Team's response to the UDC Draft Local Plan: Detail within the draft local plan - I am concerned how little detail there is in the plan regarding transport infrastructure and impact (South Cambs have identified £7.5M of upgrades to A505/A1301/A1307 junctions vs just £1M identified by UDC); how little concern is given to already over capacity drainage; the list could go on but really there just isn't enough detail for us to make a decision on - is this deliberate?

Transport infrastructure - how have South Cambs identified £7.5M of upgrades require to A505/A1301/A1307 junctions vs just £1M identified by UDC? This seems a massive oversight from UDC.

Schools - Surely the priority should be on keeping Walden school (Friends) open to reduce pressure on an already oversubscribed SWCH within Saffron Walden rather than increasing the travel time for SW pupils having to travel to JFAN (Newport) and Gt Chesterford. How are already oversubscribed health services (NHS dental waiting list at all time high) going to be improved by this development? Surely that should be the goal - to improve the provision.

Employment - how is this new proposal going to ensure employment for the new residents? Where are the out of town industrial estates for local businessmen and women?

Retail & Leisure provision - When are we going to get a new public leisure centre to take the strain off Lord Butler and to improve the provision for people not wanting to travel into Saffron Walden?

Flood risk, water availability & sewerage considerations - how is the development building going to affect water run off into Cam valley, natural chalk aquifer serving South Cambs villages, pressure on sewerage facilities?

Pollution & air quality - how are the villagers of Ickleton and Duxford going to feel about more traffic travelling through their villages, queueing and increasing the air pollution that they suffer? What has been done to investigate this and to ensure that UDC are going to meet their obligations with regards to air quality? As has been completely failed in Saffron Walden up until now?

Other:- What are UDC doing to reduce the carbon impact of the new homes? Are there plans to ensure that ground sources heat pumps are installed? Will wind power be

utilised for the planned developments? Will the new houses ALL meet carbon neutral standards and if not, why not? Set the standards higher than you have up until now

- North Uttlesford Garden Village on the northern edge of the district is not predicated on serving local employment needs. It is clearly aimed at the strong Cambridgeshire housing and employment market and the London commuter market. Nor can I understand how, in strategic terms, that this location is appropriate for meeting Uttlesford's housing needs.
- Concerns regarding affordability, feasibility and transport. Moreover the topography of the land plays an important part in the flood plain of the River Cam. In concreting over half this area there will be a considerable reduction in the amount of water reaching the aquifer on which local villages depend for their water supply and the flood risk could be significantly increased.

Landscape - The proposed new settlement will permanently destroy the uplands, the skyline, good quality agricultural land and will add to the urbanisation of what is currently largely a rural landscape.

- Location will not meet the housing needs of Uttlesford but will instead act as a commuter community for Cambridge and London. This in turn will increase the cost of the proposed houses and will not, therefore, meet the affordable housing needs of Uttlesford. Amenities: Affordable housing for first-time buyers, low-income families and OAPs, requires easily accessible amenities; shops, schools, employment, healthcare provision and transport. The proposed location lacks any infrastructure to provide these amenities within easy access and will instead require the need for cars, which defeats the object of affordable housing and does not therefore meet the Garden City Principles. Existing local amenities – in particular schools and healthcare provision – are already functioning at full capacity. Transport The NUGC settlement will significantly increase traffic on the B184 and in particular within the village of Great Chesterford.
- The infrastructure in the area simply cannot cope today, let alone with an extra 20,000 people. Schools are full, roads congested, GPs have no room for new patients and the lovely town of Saffron Walden will be completely ruined by such a large development so close by.
- Its size is out of scale with the surrounding villages. They will be overwhelmed by people and traffic changing the rural character of the area. The footprint of the development is larger than Saffron Walden, but there are no plans for major road development to take traffic away from Saffron Walden or the nearby villages. This area is beautiful. It will be destroyed by such a large insensitive development.
- The roads in the area are already packed with the increased traffic from the developments that have already been built and despite developers claiming that they will provide infrastructure the traffic problems will only get worse. Also there will be far more demand for school places and doctors' appointments making life extremely difficult for people already living in the area. In an uncertain future regarding agriculture and the possible need for us to grow more of our own food in this country it seems a very stupid idea to build on what is prime farming land. Also by concreting over yet more of the countryside the risk of flooding is increased. Our countryside is a precious commodity and we should preserve as much of it as possible for the enjoyment of future generations and not sacrifice it to the greed of developers.
- Overall, the Local Plan is vague, with insufficient detail to allow informed objections in many crucial areas. The consultation period is unnecessarily short and biased towards

those who do not have school age children since it substantially only includes the school holidays when most are away on holiday. It is also not clear that Uttlesford District Council have fully discharged their duty to cooperate with the neighbouring South Cambridgeshire District Council over the Plan and its effects around and across the border. The station at Great Chesterford has few parking spaces. There is little space for car park development since it is surrounded on all sides by houses and businesses. Cars are regularly parked the whole length of the approach road. An increased number of road-parked cars will cause access issues for the businesses located there and the village is likely to become a rat-run for the station. Greater Anglia clearly don't believe that the station is worth investment, since they are pushing through closure of the part-time ticket office. After many years of talking, even the Addenbrooks hospital campus has yet to receive a new station and it is not at all clear from the current plan if any improvement to train numbers, particularly stopping services at Great Chesterford could be forthcoming. Despite carpark increases in the past, Audley End and Whittlesford parkway station carparks are also at capacity. Bus service is poor with infrequent and very slow services, with buses taking in the region of an hour to reach central Cambridge from Great Chesterford. Buses are already experiencing regular problems travelling through the village due to narrow roads being blocked by doctor's surgery patients who can't find parking.

- This prime agricultural land is used for growing crops at a time when we are all being encouraged to become more self-sufficient and import less food.
- 1. The location is not right for a development of this size and does not fall in line with the Strategic Housing Market Area defined by UDC.
- 2. There is no sufficient infrastructure plan in place, which will put pressure on Saffron Walden.
- 3. The existing road structures will not cope whatsoever.
- 4. The railway station cannot cope with that amount of growth, and Audley End is already at breaking point.
- 5. There is no plan for schools, medical facilities and services at all.
- 6. It's is the wrong landscape for a development of so many houses.
- 7. UDC haven't completed the heritage and archeology study.
- 8. The land is unsuitable and could flood if covered with concrete.
- The recreation ground floods every year with because the sewage system is not sustainable, building on farm land higher up the village will cause flooding from the Cam lower in the village, this will cause house insurance to rise, doctor's surgeries are oversubscribed, primary school is oversubscribed, secondary school is oversubscribed , local roads are poorly maintained and full of potholes, racing traffic will cause accidents, roads though the villages are already being used as rat runs to short cut to the train station and other local roads, train station cannot sustain more people as it 2 platforms with a nonexistent car park and no trains stopping.
- Objections focused on Housing Need, Infrastructure and Sustainability (including Financial Sustainability).
- With regard to both the plan as a whole, and the proposed development close to Great Chesterford, I am concerned that the plan does not provide anywhere close to the amount of detail to convince me that the impact of 14,100 homes in Uttlesford with >5000 (incl. other proposed sites) close to Great Chesterford has been adequately

considered and planned for by the District Council. I submit below the most pressing observations about the plan as we see them;

1. Transport infrastructure; Roads:

2. Schools, GP's and other services; Schools; I understand from the various meetings held in Great Chesterford over the past few months that development on the 'Garden Village' site would quickly involve building of a primary school, with a secondary school following only once the development had grown to a suitable size. Secondary school provision in the area around Great Chesterford is already under strain. As the Northernmost village in Uttlesford, the children of Great Chesterford have previously assumed a place at the closest Essex secondary school (Saffron Walden County High School, SWCHS). For the past two years this has not been the case, and children from the village have been split between SWCHS and the Joyce Frankland Academy in Newport. Even if the 'Garden Village' site is disregarded, the local plan proposes sites in the catchment of both of these schools that will further increase the pressures that they are both currently under. Once again the local plan offers no clues as to how many houses are sustainable in the region around both of these existing schools before plans for a new secondary school are proposed.

GP and hospital provision; The local GP practices in Great Chesterford (The Crocus Medical Practice and The School Street Surgery) are both satellites of surgeries based in Saffron Walden and are already at or close to capacity. The development of the 'Garden Village' must include provision of a GP from the outset. The closest hospital to Great Chesterford and the proposed 'Garden Village' is Addenbrookes, offering the world class medical services for which it is famed (including maternity services and an accident and emergency department).

3. Loss of agricultural land and landscape impact;

- There is also the comical counter claims that building circa 5,000 homes will not impact Saffron Walden or the surrounding villages. UDC should be focussing on realistic and deliverable schemes rather than angering their residents with politically driven and impracticable visions to boost their own assets. Strategic sites such as this need years of planning. For example, Beaulieu Park in Chelmsford (3,600 units) was circa 20 years in the making. Following years of meetings and planning with the various service and utility providers, strategic highways engineers, local, district and county planners plus many more, an outline planning submission was finally made in September 2009. It wasn't until March 2014 that approval was decided. It was then the end of June 2014 that a reserved matters approval was granted for the first phase of 49 units - the first sale completing in August 2015. That's 6 years from the award of outline planning permission to the completion of 1 unit! Therefore if we assume an allocation is given in mid-2018 a well-considered approval could be granted in summer 2022 with completions starting from about 1 year later (allowing for build and sale). When using an industry average of 5 private sales completions and 2 affordable houses per month this would provide the housing need with 42 houses complete by the start of 2024! To reassure those concerned about the lack of infrastructure that comes with large schemes councils typically provide 'triggers' of occupations before requirements of infrastructure are deemed necessary. For example 500 occupations before a primary school is required. In an unpredictable market these triggers are senseless as developers have no obligation to ever fulfil the full provision of units granted in the outline permission. As an example you could have a developer build the first 499 houses before encountering a slowdown in sales and simply pull off from site. This leaves the local area with circa 800-1000 new

residents, 500 – 1000 additional cars and no infrastructure whatsoever to assist the strain put on doctors, schools, roads etc. UDC cannot progress with such a hurried and rash plan until all other avenues have been exhausted. There are a number of potential sites in key areas (namely in Newport, Thaxted and Takeley) that have been put forward with proof of viability and deliverability that are being ignored in favour of an 'easier single option'. In short, a scheme of this capacity cannot be seriously deliberated until years of investigation have been completed. The conflict of interest is prevalent in the councils drive to allocate this proposal quickly ahead of other more viable and deliverable options.

- Cambridgeshire would end up having to deal with the bulk of the infrastructure problems that would ensue. This fails the proposals for inclusion in a Local Plan as inadequately considered. Despite the prevalence of local science parks there is limited employment need for these sites and most residents would need to travel to London or Cambridge for which provision is strained and inadequate, in complete contradiction of the statements in the proposals.
- The simplistic approach to significant transport concerns by saying some cycle paths and the train station at Great Chesterford are the answer when the cycle paths are not planned/linked with Saffron Walden; the ticket office at GC station is being closed and there are no plans for car parking facilities being built, shows up this plan as ill considered and inadequate. Overall the lack of infrastructure detail shows up the plan as a poorly inadequately thought through exercise. Our objection would be diluted if there was a detailed, budgeted and timelined infrastructure plan. The need for affordable housing in Uttlesford is a given but this plan needs to go back to the drawing board.
- Current proposal is to build on valuable greenfield land and to create a new town that would dwarf all nearby settlements and replace the current separation of the villages with a sense of urban sprawl. In my view this is not sensitive development to either the local towns and villages or their communities.
- Issues leading to our objection include: Medical services are already grossly oversubscribed, with one of the surgeries frequently and randomly closed. Even though the nearest A & E is at Addenbrookes which can be an hour away during peak traffic times, it seems that people are routed to Harlow for economic reasons (with a 4 hour wait for an ambulance) suggesting that the resources aren't available to provide safe and adequate care. Given the absence of a fully manned police service in the area adding 20,000 people to the region is going to provide further dilution of such help. Bus services are unreliable and with a limited running time due to being totally 'Cambridge centric' and the traffic issues that entails. The (Unmanned) Train station has inadequate parking already resulting in overspill onto the main road - as the plan is likely to result in the village becoming even more of a dormitory village/London access point and we will see every available point in the village used as commuter parking. We are hardly over supplied with shops or petrol stations at the moment. Local schools are already having to separate siblings from going to the same school. The village has many conservation based issues (i.e. the Roman Fort) and English Heritage restrictions. This suggests that the essential character of the village has been considered important historically and such a huge project must inevitably be detrimental to this both with construction traffic and with the final character of the area. Wider utilities and services are already prone to erratic delivery (i.e. refuse collection, electricity and broadband) and a sticking plaster approach isn't going to prevent further degradation of such services.

- In terms of leisure and recreation facilities - further parks/playgrounds will be needed and there must be proper consideration of how our only public swimming pool could cope with an influx of 20,000 new families.
- Jobs. The proposed development does not contain adequate commercial opportunities to support the community. This will lead to it becoming a dormitory town, with residents driving to jobs in other locations. The nearest locations for material levels of work are in Cambridge (over 10 miles away), which will place 100% of the traffic pressure on South Cambs infrastructure which is already at capacity and in need of upgrading. Saffron Walden is an alternative (over 5 miles away) and will require new road links.
Environmental. The location is a greenfield site. It will be highly visible from neighbouring areas, including Ickleton, ruining the landscape and local culture. It will affect the water table (water pressure, sewerage, flooding etc) and local wildlife. The proposed development will also cause substantial light pollution at night. As residents of Ickleton in South Cambs we wish to put forward our concerns regarding the proposed North Uttlesford Garden Community, Great Chesterford. We have a number of major concerns.
- The main employment area in Uttlesford is Stansted airport and its immediate surroundings. The information on which the requirement for this additional housing must be fundamentally flawed. Who and where will the people come from to move into this area.
- The removal of yet more grade A arable land the traffic created by such development on already over congested local roads the lack of employment opportunities in north Uttlesford
- This is a rural area with no proper cycle lanes, cycling is already hazardous [reference: Uttlesford cycling strategy]. The reality is that this landscape is not Netherlands flat lands but a rural area consisting of 50MPH/60 MPH sections of curvy and sloping B-Roads. Cycling is dangerous and attempted by few. The proposed NUGV site is on a hillside which makes the likelihood of cycling low. There are no existing cycle lanes from Great Chesterford to the Genome Campus or the Great Chesterford Research Park. Current local workers are not cycling to these places of work. Consequently, new residents at the NUGV will simply not cycle and it is unreliable to simply hope that they will.
- NUGV will not follow the historic settlement pattern for the area and therefore it is difficult to see how there could not be adverse visual impact, and if there are any mitigation measures that would not constrain development.

Water Resources

The District is located in one of the driest areas of the country and much of the water supply (60%) is sourced from the underlying Chalk aquifer, which for a number of years has been below normal levels prior to summer. NUGV is located within the total and outer groundwater source protection zones for a potable source. NUGV will place pressures on the utility company to provide a sustainable supply to the District from stressed groundwater sources. The need to protect the aquifer particularly with regard to waste water management will also constrain or restrict the siting of certain activities.

- Future employment growth in Uttlesford is in the Stansted area 16 miles away from the proposed development. No account of the consequent traffic impact has been taken into account in the plan.
- Due to the lie of the land, this proposed settlement will be highly visible from neighbouring South Cambridgeshire and from the western side of the environmentally sensitive Cam Valley. It will permanently destroy the uplands, the skyline and good

quality agricultural land and add to urbanisation of what is currently essentially a valued ancient rural landscape which is stated to have high sensitivity to change. This proposal is lies within in the London-Cambridge Growth Corridor and is well supported by good road and rail connections to major sub-regional centres of employment (eg Cambridge and Stansted Airport). However, Garden Communities are supposed to provide employment opportunities within their boundaries and not add additional commuting pressure to road or rail networks which are already carrying high levels of commuter traffic.

- Objection regarding impact on the dwellings of Springwell hamlet Small-scale development proposals at Springwell have been repeatedly rejected due to a lack of sustainability, and the opinion that development in this area is inappropriate, with an impact on green-belt land and the threat to local water supply. In accordance with the precedent of the declined Springwell development, we request that the proposed North Uttlesford Garden Village development is also declined.
- The impact on the B184 will be too much for such and already busy 'B' road to take, especially if you are to estimate 7,500 to 10,000 cars residing at the new development town. It is also laughable that Bidwells said they may look at a bus route to go down Cow Lane which is single track! Essex County Council has made it clear they will not pay for infrastructure and S106 developer contributions wouldn't touch the sides. The skyline will be a vision of urbanisation. Please remember that this is high quality agricultural land. Please refer to Landscape Character Assessment UDC did that describes how visually sensitive this area is as well as the warning about pressures on the small and narrow minor roads in the area.
- I disagree with the current strategy of investing in the south east, at the expense of other regions. The social and employment problems of northern communities are less likely to be prioritised and solved if the south east is further promoted by investment in jobs and housing. This development appears to be based only financial drivers for the landowners and construction companies, such is the crassness of the proposal. The need for housing for local people to purchase or otherwise occupy at reasonable cost does not merit the construction of this new town. This need would be better served by additional village homes located in existing developments and reserved for those with local family connections.
- Find constructive and imaginative ways to incentivise landowners and builders to do the same thing in say 50 villages and in that way aim for an additional 1500 or 2000 houses over the next 10 years. You are then well on the way to meeting housing needs in an integrated, low-impact manner, with entirely manageable implications for schooling, healthcare, facilities and transport During this time you can then reassess (a) whether Stansted airport has any bearing on this area at all, (b) what the effects of Brexit on this region prove to be, and (c) whether a new settlement of any size is needed at all.
- When questioned at meetings about the very real impact on commuter and other traffic associated with the town Howard Rolfe's response was: Firstly complete denial, "everyone will cycle". When pressed this became: "We will be driving electric cars" - (this will still result in traffic jams). This then became: "They will be driverless cars" – (so we will be hands free whilst sat in a traffic jam). This then became: "They could be flying cars by then" at which point several exasperated residents decided to leave the meeting. This gives a flavour of the sort patronising response to sensible questions that has left many residents completely incensed.

- It is extremely unlikely that even 75% of the occupants will work in Uttlesford, and it is essential that development in this area is considered in context with the proposed development at the Genome Centre and the traffic to the proposed Agri Parks at Hinxton.
- We fully endorse the very clear and comprehensive case put by STOP N.U.G.V. Action Group against Uttlesford District Council's proposed new town near Great Chesterford. Previously the proposed Hanley Grange Development and the massive expansion of the Land Settlement Association's land in Great Abington were discounted for the same reasons. In addition since this country imports much of its food, the situation after Brexit may increase this cost considerably.
- I am writing to object to the proposed development of a Garden Village at Gt. Chesterford. It is unsuitable to build on productive arable land. Please consider lower grade land first – i.e. Carver Barracks, Weatherfield Air Base.
- Where will all the extra sewerage go? In fifteen years' time, where will the additional sewerage from 15,000 - 20,000 people go? This in addition to the other residential sites being planned on either side of the county line. Do the councils of Uttlesford and S Cambs have plans for a sewer upgrade to allow for what could be double the amount of waste that is already produced?
- Mobile Phones – some of the poorest coverage in the country. Schooling – stretched beyond capacity. Flooding – we are all aware of the adverse effect developments have on surface water runaway, as recently experienced on the Shirehill industrial area, but even the most basic efforts are proved delinquent. We have just gone through the driest two years for a while and yet still with problems.
General Village life – it is the responsibility of the local authorities, at all levels, to uphold that a person has the right to peaceful enjoyment of all their possessions, which includes the home and other land.
- There is no sign of the settlement complying with the Town & Country Planning Association Garden Village/City Principles. The failure to carry out a full Traffic Impact Assessment and publish its results, prior to the consultation period, is lamentable and suggests an unwillingness to face up to major infrastructure costs. As Essex Highways have already said they would not finance such costs it is difficult to see who would.
Archaeology (e.g. considerations for protection of an area rich in archeological heritage)
A commitment is required to protect heritage sites, in line with other such sites across the country.
- The site has previously been deemed unsuitable for a wind farm which is highly inconsistent with the current proposal. Section 21, "Local Demand", states "It is important that new garden villages are built in response to meeting new housing needs locally". The approach for the proposed development is exactly the opposite, being driven by a desire to meet headline numbers for housebuilding, with any consideration of the potential occupants being little more than an afterthought.
Specific Contravention of National Planning Policy Framework (NPPF) Policies and Criteria The policies contravened include: - Loss of Agricultural Land (CPP 7 and NPPF 110-112) - Threat to chalk aquifer and Chalk Stream Environment (CPPs 5,7,10 and NPPF paras 109-113,117,118,123,156,157,165) - Adverse effect on landscape (CPPs 5,7 and NPPF paras 109-113,156,157) - Serious threat to significant Heritage assets (including extensive Roman and Anglo Saxon remains) (CPP10 and NPPF paras 110,126,129,132,133,156,157,169) - Significant flooding risk to Great Chesterford (CPP

6 and NPPF paras 111,156,162) - Taking road transportation network beyond capacity with insufficient funding identified for mitigation (CCPs 2,3,11,12 and NPPF paras 152,156,157,162,177,179) - Taking other local infrastructure (health, education, rail) beyond capacity with insufficient funding identified for mitigation (CCPs 1,2,3,4,12 and NPPF paras 152,156,157,162,171,177,180) - The proposals are not commercially viable (CPP 3 and NPPF paras 159,173,177) Conflict of Interest UDC owns a large part of the neighbouring Chesterford Research Park. Furthermore, any personal relationships between UDC and the landowners should be disclosed.

Comment

- The council assumed the 150 completions per year from the 3 garden communities. However, Braintree and South Cambridgeshire District Councils use a higher number of 250 per site. The UDC should adopt the same housing delivery figure. 500 houses per year could be delivered from 2 sites. North Uttlesford Community Garden will be unnecessary in this plan period.
- Changes are made to M11 Junction 9 to facilitate northbound access from the A11, and access to the A11 North from the M11 southbound. Access to the road network should be via the A11 north towards Abington and exiting roundabout adjacent to the A11 (not the existing Field Farm Road roundabout).
- No development should take place within 1 kilometre of the existing settlement of Great Chesterford.
- No development is visible from the many vantage points that overlook the site. Screening with trees is an option.
- Suitable flood protection measures should be deployed.
- Policy SP7 should highlight the potential opportunity for improved train services at Great Chesterford as a result of Crossrail 2 and how this could help enable development and increase sustainable travel options in the proposed new garden community.
- This town will sit just outside the historic market town of Saffron Walden and right next to the village of Great Chesterford. Inevitably it will influence and change the old town and the area between Saffron Walden and Great Chesterford. Elsenham was, and still is, a far more appropriate site for a new town, in my opinion. The proposed site was right next to the station, within walking distance. And Elsenham is right next to Stansted airport, Uttlesford's biggest employment site. Saffron Walden would benefit more by having the investment and facilities that come with the previously proposed new houses in the town than from 5000 houses outside it. It is again only political manoeuvring that has removed Saffron Walden (Keir) from the draft plan. The eastern relief road would be a massive advantage and improvement to Saffron Walden. The proposed sports land that Kier was offering would have filled a void and it looks like that land may now be built on instead. Saffron Walden Town Council has chosen not to play ball with Uttlesford District Council by, for example, contesting by judicial review the decision to remove daytime parking on some main roads. Most congestion arises due to obstruction on the roads. In most cases, "gridlock" is not simply caused by the volume of traffic in Saffron Walden, indeed most of the time circulation is fluid and easy around town..
- Having viewed the proposal it is my view that it lacks detail and the evidence-based analysis required for a credible development proposal. I would question the validity of the population growth analysis and request transparency as to how it was arrived at. More

specifically, is the choice of site based on demographic need or rather landowners wanting to sell land? Is the demand for houses a LOCAL demand or will housing actually be sold to people currently living outside of the district (e.g. London and Cambridgeshire)?

- The needs of equestrians have once again been overlooked. Pleas can these be addressed by altering references to cycling and walking to include horse riding.
- Any development should be sensitive to topography
- I think that the topography of the new town is questionable as it is a very hilly area so is quite an unusual place to position 5,000 houses. Additionally, it is unrealistic for the only access to other roads is via Stumps Cross roundabout. Looking on a satellite map of the area, there are other potential points of access to the roads than just this roundabout (such as the A11). However, on the other hand, I consider this development to be an improvement to the area and that new housing is an ongoing demand so this could solve that. I know that only a tiny 2% of the country is residential and developed on, so consequently new housing developments like this one are needed in the foreseeable future.
- How was the site chosen? and why? If it was proposed by the land-owners what is the rationale for placing so large a community just there? Will there be sufficient affordable housing, and provision for the elderly as well as for starter homes? What will be the impact on local roads, already under pressure? Will there be adequate infrastructure, such as schools, shops, a Health centre, leisure facilities? It is important that infrastructure is part of the original build and not relegated to an after-thought. What will be the impact on Saffron Walden, and the villages of the Chesterfords, the Abingtons, Linton, Hildersham and Hadstock? The site will engulf several farms and will totally alter the landscape. Several rights of way cross the proposed area, including the Icknield Way Trail. It is important that public footpaths are preserved, especially those which cross the county boundary. Finally, while it is important to provide more housing, the siting should be planned and not providential and hap-hazard.
- 1. The area itself and its future housing employment/housing – more is not needed I have watched with interest the gradual development of the housing plan for Cambridge area's employment growth – with the eventual start of Northstowe, other developments on the Cambridge north side, and more recently the massive expansion of the suburbs on the south side of the city. Now proposals in the pipeline in this area are for expansion on a scale each in terms of 'thousands' - employment and housing: Sawston/Pampisford the 'Agritech' site (A505/A1301) and Wellcome Trust for housing to feed the expansion of the Genome Centre that they plan (whether or not this is logical – see below). Any plans by Uttlesford need to take these schemes into account.
The nature of employment at the Wellcome campus: A large proportion of employees are young and single, with a big percentage from overseas, on relatively short-term contracts. They prefer the city life and to live in Cambridge and come to work in fleets of company provided buses. Wellcome's own plans for housing expansion opposite the Hinxton site would be more than enough. Leaving aside what is going on just over the County border, I can see only one employment growth area that could to some extent gel with the NUGC location in distance terms – Chesterford Research Park. But numbers forecast for growth there are relatively miniscule.
- 2. The totally unsuitable location of NUGC for a town – a remote windswept hill I cannot imagine a more unsuitable place for the location of a new town. Already well away on the

Essex side of the Stumps Cross road junction complex, then up a continuous hill a mile long (Park Road) from the B184 to reach a remote windswept plateau. Cycling is popular in Cambridge (always has been) because it is already a contained city and is FLAT, like the Netherlands. People do not cycle in hilly areas. NUGC is an absolute no-no for pretending that cycling is logical as anything more than a tiny proportion of journeys.

3. Road infrastructure The roads around here have been under pressure for years, and we expect further years to go by before any improvements that may be considered come to pass.

4. Other locations for Uttlesford's housing needs

This is no doubt debated and argued over at length. But I would have thought that the main pressure for employment growth is Stansted, and that the Takeley area should be a good location for this.

Secondly: Surely it's better for other general housing needs, particularly affordable, to be sprinkled in the village chain paralleling the railway line. Protected valley location, existing public transport access, communities already in existence – surely it's the best way. Then make use of the M.11 with more entries/exits.

- The flood risk, the transport links, the strain on the infrastructure, the increased traffic, the impact on the environment and the surrounding landscape...however I would like to focus on two main concerns. Waiting lists for mental health support continue to grow and Addenbrookes is packed and struggling. With schools, doctors, dentists and other services at full capacity how will this proposed settlement be sustained whilst it grows over time?
- I am baffled at the logic that thinks you can parachute this many houses into this area, without a major overhaul of infrastructure to service the area, and very comprehensive provision of nurseries, primary schools, secondary education, doctors and dentists. As far as I can see, your plan makes no provision for such essential services in the early years, meaning that there will be no school places for the residents that may wish to move into North Uttlesford New Town. I also fail to understand how the additional traffic from this town will be catered for – Saffron Walden is a bottleneck, and the A1307 is near stationary at peak commuter times. Nearest supermarkets for this development will mean accessing Aldi / Tesco on Radwinter Road / Waitose in town centre, all of which means car traffic through an already over-congested market town. The M11 may seem likely to give some respite, but even this is over-congested at peak time, with traffic on the Duxford junction queuing dangerously back onto the motorway, always an accident waiting to happen.
- The consultation process has been run over the summer Holidays where a large number of people away on vacation. I am very concerned about the lack of UDC ability to answer or provide any detail about the questions that have been posed to them. This highlights a real lack of thought that has gone into this proposal and as has been suggested UDC has spent more time considering a bus stop proposal than the major development that is being suggested at Great Chesterford. There has been a lack of evidence to support and substantiate the proposal and alleviate any concerns local and wider residents have. The fact that UDC have recently made a £40m investment in an asset that is adjacent to the proposed development means they cannot be impartial when considering the site as any development will likely add value to the UDC part owned asset. More specific concerns: roads, transport, schools, flooding, housing requirement, garden city principles.

- Very worried about the impact a village of 5000 houses will have on the local area especially in relation to the issues I highlighted below:
 - 1) Already the roads are very busy at rush hour with delays along the A1301 with cars waiting to join the roundabout on to the A505. Surely this will only get worse with 5000 new houses full of residents commuting to Cambridge. Have detailed transport assessments been made?
 - 2) In terms of flood risk, drainage and sewerage is it a good idea to build such a large development on a hillside - where will all the run off go?
 - 3) Why do 5000 houses have to be built? Will there be affordable housing for local residents? What Essex based employment will be available to these residents?
 - 4) I envisage it is likely that many will be bought by people who work in Cambridge at many of the new biotech clusters springing up. Surely housing requirements for these people has already been planned for by Cambridge City and South Cambs council?
 - 4) Won't many of the people who buy these houses be people moving from Cambridgeshire? Is that the best thing for Essex?
 - 5) Can the country afford to lose such prime agricultural land important for food production?
 - 6) Is it a good idea to build such a large development on top of an important aquifer? I am very worried that North Uttlesford Garden Village has all been planned in too much of a rush without proper consideration for all of the issues I allude to above and more. Also there has been an insufficient consultation period which took place over the summer holiday period when many people are away.
- The District Council should encourage the extension of the guided busway from Cambridge to Stansted Airport, via Saffron Walden.
- We are delighted to see that common sense have prevailed at last and that new developments are planned so as not to adversely affect existing communities and appear to be evidence based.
- The proposed development at Great Chesterford is quite large and we trust that the developer concerned will be making provision for the necessary infrastructure i.e education, medical facilities and roads etc. In fact, they should be forced by UDC to build these first as in the majority of cases the developers find excuses not to carry out initial promises as it adversely affects their bottom line.
- In general, this location is good for a new development having the potential for good road access, good rail access, good access to employment sites and a landscape that can be used to assimilate development in a attractive form appropriate to its rural setting. However, great attention needs to be paid to the necessary community infrastructure. It is the better option for development in the north of the district.
- I ask that you justify your target of 14,100 houses.
- North Uttlesford Garden Village My comments relate to educational provision in the proposed village settlement. Families moving to the settlement must have guaranteed school places available.
- I support the theory of Garden Villages/Communities, and have no specific views of where in Uttlesford they should be located, other than that the sites should be entirely evidence, and not politically, based.
- NUGC Should include Granta Park due to proximity to site. Cycling/pedestrian access to Granta Park must also be included.

- What about maintaining the sense of tranquillity of the crematorium during 20 + years of construction work
- Policy SP7 106 agreements will be collected after development. “ Point 3 contribution towards new schools will be provided.” This is all hindsight. Full financing of a primary school and secondary school in this new ‘garden community’ must be built and paid for at the same time as the housing
- Pt 11 An area of trees for screening of large native species must be part of the design. Wildlife corridors are essential.

Support

- This site is near the M11/Cambridge corridor, where a large increase in employment prospects has recently been announced on Look East. It would appear more sensible to put more housing here, rather than in large numbers on the Uttlesford/Braintree border where fewer jobs will materialize and greater travel will be entailed. Paragraph 34 333 in the NPFF Guidelines would support such a decision. Conservative Party Policy It has always been a strong policy of the Conservative party to CONSERVE rural areas. The destruction of predominantly rural areas will result in the decimation of votes for the party in the years to come.
- Infrastructure is already in place in terms of major roads, railway, public transport, employment and utility services. These sites are sustainable and viable in planning terms.
- A controversial proposal but seems sensible given the housing demand. It is well placed in relation to existing rail and road infrastructure
- Please may I register my support for the Draft Local Plan. As a resident of Henham, I am pleased to see that the plan has addressed the concerns raised by the two Inspectors’ and Secretary of State’s Reports that conclude that Elsenham and Henham were not suitable sites for development. I do have sympathy for the folk who live in the areas proposed for large new developments. However, the development is split into three well-spaced areas, which I suppose is a reasonable approach as compared to the alternative of putting it all in one megablob. The proposed developments seem not too large, but large enough to justify building the extra infrastructure required by large developments.
- The North Uttlesford development is well located to the extensive developments around Cambridge, and have good communications in that direction. The Easton Park and West Braintree developments are next to the A120 which provides good access to adjacent locations. It will be interesting to see how a modern large-scale community will develop, a wonderful opportunity for planning to meet the needs of the inhabitants.
- I am totally in support of this, subject to the essential infrastructure being in place, namely: a new primary school sufficient secondary school places, either by enlargement of the existing or the provision of a new secondary school A new doctors practice within the development a supermarket and provision for basic shops, public spaces, i.e. a country park, playground, etc. Improved access to motorways, train stations, etc. Provision for all this should be in place before the first brick is laid, and I trust the Council will ensure that this happens.

- The outcry from the residents of Great Chesterford is understandable and in my view more needs to be done to protect the existing village and local highways from the impact of the planned development.
- Access to the railway station should be via the B1383, with restrictions placed on traffic through the existing village. Although there is good access to the M11 southbound and from the M11 northbound, the links to the M11 north via the A1301/A505 will not be able to cope and it is not sufficient to say that 'contributions will be sought' to upgrade this. It must be a requirement for these roads and their junctions to be significantly enhanced.
- There will be significant impacts on Saffron Walden from this development. The town's roads and parking facilities will not cope even if only a proportion of the new residents of the Garden Community choose to shop in the town. Saffron Walden urgently needs an eastern and southern by-pass to take people around the town to get to the out of town shopping facilities, as well as for through traffic which does not need to travel via the town centre.
- Agree in principle to the Garden Community concept to meet the housing needs as they must be better able to attract the funds for infrastructure changes.
- Main Line Railway, this gives access to Cambridge North, Cambridge Central and the proposed Cambridge South stations.
- Road access, M11, A14, A11 and A505 & M11 Corridor.
- Within LSCC (London Stansted Cambridge Consortium Growth Commission Report).
- I recommend that Garden Village proposal is included under the Government list of Garden Villages drawn up by Rt. Hon. Gavin Barwell, Housing and Planning Minister.
- I agree with a single purpose-built settlement near Chesterford. It's fair. It must respect our historic built environment and beautiful landscape.
- The new village would have good connections to Newmarket, Cambridge and London as well as Walden. I would like to see a new junction at the M11 so Cambridge bound traffic could join rather than go down to Duxford.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy can be seen to address the majority of those potential concerns raised in the 'policy off' appraisal of the site (later in this report). Significant positive impacts are realised for housing, employment, sustainable travel and access, education and infrastructure. Positive impacts will be realised for the sustainable use of land, and health and social inclusion. The Policy does not specifically mention the presence of a number of Local Wildlife Sites and two SSSIs in close proximity to the area. As a result, uncertain impacts are highlighted for biodiversity at this stage, where the provision of natural and seminatural green space is included within the policy alongside ecological benefits from SuDS, which can enhance green infrastructure in the wider area, should existing designations also be protected and enhanced through the policy. Uncertain impacts have also been highlighted regarding landscape, where the location has a relatively high sensitivity to change / development and related to the presence of a Roman Temple on the site; however it should be noted landscape issues aside from the historic environment are suitably addressed in the Policy. There are uncertain impacts at this stage regarding the historic environment. Impacts are not identified as negative in response to the requirements for a landscape/ visual and

heritage impact assessment to accompany any forthcoming application; however it should be noted that any inappropriate schemes could lead to significant harm to this important heritage asset. Uncertain impacts are highlighted for water related criteria, in response to the site being within groundwater source protection zone 3, and there being no direct mention of water related issues within the Policy. The Policy also does not specifically mention a need to address an area of high fluvial flood risk in the middle of the site and an area of flood zone 2 and 3 on the south eastern section of the site.

Alternatives Considered

The principles and requirements of this Policy are specific to the Garden Community, to which this policy relates, ensuring that aspirations surrounding sustainable development will be met from any successful proposal. In so far as the Policy ensures sustainable development, it accords directly to the presumption in favour of sustainable development of Policy SP1 and more critically, the NPPF. As such no other alternatives can be considered reasonable and the preferred policy approach has been selected.

Proposed Mitigation Measures / Recommendations

It is recommended that acknowledgement of a number of Local Wildlife Sites and SSSIs in close proximity to the site is included within the policy, with enhancements sought where possible to enhance wider green infrastructure and networks.

It is also recommended that the policy is expanded to specifically address water and flood risk implications; however it is acknowledged that this recommendation and any specific solutions regarding design and layout may be more appropriate to be addressed in a forthcoming development framework / masterplan for the Garden Community.

West of Braintree Garden Community

Paragraph 3.63 and Policy SP8

This policy and supporting text was responded to by 153 people/organisations.

Support	9
Object	135
Comment	9

Overarching Summary

- Key issues amongst the statutory consultees are about addressing the evidence base in relation to Sports Provision, the need for a detailed Water Cycle Study, a full Historic Impact Assessment and a Minerals Resource Assessment. It is recognised that ongoing work with the County Council and Braintree District Council will be vital and the need for progressing issues and masterplanning jointly through the Development Plan Document process
- Consultees and respondents focus on a wide range of reasons to oppose the development. Many of the residents state that they moved to this part of the district for its rural quality and this would be lost when the Garden Community is developed. Main planning reasons for objecting to the development are:
 - inadequate transport infrastructure, especially existing highways and public transport;
 - deliverability given that the site straddles the district boundary and also includes a minerals site;
 - sensitive landscapes and impact on the countryside;
 - important historic buildings and assets that will be adversely affected;
 - loss of an important airfield of historic significance;
 - adverse impact on wildlife and ancient woodland;
 - loss of high quality agricultural land;
 - lack of infrastructure and problems in funding and delivering this, especially in relation to drainage.
 - existing constraints in education and health facilities;
 - relative remoteness from existing jobs and likelihood this will result in increases in car commuting; and
 - concerns about flood risks.

Statutory consultees and other bodies

- **Highways England** - We broadly support this proposed development although impact upon the A120 and its junctions will need to be thought about, a significant opportunity to link to the airport and access to destinations, locally, nationally and internationally by public transport exists.
- **Diocese of Chelmsford** - This policy is not compliant with the National Planning Policy Framework because it does not mention places of worship. For Policy SP8 to be sound “places of worship” needs to be included in the list of community services

and facilities. Since the NPPF specifically mentions “places of worship” this policy SP8 should also specifically mention “places of worship” as it cannot be assumed that places of worship are included if they are not mentioned. The most appropriate place to add this information is point 3.

- **Sport England** - The proposal in criterion (9) to provide leisure and recreation in this proposed Garden Community is welcomed as it would provide the policy basis for ensuring that adequate provision is made for community sports facilities within the Garden Community. However, regard should be had to separate comments made on policy INF2 about the Council’s evidence base for sport and the proposal to use standards for informing and justifying provision within new development. Addressing these comments would help ensure that the Council has a robust basis for ensuring that these developments make adequate provision for sport. Braintree District Council has recently completed its evidence base for sports facilities which is considered to be acceptable. The collective evidence base documents should be used for informing how this development makes provision for sport.
- **Flitch Green Parish Council** - The infrastructure of the proposed development needs to be considered very carefully. There must be sufficient educational provision incorporated within the plan for development. Sufficient provision of off-street parking for residents also needs to be addressed as a matter of priority. The parish council would like to stress the impact such a large development would have on the existing highways. Specifically, the council is very concerned that the old A120 (B1256) would struggle with the immense numbers of vehicles which would be generated. A new exit from the new A120 would be preferable rather than the large number of extra vehicles trying to access the old A120 (B1256). There are also serious concerns that Station Road (B1470) - through Little Dunmow and Felsted - would become a rat run for residents trying to get to Chelmsford from this, very large, new development.

Strain that will be placed on the public transport network if the proposed development goes ahead (this is also relevant to the proposed Great Easton development). For example, the station car parks at Bishop's Stortford and Chelmsford are already very oversubscribed and under great strain. Public transport routes in the area are very poor with just a few buses servicing Flitch Green and the surrounding villages at present. Also the provision of high speed broadband in Flitch Green and some of the surrounding villages is woeful. It is assumed that many of the new residents will work from home, but with the existing broadband that will not be possible and the addition of thousands of new users will only worsen the situation.

- **Saffron Academy Trust** - Building a 'new' school might not be as helpful or exciting as expanding a current school on a new site. Alec Hunter Academy, which has just enjoyed a very positive Ofsted inspection, is a school of 1,000 students. It suffers from an outdated building. A new school which could accommodate twice that number of children in a new build, run by Saffron Academy Trust, would be economically more viable and resolve one of the challenges that Alec Hunter Academy currently faces....its cramped and uninspiring environment.
- **Essex Bridleways Association** - It appears that only pedestrians and cyclists will be catered for with links to Flitch Way (which is a definitive Bridleway) whereas of course equestrians should also be included. Again, the fact that the public exhibition boards and the Policy documentation incorrectly show this route as a ‘cycleway’ gives a distorted view of the existing definitive bridleway network, and one that should be corrected on the issue of the Submission Draft of this Plan.

It should also be noted that, as this community will adjoin the proposed development under the North Essex Shared Strategic Plan, it would surely be sensible to ensure that Uttlesford's Policies are consistent with that Plan. The North Essex Shared Strategic Plan has ensured that equestrian access is incorporated into their garden community proposals.

- **Stansted Neighbourhood Plan Steering Group** – Transport links are weak. A bus service is not sufficient and train links are needed from Stansted Airport to Easton Park, Great Dunmow, Braintree and Chelmsford. Bishop's Stortford Station is already overwhelmed by Uttlesford residents. People will otherwise get in their cars. Community provision should also include land, sports facilities and pavilions. There is a need for light railway infrastructure investment. It is also important that the location of the settlement does not result in expansion of Stansted Airport towards Stansted Mountfitchet. Also concerned that the site is unsustainable in terms of close proximity to the Airport given existing health and noise standards.
- **The Thaxted Society** - Uttlesford is an area where villages and towns have remained small and historically isolated, to provide several new communities appears to chime with the area's narrative growth. However it will be the critical degree of *buffer* and *setting* that allows for that essential narrative to continue. Transport Choice, seems somewhat limited to Dunmow and Braintree only. Why is this? What provisions are being made to join the West Braintree Garden community to the surrounding neighbouring networks and growing communities? There is a lack of public transport options between West and North which will need addressing to align the community's opportunities in terms of employment and public accessibility.
- **British Horse Society** - Supports the comments made by Essex Bridleways Association with regard to the provision of equestrian access within this Policy.
- **Epping Forest District Council** - Policy 8 sets out that the development should include the reconfiguration of and improvements to junctions on the A120, allowing access in all directions and that contributions will be sought for improving M11 Junction 8. Policy SP8 also sets out that development should provide transport choice, including high quality, frequent and fast public transport services to Great Dunmow and Braintree, and a network of safe walking and cycling routes, including connections with and improvements to the Flitch Way. Epping Forest District Council supports this approach. It would be helpful if any future supporting text makes reference to the fact that the strategic highways infrastructure requirements are identified in the Memorandum of Understanding on Highways and Transport Infrastructure in the West Essex/East Hertfordshire HMA (signed March 2017).
- **Saffron Walden Town Council** - Community provision should also include land, sports facilities and pavilions.
- **Great Saling Parish Council** – Strongly object for a number of reasons. The District Council are not listening to local residents or undertaking serious consultation. There are better alternative sites within the district such as Easton Park and North Uttlesford. The development will involve the loss of the best and most versatile agricultural land. The proposal would have a very serious adverse impact on the special features of the area, such as the Registered Parks and Gardens, Ancient Woodland, many listed buildings and other heritage assets and high quality landscape. There would be a negative impact on the character and beauty of the countryside with a loss of sensitive ecosystems that support protected woodlands, flora and fauna. There will be increased noise, air and light pollution. Andrewsfield

Airfield will be lost. There would be significant adverse highway impacts, There is a lack of critical infrastructure such as water and drainage. Other reasons include lack of transparency, minerals deposits and flood risk.

- **Natural England** - commends the commitment to the protection and enhancement of Boxted Ancient Woodland.
- **Harlow District Council** – comments that **Policy SP6.1** refers to the delivery of 10,000 new dwellings, of which a minimum of 1,800 will be delivered by 2033. The corresponding sentences for **SP7** and **SP8** do not specify figures as minima.
- **Environment Agency** - Generally supportive of the thrust of this policy. However, a detailed Water Cycle Study should be carried out as an essential part of the Evidence Base. The absence of a detailed Water Cycle Study would be a soundness issue and should be carried out to comply with environmental legislation. Item 7 of the policy wording should be reworded so as to emphasize that any enhancements, or new water recycling centres, are in place before any development takes place.
- **Historic England** - There are a number of listed buildings, a scheduled monument (Porters Hall moated site) and the Stebbing Conservation Area which could be affected within Uttlesford. The draft policy makes no mention of any of these heritage assets or their settings, and contains no provisions to secure their conservation or enhancement. A comprehensive and collaborative approach to the historic environment between the two Councils is encouraged. A Brief Heritage Impact Assessment (HIA) has been undertaken which identifies harm to a number of nearby heritage assets including a variety of listed buildings and a scheduled monument, concluding that a full HIA is strongly recommended. The findings of the Brief HIA are agreed which is that further work needs to be undertaken in order to justify the proposed site allocation. The use of mitigation measures such as buffer zones should be considered in the allocation policy and the policy should be illustrated with a strategy diagram which broadly establishes the development criteria/mitigation measures for the site.
- **Campaign for the Protection of Rural Essex** - Major concerns about the integrity of existing settlements, such as Stebbing, which would be under great threat from the proximity of large scale housing developments on their borders. The impact on surrounding villages would also be significant in terms of the huge increase in traffic using the local road network - given the inadequate rail connection (via Braintree to Witham) the reliance on car-based movement would be inevitable. In addition, such a large development would result in a substantial amount of harm to the natural environment (ie loss of valuable countryside, damage to the landscape, woodland and wildlife habitats) as well as the significant loss of high grade agricultural land.
- **Essex County Council – Environmental, Sustainability and Highways** - As it currently stands the UDC Draft Local Plan is inconsistent with the Braintree DC Draft Publication Local Plan. Reference to the West of Braintree Garden Community is too specific in terms of overall capacity, as ongoing work will identify the precise capacity of the new Community. Further cross boundary work between UDC and BDC is required to identify and agree the number of new homes and supporting infrastructure to be delivered by 2033. This will be done through the West of Braintree Garden Community Strategic Growth Development Plan Document (DPD)

Policy SP8, Point 3 - reference to providing community facilities is welcomed, and these should be a key component of the local centres. However, reference should

also be made to 'community hubs', which cater for a number of local services and community groups. Whilst ECC retains the operation of some existing youth centres there are no plans to build new centres in existing areas, however there will need to be facilities in major new developments. These are likely to take the form of multipurpose community spaces, but must take account of the specialised requirements of youth provision. Reference to youth centres should be amended to 'youth facilities'.

Policy SP8, Point 4 – reference should be made to '*safe walking and cycling routes throughout the development, and to and between local centres and schools etc.*'. At present the policy only references connections to the Flitch Way. Policy SP8, Point 9 and 10 – reference should be made to a network of multifunctional green space, which could utilise SuDS measures. It is important that the new communities offer a network of green space, which is linked to enable sustainable transport movements to key facilities.

ECC notes that the development at West of Braintree sits between the Policy SP6 – Easton Park Garden Community and allocations proposed by Braintree District and Chelmsford City Councils, around Notley/Great Leighs. The early delivery of a secondary school in this location will be necessary to balance significant pressure on schools in the area. ECC seeks further discussions with UDC (in consultation with adjoining local authorities) to ensure that the phasing of development and educational infrastructure is considered in a holistic manner.

ECC aims to ensure that there is a consistent approach at West of Braintree to the Garden Communities proposed at Colchester, Tendring and Braintree. Therefore UDC should use the term '*landscape buffer*' within the UDC emerging Local Plan. It is recommended that the following wording be included –

"Ensure that high quality landscape buffer zones around the new settlements are both protected and created, and that within these areas the landscape (and land uses?) is/are enhanced and positively managed".

The UDC Draft Local Plan allocation is within a Mineral Safeguarding Area and therefore development proposals must be supported by a Mineral Resource Assessment. On the UDC side, the quality and quantity of mineral resources in the area must be considered as early as possible, in order to facilitate prior extraction without impacting the delivery of the proposed Garden Community in Uttlesford. Prior extraction could have benefits to the Garden Community, through on-site use, and could potentially result in a lower level platform for development which could result in landscape and visual benefits. Therefore preparation of a Mineral Resource Assessment in consultation with ECC as the Mineral Planning Authority at an early stage of masterplanning for this Garden Community in Uttlesford District is essential. A cross border mineral scheme, with phasing linked to Rayne Quarry and the wider Braintree District allocation is essential.

The Woodland Trust – object due to the proximity of the Garden Community to the ancient woodland at Boxted Wood. *The Trust is concerned about the potentially adverse impacts that the proposed site allocations will have. Ancient woodland should not be included in areas that are allocated for development, whether for residential, leisure or community purposes as this leaves them open to the impacts of development. The Woodland Trust objects to the inclusion of the site allocations in the Uttlesford District Council Draft Local Plan as it is likely to cause damage and/or loss to areas of ancient woodland within or adjacent to their boundaries. For this*

reason it is believed that the site is unsound and should not be taken forward.
Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.

- **Braintree District Council** - The North Essex authorities have created a Charter which takes the TCPA principles and applies these to the 21st century North Essex context. BDC would be supportive of UDC looking to adopt the same Charter principles across all its garden communities and in particular the garden community to the West of Braintree.

BDC is keen to work with Uttlesford on planning the new garden community as a whole, which is 'boundary blind'. This means that development and land uses should take place on the most suitable parts of the site for those uses and not because of their location on one side or other of a District boundary. As such it is intended that the authorities work together on the Development Plan Document to produce a single set of policy criteria which will apply across the whole site. Compared to policy SP10 of the Braintree District Local Plan, this policy provides much less detail and context for the development. Whilst the overall principles are generally reflected within both policies there is an opportunity here to share a single planning context which would then be reflected within the joint DPD. BDC would be supportive of UDC using the policies already set out in the BDC Local Plan within its Local Plan on the West of Braintree Garden Community.

The policy does not include reference to green buffers which would be within the area of search and which would act as an appropriate buffer between the built development in the garden community and surrounding villages, hamlets or natural or heritage features that require a setting. These areas would be relatively large scale and could be used for a variety of land uses, from being retained agricultural land to useable open space for the development. The policy does also not reference the minerals site which is located within the overall site. Whilst not within the UDC appropriate references may be useful in the UDC Plan to take this into account.

BDC welcomes the reflection of the BDC area of search for the West of Braintree garden community within the map shown within the UDC Local Plan and for the consistency with which the land within UDC is shown on the Plan. At present the area of search within UDC is strictly based upon land submitted during the 'Call for Sites' and this has resulted in effectively two separate triangles of development within UDC. Through the DPD process the area of search will be refined to a red line boundary, however it is considered that the area of search should show the maximum possible extent of a garden community and the managed buffer. By missing out this central triangle there is a risk that if built development moved either north or south within the BDC area, this could isolate these areas, potentially making them less suitable for development. It should therefore be considered that the area of search be extended within UDC to include the area in the centre of the map which ensures maximum flexibility for the location of the built development within the area of search.

- **Stop Erosion of Rural Communities in Local Essex** - While the need for more housing is not in question, the amount in any particular location should remain an important consideration. Both UDC and BDC appear to be lacking in this respect by failing to interact adequately with the local community and failing to be sufficiently open about the due process. The impression created is one of inevitability rather than one of open discussion. The arguments promoted by the councils and the developers are both flawed and biased.

- **Flitch Way Action Group** - The Flitch Way is a definitive bridleway. It is becoming increasingly important as a non-motorised multi user route across the district, and new development will bring challenges as well as opportunities for it to flourish during the life of this Local Plan and beyond. The Council acknowledges the lack of recreational facilities in some areas and the relatively low level of cycling and walking which the Council hope will improve as the plan matures and development is agreed. The concern is that unless the Flitch Way and the connection project is specifically highlighted for protection and further enhancement a valuable asset could be seriously damaged, and miss opportunities missed for further development and greater benefits to the enlarged communities and tourist trade that it will serve. The draft Local Plan should be revised to ensure that this great asset is enhanced and properly protected.
- **Anglian Water Services Limited** - Policy SP8 refers to enhancements being made at Bocking Water Recycling Centre in Anglian Water's ownership to accommodate the foul flows from the West of Braintree development. It is important that any required investment at existing water recycling centres would need to be identified as part our business planning process. The company are in the early stages of developing a 25 year growth forecast for our area of responsibility and are developing long term integrated strategies to manage growth. These will be published and consulted on in our new Water Recycling Long Term Plan and as part of the PR19 business planning process (next business plan period). It is expected that this strategy will be published in Summer 2018.

Reference is made to a development framework for this site to be agreed between Braintree and Uttlesford District Councils for this site as it straddles the administrative boundary. Consideration should also be given to having consistent wording relating to foul drainage and sewage treatment. For example Policy SP10 of the plan for Braintree district refers to 'provision of improvements to waste water treatment'. Reference is made to Sustainable Drainage Systems (SUDs) being incorporated as part of the North Uttlesford Garden Community which is welcomed. It would be helpful if reference was made to SUDs being considered at an early stage as part of the design process.

- **Stebbing Parish Council** – The Parish Council objects to the proposal. It is considered that the extensive amount of water bodies present could result in residential development being more challenging thereby undermining the delivery of the proposals. The Parish Council strongly urges the District Council to take the findings reached by The Landscape Partnership fully into account should it ultimately decide to proceed with the West of Braintree Garden Community notwithstanding its fundamental objection to the proposals. It is essential that an extensive good quality landscape buffer be provided to separate Stebbing from any West of Braintree settlement. It is apparent that the land identified for the construction of the garden community possesses several important heritage assets which could potentially suffer harm.

The fact that a tenth of the land has been classed as a Medium Risk due to its former WWII use, including the presence of bomb and fuel storage areas which might require remediation is important as it could potentially cause delay in the overall delivery of the project and significantly add to overall development costs. What is of more importance is the acknowledgement that the southern parts of the proposed garden community are located within an area already susceptible to poor air quality

due to its proximity with a junction of the A120. This is a further serious cause of concern particularly given the increased level of traffic likely to be using the A120, not just resulting from the West of Braintree proposals but also from other garden settlements along its route, as well as from other traffic.

It is not apparent how precisely the southern-most portion of the garden community which includes a strip of the River Ter and is partly within Flood Zone 2 and 3, could be remediated within the design proposals. The Parish Council considers that whilst there may be opportunities to utilise bus services to and from Dunmow and Braintree, neither of these two towns are of a sufficient scale and size in terms of facilities and services, to mean that a high proportion of future inhabitants of a West of Braintree community are likely to utilise them. Furthermore, both Braintree and Uttlesford itself suffer from a serious commuter outflow. Consequently, it seems likely that the vast bulk of journeys undertaken by future habitants of a garden community would be by private vehicles

The Parish Council is concerned that a large new settlement being located near to the A120, where air quality concerns already exist, is only likely to exacerbate matters. The location of the development will support some of the wider existing housing needs of the district, however these are limited in terms of location and the cross-boundary nature of the proposal. Given that there would be no employment, retail, community or educational provision located within Uttlesford, Stebbing Parish Council fails to see how the proposed West Braintree Garden Community will promote the efficient use of resources or ensure the necessary infrastructure to support sustainable development within Uttlesford District.

Whereas other housing provision proposals that are better related to Uttlesford's existing settlements and hierarchy would be far more capable of improving the education and skills of Uttlesford's population. The Parish Council believes that reiterates that employment provision proposed will be to the benefit of Braintree resident's rather than Uttlesford residents. It considers that an alternative spatial strategy should be pursued, which would be of more benefit to Uttlesford's existing settlements and communities.

In the light of the findings contained within the Sustainability Appraisal the Parish Council has serious misgivings about the suitability of the area identified for the construction of a new garden community. Inadequate regard has been had to the potential heritage and landscape impacts of the proposal upon Stebbing Parish.

Furthermore, the Parish Council considers that the focus of the proposed Garden Settlement is upon addressing Braintree's needs, and that inadequate regard has been given to addressing the housing, employment and retail needs of Uttlesford in as sustainable manner as possible. Accordingly, the proposed strategy will not provide Uttlesford with the key infrastructure it requires.

- **Rayne Parish Council** - A major concern, a long-standing issue, with the Uttlesford Plan is within the heading of Communication and this has to be addressed and resolved immediately..Uttlesford, and other Districts, have yet to demonstrate they are building plans that are achievable and that they are strong enough to protect residents against unscrupulous builders and developers.
- **Felstead Parish Council** - The Parish Council believe the proposed Garden Community is in the worst of all locations being considered by UDC both from financial and logistical viability. The Parish Council is specifically concerned about

the impact on roads going south through Felsted and on services including doctors and schools in the area. UDC has no control over this development, and is simply picking up what BDC allows to happen. For UDC to therefore present WoB as a part of a careful plan to achieve a certain number of houses is highly misleading. The site should therefore be removed from the UDC Pan. If BDC goes forward in the way it is now suggesting then it might not offer an opportunity for UDC in the next plan period, but not in this one. The risks and uncertainty and lack of control are just too great.

- **Manchester Airport Group** - The transport clause about A120 and M11 is supported and is vital for the successful delivery of development in the south of the district. However, the policy intention should be strengthened to encourage working with Highways England, Essex County Council and other stakeholders to ensure opportunities for collective provision of transport infrastructure are maximised.

Developers/landowners/site promoters

- (promoter of land within Area of Search) - It may be helpful to expand Paragraph 3.63 to state the development limits for these Garden Communities will be defined in the relevant Development Framework.

Policy SP8 – (WBGC) is generally in accordance with the development vision and master plan prepared and submitted by Andrewsfield New Settlement Consortium (ANSC) towards the previous Uttlesford and Braintree call for sites and Local Plan consultations

ANSC supports the requirement for Supplementary Planning Guidance, framework or design codes to provide more detailed master planning guidance for the WBGC. The guidance should draw heavily upon the guiding principles for garden city developments as promoted by the Town and Country Planning Association.

The Policy SP8 provision for 3,500 new dwellings in Uttlesford at the WBGC, of which 970 will be delivered by 2033 is supported by ANSC. Indeed, it is submitted that there is suitable, achievable and available land to exceed these housing targets if necessary. ANSC fully support the provision of a range of mix of housing sizes and types at the WBGC as well as a range of local employment opportunities and local centres incorporating a mix of retail, business and community uses, importantly to include education and health care provision.

It is intended that the WBGC will provide a wide range of uses resulting in the development being self sufficient as far as possible and thus reducing the need for people to travel. In addition, the development will incorporate a range of high quality, frequent and fast public transport services, and a variety of safe walking and cycling routes, including connections to and improvements to the Flitch Way. It is recognised that there will inevitably be a requirement for junction improvements on the A120 and the B1256, and other infrastructure requirements as flagged up by the Infrastructure Delivery Plan prepared by Troy Planning, May 2017, on behalf of UDC. It is also recognised that there will be a need for sensitive treatment of heritage and landscape assets within proximity of the WBGC, as considered within the technical reports submitted by ANSC, as well as the Land West of Braintree Landscape & Visual Appraisal prepared by Chris Blandford Associates, June 2017, prepared on behalf of UDC, and the Brief Heritage Impact Assessment prepared by UDC. Only where there is a demonstrated need, there may be a requirement for mitigation measures to

wider higher impacts such as junction 8 of the M11 and measures along Essex Regiment Way.

ANSC therefore strongly supports Policy SP8 (WBGC) and ANSC will continue to working closely with Uttlesford and Braintree Councils, as well as with Galliard Homes relating to land at Boxted Wood to facilitate the successful planning of the new community.

- (promoter of land within Area of Search) - strongly supports the innovative approach to meeting housing need through garden city principles, and confirms it is working co-operatively with the 'Andrewsfield' Consortium to achieve comprehensive development both on the Uttlesford and Braintree side of the administrative boundary. We don't believe that the figure of 970 should be treated as a 'target' as if more homes can be delivered, that will be a bonus, and could help fill the gap if other major allocations fail to deliver the homes anticipated there. Similarly if infrastructure provision allows development to commence earlier than 2025/6 then such a move should be supported.

Agrees the details of development and infrastructure should be determined through a development framework, and this should be prepared with the benefit of contributions from the landowners, developer, and local community. In respect of a delivery model it is important that the new community is delivered as efficiently and to as high a quality as possible, to meet the aspirations of stakeholders. It is quite likely that the most effective method will be one where there is a collaboration between public and private sectors, but it is the effective delivery that should be the driver, not the mechanism.

- (promoter of an alternative site) - Persimmon welcomes the identification of these new settlements which shows a commitment to delivering housing for this plan and beyond. The Plan expects 4,670 homes from the Garden Communities up to 2033. Development is expected to commence and deliver housing from 2021/22 (Appendix 3 – Housing Trajectory and the number of houses at this time is calculated as 125). This is considered to be unrealistic given the work that is required including developing a framework, and SPD (which requires consultation) all prior to the submission and granting of planning permission.
- (landowners that adjoin the proposed development to the north west) - Essex Farms fully supports these policies which establish the planning basis for the development of a new Garden Community to the west of Braintree. Essex Farms also supports the work the local planning authority have done in identifying the broad location as the most suitable and sustainable location for the construction of a new settlement in the District. In terms of developability, the land is largely free from landscape and biodiversity designations, with the exception of a few small areas of woodland, including ancient woodland. There are a number of Grade II listed farm buildings in the area, but there are no heritage buildings of exceptional interest or buildings that are particularly important in heritage terms, and there are no Scheduled Ancient Monuments. The area is at the lowest risk of flooding – categorised as flood zone 1. Much of the land is Grade 2 or Grade 3 classified Agricultural Land. As with the neighbouring Garden Community broad location, the area we is largely free from physical constraints. In terms of deliverability, the land is in agricultural use and is free from any significant constraints or exceptional costs to development (such as site clearance); as such, development of the land is considered to be viable and development would, therefore, be deliverable.

- (promoter of an alternative site) – Object because the location of West of Braintree is unsustainable and poorly located in relation to facilities and services; will create environmental harm to ancient woodland and the wider landscape; requires highway improvements that question the deliverability and suitability of the location, involves complications given the administration district boundary, will not address the affordable housing needs in Uttlesford and part of the new settlement in Braintree is an allocated minerals site at Broadfield Farm.
- (promoter of an alternative site) – The Garden Community proposal is unsound and should be removed from the Plan and growth redistributed across key villages. The proposal is unsound because it requires both the Braintree and the Uttlesford Local Plans coming forward together and this is not being done.
- (promoter of an alternative site) - The concept of Garden Communities is supported however there are concerns with various aspects of deliverability..Policy SP8 also sets out a comprehensive and detailed list of requirements which will need to be provided as part of the development of the Garden Community across the whole strategic allocation. The need for these provisions is likely to lead to protracted S106 agreement negotiations which may well cause additional delays in the delivery of the scheme.
- (promoter of development on adjoining land) – Proposes employment provision on land situated between the B1256 and A120 immediately to the south of the proposed Area of Search for the new Garden Community. The site was put forward in the 2015 Call for Sites process and a development of 9,550 square metres is proposed. In Planning terms it seems illogical to exclude these areas given the proximity to the A120 for access, that the land will become isolated between the B1256 and the A120, and its usefulness for any agricultural purposes will be diminished due to isolation and proximity to surrounding large scale infrastructure and comprehensive commercial development within the Garden Community and the likely B1, B2 and B8 uses.
- (promoter of an alternative site) – There is a significant risk to this site coming forward in this plan period as its deliverability is dependent on Braintree District Council and delivery of the proposed new settlement within Braintree. The larger portion of the site is in Braintree and naturally the majority of services and facilities to support a new settlement in this location will be located in Braintree. If the area of the settlement located in Braintree does not come forward, the area of the site in Uttlesford cannot come forward as there will not be sufficient services, facilities, infrastructure and other amenities to support the delivery of a new settlement solely in Uttlesford. Furthermore, there is a lack of clarity over the proposed access arrangements, which is fundamental to the delivery of the new settlement. The Garden Community, is therefore undeliverable within the plan period and the associated growth proposed should be redistributed across the District's more sustainable and established towns and key villages.
- (promoter of an alternative site) – the promoter objects to the proposed allocation of the West of Braintree Garden Community. The West of Braintree site should be identified as a reserve site to come forward on a phased basis. The Council's reliance upon the delivery of 970 dwellings from this site during the plan period is not robust or supported by adequate evidence given the sites unique characteristics and requirement to conform to a development, infrastructure delivery and phasing strategy which is likely to be determined outside of Uttlesford.

- This quiet and peaceful part of Uttlesford should not be urbanised and development would be better located closer to Chelmsford.
- Development of Andrewsfield Airfield will result in more planes flying over surrounding villages creating more noise and pollution.
- Fine agricultural land will be lost.
- The decision to develop the land has already been made and consultation is not genuine.
- Any new amenity space should be equal or great than any which may be lost.
- This will adjoin the 10,000 homes proposed in Braintree and will be a new city.
- Proposal would significantly adversely affect the local historic character.
- Development surrounding Boxted Wood will affect the setting of the ancient woodland as well as local wildlife.
- Local roads are narrow and not suitable to accommodate the extra traffic arising from the proposed development, there will be a danger to cyclists, dog walkers and horse riders and the traffic will create noise and air pollution.
- There will be more traffic on A120 and local B roads which will not be able to cope.
- Andrewsfield Airfield is historically important and will be lost, so too an adjoining Rifle Range. Andrewsfield is also part of the UK Met Office weather station network and the Met Office have made it clear that any significant development would have an impact on this weather station. Andrewsfield is an active CAA regulated airfield which plays an important part in the network of airfields across the UK, as well as being an important centre for training commercial and private pilots. The guiding document on airfield planning is NPPF13 and the CAA's CAP 168 covers Safeguarding requirements. We assume CBC are familiar with the provisions of the NPPF requiring priority being given to the retention of existing airfields.
- Majority of local residents are opposed to the proposed development. 96.7% of all households responded to the Stebbing Neighbourhood Plan and overwhelmingly this proposed development is NOT supported, 90% think that it would be a bad thing for the parish. Better to locate the development at Great Chesterford, Newport and Elsenham.
- If development goes ahead then there needs to be detailed consultation on mitigation measures including green space and no access to local lanes and roads.
- The local plan contravenes NPPF paragraph 155 because there has been no meaningful engagement with neighbours, parishes or community by Uttlesford or Braintree District Councils.
- The consultation should have included the Braintree proposals so that the community can see the whole picture of where this proposed development is sited over the rural landscape.
- This site is unsustainable and violates the hypothesis as set out in the Governments policy for Locally-Led Garden Villages, Towns and Cities (DCLG March 2016)
- From the undefined plans the proposed development will cover agricultural and brownfield land which is class 2 and 3 agricultural land good for growing crops on which it has been doing for many decades.
- This land already sustains employment and includes diverse leisure activities. Including horseriding, walking, shooting, flying, bird watching plus it is the route for many cycling clubs .
- It is not realistic to think that the residents of the Garden Community will work from home or within close proximity and there are not enough jobs locally. It is important

to get the proper infrastructure in place from the outset. The infrastructure of the A120 is flawed.

- In the same way that the A120 between Braintree and Colchester represents a sub-standard link in the strategic road network, the A131/A130 between Great Leighs and Chelmsford (and the A12 Boreham Interchange) suffers similar congestion and capacity issues, particularly at peak hours. This has been recognised by both Essex County Council as Highways Authority and Chelmsford City Council as Local Planning Authority through the safeguarding of a preferred route of a new North East Chelmsford By-pass. This would extend the dual carriageway from the Great Leighs' By-pass to the A12 Boreham Interchange.
- The delivery of the new North East Chelmsford By-pass is a key cross-boundary strategic infrastructure issue which is omitted from the Braintree Preferred Options consultation document and yours. Specific reference should be made to the proposed NE Chelmsford By-pass in the Strategic Part 1 section of the document.
- The infrastructure requirements for schools and health facilities need to be in place from the start or built alongside such proposed developments. If not they will put even more pressure on these overstretched resources from day one.
- Qualified support to the West of Braintree development would be given as long as the integration of the surrounding villages remain intact. Infrastructure is clearly a huge issue and road and cycleway access must be improved. Would also prefer to see the historic element of the airfield at Andrewsfield preserved.
- The proposed development would have an adverse effect on the heritage and character of the village as well as significant damage to the infrastructure currently in place. The roads are rural and narrow, they cannot take large volumes of traffic which will be inevitable if the development goes ahead. The A120 cannot currently cope with the volume it has at peak times. In order to protect the village, there would need to be provision to prevent the new development spilling over into the village, access restrictions to avoid damage of local infrastructure and to ensure the safety of residents who enjoy walking, riding and cycling in the area. The gap between communities must be preserved.
- The countryside surrounding the developments would be damaged and with that the wildlife within it. This would be the case during construction and when the development is inhabited. Species such as bats, deer, a variety of birds, badgers, hedgehogs, otters and insects would all be adversely affected. The plan states that there will be measures to protect Boxted Wood - what measures? Wildflowers and trees will all be adversely affected,
- The close proximity of this development and that of Easton Park will saturate the entire area, they are too close together to not have a devastating affect on the communities, the environment and infrastructure. The proposals are simply not sound. There is a lack of development in the Saffron Walden area which is likely to have a greater ability to cope from an amenities and infrastructure perspective. Geographically, development sitting closer to the M11 would be more suitable.
- The development would destroy the character of the hamlet of Stebbing Green.
- Regarding the northern part of the proposed Garden Community, there are concerns regarding transport routes for construction traffic. The existing access roads are quite narrow and pass by the existing properties of Stebbing Green/Stebbing. They are not suitable for construction traffic.
- Not convinced that there will be transport choice, including high quality public transport. There is no mention of a rail connection. Not an attractive option for London commuters who will make up a high proportion of the new residents.
- 10,000 homes surely deserve a railway service. If not, imagine the CO2 emissions! And the railway in Braintree could easily be extended because the line used to exist (until Beeching presumably) and the track still looks clear and free to exit Braintree to the west to serve the Garden Community site. By contrast, the plan is very specific

about road transport, specifying junction improvements on the A120 and M11 Junction 8 and 'mitigation' on the B1256. Not a policy for sustainable transport at all.

- Services are already stretched with the current population. The NHS is struggling to cope - as most people know from experience, waiting list times are long. In Dunmow there are already long waits for medical appointments as there are just too many people for the services to cope with. Encouraging more people to live in this area is nonsensical and just has not been thought through.
- Stansted is the UK's default diversion airport for terror threats. Placing people's homes near an airport such as this is not a wise move due to the current high risk of terrorist incidents.
- 90% of respondents to the recent Stebbing Neighbourhood Plan questionnaire said that the proposed development would be a bad or very bad thing for the parish.
- If this development is to go ahead, then at least reduce the size and allow Stebbing a gap – a space of green land between Stebbing Green and the new settlement to enable the Parish to keep their historical character. Keep Andrewsfield as it is.
- This appears to be the most sensible suggestion in that there is room to make a very good viable, independent community which is not likely to join up with Braintree. By concentrating all effort and expertise into this project, Uttlesford, with Braintree, could lead the way and create one of the first in the Country of the new style environmentally friendly Garden Villages fit for the 21st Century.
- There is a railway at Braintree to which a dedicated bus road could provide access. It is proven to be cheaper than either road/rail or rail connections or can move as many, if not more, passengers per hour than either.
- If development is initially concentrated on this Village it would provide a viable, independent community far more quickly than spreading resources across two or three developments at the same time. The proposed populations of 1900 and 1800 by 2033 couldn't expect to have many, if not most, of the infrastructure eventually envisaged.
- It will also provide a pilot scheme enabling problems to be identified and dealt with and the experience thus gained will add greatly to the understanding of the practicalities of this new concept of a Garden Village.
- The size of the development within the area is not appropriate for the area;.
- There is no clear plan for road use with the existing A120 grid locked for much of the day around the McDonald's roundabout, further there was very vague information given out at the local meeting in Stebbing by council members as to who would be paying for these road upgrades. With the initial number of houses planned the house sales would not warrant the road upgrade.
- Poorly conceived water, sewage and electricity requirements for number of houses planned, to make broad statements that existing services will be upgraded is not enough.
- The development is tagged onto a Braintree plan rather than thought out for the requirements of the Uttlesford District. Weighting development in one area based on a possible expansion at Stansted etc.
- The up lift to the land would only benefit the farmers who are selling off their good quality agricultural land, no thought has gone into the impact of the number of cars, at least 2 attached to every property as nothing would be within walking distance.
- Lack of detail of services being provided for, namely, health care, education, public transport, leisure facilities, shopping, no detail of provision for shops within the development.
- Noise and disruption over a long period during the construction process in localised areas.
- No details of affordability of properties only vague statements of mixed residential social housing.

- There should be early commitment to solving the traffic jams that already occur regularly at M11 Junction 8 (for example at 5am) and early commitment to solving the over-short A120 crossover section East of J8. Item 5 of Policy SP8 seems remarkably weak in its resolve to get contributions from the developer.
- There is no justification for a cross boundary settlement. The area is within a separate Strategic Housing Market Area and should only meet the needs of Braintree. There is sufficient land within Braintree District to accommodate the needs of its principal town for the foreseeable future, and that as a result, no cross-border project is needed. The 950 dwellings proposed in that general location in Uttlesford District should be accommodated instead as part of extensions to the principal towns, and preferably Saffron Walden, or in other sustainable locations close to them, such as Swards End.
- Will result in the near coalescence of many existing settlements. Will also unacceptably extend development into open countryside between Braintree and Great Dunmow. The expansion of existing settlements, accessible to the main urban centres of Great Dunmow, Saffron Walden and the A120, offers a viable and more sustainable alternative to large scale Garden Communities.
- Associated costs are prohibitive and cast doubt as to the ability to deliver the development on the scale envisaged. Garden Communities on the scale proposed will divert resources which could be directed towards making existing communities more sustainable.
- This site has no main developer and no firm agreement among the lesser developers that one of them should take the lead in the overall management, control and delivery of the settlement. There are at least 14 separate landowners involved. There is no credible overall land acquisition strategy in place under which the Special Purpose Vehicle (if and when there is one) or the main developer can be assured of purchasing the land at prices advantageous to the community. There is scant evidence of any credible 'options to purchase' the land. Therefore there is no credible means of capturing the land value increase for the benefit of the community.
- Nowhere in the Local Plan Draft does UDC mention Bardfield Saling. It is a community right on the edge of this proposed development. This community would not want to coalesce with this development. The identity of this small community with its vast amount of grade II buildings and its Grade I church, one of 6 round tower churches in Essex, would be spoilt and lost forever. Mitigation measures will be needed if the development does go ahead.
- Infrastructure is limited, Braintree has few facilities and many empty shops, it has a small railway station with a tiny car park and is located in the centre of a town congested by traffic. The journey is long with many stops. Galleys corner has queues for most parts of the day,
- Where will the water supply come from? Also existing residents at Bardfield Saling have no mains drainage and this is a constraint. Electricity supply is limited.
- There is a distinct lack of detail of services being provided for, namely, health care, education, public transport, leisure facilities, shopping, no detail of provision for shops within the development. How many jobs will these create? When will they be built?
- The scale and distribution of housing development is heavily weighted towards the south of the District. A significantly greater proportion of the houses to be built, those with planning consent and proposed new developments, are to be built along the A120/B1256 corridor, approximately 1,500 more dwellings than in the north.
- Concern that planning agreements will not be properly enforced.
- Flooding and downstream contamination – The area bordering the south of the proposed development is a flood risk zone and an increase of run-off water would present a significant flooding risk to the River Ter and the hamlet of Stebbing Green.

This additional water and contamination would also be a risk to the River Ter SSSI site to the south of Great Leighs.

- Light Pollution (Night time Environment) – The area around Andrewsfield is recorded as one of the few remaining dark skies region in North Essex where the natural beauty of the stars and the Milky Way are clearly visible. This is important not only to the local residents but to the environment as the majority of wildlife is nocturnal i.e. bats and owls.
- Flight Path – The site is located under the Stansted flight path for aircraft taking off. These flights start early morning and have been recorded throughout the night. It would be irresponsible for a council to build “quality housing” that suffers from noise pollution. NATS as part of the LAMP programme deliberately changed the flight to reduce the number of houses that flights passed over. Building West of Braintree would invalidate that work.
- Housing numbers for the district appear to be over inflated and there is no need for the new settlement. In addition Brexit will result in a reduction in the need for additional houses.
- The community atmosphere and country character of surrounding communities like Stebbing are amongst the reasons why a number of people have moved to the area. This atmosphere and character we be lost if the development takes place.
- Braintree's preferred option stops well short of any development near the historic Andrewsfield airfield, which marks a boundary change for the West of Braintree development. It is suggested that Uttlesford District Council coordinate their decisions similarly to protect this historical site (the first US Air Base in the UK), and preserve it as an asset and visitor attraction to residents of both district councils for decades to come.
- Reservations as to how the new garden communities will be delivered by the special delivery vehicle (SDV) to be set up under the auspices of the North Essex Garden Communities Limited, set up by Braintree District Council, Colchester Borough Council, Tendring District Council and Essex County Council. Furthermore UDC is not a member of the Company/SDV and there are serious questions as to how it will deliver the proposed extension of the West of Braintree Settlement when not being a party to the delivery vehicle.
- The Report of Chis Blandford Associates relied upon by UDC in its evidence base does not meet applicable objections, not being comprehensive in its approach. The Report of the Landscape Partnership is relied upon as cause for objection to the proposed Policy. Mitigation measures by way of planting are not appropriate given the open nature of the landscape, as the likely development of high rise "town houses" (in order to meet density requirements) and absence of year round native tree foliage would defeat any such possible mitigation.
- The Report of Grover Lewis Associates Limited dated August 2017, commissioned again by the Stebbing Neighbourhood Plan Steering Group does not support the prospect of the proposed Policy, as it will have a deleterious effect upon the valuable heritage assets of the Parish of Stebbing. These are not adequately addressed, let alone overcome by UDC's own evidence base as to heritage, which for "West of Braintree" is in the nature of a basic, undated, unauthored commentary.
- Neither ANSC nor Galliard have stated that they will agree to adhere or be bound to the TCPA Garden City Principles. Without legally binding obligations which cannot be diminished, the whole concept of a Garden Community cannot be achieved.
- Social services in the area would face an excessive strain to an already overburdened system. The problems generated in the new town will spill over and affect neighbouring communities. There is no indication as to how these matters will be dealt with. The police force has faced draconian cuts recently and there is no sign that the situation is going to be reversed. All the residents in Uttlesford are only too aware of the almost complete lack of police in the area and those police that are

there are completely overburdened and would not be able to provide adequate policing to the new town.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy can be seen to address the majority of those potential concerns raised in the 'policy off' appraisal of the site (later in this report). Significant positive impacts are realised for housing, employment, sustainable travel and access, education and infrastructure. Positive impacts will be realised for the sustainable use of land, minimising flood risk, and health and social inclusion. Uncertain impacts have been highlighted regarding landscape, where the location has a moderate to relatively high sensitivity to change / development, with the western part of the area having a higher sensitivity to change in association with the River Chelmer. Development in the area could see the coalescence of Stebbing in the north and Flitch Green in the south and this is not addressed in the Policy as a criterion. There will be positive impacts related to biodiversity; the site does not contain any designations of wildlife value, however does contain Boxted Wood. The Policy adequately seeks the protection and enhancement of this Ancient Woodland, which also contains below ground archaeological deposits (a Roman villa). Wider impacts on the historic environment are broadly uncertain, where the policy does not contain any criteria related to possible impacts a protected lane bisecting the site, and the setting of two Registered Parks and Gardens (most notably Saling Grove). There may also be wider setting issues regarding the Listed Buildings both on and in close proximity to the site.

Alternatives Considered

The principles and requirements of this Policy are specific to the Garden Community, to which this policy relates, ensuring that aspirations surrounding sustainable development will be met from any successful proposal. In so far as the Policy ensures sustainable development, it accords directly to the presumption in favour of sustainable development of Policy SP1 and more critically, the NPPF. As such no other alternatives can be considered reasonable and the preferred policy approach has been selected.

Proposed Mitigation Measures / Recommendations

It is recommended that the Policy is expanded to include requirements for a Heritage Impact Assessment to explore the impacts of proposals on the historic environment.

It is also recommended that the policy is expanded to specifically address landscape implications. It is further recommended in relation to this point, that updated landscape evidence work is prepared to inform future iterations of the Policy and Plan, or otherwise to inform the development framework / masterplan for this Garden Community.

Development Limits Paragraph 3.63 and Policy SP9

This policy and supporting text was responded to by 108 people/organisations.

Support	86
Object	15
Comment	7

Overarching Summary

- Overall support for policy
- Additional criteria suggested covering impacts on natural environment; historic environment; air quality; infrastructure.
- Developers are seeking a relaxation in the policy to allow greater flexibility as this can lead to sustainable development.

Statutory consultees and other bodies

Natural England feels that this paragraph should reference impacts on the natural environment or at least specify a requirement to accord with policies elsewhere in the plan to avoid ambiguity.

Historic England request that the policy is amended to require development to have regard to the conservation and enhancement of the historic environment and its setting.

Ugley and Henham Parish Councils support the policy. **Great Chesterford Parish Council** supports the policy and considers that North Uttlesford Garden Community is contrary to the policy.

Saffron Walden Neighbourhood Plan Group and **Stansted Mountfitchet**

Neighbourhood Plan Group support the policy but propose an additional criteria of h) It would not add to an existing AQMA.

CPREssex consider that any proposed development should have the necessary infrastructure, especially with regard to water supply and sewerage before dwelling units can be built. Essex is a county with low rainfall and if all the proposed new developments go ahead, then the demand for clean water will increase substantially.

Thaxted Society supports the policy.

Developers/landowners/site promoters

- For clarity, in relation to the new Garden Communities it might be helpful to expand Paragraph 3.63, to state that the Development Limits for these communities are to be defined in the relevant Development Framework.
- Criteria 1 should be deleted as it provides an unnecessary barrier to delivering development within development limits that is unsubstantiated by the evidence provided and raises the risk of preventing sustainable development which would be contrary to national policy.
- The Council should look to permit development beyond development limits on the same grounds as the criteria listed in Policy SP9. This would provide greater

flexibility to ensure that the housing land supply strategy can be effective and the objectively assessed housing need can be met.

- The justification for the Policy at paragraph 3.63 specifically states that the development limits are a guide to where new development should be located. Should the Council not, therefore, be more lenient towards development that is immediately adjacent to, or which straddles the development limits of a settlement?
- Uttlesford District is a predominantly rural area where the opportunities for development are limited. In this context we submit that the emerging plan should recognise the important role that the rural housing market has to play in meeting housing need and ensuring that annualised housing supply in the early years of the Plan is maintained.

Individuals

- The policy is supported by a number of individuals
- Thought should be given to the size and shape to development limits. The lines on the map (certainly in Wendens Ambo) appear to be arbitrary, with some houses within and others outside the development limits. This does seem to be an unnatural restriction on the ability of the villages to grow coherently.
- Object to the urbanisation caused by development beyond development limits, namely the Garden Communities.
- Point 4 of policy - Any new amenity space should be equal to or greater than that which is lost, rather than use the terms adequate and unacceptable.
- Add the criterion that development will be permitted if it reduces reliance on the car (as stated in policy SP5)
- Development should be permitted if and only if it is included in this Local Plan, otherwise development should be permitted only on windfall sites, for which a clear definition is needed.
- Point 6 of policy- use of the word 'overbearing' sets bar too high and should be replaced with 'significant or adverse'.
- The policy should include a criteria mitigation measures to reduce or minimise impact.
- The policy should require trees to be retained to avoid the areas being denuded of mature or semi-mature vegetation
- The policy should include a requirement for a review of all existing settlement boundaries to assess opportunities for sustainable development through logical extensions and rounding off.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The policy protects those locations where the principle of development would not be appropriate and directs development towards existing sustainable locations. This promotes positive impacts on several SA objectives.

There will be positive impacts across the majority of the sustainability objectives due to the variety of themes the criteria cover in relation to new development within development limits.

Positive impacts have been highlighted in association with the character of settlements and/or countryside setting, reflecting the District's many historic settlements, and there will be significant positive impacts associated with landscape character through the policy approach and the revision of development limits within settlements through the plan-making process. The principle of this policy in isolation can only seek to retain and protect current characteristics, thus impacts cannot be significantly positive.

There will also be positive impacts associated with those criteria regarding unreasonable noise and disturbance and also regarding health through the requirement for the provision of adequate amenity space.

Alternatives Considered

Alternative SP2(a): To remove the designation of Development Limits. The alternative adopts a more flexible approach to development, based on the premise that the removal of limits allows greater flexibility for development to come forward outside existing limits. The argument is that this would increase housing and employment land supply. There would be negative implications from this approach, in particular on those themes regarding landscape, soil, sustainable travel, accessibility and education. There could be positive impacts regarding cultural heritage based on an assumption that growth would be located away from the District's historic settlements. It is felt however that a considerably more sustainable approach is for development outside existing limits to be identified through allocations in a plan-led system, rather than come forward in piecemeal developments that may not be able to offer the critical mass to make them sustainable regarding infrastructure provision. For this reason the alternative has been rejected. It should be noted however that any forthcoming proposals for development within, adjacent, or outside established development boundaries will be assessed on their merits in line with a presumption in favour of sustainable development and all relevant planning policies within the Plan area.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Development in the Countryside

Paragraphs 3.64-3.74 and Policy SP10

This policy and supporting text was responded to by 133 people/organisations.

Support	92
Object	25
Comment	16

Overarching Summary

- Recognition of importance of best and most versatile agricultural land welcome

- Reference biodiversity in separate bullet point for clarity
- Requirement for development to protect and enhance the countryside and landscape character is welcome
- Requirement to clarify the pressures referred to in the policy regarding Stansted Airport
- Continued Countryside Protection Zone (CPZ) designation is supported
- Concern raised over future of CPZ due to the proposed Easton Park development
- Inadvertent alteration of the substance of place through unplanned growth will be impossible to mitigate
- North Uttlesford Garden Community (NUGC) will significantly damage the countryside
- Development of NUGC is contrary to SP10 principles
- Retention of the Green Belt is important for the preservation of character and essence of Birchanger
- Amalgamation of three policies i.e. (Saved Policy S6 (Metropolitan Green Belt), Policy S7 (The Countryside) and Policy S8 (Countryside Protection Zone) weakens the longstanding Policy 8
- Classification of agricultural land as Class 2 underestimates subtleties of individual areas of marginal land
- Concern was raised about UDC's rigid adherence to MGB and CPZ historic boundaries
- Metropolitan Green Belt not delineated in accordance with NPPF paragraph 85 stating the LPA "should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."
- SP10 deemed a protection policy that resists development unless certain criteria are met
- Due to restrictiveness SP10 certain sustainable development opportunities classed as "countryside and protected."
- SP10 protects land for its intrinsic character and beauty whilst NPPF paragraph 17 requires LPA to "recognise" the intrinsic character and beauty of the countryside
- Difficult to locate Policies Map on website
- Querying existence of Policies Map
- Reference to Development Limits should be replaced with a broad definition of settlements beyond which land is considered to be Countryside (approach being followed by other LPAs)
- SP10 considered not effective and not positively prepared as it seeks to hinder potentially sustainable sites in the countryside
- Conflict between protecting agricultural land and supporting biodiversity
- Need to support biodiversity should be prioritised
- Objection to omission of reference to Countryside Protection Zone (CPZ) after "MGB" in penultimate sentence in paragraph 3.74.
- Countryside Protection Zone's integrity compromised by development of 300 dwellings and an additional smaller site allowed on appeal
- Land south of A120 should be released from Green Belt to employment uses as it does not currently fulfil Green Belt purposes

- Request to undertake a Metropolitan Green Belt Review with Limekiln Lane as a firm southern boundary.
- Inflexibility of approach to Green Belt release regarded as hindering release of land that could contribute to vitality of Type A Villages such as Leaden Roding.
- Clarification required on who is responsible for identification of need to infill
- Development of Garden Communities on rural land seen as contradictory to the protection of countryside assets
- Scale of new settlement development does not respect quality or character of area
- Need to provide bridleways

Statutory consultees and other bodies

Natural England - Natural England is pleased to see recognition of the importance of best and most versatile agricultural land however the sentence as a whole is currently unclear. It would make sense to split the reference to biodiversity into a separate bullet point.

Historic England - Historic England welcomes the requirement for development to protect and enhance the countryside and landscape character.

Manchester Airports Group (MAG) - MAG supports the overall purpose of the Countryside Protection Zone (CPZ). However, the wording of the policy indicates that the Airport puts pressure on the surrounding area. This is refuted because the airport growth can be delivered within the existing airport boundary. UDC is required to clarify the pressures referred to in the policy. The policy should also clarify what the Countryside Protection Zone is attempting to protect against.

East Hertfordshire District Council maintains its view that land to the south of the A120 adjacent to Bishop's Stortford does not meet the purposes of the Green Belt because it is surrounded by built development, the bypass and therefore it should be released from the Green Belt designation and reallocated to employment uses.

CPRE Essex - The continued Countryside Protection Zone (CPZ) designation is supported. Concern has been raised over the future of the CPZ due the proposed Easton Park (10,000 homes) development abutting the eastern boundary of the CPZ. Proximity of the development to proposed housing will subject residents to noise and disturbance from overflying aircraft and ground operations.

Retention of the Metropolitan Green Belt (MGB) with minor amendments and not releasing Green Belt land up to 2033 is welcome. Reiterated that development within the MGB should only be released in exceptional circumstances.

Uttlesford Futures, Employment, Economy, Skills Environment and Transport - Query on scope for the reduction of food travel through growing food and food manufacture. It is noted that arable farming needs to be protected as land is being lost to housing development especially in Stansted.

THE THAXTED SOCIETY - The Thaxted Society reiterates the importance of countryside to Thaxted and there is concern that inadvertent alteration of the substance of place through

unplanned growth will be impossible to mitigate. Concern expressed that the destruction of the built/rural balance will result in irrevocable loss of fundamentals of place.

Great Chesterford Parish Council – Paragraph 3.64 is considered clear and correct and should be applicable to Great Chesterford in equal measure. However, NUGC is does not conform to the paragraph. The proposed North Uttlesford Garden Community (NUGC) does not protect the intrinsic beauty, character and local distinctiveness of the landscape surrounding Chesterford. In fact the NUGC would be both highly and significantly damaging to the countryside. The proposal ignores the key characteristics, features and sensitivity to change of the landscape. Also NUGC does not protect the best and most versatile agricultural land. Contrary to Policy SP10, the development of NUGC is not based on a location with good access to services and facilities.

Little Chesterford Parish Council - The proposed location of North Uttlesford Garden Community is a Greenfield agricultural site of over 1,100 acres. Development on this site does not accord with the stated aims of Policy SP10 to protect this type of land. Loss of “the best and most versatile” land is contrary to Policy SP10, NPPF and Core Planning Principles.

Birchanger Parish Council - Birchanger Parish Council supports the decision to respect the Green Belt because its maintenance is vital in stopping coalescence with Hertfordshire. The Green Belt is also important in containing the urban sprawl between Bishop’s Stortford and Stansted. Retention of the Green Belt is important for the preservation of character and essence of Birchanger.

Henham Parish Council and Ugley Parish Council support Policy SP10.

Great Dunmow Town Council - Policy SP10 is an amalgamation of Saved Policy S6 (Metropolitan Green Belt), Policy S7 (The Countryside) and Policy S8 (Countryside Protection Zone). Amalgamation of these three policies weakens the longstanding Policy 8 which ensures that the airport remains an airport in the countryside as original envisaged. The wording of Policy 8 should therefore be retained in its entirety in Policy 10 to ensure that the Countryside Protection Zone is maintained.

Policy SP10 is in conflict with SP6 because SP10 is about the protection of the countryside and yet SP6 (Easton Park) is proposed to be developed on land within the countryside that SP10 purports to protect.

Wendens Ambo Parish Council - The Draft Local Plan provides protection for a belt of countryside between Harlow, Bishop’s Stortford and Stansted Mountfitchet. Retention of this countryside belt should be accompanied by a strong rural strategy promoting a diverse and rich quality of habitat for wild life and not ‘green desert’ verges.

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group - Policy SP10 is supported but the wording should include encouraging the protection of woodland and hedgerows.

Developers/landowners/site promoters

- Policy SP10 seen as all-encompassing in characterisation of the countryside and makes very little distinction in quality of land

- Classification of agricultural land as Class 2 underestimates subtleties of individual areas especially land that is marginal to farming and is outside Development Limits
- There should be a reclassification of land to identify land marginal to farming suitable for development
- Purposes of both the CPZ and MGB are supported but concern was raised about UDC's rigid adherence to historic boundaries
- Suggestion to limit CPZ to the line of B1856 to form a buffer to airport growth in the south
- Current southern CPZ boundary regarded as unnecessary restrictive and being of limited value
- Metropolitan Green Belt not delineated in accordance with NPPF paragraph 85 stating the LPA "should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."
- Review of the Metropolitan Green Belt not regarded as proper and thorough
- A revised boundary would be more robust, consistent, defensible and less contrived
- SP10 deemed a protection policy that resists development unless certain criteria are met
- Due to restrictiveness SP10 certain sustainable development opportunities classed as "countryside and protected."
- SP10 seen as a blanket protection policy that stifles growth opportunities on edge of settlements
- Flexibility recommended enabling accommodation of development outside Development Limits
- UDC to take more flexible approach in line with NPPF paragraph 55 in development within countryside to enhance or maintain rural vitality
- SP10 considered not effective and not positively prepared as it seeks to hinder potentially sustainable sites in the countryside
- SP10 protects land for its intrinsic character and beauty whilst NPPF paragraph 17 requires LPA to "recognise" the intrinsic character and beauty of the countryside
- Reference to Development Limits should be replaced with a broad definition of settlements beyond which land is considered to be Countryside (approach being followed by other LPAs)
- Development Limits boundaries should be omitted from inset maps once "Countryside" has been redefined
- Policy needs to be redrafted so that it does not constrain development on appropriate sites
- SP10 regarded as not consistent with national policy because it is not effective and not positively prepared – seeks to hinder potentially sustainable sites in the Countryside)
- UDC's approach is not positive as it restricts the majority of development in the countryside and smaller villages
- Overall the strategy is not effective in addressing the District Council's housing need
- Inflexibility of approach towards Green Belt release is regarded as hindering the provision of vitality to villages such as Leaden Roding. The Draft Local Plan is seen as not having been applied appropriately as well as not considering the benefits of

releasing land within the Green Belt in order to provide growth opportunities and meet demands within Type A villages.

- Review of the Metropolitan Green Belt (2016) deemed not to have undertaken a fine grain analysis and also lack of evidence of a fine grain analysis.
- The analysis did not provide an indication of performance of the 31 General Areas against criteria for inclusion in the Green Belt.
- The proposed three new settlements do not promote a sustainable rural economy, address rural deprivation nor protect important countryside assets. The new settlements take up a significant amount of the rural land

Individuals

- Policy 10 defines Countryside as land outside Development Limits and identified New Garden Communities. However, currently countryside includes the majority of this land and Policy 10 will destroy irreplaceable large tracts of arable land and ancient woodlands.
- Request to release a portion of a garden from Green Belt and include it in Development Limits
- Paragraph 4 of Policy 10 should be amended to include “will be protected against development”.
- Objection to omission of reference to Countryside Protection Zone (CPZ) after “MGB” in penultimate sentence in paragraph 3.74.
- Conflict between protecting agricultural land and supporting biodiversity
- Need to support biodiversity should be prioritised
- Querying location and existence of Policies Map
- Two large housing estates approved by UDC in Elsenham within the CPZ
- Development of smaller site allowed on appeal within CPZ
- UDC not effective in maintaining CPZ
- Noted that the Metropolitan Green Belt boundary was not easily traceable on the main Policies Map.
- Countryside Protection Zone (CPZ) not being effectively enforced
- Countryside Protection Zone’s integrity compromised by development of 300 dwellings and an additional smaller site allowed on appeal
- Clarification required on who is responsible for identification of need to infill
- Scale of development pertaining to new settlements does not respect quality and character of area
- The North Uttlesford Garden Community is located on prime agricultural land
- Building Garden Villages will lead to a reduction of rural economy through the change of use from agriculture to a built environment
- Needs for bridleways overlooked despite the contribution of horse riders to rural Communities

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The policy protects those locations where the principle of development would not be appropriate and directs development towards existing sustainable locations. This promotes positive impacts on several SA objectives.

There will be positive impacts across the majority of the sustainability objectives due to the variety of themes the criteria cover in relation to new development within development limits. Positive impacts have been highlighted in association with the character of settlements and/or countryside setting, reflecting the District's many historic settlements, and there will be significant positive impacts associated with landscape character through the policy approach and the revision of development limits within settlements through the plan-making process. The principle of this policy in isolation can only seek to retain and protect current characteristics, thus impacts cannot be significantly positive.

There will also be positive impacts associated with those criteria regarding unreasonable noise and disturbance and also regarding health through the requirement for the provision of adequate amenity space.

Alternatives Considered

One alternative policy approach has been considered in regard to development limits:

- Alternative SP2 (a): To remove the designation of Development Limits. This alternative is appraised follows:

The alternative adopts a more flexible approach to development, based on the premise that the removal of limits allows greater flexibility for development to come forward outside existing limits. The argument is that this would increase housing and employment land supply. There would be negative implications from this approach, in particular on those themes regarding landscape, soil, sustainable travel, accessibility and education. There could be positive impacts regarding cultural heritage based on an assumption that growth would be located away from the District's historic settlements. It is felt however that a considerably more sustainable approach is for development outside existing limits to be identified through allocations in a plan-led system, rather than come forward in piecemeal developments that may not be able to offer the critical mass to make them sustainable regarding infrastructure provision. For this reason the alternative has been rejected. It should be noted however that any forthcoming proposals for development within, adjacent, or outside established development boundaries will be assessed on their merits in line with a presumption in favour of sustainable development and all relevant planning policies within the Plan area.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

London Stansted Airport

Paragraphs 3.75 – 3.88 and Policy SP11

This policy was responded to by 148 people/organisations.

Support	6
Object	41
Comment	101

Overarching Summary

Of the 125 comments received on the policy, there were 77 'standard' comments stating the Policy should be amended in line with Objective 2c. The remaining 48 comments were on different aspects of Policy SP11.

'Standard' comment

- Policy SP11 (Stansted) should be amended in line with Objective 2c "Plans should not allow any further growth beyond the 35 million passengers per annum approved limit.

Statutory consultees and other bodies

Environment Agency - Concerned the policy does not include any specific recognition that further development at the airport, notably through growth in passengers, may potentially have an adverse impact on water resources, both water supply and waste water treatment. The cumulative impact of growth in passenger numbers at the airport and adjacent Easton Park garden community on water resources has not been adequately assessed. We consider that the policy does not, in our view, fully engage with National Policy and the National Planning Practice Guidance. We consider it is not consistent with the National Policy position and is therefore unsound. This unsound position could be overcome by inserting under the paragraph heading 'Airport Development' the following sentence as point 10: No development including growth in passenger numbers will be permitted unless it has been demonstrated that either sufficient water resources infrastructure already exists or additional water resources infrastructure can be provided before development becomes fully operational. This potentially significant development should be subject to the aforementioned WCS assessment.

Natural England - Natural England recognises strategic importance of the Airport to the local area. Important that existing/ future proposals for expansion are properly assessed for impacts on the environment, in particular on Hatfield Forest SSSI. Natural England welcomes 4th criteria for assessment of proposals but would like to see specific mention of safeguarding/ enhancing the SSSI in the policy.

Essex County Council

- ECC welcomes that UDC is seeking to support the growth at the Airport within SP11. Noted that reference is given to the MAG's Sustainable Development Plan, but SP11 does not explicitly refer to maximum use of the existing runway. ECC will be interested in appreciating how UDC will ensure how the submitted planning application will shape emerging policy.
- ECC recommends that the supporting justification text and strategic spatial policy for the Airport include reference to the Stansted Airport College. Harlow College, in collaboration with MAG and supported by ECC, have been successful in a bid to the South East LEP to develop and operate a college campus centrally located within the Airport grounds. All partners agreed that the campus should be named Stansted Airport College. Construction of a new 2000m² college building located near the main

terminal building is to be flexible in design to accommodate the needs of the curriculum and to provide suitable warehouse type space for aircraft maintenance courses. Overall design will also consider potential future expansion with key positives which include:

- Addressing shortfall of FE provision in Uttlesford; early discussions suggests the scheme is supported by local planners; is supported by MAG and allows development to be flexible in design providing future expansion possibilities. When fully operational/ at full capacity the campus will provide training opportunities to 530 learners. In addition to providing support for the expanding airport the proposed curriculum will also focus on areas that match broader and growing skills required along the M11 Corridor and Harlow Enterprise Zone.
- Passenger Transport: The draft Plan designates the Airport as a Regional Interchange designation in terms of public transport. UDC should promote this major interchange facility in its own right, i.e. as a major interchange which happens to be at the airport (rather than just Stansted Airport bus station). In the past many bus passengers would have interchanged in Bishops Stortford, however Stansted offers a far greater potential as an interchange location for Uttlesford residents. However, it is not necessarily seen, promoted or used in this way. Promotion of this goes hand in hand with the obligation placed upon London Stansted Airport to increase its proportion of passenger and staff accessing the airport sustainably. The additional passengers that might use this in its capacity as an interchange could make a significant difference in the quantity and quality of public transport services accessing the site “and thus the future viability of those services“ many of which could give both direct and indirect benefits to Uttlesford residents and businesses.

Hertfordshire County Council - With continued airport growth, discussion is required in relation to the M11 motorway from south of Junction 8 at Bishop’s Stortford to Junction 9/9A at Great Chesterford/Stump Cross, A120 close to Bishop’s Stortford and any B class roads that will impact highway capacity in Hertfordshire.

Harlow District Council - Draft Local Plan acknowledges interdependencies between Airport and Harlow, East Herts and Epping Forest as Airport provides and underpins employment for a pool of workers and businesses from neighbouring authority areas. Also welcome principle of maximising potential of unused/ under-used land within the Airport which had previously been identified within the Adopted Local Plan specifically for development directly related to or associated with the airport. SP11 includes allocation of 55Ha site within Northern Ancillary Area for B2 and B8 employment uses not restricted to airport-related development and also allows small scale ancillary retail and leisure. Helpful to define what is meant by small scale in this regard. The effective management of a wider variety of use classes and the juxtaposition with established uses within the airport will require careful consideration; the definition of thresholds/safeguards within the policy may be helpful in the preparation of briefs/masterplans.

Epping Forest District Council - Epping Forest District Council supports the inclusion of SP11 which is in accordance with the LSCC Vision.

East Hertfordshire District Council (EHDC) - Policy should make specific mention to Jet 8 of the M11. Policy references in Airport development Part 9 that proposals should

incorporate suitable road access for vehicles including any necessary improvements required as a result of the development. No mention is made to the strategic highway network. With the proposed easing of the restriction to the use of the Northern Ancillary Area to non-airport related employment uses, in addition to growth at the airport itself, measures will need to be taken to ensure that the necessary junction upgrades are made in a timely fashion. EHDC committed to working with UDC, Hertfordshire CC, Essex CC and the Highways Agency to ensuring that the appropriate mitigation measures are delivered.

Saffron Walden Town Council - Proposed development will be assessed against the Local Plan but UDC's Corporate Plan says it will oppose a 2nd runway at Stansted. Proposed Action: Add 'in line with UDC's Corporate Plan. Should make provisions to ban night time flights with no increase in permitted flightpaths Proposed Action: Policy to be amended.

Thaxted Parish Council

- Airport development: Note proposed development will be assessed against the Local Plan but UDC's Corporate Plan says it will oppose a 2nd runway at Stansted. Policy potentially against Corporate Plan?
- Should make provisions to ban night time flights and with no increase in permitted flightpaths.
- Statement on airport parking help to protect residential amenity is not necessarily factual.
- Current levy placed on airport users in relation to car park charges needs to be reconsidered as it is cheaper to take a taxi, therefore local residents are plagued with cars on streets, near bus stops, or in local rural residential car parks. Proposed Action: Policy is to be amended, and consideration to the statement is investigated with a view to create a more competitive solution to the end user.

Takeley Parish Council - Airport Related Parking must comply with current planning restrictions and not be subject to suggestions in the Draft Plan (Pg. 48). All parking must be contained on-airport land to prevent encroachment into the CPZ as per the original planning condition which must remain in force to ensure amenity of residents. A change in policy will mean a further spread of irregular parking and make the airport less commercial. Already problems of offsite parking in Takeley which are regularly reported to enforcement. If the policy is weakened as suggested in the draft Plan this will be exacerbated. Must remain a priority that airport related parking occurs on site. Not ensuring airport car-parking is contained on site would undermine aims of airport surface access strategy. Also Government policy as outlined on (Pg. 46) within the Aviation Policy Framework.

Henham Parish Council and Ugley Parish Council

- Para 3.85 describes permitted limits: Is a S106 agreement relating to the 25mppa permission, a unilateral obligation relating to the G1 (35 mppa) permission and associated conditions including those required to be imposed by the Highways England. These combine to provide a framework within which the surface access needs of the airport as currently permitted to develop will be managed. Air Traffic Movements (ATMs) are limited to 274,000.
- Airport may consider that 'full capacity' means something in excess of 35mppa. A scoping opinion was submitted in June 2016 seeking to raise the limits to

44.5mppa/285,000 ATMs. However, SP11 records no such constraint, beginning 'The growth of London Stansted Airport will be supported'

- To be consistent with Objective 2c, Policy SP11 should be amended as follows: The growth of London Stansted Airport will be supported up to the limits already permitted which are 35mppa and 274,000 ATMs. Proposals for the development of the airport and its operation, together with any associated surface access improvements, will be assessed against the Local Plan policies as a whole. The operational capacity is restricted to 35mppa and 274,000 ATMs and this Policy does not endorse any increase on those limits. Proposals for any development will only be supported where all of the following criteria are met: [including] 2. They contribute to achieving the latest national aviation policies; 3. They are in accordance with the latest permission, subject to the operational limits of 35mppa and 274,000 ATMs not being exceeded;

Wendens Ambo Parish Council - Planning permission has been granted for a new arrivals terminal, with work starting in 2018 and to be completed in 2021. WAPC remains concerned over the future development of the airport, including increased passenger numbers which cannot be supported by current rail or road infrastructure. Also concerned over air quality, noise and change to flight path.

Great Hallingbury Parish Council Noting paragraph 3.76 on the growth of Stansted Airport, we trust that the support of Uttlesford District Council extends only to the mentioned planning consent of 2008 for growth up to 35mppa. Even this amount of increase will be quite intolerable for residents of Great Hallingbury who endure 70% of departure flights overhead. We trust also that the required road infrastructure would be put in place before any further increase in flights. Great Hallingbury Parish Council has not in the past supported non-airport related business on Stansted Airport land, but because this is a 'Brown Field' site the use for non-airport related business makes sense.

Uttlesford Futures - Has been reported that the Airport Northside has relaxed planning agreements i.e. not having to be airport related. Is this the case? Thought to be given to other airport property (that is vacant) not having to be airport related activity.

Saffron Walden Neighbourhood Plan Steering Group - Night time flights contribute to people's ill health. Increased freight flights are a nuisance at 2.30 am. Majority of people do not support UDC's enthusiasm for further growth at Stansted. Still not using the extra 10 million increases to 35mppa granted after a five-month public enquiry in 2007. Suggestion: Expansion to 35mppa or 45mppa should only be achieved with flights operating during normal daytime hours and banned between 11pm and 6am. Existing permitted flight paths should remain and not be breached as they are currently! On airport parking helps to protect residential amenity. This is not true because high parking charges often mean someone is paying more than the cost of their flight to park and so travellers park on local streets near bus stops or use taxis.

Stansted Neighbourhood Plan Steering Group – There need to be specific conditions attached to further airport development as increased air traffic is already impacting on the health of local people. Additional infrastructure will also be required. On airport parking helps to protect residential amenity **Comment:** This is not true because the high parking charges often mean someone is paying more than the cost of their flight to park and so travellers park on local streets near bus stops or use taxis.

CPRE Essex - Inconvenience of illegal parking by airport users in nearby locations is a serious blight on amenity of local residents and character of neighbouring villages and countryside. Planned passenger growth of the Airport will exacerbate this problem unless there is an effective car parking management strategy. This needs to ensure that not only is there is enough land allocated within the boundary of the airport for air passengers to access on-airport car parking but also that mitigation measures are in place to penalise and reduce fly-parking. Whilst improving public transport to, from and within the airport is to be supported; the additional attention on the development of cycling and walking routes to the airport seems somewhat questionable given the nature and scale of the operation. Also, it is not clear whether this provision relates to passengers or employees.

Manchester Airports Group (MAG)

- Overall policy is supported and the strategic allocation of the airport is welcome. The objection is based only on the need to refine the policy.
- Airport Safeguarding: Airport safeguarding element of the policy is a vital component of land use planning and one which is integral to maintaining the safe operation of the airport.
- Access to the Airport: UDC's ambition to see the airport be a national and local transport interchange be 'maintained' is welcome, however to align with Stansted's ambitions, the policy wording should be more ambitious. UDC should consider amending 'maintained' to 'enhanced' or 'maintained and enhanced' and should include a commitment to partnership with the airport from bodies such as the Council and other key organisations such as HE and ECC, to achieve this aim.
- Airport Expansion: Proposal to manage airport expansion subject to criteria is appropriate; however amendments are required to clauses in order to make the policy achievable, deliverable and sound.
- 1: Supported, but should explicitly exclude the Northside allocation for clarity.
- 2: No comment; supported.
- 3: Delete. Not clear why this is necessary. As written this clause applies to all applications for development and there is no practical or lawful way in which all development proposals can be in accordance with previous permissions. For example, it is not possible for an alteration to the planning caps to be in accordance with the latest permission which restricts operations.
- 4: It is not possible to define a 'significant increase' compared to an 'increase' in ATMs. 'Adverse' effects on their own don't lead to the need to refuse planning permission: this is a too stringent test whereas 'significant adverse' aligns with NPPF. 'Disturbance' is not a recognised environmental impact criterion. As a minimum, the clause should be amended to: 'Do not result in **an** ~~significant~~ increase in Air Transport Movements that would **lead to significant adverse effects on** the amenities of surrounding occupiers or the local environment (in terms of noise, ~~disturbance~~, air quality and climate change impacts); This sub-clause and the policy as a whole however, does not allow any balancing of economic or social benefits. As a result, the alignment with the NPPF is questioned and generally clarity is required in the policy as to how the LPA will be able to form a balanced judgement on applications taking into account the principals of sustainable development.

- 5: Delete. Baseline position to comply with this clause would be a limit that will have been judged previously to be acceptable (and therefore a likely operational limit controlled by planning condition). Unreasonable therefore for further development to 'improve' on such a limit, national policy requires only that development does not give rise to 'significant adverse effects'. Policy is also partially duplicative of clauses 4 and 6.
- 6: This would be improved and consistent with national policy if the relationship with planning permission was altered to the airport's noise action plan. Suggest amendment to: Include an effective noise control, monitoring and management scheme that ensures that current and future operations at the airport are fully in accordance with the policies of this Plan and ~~any planning permission which has been granted~~ **the airport's Noise Action Plan**;
- 7: This clause could only be reasonably expected to apply to applications for increase operations, and needs to be caveated according. The airport company cannot 'require' fleet modernisation from its airlines as this would conflict with the ICAO balanced approach. Measures that can be taken (e.g. charging and compensation) would be covered by 'proposals' which are implied in the policy. Further, it is suggested to delete the word 'significant' as it is logical only that the betterment of effects are proportionate to the size of increase in operations i.e. if there is an application for a small increase in movements, that increase wouldn't be capable to generating a significant reduction in impact. Suggest amendment to: **For development that would lead to an increase in the permitted operation of the airport**, include proposals which will over time result in a ~~significant~~ diminution and betterment of the effects of aircraft operations on the amenity of local residents and occupiers and users of sensitive premises in the area. ~~through measures to be taken to secure fleet modernisation or otherwise~~;
- 9. This is not specific and is unclear as to what the policy is trying to achieve. The airport roads are private and an existing network is already in place. Other policies in this plan deal with the strategic road infrastructure. This clause requires clarification or deletion.
- Northern Ancillary Area This is supported in principal. The final sentence requiring a development brief and masterplan should be deleted as the site phasing and development is unlikely to warrant such an approach. Sufficient controls will exist in the normal planning application processes. Note that the reference of 55ha is correct in this policy.
- 3.76: Now over 25mppa and has operational limits to 35mppa. Capacity not correct expression.
- 3.78: Amendments for accuracy/ clarity: Land at the Airport has previously been identified specifically for development directly related to or associated with the airport. The role and function of the airport, however, has ~~changed~~ **evolved** with a ~~greater emphasis on~~ **significant proportion** of short-haul flights. These flights are now the mainstay of London Stansted with planes spending relatively little time on the ground and with the focus on carrying passengers **and have limited cargo handling capability** ~~rather than cargo~~. Therefore, few facilities are required for cargo storage pending trans-shipment resulting in little demand to take up the space reserved for airport related uses identified in the adopted Uttlesford Local Plan for the Northern Ancillary Areas of the airport. As a result, much of the land to the north of

the runway in the Northern Ancillary Area is unused or underused and new commercial units built on a speculative basis to the south of the runway have been empty **subject to long and / or frequent periods of vacancy** since they were completed.

- 3.80: London Stansted lies within an airport safeguarding area. This should be amended to “**London Stansted is a statutory safeguarded aerodrome**”. Overall this paragraph and 3.81 & 3.82 provide a lot of context to PSZ and far less to the aerodrome safeguarding. The latter has a greater land use impact and perhaps should be afforded more weight / description.
- 3.85 - suggest including reference to the airport i.e. "The Council will continue to work **with London Stansted Airport and** other District and County Authorities".

Stop Stansted Expansion

- 1. Clarification the Draft Plan does not support the expansion of Stansted Airport beyond the current planning cap of 35 million passengers per annum (mppa). We take this to be an oversight and expect to see this corrected in the next draft of the Local Plan.
- 2. Maintaining UDC policy that ‘industrial and commercial development unrelated to the airport will not be permitted on site’. Has been a clear and consistent local policy precluding industrial and commercial development unrelated to the airport within the airport boundary, set down in Policy S4 of the current Local Plan. No explanation or justification has been provided for its proposed reversal, as foreshadowed in Para 3.78 and 3.79 of the Draft Plan. The Airport has a significant advantage over other developers of industrial and commercial sites because it can acquire land at its undeveloped value using compulsory purchase powers and it is not a level playing field.
- 3. Draft Plan states (Pg. 72, para 5.20) ‘There is a surplus of vacant new warehousing space available at the Airport and little prospect of the un-used and under-used parts of the northern ancillary area at the airport being brought into beneficial use in the early part of the Local Plan period’. Appears to acknowledge that this space may well be needed for airport-related purposes later in the Local Plan period. Within the existing planning caps, Stansted has very considerable room to grow; the demand for on-airport industrial, commercial, office, hotel etc. accommodation will also grow. It would therefore be inappropriate short-termism to begin downsizing the amount of on-site industrial and commercial accommodation available to support the airport’s activities.
- If industrial and commercial sites within the airport were allowed to be used by all-comers, rather than reserved for internal airport-related use, this would inevitably exacerbate the current congestion problems at Jct. 8 of the M11. Policy S4 in the current Local Plan should therefore be retained and SP11 (Pg. 47) and EMP1 (Pg. 76) in the Draft Plan should be amended accordingly.
- Employment projections: Oxford Economics estimated that for a throughput of 35mppa, the number of on-site employees at Airport (direct and indirect) would be around 16,800 in 2023 (Economic Impact of Stansted Scenarios, Oxford Economics, Nov. 2013, p.23). Compared to 2011 headcount of 10,231 on-site employees and throughput of 18mppa, equates to 386 additional employees for each additional mppa. In contrast, the Airport’s own numbers show that the on-site headcount of

10,231 in 2011 for a throughput of 18mppa increased to a comparable on-site headcount of 10,964 in 2015 for a throughput of 22.5mppa. Equates to just 163 jobs per additional million passengers.

- Comparing throughput and employment data for Stansted over a longer period, Oxford Economics arrived at a figure of 290 additional staff for each additional million passengers (2 Ibid, Appendix 1). The OE figure of 290 is similar to the range of 300-350 additional jobs per million extra passengers found at other airports with a similar (low-cost airline) profile to Stansted. 5 BAA G1 Environmental Statement, Volume 6 - Employment & Housing, Table 5. In its G2 planning application BAA estimated that for a throughput of 35mppa the number of on-site employees at Stansted Airport would be 15,300 in 2030, which equates to 310 employees for each additional million passengers (3 BAA G2 Environment Statement, Volume 7 - Employment Effects, Tables 26, 34 and 39 "Tribal Economics). Sustainable Development Plan produced by MAG in 2014 projected an increase in on-site employment from 9,833 in 2013 "when 17.8 million passengers were handled "to 18,800 employees for 35mppa in 2025. This equates to 521 additional jobs per mppa and is well out of line with all other previous comparable estimates "which point to between 15,300 and 16,800 jobs when the airport reaches a throughput of 35mppa. In the light of all the evidence, it would be more reasonable to use a mid-point estimate of about 16,000 on-airport jobs for a throughput of 35mppa in the mid-2020s and to expect the number of jobs to decline slightly for the same throughput in subsequent years as a result of ongoing productivity improvements. This would mean an increase of no more than 5,000 jobs over the plan period (2011-2033). The Draft Local Plan however assumes an increase of 8,000 jobs over the plan period (page 313). We submit that this is too high and is not supported by the evidence.
- Local Impact: Proportion of airport employees who are Uttlesford residents is declining. Latest figures (2015) show just 18.3% of employees were Uttlesford residents (MAG/STAL Scoping Report, June 2017, Table 12.1, which cites 2015 STAL Employment Travel Survey). By comparison, in 2003, 23.8% of employees were Uttlesford residents (BAA G1 Environmental Statement, Volume 6 - Employment & Housing, Table 5). In numerical terms there were 500 fewer Uttlesford residents working at Stansted Airport in 2015 than in 2003 (2,007 vs 2,519) despite the fact that Stansted grew by more than 20% between 2003 and 2015 from 18.7mppa in 2003 to 22.5mppa in 2015.
- Concluded from evidence that the growth of the Airport to its permitted capacity of 35mppa between 2011 and 2033 is unlikely to generate more than a few hundred jobs for Uttlesford residents (somewhere between 500 and 1,000). Draft Plan creates a wholly misleading impression about significance of the Airport for local employment. Believe it is vitally important to put jobs impact of the airport into context. Otherwise risk is that if jobs impact is misunderstood and exaggerated, other elements of the plan, such as the need for housing, will also be based on a false premise.
- Airport-related housing demand: Important to recognise it is not just a numbers game but also a question of affordability. Vast majority of new jobs which will be created assuming the Airport grows to 35mppa will be relatively low-paid. Uttlesford house prices will be beyond the means of all but a few airport employees. Stansted Airport's recruitment strategy will not be focused locally.

Sustainable Uttlesford - Application to increase level of permitted flights at Stansted during plan period is premature. LPA should not decide the future increase of use of the single runway. Responsibility of National Government to publish a national Airport Policy including their final decision on additional runway capacity in the South East to ensure that is compliant with the Paris Climate Change Accord.

The Thaxted Society - The airport appears to be presented as just a tourist base - there is not much suggestion it might help/be linked to local businesses. The roads apart from the M11 access are poor and the area around the airport if planned is haphazard. Given its growth and history the Society understands the inevitability of its development but unless enjoined it remains a proliferating adjunct.

Developers/landowners/site promoters

- Object to SP11 which does not reflect the Spatial Vision of the Plan which indicates that London Stansted Airport will be a pivotal part of the London Stansted Cambridge Corridor. SP11 does not provide sufficient scope for the airport to expand to reflect its economic potential for employment growth. SP11 would establish an unnecessary throttle for growth at LSA and does not reflect the vision for the airport set out in the Stansted Airport Sustainable Development Plan 2015. MAG have provided a signal of their ambition for the future of the airport through the request for an EIA Scoping Opinion in June 2017 for increased throughput at the airport from the current permitted level of 35mppa to 45mppa. This indicates that the development would increase total on-site employment at LSA to 18,800 jobs, 8,967 of which would be associated with the proposed increase in passenger throughput. SP11 does not make adequate provision for this scale of development and does not therefore seek to plan positively for economic growth presented by LSA.
- Are two elements of the policy which should be clarified/ amended to improve clarity of the policy:
- 8. Incorporate sustainable transportation and surface access measures in particular which minimise use of the private car, maximise the use of sustainable transport modes and seek to meet modal shift targets, all in accordance with the London Stansted Sustainable Development Plan; and
- 'Airport related car parking' section of Policy SP11
- Object to this part of SP11 in its current form. General principle of providing a policy that allows for off-airport car parking, subject to tests, is supported. This is because if there is a failure to meet demand for airport car parking related products it can lead to adverse impacts including nuisance parking, illegal green belt/ CPZ parking operations and an increase in the use of kiss and fly modes which are far less sustainable than long-stay car parking options that offer park and ride facilities.
- Criteria 1-3 are accepted as they are clear and set out appropriate considerations for off-airport car parking developments.
- Criteria 4 is not accepted as, by definition, delivery of off-airport parking cannot be in accordance with the Sustainable Development Plan for the Airport which has a core objective of seeking to locate all car parking on site and increase use of rail and bus

options. Also remains that the Sustainable Development Plan for the Airport is only updated occasionally, the last update being in 2015. It cannot therefore be considered up to date when parking issues arise and therefore non-compliance with Criteria 4 is likely to always remain.

- To ensure this element of the policy functions correctly recommend that either 1) Criteria 4 is redrafted to focus on which elements of the Sustainable Development Plan for the Airport should be met and how a scheme will be assessed against these elements; or 2) clear quantitative indicators are set out in the policy that require update information to be recorded in the Council's AMR. These indicators would ensure that the important matter of maintaining a sufficient and sustainable level of airport car parking can be properly monitored and managed. Without these indicators, the policy is not effective and could lead to nuisance where demand outstrips supply. Such indicators could include mppa numbers, use of transport options and available parking spaces. As stated, this data can then be used to effectively manage supply for airport parking in accordance with the objectives of this element policy SP12.
- Although it is fairly neither comprehensive, neither the policy itself nor the supporting text at paragraphs 3.75 to 3.88 addresses properly the issue of the relationship between the employments it provides and the location of housing needed to support the airport in a sustainable manner. Think that the proposed new community at Easton Park will go some way to address this issue but the Plan should be more explicit about the relationship between the two. Change sought: amendments to the policy and the supporting text to address the concerns set out above.
- Oppose proposal to permit non airport related B2 and B8 uses on 55 Ha of land north of the airport; site should be retained for airport uses only and alternative sites in the proximity of the airport should be allocated. Allowing non-airport uses in order to make effective use of land is not the most appropriate policy approach in light of reasonable alternatives. Lifting the airport restriction could have consequences for accommodating airport related growth in the future, should the dynamics of the airport change and space be required. A more robust approach would be the allocation additional employment land elsewhere with ready access to the airport. The Policy is not based on robust evidence. ELRU 2017 supports release of only 18 Ha of land (as did earlier versions of the ELR), not the 43 Ha proposed. Save for these 18 Ha, the ELRU 2017 supports airport related development within the airport boundary in line with the Airport's Sustainable Development Plan (SDP) to enable and support future growth at Stansted Airport. Similarly, the Assessment of Land North East of Bury Lodge Lane 2012 recommends only the release of 18 Ha.
- Is a discrepancy as to size of the site; SP11 describes it as a 55 Ha site yet ED1-Employment Strategy, refers to 43 Ha. Table and map in Chapter 13 Non-Residential Allocations refers to the site area twice; once as 43 Ha and once as 55 Ha. Table refers to site specific policy SA1, but is no such policy. Clarity is required regarding size of area proposed for allocation for non-airport related uses and policies to deliver it. Essential the plan correctly identifies size of the site. This is still far in excess of the 18 Ha recommended by the ELRU 2017 and allocating new employment sites not within the airport would be a more robust approach.
- Broadly supportive of Airport Policies, and particularly note comments about safeguarding and retention of the Airport User Restrictions in relation to areas on the

south side of the runway. Northern Ancillary Area has been proposed as a site for B2 and B8 employment uses with ancillary use. A site of this nature is required but it is however important to appreciate that there is little between local employment serving the needs of businesses established in the area and strategic employment drawn to the site because of highway and communication benefits. Particularly concerned at the potential of this site to be given over to substantial 'big box' distribution warehousing as this would not serve interests of local businesses and would not provide a range of accommodation which is demonstrably required in relation to businesses already established within the District. As previously noted, we are concerned that this site appears to be the only substantial allocation of employment use within the District. While we understand this may make sense of a spatial and locational perspective, we are concerned that it creates both a monopoly supply situation, with a risk of potential delays and restrictions in of supply given that a) the Airport's focus is on their operational activities and b) there are a significant number of 'obstacles', both practical and legal, to overcome before land in this location can be considered to be developable. This risks putting into question the supply of land for employment purposes, and as a consequence leaves the Council open to potential challenge in relation to sites which are currently not allocated for such purposes. We would therefore recommend that the Council considers a wider distribution of their employment allocation within the District with reasonable proximity to the A120/M11.

Individuals

- Growth at Stansted Airport is subject getting permission to go above 35 mppa and this should be stated in this Local Plan. It should not be taken as a foregone conclusion.
- Airport related car parking Ryan Air et al are already operating Park and Rides in surrounding countryside, coupled with adjacent proposed site development whole area is likely to be grid locked.
- Plans should not allow further growth beyond the 35 million passengers per annum approved limit.
- Should not be increased beyond 35mppa already approved. Is pure Commercial Speculation without environmental and quality of life considerations by MAG. It should not be supported.
- Object on basis it is not justified: Stansted Airport Growth is supported by UDC. Increased air/ noise pollution this will bring to residents of Uttlesford is not given consideration anywhere in this Plan.
- SP11 Growth above 35 Million passengers at Stansted Airport should not be allowed.
- One question which I consider should be of concern to UDC and residents is the possibility of further expansion and a second runway at Stansted Airport beyond the existing 35million passenger capacity for the single runway. (Believe MAG projections have hinted at this intention in their long-term planning proposals). Locations of proposed three Garden Community sites could well be affected by aircraft noise in the future. It is therefore to be hoped that the area around Stansted

Airport will remain protected and preserved under its designation as a Countryside Protection Zone.

- Please limit Stansted Airport passenger numbers at the current levels as the allowance still has plenty of unused headroom, contrary to suggestions by the Airport owners.
- If Short term and drop off parking at the airport was made easier a lot of the problems with people parking and waiting in the surrounding area would be resolved.
- Proposals seem fair and balanced
- I don't see the risk contours on the Policies Map. They are not on the key.
- In first sentence, add "within approved limits" after "Airport". The description in the first para of use of 'North Stansted Employment Area' is woolly/ open to abuse. Intention appears to be too muddy the waters and give airport operator a competitive advantage over other land holders. Land should be either within the Airport boundary and restricted to airport-related activities or completely outside.
- Amend para 1, line 1 to read: "The growth of Stansted Airport within approved limits will be supported . . ." References here and elsewhere in the Plan to the "North Stansted Employment Area" or "Northern Ancillary Area" should clearly state that there will be no change to the longstanding policy of allowing only airport-related activities within the airport boundary. The current wording implies that non-airport activities may be allowed, but this would be anti-competitive and give unfair advantage over landowners and non-airport businesses elsewhere. I specifically oppose the change of policy proposed in SP11 under the heading "Northern Ancillary Area". Airport Development item 5 is unclear and ambiguous. Furthermore, UDC should not commit itself to an unknown outside UDC's control, specifically the "most recent Airport Noise Action Plan". Under the section "Airport-related Car Parking", I object to any wording that may permit airport-related parking outside the airport perimeter.
- For consistency, please remove "London" from the final sentence.
- This shows a real lack of understanding concerning the problem of street parking in surrounding settlements. UDC needs to work with the airport to make car parking more affordable or the problem of street parking will increase to intolerable levels.
- Who are ODPM? Where can their circular be found?
- Any changes to the aircraft stands and HAP to make way for the development should be done with consultation with existing businesses and in such a way that it does not impact their ability to sustain and grown those businesses. Consideration to the existing infrastructure such as roads and signage to be done as they are already in much need of improvement
- Why is the 'underuse' of land at Stansted a problem?
- In view of this changing nature of airport Plans why was a speculative office development in Green Street (near Elsenham) approved when it had previously been rejected. A flagrant attempt at changing the nature of an area to suit UDC's desires rather than meet true need.
- The proposal to make the "North Stansted Employment Area" available for either airport-related or non-airport-related activities breaches the hitherto clear policy of keeping airport-related activities on airport and other activities outside. Such a move could give the airport operator an unfair competitive advantage over other local enterprises that have to pay "real world" premises costs. This would be a dangerous precedent.
- Why make undeveloped land to the north of Stansted available for development when there are unused buildings already to the South of Stansted?

- Regarding the final sentence, surely, continuing use of the London Stansted Distribution Centre should not be allowed as it is within a high risk area.
- Improvements will be needed to accommodate the transport of more people at the airport. Rail transport is slow and barely adequate. Road transport is better but short term parking remains constrained.
- Stansted Airport planned to grow from 24.5 million passengers pa to 35 million – almost a 50% growth rate. No mention of the CO2 emissions or noise. How will it help Uttlesford meet the national carbon emissions reductions cited on p 50 to cut emissions by 34% by 2020 and 80% by 2050 below 1990 levels? No mention of increased noise in the area, even though the proposed Easton Park Garden Community is immediately adjacent. This not a policy about sustainable development, but one about unsustainable submission to big business interests, with no regard to the consequences.
- Impact on housing numbers and decision to locate a settlement in North Uttlesford. **Stanstead – Uttlesford’s Key Employer - is the driver for the housing numbers - but you are building as far from it as possible.** The basis for 3 single settlements is the modelling of population growth for Uttlesford. This is skewed based on a spike of housing needs driven by the expansion of Stanstead Airport back in history. UDC are able to discount that, if they do then there is no need for the 1900 homes in NUGV. If UDC decide to keep these projected housing need numbers these will be based on the needs and impact of Stanstead airport, not the employment dynamic of south Cambridgeshire. Consequently the basis on which this location, and this number of houses are needed are fatally flawed because the reason this number of houses are needed is Stanstead airport driven, but UDC will have decided to place the houses as far away from Stanstead as possible forcing employees to drive through the towns and villages to get to the airport, with no road improvements. Which is a nonsense?
- 19,000 employees for 35mppa seems very high and implies a lack of efficiency in achieving economies of scale or embracing new technology. The source of this figure should be clearly stated and independently tested, especially as it has an influence on forecasts of population and housing need
- An expectation of 19,000 jobs in and around the airport seems well overstated for 35mppa. In 2006, BAA forecast 15,800 jobs for 35mppa. One would expect ongoing efficiencies. What evidence is there to support the 19,000 forecast? Has the evidence been independently reviewed and tested?
- Stansted Airport is clearly set to grow and since this Consultation started they have made proposals to effectively double passenger throughput on the existing runway. This will create major employment growth and matching demand for housing. It is not logical that this is met in the current Plan by a development of NUGV at the furthest point possible from Stansted.
- Stansted airport currently has permission to operate at 35 million passengers per annum (mppa). In paragraph 3.76 it states that once this level is reached there will be “around 19,000 people working on or off airport”. In Appendix 2 (page 313) of the draft plan it states that there is “provision of 8,000 extra jobs at Stansted Airport 2011-2033”. This figure is apparently taken from the “Airport Employment Survey” although I cannot trace this report. However, the Stansted Sustainable Development Plan 2015 (Economy and Surface Access, page 15) predicts onsite employment to reach 18,800 at 35 mppa. In 2011 the actual numbers employed at the airport were 10,231 and so this would indicate an increase over the period of 8,569 which may be the justification for the figure of 8,000 being put forward. These figures are rather different to those shown in the report by the council’s consultants, Hardisty Jones, in September 2015. They used a figure of 10,000 extra jobs which had been supplied to them by the local councils. Hardisty Jones made it very clear that they had “not

assessed the validity of these growth ambitions". Unfortunately, it is not clear which figures have been used in the calculation of housing need or what effect they have had on that figure. And, of course, only a small proportion of airport employees live within Uttlesford. It was about 18% at the last count and even allowing for more affordable housing being provided in the district it is unlikely that this percentage will change dramatically. It needs to be pointed that these figures for employment growth bear no relation to past experience. In a report prepared for the London Stansted Cambridge Consortium (whose main sponsors are the airport owners and supporting businesses) it is stated that past experience shows employee numbers increasing at the rate of 290 per one million passengers (see Appendix 2 of the Oxford Economics report, "Economic Impact of Stansted Scenarios" November 2013). In 2011 passenger numbers were 18 million and so an increase of 17 million to 35 million would at historic rates produce just under 5,000 extra jobs. But these are historic rates and do not allow for future economies. Between 2011 and 2015 onsite employment increased by 733 and passenger numbers by 4.6 million which gives an employment rate of 159 per one million passengers. This would yield only 2,700 extra jobs (say, 3,000 at most) over the plan period of 2011-33. So it would seem that the suggested figure for extra on-site employment is vastly overstated. But, as stated above, it is impossible to know what effect making such adjustment would have the figure for housing need since it is impossible to tell what was the effect of the initial calculation

- Stebbing has seen a vast increase in aircraft noise since flight paths have been changed. This is likely to become much worse as flights increase. To be building WOB underneath this noise and pollution is something that should give serious concern to both Braintree and Uttlesford.
- I trust that Uttlesford will continue to oppose the further expansion of the airport and will continue to campaign to reduce the existing unacceptable noise nuisance for Uttlesford residents who live on the flight path, e.g. in Thaxted.
- P44, 3.75, Stansted Airport: The positive effects of Stansted Airport are seriously over-stated (narrow economic interests and low-skilled jobs) and the serious negative impact of aviation growth (on quality of life and incremental urbanisation) ignored. The further expansion of Stansted Airport should be very strongly resisted.

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Significant, Temporal and Secondary Effects

As the Policy states, Stansted Airport is an employer and airport of strategic importance for Uttlesford, and also the sub-regional. The Policy ensures it's safeguarding and further growth opportunities as a Strategic Allocation; for that purpose will have significant positive impacts on employment and economic growth. Associated with the general impacts airport of a strategic airport on the wider community, the Policy will ensure that positive outcomes are realised regarding pollutants. The success of the Policy and expansion of the Airport and associated Employment Areas will ensure that sustainable transport and access improvements are made, which can have wider secondary positive impacts.

Alternatives Considered

No alternative approaches can be considered reasonable as the policy reiterates the thread of sustainable development as espoused in the NPPF. Any alternative that deviates from this approach would be contrary to NPPF and therefore an unsound approach.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Sustainable Development Principles

Paragraphs 3.89 – 3.94 and Policy SP12

This policy and supporting text was responded to by 33 people/organisations.

Support	5
Object	15
Comment	13

Overarching Summary

- Support for the policy in principle and specific elements of the policy. Suggestions made for amending wording to ensure consistency with national policy, clarity and to address inconsistencies with other policies proposed in the Regulation 18 Draft Local Plan. Concern that the use of the term sustainable development in the policy is not inclusive of all aspects of sustainability.
- Irreversible loss of assets such as greenfield land and agricultural land (e.g. new garden communities) are considered contrary not only to this policy but also the National Planning Policy Framework and Core Planning principles.
- Definition of previously developed land and the criteria for under-used land should be consistent with the NPPF and included in supporting text to make policy more robust.
- Clarity required in relation to development at risk of flooding.
- Support for greater emphasis on reducing energy demand and including specific and clear energy efficiency targets, air pollution targets and emissions targets to make the policy stronger.
- Suggest merge Policy SP1 and SP12.
- Suggest a sequential approach to new development.
- Concern that the content of Policy GEN4 in the Adopted Local Plan will not be adequately replaced by Policy SP12.

Statutory consultees and other bodies

Campaign to Protect Rural England Essex – We would propose that a sequential approach to new development is more practical and sustainable. We recommend that there should be a hierarchy of sites, whereby those already identified in or close to existing towns (especially previously developed land) should be allowed to develop first. Only when these sites have been developed sustainably and the homes occupied should the next phase of

sites be released. This sequential approach should also apply to the delivery of affordable homes, homes for the elderly and social housing which will meet the urgent needs of local people. In this way supply would be matched closely to demand and the greenfield sites of the proposed garden communities would be developed as a last resort.

Chrishall Parish Council – Sustainability – for an area to be termed sustainable there must be local employment, transportation, health and well-being, protection of local environment (green and built), leisure as well as development potential. The provision of water, food, green spaces, sewer capacity, drainage, air quality and pollution all need to be carefully assessed and planned. Sustainability is a key component of the National Planning Policy Framework and does not appear to have been qualified or quantified in this Local Plan.

Environment Agency – We support the thrust of this policy, particularly bullet points 2, 6, 7, 8, 9 and 10. We note that Policy SP12 includes promoting development that minimises consumption of and protects natural resources including water. We are in favour of this approach.

Essex County Council Environment (Environment, Sustainability and Highways) – Sustainable Drainage - Essex County Council as Lead Local Flood Authority recommends that bullet 7 be amended to read “Locating development on land identified as being at low risk from all forms of flooding and taking into account any potential increased risk of flooding from new development”.

Great Dunmow Town Council – Most of the bullet points in Policy SP12 are in conflict with SP6, specifically: Encouraging the redevelopment of previously-developed land which is unused or under-used for uses which are sustainable and protect the natural environment in that location; Minimising the amount of unallocated greenfield land that is developed; and Retaining and enhancing the character, appearance and setting of those areas, settlements or buildings worthy of protection. Saved Policy ENV5 (Protection of Agricultural Land) is to be replaced by Policy SP12 but Policy SP12 does not mention agricultural land. How will this be protected?

Historic England – The supporting text for this policy refers predominantly to climate change rather than to the multifaceted nature of sustainable development defined by the NPPF. The fourth point of the policy refers to the retention and enhancement of areas, settlements or buildings worthy of protection. We would recommend that this is amended to make use of the term historic environment. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. This applies throughout the Plan.

Littlebury Parish Council – The plan should reduce the energy demand of the District, and include firm proposals to increase the local generation and storage of electricity which is being promoted and incentivised by Government. Every new home should be mandated to have solar water heating and solar PV [photovoltaics] and, when the technology is ready, electricity storage.

Little Chesterford Parish Council – North Uttlesford Garden Village is a greenfield agricultural site of over 1,100 acres. Development of this site does not accord with the stated aims of Policies SP10 and SP12 to protect this type of land. The policies state: “The

countryside will be protected for its intrinsic character and beauty, for its value as productive agricultural lands”; “Minimising the amount of greenfield land that is developed”, “protect the best and most versatile agricultural land”. The NUGC site is over 1,000 acres of Grade 2 agricultural land, the official description is “the best and most versatile land”. Irreversible loss of this asset is contrary not only to this policy but also the National Planning Policy Framework and Core Planning principles.

Natural England – Commends the inclusion of safeguards for the natural environment in this policy but would also like to see reference to “enhancement”.

Saffron Walden Neighbourhood Plan Steering Group – This policy is weak. Development should also not take place in any areas rated higher than “low risk” for flooding. Suggest additional policy: “Contributes to non-carbon-based transportation” and “Development should not take place in Flood Zone 3”.

Saffron Walden Town Council – Development should not take place in any areas rated higher than “low risk”. Proposed new bullet point: “Development should not take place in any areas rated higher than low risk flooding.”

Stansted Neighbourhood Plan Steering Group – This policy is weak. Development should also not take place in areas rated higher than low risk for flooding. Suggest additional policy: “Contributes to non-carbon-based transportation” and “Development should not take place in Flood Zone 3.”

Thaxted Parish Council – Development should not take place in any areas rated higher than “low risk”. Proposed new bullet point “Development should not take place in any areas rated higher than low risk flooding.” What does UDC consider previously developed land and what is meant by under-used. Define previously developed land and the criteria for under-used land, is this suggesting compulsory purchase orders will be implemented by UDC?

The Thaxted Society - Support sustainable principles as before and clearly defined per UN, and not development needs.

Developers/landowners/site promoters

- We support the sustainable development principles as identified within policy SP12. However, bullet point 2, which states “Encouraging the redevelopment of previously-developed land which is unused or under-used for uses which are sustainable and protect the natural environment in that location;” is too prescriptive in managing the use of previously-developed land. According to Annex 2 of the NPPF defines ‘Previously-Developed Land’ as “Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.” The

definition given by Annex 2 of the NPPF is not prescriptive in detailing sustainability criteria or indeed the protection of the natural environment. There are other policies contained within the DULP that deal with these two matters appropriately. Request amend bullet point 2 in Policy SP12 to read: “Encouraging the redevelopment of previously-developed land which is unused or under-used.”

- Policy should be placed at the beginning rather than the end of the section as it contains what could be described as core planning principles similar in purpose to those set out in paragraph 17 of the NPPF. This policy could be usefully combined with Policy SP1. Combining the two policies as SP1 would provide more meaning and substance. The question arises as to whether the strategy covered by policies SP2 to SP11 inclusive is actually consistent with the provisions of SP12 as expressed by the phrase “which ensures the prudent and sustainable management of the District’s towns, villages and countryside.” The garden village proposals in our view do not constitute the prudent and sustainable management of the District’s countryside. In terms of the detail, the strategy might discourage rather than encourage the use of previously developed land (second bullet point) and little useful purpose is served by attempting to minimise the amount of greenfield land which is unallocated (third bullet point) when the proposed allocations themselves make profligate and unsustainable use of such land.
- The policy should include a requirement for the review of all existing settlement boundaries in order to identify opportunities for sustainable development.
- The proposed housing distribution, the three proposed new settlements and lack of consideration for improvement to existing buildings stock nor provision of improved retail facilities in smaller settlements is not an appropriate way to achieve these aims. New settlements built predominantly by 4 or 5 major developers is not the best way to achieve these goals. See alternative proposal regarding housing distribution.

Individuals

- This section quotes the national carbon emission reductions requirement to cut emissions by 34% by 2020 and 80% by 2050 below 1990 levels but these emission targets are not translated into targets for Uttlesford. If Uttlesford is wealthier and has higher levels of employment than the national average it should aim for higher targets than the national average to help the less prosperous districts.
- In relation to low carbon economy the Plan frequently includes phrases such as “Consideration should be given ...” and “Encouraging ...”. The Local Plan should strengthen these objectives by replacing “encourage” with “mandate” and “should” with “shall”.
- Paragraph 3,93 is not enough. “Has the potential to ...” is not a policy nor a principle, target or a plan. It is flimsy PR.
- Support Policy SP12.
- This policy statement is far too loose with regard to sustainability. No targets for energy efficiency are mentioned. The NPPF cites zero carbon. Why is that not established here as a goal/ expectation and immediate target? CO2 should be cited specifically here, it is not good enough to class it under ‘pollution’. If the word carbon

features strongly in the NPPF, it should feature here too, in policies that overtly and specifically set out to protect the interests of future generations.

- Policy SP12 refers to “Reducing, to an acceptable level, any pollution that may result from development” but the level of ‘acceptability’ is not defined as no pollution targets have been set. Who will determine the level of acceptability? This generation, or the generation who will have to live with consequences? Policy SP12 refers to “Promoting development that is located and designed to be energy efficient” but what does “promoting” mean? It does not sound like a plan but a wish list that will be easily cast aside in committee meetings. The word “promoting” should be replaced by “requiring” in all instances. Politicians should be taking the lead on this. In terms of locating development to be energy efficient the disregard of the significance of Audley End station is an indication that this principle is being ignored in practice.
- I support all of the sustainable development principles. However, in the case of air pollution previous planning permissions have ignored the intentions of the NPPF, UK air quality legislation on AQMAs and a letter from the Secretary of State in 2010, by adopting a policy that several 'negligible' increases, which are never properly aggregated, are acceptable. With the recent rise in public and political awareness of the problems this pollution causes to our health, particularly the young and elderly, it is important UDC takes full account of all cumulative increases any development will create, particularly on the AQMA in Saffron Walden.
- I do have a concern which is that Policy SP12 focuses on things and not people. I would have expected the sustainable development principles to also cover the sustainability of community, services, education, leisure and culture.
- "Promoting development" is not strong enough. It should be "Ensure development" in order to emphasise the responsibility those overseeing the Local Plan will take for protecting and promoting our environment and natural resources.
- Is there 'an acceptable level' of pollution or potential contamination? Is legally specified anywhere? Who decides?
- The policy should include a requirement for the review of all existing settlement boundaries in order to identify opportunities for sustainable development.
- According to Appendix 1 this policy replaces Policy GEN4 of the Adopted Uttlesford Local Plan 2005, however it does not make provision for GEN4:

“Policy GEN4 – Good neighbourliness

Development and uses, whether they involve the installation of plant or machinery or not, will not be permitted where:

a) noise or vibrations generated, or

b) smell, dust, light, fumes, electro magnetic radiation, exposure to other pollutants;

would cause material disturbance or nuisance to occupiers of surrounding properties.”

Significant, Temporal and Secondary Effects

The Policy will have significantly positive impacts and outcomes through its implementation regarding water resources, landscape / townscape, the use of previously developed land, reducing pollution and minimising the risk of flooding. There will be minor positive impacts on reducing carbon emissions through energy efficiency requirements.

Alternatives Considered

No alternative approaches can be considered reasonable as the policy reiterates the thread of sustainable development as espoused in the NPPF. Any alternative that deviates from this approach would be contrary to NPPF and therefore an unsound approach.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

CHAPTER 4 HOUSING

Introduction

Paragraphs 4.1 – 4.7

This supporting text was responded to by 36 people/organisations.

Support	-
Object	14
Comment	22

Overarching Summary

- Concern over policy approach to size, type and tenure of houses
- Concern over policy approach to meeting accommodation needs of gypsy and travellers

Statutory consultees and other bodies

East Herts District Council considers that the Plan is not clear on its approach towards Gypsies and Travellers and Travelling Showpeople, in that the text does not actually identify clearly what the needs are. The Plan describes the number of people interviewed but does not state what number of plots or pitches the Plan requires nor whether there are sufficient allocations to meet these needs. A criteria based policy is insufficient if there are needs to be met. The Plan does not seek to make provision for those who no longer meet the Planning policy for traveller sites definition i.e. Non-Nomadic Travellers. It is therefore recommended that further evidence is undertaken to clarify the position of the 'unknown' households to ensure that appropriate accommodation options are planned for. (paragraph 4.7)

Saffron Walden Town Council Paragraph 4.2 - Query greatest need is for 3 or 4 bedroom houses, the work of the Neighbourhood Plan show that 2 and 3 bed homes are the priority. That requirement should be based upon policies within the Neighbourhood Plan and within good practices as detailed in the South Cambs Local Plan. In paragraph 4.3 they consider the text should be amended to read "necessarily require *or qualify* for subsidised affordable housing"

Elsenham Parish Council supports the provision of affordable housing and housing for the elderly. It considers that where the greatest housing need lies across the district is a matter which town and parish councils should be consulted on and so without the necessity for the production of Neighbourhood Plans,

Thaxted Parish Council query that greatest need is for 3 or 4 bedroom houses, this is contradicted on page 54 under Housing Mix 4.10 where it is stated whilst the greatest need for affordable housing units is for 2 and 3 bedroom houses. In addition to this, the work of the emerging Thaxted Neighbourhood plan suggests that the need is for 1 or 2-bedroom affordable homes. In paragraph 4.3 they consider the text should be amended to read "necessarily require *or qualify* for subsidised affordable housing"

Stansted Mountfitchet Neighbourhood Plan Group considers that a policy is needed on regenerations as a lot of people live in below standard housing.

We Are Residents considers that there should be a specific policy on minimum space standards for new homes.

Developers/landowners/site promoters

No comments received

Individuals

- Concerned about capacity of utilities and lack of infrastructure planning
- no audited data that identifies the number of houses required
- No mention of specifics re sustainability- new housing should be carbon neutral and include solar panels, grey water systems and ensure that there is drainage for ground rain water run off and capture of roof run off water.
- Concerned about scale of housing needed
- Do not agree that greatest need is for family housing.
- The use of the term 4+ bedrooms can justify the building of huge houses. The + should be removed.
- The last sentence of paragraph 4.2 should read that the greatest need is for *market* family housing.
- As well as meeting the needs of existing residents, the Plan is also having to judge the needs of people moving into the District.
- Concerned about affordability of homes.
- Cheaper smaller studio apartments for young first time buyers need building, there ought to be a clause on purchasing that smaller units can only be bought by those with local connections. Safeguarding cheaper/smaller units from mass acquisition of landlords increasing their portfolios must be resisted.
- So what is the proposal for those not qualifying for affordable homes, but unable to buy on the open market? (paragraph 4.3)
- All new developments should have at least 10% instead of 5% open market bungalows. Good quality open-market 2 or 3 bedroomed bungalows with garages are what are required to enable older people to down size and free up family homes.
- The local self-build register contains around 143 groups and individuals (as of August 2017, from an FOI request) so what is the rationale for quoting a figure of two from a national website? Uttlesford should be doing more to promote self-build housing, including exploring how the planning system promotes 'developer-led' planning, at the expense of self-build. Promoting only serviced plots on developer led sites will not allow self-builds to increase the housing supply because it is these developers that are holding back supply to maximize their profit. (paragraph 4.5)
- Explain acronym PPG. (Paragraph 4.5)
- Self/Custom build would be far better met by small developments in the towns and villages where people are established and have friends and support. Moving them to a remote urban town with its lack of social infrastructure will lead to isolation with its associated problems and health effects. The same applies to moving young families away from family support. (paragraph 4.5)
- The District Council should build the opportunity to develop Carver Barracks into its long term plan. It would be an ideal place for a new town. It is a brownfield site and it

has all services including sports provision and open space. It could fund the part of the Saffron Walden Bypass. (Paragraph 4.6).

- As the building of garden communities will cover more than one plan period why is it not intended to allocate land for Gypsies and Travellers within the master plans to ensure future need can easily be accommodated? (paragraph 4.6)

Sustainability Appraisal June 2017

No policies to appraise.

Officer response

Proposed changes to plan

Housing Density Paragraph 4.8 and Policy H1

This policy and supporting text was responded to by 30 people/organisations.

Support	4
Object	9
Comment	17

Overarching Summary

- Densities are too high and do not reflect character of Uttlesford
- Policy should be more flexible
- Make reference to density policies in Neighbourhood Plans

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan Steering Group and **Stansted Neighbourhood Steering Group** consider that the Housing Density Chart negates any freedom for our NP to have a say on what housing should look like as densities are so high. Minimum requirement of 30dph was removed by government in 2010. They suggest that no densities to be given and policy is reworded to say that “densities are as outlined in the relevant Neighbourhood Plan and determined according to the character of the settlement. In the absence of an up-to-date neighbourhood plan then densities should average around 30dph.” The same comment is made by **Saffron Walden Town Council** who adds that this density accords with both the South Cambs and East Herts local plans.

Thaxted Parish Council consider that this policy should be amended to state as led by local demand and outlined in the emerging Neighbourhood Plan and according to the character of the area.

The **Thaxted Society** support the policy

We are Residents believe that the proposed housing densities are much too high, and are considerably higher than comparable authorities. Recent development, when equivalent

housing densities have been in operation, has been very poor quality with homes tightly packed in and very little green space, and continue to lead to neighbour disputers over parking and children playing outside. It is also not clear to us how these levels of housing density are compatible with the garden community principles. Either these provisions should be removed, and a principle adopted of appropriate densities, as East Cambs has done, or an average density figure of 30 dwellings per ha be adopted. No higher average figure should be permitted. Additionally the policy needs to recognise Neighbourhood Plans, and state that "Policy H1 only applies if housing densities have not been identified in a respective Neighbourhood Plan".

Developers/landowners/site promoters

- Policy supported
- the policy needs to employ an element of flexibility to allow the design of schemes to reflect a particular location, or to address local issues.
- the upper end of the density ranges proposed appear a little high for the character of the settlements within Uttlesford, particularly rural locations.
- high densities suggested are generally not achievable particularly taking into account parking and amenity space required.
- Housing density should be design led and not a simple reflection off applied average densities. The NPPF places significant weight on the quality of design. It is therefore recommended that this policy should be omitted from the plan.
- Policy should make clear that specialist forms of housing, including housing for the elderly may, are likely to achieve higher densities as a result of their form.
- The policy refers to density requirements for development that would be adjacent to any settlement, so there has to be some allowance for minor expansions to settlements beyond the guidance lines that are drawn by the development limits boundaries?
- Lack of clarity as to housing density policy as it relates to the Garden Communities and where this will be set out. The development framework is considered the most appropriate document.

Individuals

- Policy supported
- We should be aiming for much lower densities for rural homes as both houses and plots have been getting smaller.
- Modern housing density is unsustainable and doesn't allow proper living and breathing space. Historically, housing had some land available to grow some food for oneself.
- These densities are far too high and 20dph would be appropriate for a 'soft edge' to towns and villages.
- Clarification required in paragraph 4.8 as no specific numbers on " need" or any detail where they might be located.
- The density should relate to that shown in any relevant Neighbourhood Plan and reflect the nature of the settlement.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

It is important that development density is appropriate to make maximise the potential quality of proposals, to make the best use of the land available, to reduce the amount of Greenfield land being used for sites on the edge of settlements and to respect the character of the area. Paragraph 47 of the NPPF requires local planning authorities to significantly increase the supply of housing by setting out their own approach to housing density which reflect local circumstances. The densities indicated within the policy reflect broadly suitable thresholds for the district's towns and villages. Importantly, the addition of exception criteria ensure that the local and site specific context is at the forefront of development. This will ensure positive impacts on landscape, townscape and the natural and historic environment through their protection from both development within and outside development limits and also the proposed new settlements.

Alternatives Considered

The National Planning Policy Framework requires Councils to make sure housing densities are appropriate for different areas. With this at the forefront of the Policy's approach, and in line with the evidence outlined in the emerging evidence (SHMA), there can be considered no reasonable alternatives that exist for exploration.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan

Housing Mix

Paragraph 4.9 and Policy H2

This policy and supporting text was responded to by 35 people/organisations.

Support	6
Object	16
Comment	13

Overarching Summary

- Greater need for smaller properties.

Statutory consultees and other bodies

Elsenham Parish Council does not agree that it is possible to state the most appropriate housing mix across the District. This is a matter on which parish council's should be consulted, without the necessity for Neighbourhood Plans.

Saffron Walden Town Council consider that the policy should not include a significant proportion of 3 & 4 bedroom market housing, as this does not cater for families that do not qualify for affordable housing and cannot afford 3 & 4 bedroom houses. It is proposed that the policy should say 2 & 3 bedroom affordable Market housing. The Housing mix should be similar to South Cambs:- 30% 1 & 2 bed, 40% 3 bed and 30% 4 bed or as outlined in the Neighbourhood Plan for the area. **Thaxted Parish Council** similarly consider that the policy should be amended to read 2 & 3 bedroom affordable market housing to meet the needs of people who need this size property but do not qualify for affordable housing. Littlebury Parish Council consider the mix inappropriate. Given that the national average household size is 2.4 people, more people are living alone, and that the District has an above average age profile, a very much higher proportion of dwellings in all tenures should have 1 and 2 bedrooms. This would provide more suitable housing for both younger and older residents, reduce the need for younger people to move away to find affordable accommodation and produce more balanced communities. Due to the rising in age of the population, suitable accommodation for the elderly would be a requirement, designed to be integrated with the community on each site. Good quality sheltered accommodation, dementia villages or similar, and some housing suitable for multi-generational families should be provided to facilitate choice.

Saffron Walden Neighbourhood Plan Steering Group and **Stansted Neighbourhood Steering Group** consider that the Housing Mix given is completely out of kilter with normal densities and the reason given by ORS for a high percentage of larger properties is unscientific. ORS have based their figures on the results of the 2011 census showing high growth in Uttlesford but a lot of East Europeans live in large numbers in town houses to keep their rental costs low. The current guidelines will result in too many expensive homes. Given the current evidence that there are a lot of people wishing to downsize (BBC news of 2nd August 2017), there is no argument for building more 4 bed houses than the norm (24% for 4 and 5 bed). Also see the English Housing Survey. Suggestion: Market housing should prioritise large 2 bedroom and 3 bedroom houses. 5% provision of bungalows is not enough as the average in England is already higher than that so will lead to a deficit. There will be areas where bungalows are inappropriate e.g. town centres but where they are, e.g. moderate sized housing developments, then 10% could be included to help with downsizing to free up family homes. Suggest that in terms of size percentages should be: 9% 1 bed 23% 2 bed 44% 3 bed 24% 4 bed plus. The housing mix should be up to the individual Neighbourhood Plan.

Thaxted Society supports the provision of low cost housing and the provision of assistance for first time buyers.

We Are Residents disagree with the conclusion drawn from the SHMA and believe that 2 and 3 bedroom houses should be prioritised for market housing as well. The emphasis on 4 bedroom houses in Policy H2 is not appropriate and should be deleted. Additionally the policy needs to recognise Neighbourhood Plans and state that "Policy H2 only applies if a preferred housing mix has not been identified in a respective Neighbourhood Plan

Developers/landowners/site promoters

- Support the policy in creating balanced and sustainable communities and meeting the needs of the district and evidenced by the most up to date Strategic Housing Market Assessment.
- A company providing an affordable housing model that delivers affordably rented homes to buy considers that the policy is not sufficiently flexible to reflect changing circumstances and evidence which may supersede the SHMA. They recommend that the policy is amended to read ‘... as evidenced by the most recent Strategic Housing Market Assessment and any other local evidence of need, having regard to ...’ □
- Lack of clarity as to housing density policy as it relates to the Garden Communities and where this will be set out. The development framework is considered the most appropriate document.
- Policy should exempt or make reference to the fact that specialist housing for older people is aimed at downsizers and will therefore most likely be in the form of one or two bedroom units.

Individuals

- Don't forget suitable accommodation on a single floor for the disabled and not to allow later buyers to add a storey to bungalows thus reducing this type of housing stock.
- There is a need for market bungalows for residents who wish to downsize..
- The lack of one and two bedroom affordable houses in this proposed mix does not seem to reflect UDC's Housing Strategy, which highlights the need for many smaller and affordable properties.
- There is a need for 1, 2 and 3 bed properties to meet the needs of young people wishing to buy their own home.
- The data is skewed by multiple occupancy of rooms. The actual need for long-term Uttlesford residents, and for those with families, is for smaller homes.
- A genuine mixed society needs a genuine mix of housing which includes - one bedroom dwellings, family homes of various sizes and bungalows (always low priority) as well as larger properties for the more affluent. In addition, to prevent the talent drain, a percentage needs to be reserved for local people.
- The mix of housing provided in the Garden villages should reflect the jobs/income/qualification levels of the 14,600 new jobs projected to be created in the district during the Local Plan period. Over 50% of these jobs will be in support roles like retail, warehousing, offices, education and other services. Many of the jobs are likely to be at the lower end of the income scale.
- Should it make it clear that a request for variation of a Section 106 agreement will only be considered in exceptional circumstances?

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

In order to create sustainable, inclusive and mixed communities, it is important to plan for a mix of housing which creates greater choice and meets the housing needs of an area.

Paragraph 50 of the NPPF states that local authorities should ‘plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.’ This policy will have significant positive impacts on addressing

current local housing needs in terms of dwelling sizes and types to the benefit of appropriate growth and social inclusion. There will also be positive impacts on townscape where the policy requires development proposals to consider the local character of the area when determining housing mix. Despite these positive impacts, there is a small degree of uncertainty surrounding the historic environment and exceptions to the policy regarding the suitability of a development mix in Conservation Areas.

Alternatives Considered

The National Planning Policy Framework requires Councils to plan for a mix of new housing based on current and future demographic trends, market trends and different groups within the community. With this at the forefront of the Policy's approach, and in line with the evidence outlined in the SHMA, there can be considered no reasonable alternatives that exist for exploration.

Proposed Mitigation Measures/Recommendations

The Policy could make reference to the protection of the historic built environment as a physical reason why a housing mix cannot be achieved in some instances related to the protection and enhancement of specific designations such as Conservation Areas. The Policy could also include the Council's approach to any self-build home applications that might come forward in the plan period.

Officer response

Proposed changes to plan

Subdivision of Dwellings Paragraph 4.11 and Policy H3

This policy and supporting text was responded to by 11 people/organisations.

Support	3
Object	4
Comment	4

Overarching Summary

- Ensuring sufficient off street parking

Statutory consultees and other bodies

Saffron Walden Town Council and **Thaxted Parish Council** consider that the policy should be amended to read that sub-division of a flat/ property will not be allowed where the dwelling is in a flood risk area and the flat is created with no access to a 1st floor level for refuge. **Takeley Parish Council** considers that the current policy creates an unacceptable level of street parking; and loss of communal garden affects street scene, character or

identity of the area. The policy needs to be reworded to define that street parking will not cause loss of amenity or congestion as a result of sub-division

Saffron Walden Neighbourhood Plan Group and **Stansted Mountfitchet Neighbourhood Plan** group consider that there should not be a policy encouraging this. More help needs to be given to young people. **Thaxted Society** supports the policy.

Developers/landowners/site promoters

No comments received

Individuals

- Off-street parking that reduces garden space be required to be permeable to reduce water run-off in heavy rain.
- Policy supported
- Policy objected as it can lead to substandard living conditions and unforgiving neighbourhoods
- The plan should state where parking standards, design guides can be found. What is meant by the phrase Local Standards?
- Permission should not be granted if it involves the loss of off-road parking. On-road parking is intense in some parts of the district and development which increases on-road parking should be resisted.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The subdivision of dwellings and the change of use to multiple occupancy can provide additional homes and accommodation to help meet the district's housing need. The policy also seeks to protect aspects of townscape by placing restrictions on development which is likely to be detrimental to the character of the area. A criterion that there is no detrimental effect resulting from noise and disturbance positively impacts on elements of pollution control. There will be no impact on the historic environment from the implementation of this policy.

Alternatives Considered

An alternative of not having a policy on the subdivision of dwellings and dwellings in multiple occupancy may adversely affect the character of the area through an intensification which may comprise on-street parking, the use of garden space for car parking, an increase in overlooking or adjacent properties and general noise and disturbance. The Council believe that having a policy on the subdivision of dwelling would mitigate or prevent these adverse issues from arising, hence this alternative was rejected. It is also ensures that the size of housing necessary to meet the housing mix needed in the district, is retained.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan

Residential Extensions and Replacement Dwellings Paragraphs 4.12 – 4.13 and Policy H4

This policy and supporting text was responded to by 6 people/organisations.

Support	2
Object	2
Comment	2

Overarching Summary

- Concern over consistency of policy with national guidance.

Statutory consultees and other bodies

Thaxted Parish Council considers that the policy should be amended to state that the applicant must state why the proposed footprint is larger than the existing footprint.

Saffron Walden Neighbourhood Plan Group and **Stansted Mountfitchet Neighbourhood Plan** support the policy

Thaxted Society considers that the policy is weak and doesn't prevent development by the back door and increasing built forms in the countryside. This policy should also consider summer houses, garden sheds, chicken houses often very large, cabins, work spaces, gazebos, pool houses, studios, neo agricultural buildings with the sole purpose of preventing a new footprint in open countryside. In every instance planning requirements should include proof of need, and allied to this some on-going proof of use .

Developers/landowners/site promoters

None received

Individuals

- The policy title should include the Countryside Protection Zone
- The Policy is demonstrably unsound, and requires substantial amendment because:
 - It is not consistent with national policy: Paragraph 89 of the NPPF restricts size of extension or replacement dwelling by reference to that of the existing dwelling, only in Green Belt areas.
 - It is over-prescriptive, going further than is necessary to ensure that extensions or replacement dwellings within the Countryside are permitted only where they comprise sustainable development suitable for their context: It applies to the

whole Countryside, development restrictions which exceed those applied by paragraph 89 to Green Belt areas only. It would serve to restrict well-designed and innovative development in circumstances where no material planning harm would arise.

The need for a separate policy setting additional design criteria for replacement dwellings on sites outside the Green Belt and Countryside Protection Zone has not been demonstrated, and therefore Policy H4 is unsound. This representation takes no position as to whether a separate policy dealing with house extensions is required, because that does not directly affect us in the same way.

In the alternative, if it is demonstrated that the policy dealing with replacement dwellings should apply to sites outside the Green Belt and Countryside Protection Zone, a preferable alternative policy is proposed which would separate development controls into:

1. those applicable to extensions or replacement dwellings within the Countryside beyond both the Green Belt or the Countryside Protection Zone. This would contain fewer and less prescriptive criteria which are aligned to the NPPF, NPPG and consistent with draft Policies SP10, C1, D; and
2. those applicable to extensions or replacement dwellings within the Countryside within both the Green Belt and the Countryside Protection Zone. This would contain criteria aligned to para 89 of the NPPF.

Alternative proposed policy.

If a separate policy is deemed justified the following wording would overcome the objection.

- 1) House Extensions and Replacement Dwellings in areas of the Countryside beyond both the Green Belt and the Countryside Protection Zone.

Proposals to extend or replace existing dwellings within areas of the Countryside which are beyond both the Green Belt and the Countryside Protection Zone will be permitted provided that the scale, form, massing and height of the proposed extension or replacement dwelling is appropriate to the local context of the site and to the character of the surrounding landscape.

If the proposed replacement dwelling is not on the footprint of the original, the existing house will be required to be demolished within a month of the first occupation of the new house. In order to make sure that the new dwelling remains of a size appropriate to the local context of the site and to the character of the surrounding landscape, permitted development rights may be removed.

- 2) House Extensions and Replacement Dwellings in areas of the Countryside within both the Green Belt and the Countryside Protection Zone.

Proposals to extend or replace existing dwellings within areas of the Countryside which are within both the Green Belt and the Countryside Protection Zone will be permitted provided that:

- The extension or alteration of a building does not result in disproportionate additions over and above the size of the original building;
- The replacement building is in the same use and not materially larger than the one it replaces.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy will help to ensure that the character of Uttlesford's landscape and its Greenbelt are protected through controlling the amount of new development acknowledging that the erection of replacement dwellings and extensions to existing houses can individually, and cumulatively over a period of years, have an adverse impact both on the character of individual properties and their surroundings. It is considered that this Policy approach is compatible with those regarding the historic environment, specifically Listed Buildings, and those protection Policies surrounding landscape and the countryside.

Alternatives Considered

It is considered that any deviation from the Policy approach could be considered unsustainable in line with a need to ensure such provision (and a trend for the conversion of existing facilities) or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan

**Residential Development in Settlements without Development Limits
Paragraph 4.14 and Policy H5**

This policy and supporting text was responded to by 13 people/organisations.

Support	3
Object	4
Comment	6

Overarching Summary

- Reference should be made to Essex Design Guide and garden sizes

Statutory consultees and other bodies

Historic England supports the policy and its requirement for development to have regard to the historic environment and setting of buildings.

Saffron Walden Town Council and **Thaxted Parish Council** consider that the policy should define 'unreasonably small' and the policy should refer to the Essex Design Guide. **Takeley Parish Council** considers that the policy should be amended to prevent development which leads to coalescence to protect the individual character and identity of areas.

Saffron Walden Neighbourhood Plan Group and **Stansted Mountfitchet Neighbourhood Plan** consider that the policy is not specific enough; it should specify conformity to the Essex Design Guide. A specific policy on garden sizes is needed – a given area is required, no more than 2/5 of the garden should be in shade on 21 March, 3 storey homes should have south facing gardens where possible.

Thaxted Society support the policy

SERCLE (Stop Erosion of Rural Communities in Local Essex) The BDC/ NEGC justification for Garden Towns is prompted by the need to provide affordable and social housing. There is a belief that smaller sites are not viable due to Section 106 agreements on smaller sites, in that those with less than 10 homes are not required to comply and therefore provide social or affordable housing. The assertion is that building a 'Garden Town' is thus the only way of providing affordable housing. This is quite simply incorrect. TCPA have published a resource document for Councils detailing a variety of methods by which social and affordable housing in rural areas can be provided and this document specifically does not recommend a Garden Town as the solution.

We Are Residents consider that specific minimum garden sizes should be included, in accordance with the Essex Design Guide, and that these should not be departed from. Additionally the policy needs to recognise Neighbourhood Plans and state that "The garden space part of Policy H5 only applies if garden size not been identified in a respective Neighbourhood Plan."

Developers/landowners/site promoters

None received

Individuals

- Infilling between existing dwellings in rural areas would be a great idea, providing it was developed sympathetically. Development should be through small controlled pockets of housing spread throughout the areas and not concentrated into a huge expanse.
- Is the word "without" intended to mean the opposite of "within"? If not, what is this referring to? I object to a) the use of the word "overbearing" in number c which I think sets the bar too high. I suggest the words should be "significant or adverse"; b) to the lack of any requirement that a developer should be required to put in place mitigating measures to reduce or minimise the impact of any development on those

who would otherwise be affected; and c) to the lack of any requirement to maintain where possible trees (in order to avoid the areas being denuded of mature or semi-mature vegetation).

- This policy does not replace adopted policy H3 as stated in Appendix 1
- Something is needed to show which are the Settlements without Development Limits, and where an indication of settlement limits can be found.
- Development Limits are there to limit development; the policy should not introduce exemptions.

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Significant, Temporal and Secondary Effects

Additional homes can be provided for through infilling between existing dwellings and through the development of other sites within villages; however it is important that such development is appropriate, well designed and well related to its surroundings and that the interests of neighbours are safeguarded. This policy supports the provision of housing to meet needs with regards to both supporting new small scale residential development and the protection of existing dwellings from inappropriate development. The criteria set out in the policy positively impact on a number of the Sustainability Objectives through seeking to ensure that development is not to the detriment of other issues. The criteria considers the impacts of development on neighbouring properties with regards to noise and increased vehicle movements and ensure that development would only be permitted if the natural and historic environments and the character of the area are protected. Furthermore, the policy has a positive impact on health through garden space requirements.

An alternative to this policy would be to

Alternatives Considered

Retain the Adopted Local Plan 2005 'backland development' policy and text with no changes / allow limited backland development. The NPPF sets out in paragraph 53 that, 'local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.' In conjunction with the NPPF's presumption in favour of sustainable development, including a policy on 'backland development' could be seen as accepting the principle contrary to the NPPF which would likely see an increase single dwelling residential proposals. Backland development has the potential to have adverse impacts on individuals and communities through the loss of amenity, overshadowing, noise, loss of green links, visual intrusion and loss of space between buildings, and can greatly disrupt a street scene. The Council feel that it is more suitable to address this type of development through restricting its viability in a more general policy and for this reason the alternative has been rejected.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage

Officer response

Proposed changes to plan

Affordable Housing Paragraphs 4.15 – 4.23 and Policy H6

This policy and supporting text was responded to by 64 people/organisations.

Support	8
Object	22
Comment	34

Overarching Summary

- Include reference to Independent Living
- Include reference to Neighbourhood Plan policies
- Set out and justify number of affordable houses to be delivered
- Explain how viability of individual sites will be assessed.

Statutory consultees and other bodies

Essex County Council recommends that in the supporting text that housing classified as 'independent living' is included within the definition of affordable housing. This would support the delivery of ECCs Independent Living programme, which seeks to provide market and social housing for those within this specialist housing category. ECC notes that section 4 of the Draft Local Plan refers to both affordable and sheltered housing as a need that has to be served. It is worth noting that often those who need housing assistance are less affluent and as such are more likely to be in need of good passenger transport links to enable them to undertake their daily life requirements. As such it would be beneficial for UDC to identify locations that are already well served (or planned to be) by public transport for such dwelling types. Section 4 does not currently include accessibility as a required criterion. The same principle applies to designated housing for older people. ECC recommends that this omission should be addressed.

Harlow District Council explains that the specific need set out for Harlow District is particularly challenging given the tight administrative boundaries of the district and wider viability issues. Further clarification will be needed to ensure that any unmet need that may arise in Harlow, are properly considered and that such need is met at sustainable locations.

Elsenham Parish Council considers that there is a lack of transparency as to the calculation of 14,100 dwellings stated in paragraph 4.17. **Saffron Walden Town Council** considers that the policy should make reference to Neighbourhood Plans; 40% affordable homes is considered too high; housing should be pepper-potted throughout the site; A viability test should be the exception, not the rule and certainly not the most important policy

point, there should not be an invitation for developers to evidence unviability – a viability statement should be submitted with the planning application and not after determination and there should be no alterations once permission is granted. It is suggested that the policy is revised in accordance with South Cambs Local Plan. Affordable housing should be based on truly affordable rents. **Thaxted Parish Council** similarly considers that the policy should make reference to Neighbourhood Plans. **Littlebury Parish Council** considers that the garden communities should not deliver less than 40% affordable housing.

Saffron Walden Neighbourhood Plan Group and Stansted Mountfitchet

Neighbourhood Plan are concerned that the policy does not provide for sites under 11 houses. The threshold of 11 houses should not apply for A and B villages. However, sites of luxury larger houses should provide for affordable housing. East Herts have a policy whereby sites of under 11 houses or over 1000 sq m of total floor area do have to provide for affordable housing. There should also be a policy saying that affordable housing should be pepper-potted throughout the site. They suggest that a viability test should be the exception, not the rule and certainly not the most important policy point; concerned that Affordable Housing is not truly affordable (c £240 per week) and there is a need social housing at affordable rents, even if it means providing a smaller percentage .

Thaxted Society supports the policy. **Sustainable Uttlesford** consider that the mix of housing provided in the Garden villages should reflect the jobs/income/qualification levels of the 14,600 new jobs projected to be created in the district during the Local Plan period. The plan must maximise the amount of socially rented housing in future developments to enable inhabitants on low or modest incomes to live and work in the district rather than be forced to move away. They consider that major employers like Stansted Airport have a significant role in enabling this increase in social housing. To ensure fairness and avoid exploitation Sustainable Uttlesford consider that private market housing in the main should be offered for sale on a freehold rather than leasehold basis. **Uttlesford Futures (Employment, Economy, Skills, Environment and Transport)** consider that the policy should include key worker homes and larger proportion of 'affordable' housing. **Uttlesford Citizens Advice Bureau** comments that using the insights gained from their clients they are aware of the chronic lack of affordable housing in the district. Uttlesford Citizens Advice therefore supports plans to increase the provision of low cost housing for rental and private purchase and would welcome the availability of more supported housing together with intergenerational accommodation that could provide solutions for households on low income because of care responsibilities. **We Are Residents** note that Policy H6 is at odds with the Monitoring Framework paragraph 17.1 provisions. Policy H6 requires 40% affordable housing, which with an annual housing requirement of 640 new homes equates to 256 affordable homes per annum. Paragraph 17.1 requires only 100 affordable homes per annum, and therefore should be amended to 256.

The **Home Builders Federation** does not consider that the Council's viability assessment of the policy to be effective in supporting the policy. The Council should set out how many affordable houses it is seeking to delivery during the plan period.

Developers/landowners/site promoters

Paragraphs

- Paragraph 4.18 of the Local Plan sets out the findings of the 2015 SHMA with regards to affordable housing. However, the paragraph appears a little confusing in that figures of 18%, 20% and 10% uplifts on base demographic figures are quoted without a clear understanding of what these uplifts are considered to address. This paragraph should be reworded so it is clear and transparent as to what is being suggested.
- Paragraph 4.22: A company providing an affordable housing model that delivers affordably rented homes to buy supports the policy and recommends that the policy sets out that supplementary guidance will be provided on the evidence required on viability. The SPG will ensure consistency across applications. The policy does not provide a target tenure mix, which provides the most pragmatic response to the varying needs across the District, however we do recommend the following amendment to the policy to reflect the emerging national planning policy position which indicates that 10% of all major residential developments should be delivered as affordable home ownership tenures, including rent to buy and starter homes. The tenure mix of affordable housing should reflect the most up to date local housing need evidence and viability on individual sites, including a range of housing that reflect local aspirations for affordable home ownership. This wording ensures that the policy will continue to reflect national policy without tying the policy to particular tenures. The final paragraph in this policy should also make reference to alternative affordable housing provision being made where this would be more suitable than requiring affordable housing is retained in perpetuity.
- Paragraph 4.22 – The tenure mix requirement should be sufficiently flexible to allow the tenure split between affordable rent or social rented tenure and shared ownership or intermediate housing tenures to be negotiated on a site by site basis to ensure the effectiveness of the plan in delivering affordable housing across the district, in accordance with local need of settlement

Policy

- Welcomes flexibility of policy
- Policy should make reference to starter homes
- In the absence of guidance it is unclear how local housing needs evidence and viability of individual sites will be assessed which creates uncertainty.
- Do not consider the Council's viability assessments to be effective in supporting its policy on affordable housing. Whole plan viability assessment needs to be revisited in line with Paragraphs 173-164 of NPPF.
- The plan does not, at present, identify how many affordable homes it intends to deliver during the plan period.
- The policy of 40% of the total number of dwellings proposed and similar arrangements in other authorities is counterproductive and a more sensible solution exists. 40% of the total number encourages the developers to propose lower density schemes with the open market element consisting of the largest houses the market will stand, thereby reducing the number of low cost houses provided. A more sensible route forward would be for the low-cost element to be a percentage of the total gross internal floor area as smaller houses generally fetch a higher price per m². This would be a market lead approach to providing a higher number of affordable houses making more effective use of land and coming closer to UDCs proposed

housing density targets. I would suggest a figure of 30% split 50/50 between social rented and starter homes. Shared ownership has no place as almost anymore that can obtain the funding for shared ownership can afford a low cost and would prefer to own outright which reduces dependency and a burden to the state purse long term.

- Policy not justified by evidence, as per the NPPF (paragraph 182). The latest evidence on affordable housing in the District is informed by the West Essex and East Hertfordshire Strategic Housing Market Assessment Affordable Housing Update (July, 2017). In contrast to the Council's current policy wording requiring 40%, the affordable housing update suggests a much lower need for 26% (see figure 21 of the affordable housing update).
- acknowledge that this policy is in line with the PPG(Paragraph: 031 Reference ID: 23b-031-20161116) which states that contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area)
- With the threshold of 10 units, there is a need for medium sized sites (50 dwellings) to deliver additional affordable houses.
- Lack of clarity as to affordable housing policy as it relates to the Garden Communities and where this will be set out. The development framework is considered the most appropriate document.

Individuals

Paragraphs

- The 2015 SHMA is unreliable given the uncertainty Brexit creates regarding economy, migration and immigration.
- The Plan should assist those who need assistance and position dwellings where the work is within Uttlesford. If you are a service sector worker then you need to be near the Market Towns and Airport. If you are a caseworker then you need to be near to your client's homes, hospitals and other relevant areas. If you are a rural worker then you need to be near your area of work. The idea of a North Uttlesford Garden Village fails to fulfil the needs of any of these examples.
- Paragraphs 4.15 to 4.17 refers to Housing Need and not Affordable Housing and should be entitled as such or refer to paragraphs 3.40-3.42 which contain the same information.
- Paragraph 4.16 is a good point at which to raise the option of building one, or more new standalone settlements, with appropriate infrastructure, rather than affecting so many smaller, existing communities.
- Paragraph 4.17: Where are the Government's new household projections? There is vagueness as to how the figures are determined. If more houses are built, the population will increase, but that does not mean that more houses have to be built.
- In paragraph 4.18 the uplift is exactly 20% and not more than.
- Paragraph 4.18: Object to the approach of the 2017 SHMA which justifies a lower uplift. The market signals uplift should be applied at a reasonable level to make up for the past failing to deliver sufficient land for new residential. We would therefore recommend that the Council use the 2014 Household projections as the starting point and then apply at least 20% uplift to take account of market signals.
- Support paragraph 4.20 but who will ensure the intent is actioned and maintained?

- Paragraph 4.22: local circumstances should be assessed by consulting local people.
- Affordable housing needs to be in the right places and not just in the Garden Communities as this does not meet the needs of those requiring affordable housing, it is almost a designed social segregation, wrong location for key workers, and wrong location for sustainable affordable housing.

Policy

- New housing is rarely affordable for young people / families starting out.
- The policy should not give developers the opportunity to argue unviability and exceptional circumstances.
- There seems to be no consideration of rented accommodation needed for young people.
- The viability assessment must be part of the Planning Application, and part of the public record. If the developer wishes to change the amount of social/affordable housing, a completely new Planning Application should be required. Experience to date indicates that the percentage of social/affordable housing provided is not open to public scrutiny, and that developers are able to plead changes in circumstances to reduce the percentage. Provision of social/affordable housing is central to all Planning Applications and should not be open to renegotiation.
- People on waiting list appears smaller than the number of houses being planned for.
- Housing demand projection for the area should be clearly assigned against its source and then clearly assigned against the corresponding number of houses. Then a sensible housing increase planned. A housing policy should not be based on building more and more houses until the price comes down to be affordable. So if we could never build enough to make market prices 'reasonable' the question is how many houses should be built. Enough for the people who live and work there plus an allocation for 'key workers' plus a small percentage growth rate? Massive inward investment from business (either from Stansted expansion or from bioclusters in Cambridge) should not, in my opinion, be a reason to build new homes at mass scale.
- Social renting must be a crucial and central aspect of housing provision or garden villages will be exclusive communities for the wealthy. "Affordable" housing at 80% market rates is unlikely to be affordable to those on low wages.
- Sites of 5 dwellings or over should make a contribution to affordable housing.
- The Council should begin a programme of its own social housing.
- Unclear as to definition of affordable housing.
- Guarantee that houses will be reserved for local, first time buyers with significant price reduction.
- Policy does not meet Garden Community principle listed in Appendix 4.
- Perhaps 40% affordable housing is too high and a lower percentage should be sought on the provision that more low cost housing for purchase by local people is provided? It would be better to have more social rented housing provided at reasonable rents and not so-called affordable.

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Significant, Temporal and Secondary Effects

The NPPF states that where affordable housing is identified, local authorities should 'set policies for meeting this need, on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.' The Council's Developer Contributions Guidance sets out the tenure split, mix and distribution that it expects. Currently the tenure split is 70% affordable rented or Social Rented Tenure, 30% Shared Ownership Tenure. Affordable housing units will be normally distributed throughout the development in clusters of no more than 10 units, depending on the size of the development. The policy will have significant positive impacts related to affordable housing provision and associated social inclusion. The policy allows for flexibility to account for annual review, as stipulated in the supporting text. Affordable housing on-site or contributions to off-site provisions are required for all development over 5 dwellings ensuring that there will be a suitable supply of affordable housing. The supporting text also addresses the need for an appropriate mix of tenures and property sizes which would need to be agreed and determined by local circumstances, as well as consideration to the provision of specialist housing.

Alternatives Considered

Two alternative policy approaches have been identified as reasonable.

Alternative H6(a): To require developments on sites of 2-4 dwellings to provide a financial contribution to help deliver off-site affordable housing.

The alternative approach represents the previous preferred Policy of the 2014 Local Plan that was withdrawn. It represents an approach that in theory would maximise the amount of affordable housing in the District. Despite this, it is possible that the policy would prevent the viability of many small schemes and potential windfall sites that could come forward within the plan period. In addition, the approach would arguably conflict with the presumption in favour of sustainable development espoused in the Plan and the NPPF. For this reason, the alternative was rejected for a higher minimum limit to which financial contributions would apply for the delivery of off-site affordable housing.

Alternative H6(b): To retain the 2005 Adopted Local Plan policy (affordable housing only on sites of 15 dwellings plus)

The alternative approach represents the current 2005 Local Plan policy. It represents an approach that would not see any affordable housing requirements or off-site contributions below 15 dwellings. This can be seen as a high figure which, in consideration of the dispersed settlement patterns of the District, could see a significant undersupply of affordable housing in the District's smaller villages where development would only be appropriate in small schemes. For this reason, the alternative was rejected for a lower minimum limit to which financial contributions would apply for the delivery of off-site affordable housing.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage

Officer response

Proposed changes to plan

**Affordable Housing on Exception Sites
Paragraphs 4.24 – 4.25 and Policy H7**

This policy and supporting text was responded to by 11 people/organisations.

Support	4
Object	5
Comment	2

Overarching Summary

- Make reference to working with parish councils and Neighbourhood Plans
- Ensure policy is not unreasonably restrictive or too flexible.

Statutory consultees and other bodies

Saffron Walden Town Council consider that the words ‘or at any other site’ are added to the first point and reference should be made to working with Town and Parish Council.

Saffron Walden Neighbourhood Plan Group and **Stansted Mountfitchet Neighbourhood Plan Group** support the policy but suggest that the plan should mention working with Parish Councils and Neighbourhood Plans.

Thaxted Society object to the policy as it incorrectly relies on the commercial viability of the development to provide low cost housing and removes all controls to enable a proportion of low cost housing.

Developers/landowners/site promoters

- There is no need for the inclusion of pure open market housing to aid the viability of affordable housing. It only artificially inflates the land value. A far more intelligent approach would be to allow a proportion of Starter Homes possibly in a ratio of anything between 1:3 to 3:1, this would provide a mix more in keeping with the need, not inflate the land value significantly and make both type of housing more genuinely affordable.
- Support the principle of policy but object that bullet points 1, 3 and 4 are not justified or consistent with national policy. Point 1 is too restrictive; point 3 should be amended to read ‘within a reasonable proximity to the settlement’ so as not to exclude certain locations; point 4 – there is no requirement in national policy for housing needs surveys to be prepared within 3 years.

Individuals

- Policy supported
- Object to the policy as the wording is sufficiently elastic as to allow all sorts of opportunistic applications
- Saying that the proportion of market housing should be the minimum to make the development viable is good, but a maximum percentage needs to be stated too.
- Current adopted policy, which is replaced by this policy states that 100% of housing should be affordable. Draft policy is too flexible.
-

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Significant, Temporal and Secondary Effects

Paragraph 54 of the NPPF states that local authorities should ‘plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.’ The policy positively impacts upon the built and historic environment by ensuring that the size of the development is appropriate to the character of the area and townscape in the first instance. The policy also helps to meet an identified housing need. There will be significant impacts on social inclusion in so far as the policy recognises that where the market may not provide affordable housing in this manner yet seeks its delivery through permitting the principle of market housing to ensure viability.

Alternatives Considered

It is considered that any deviation from the Policy approach could be considered unsustainable in line with the need for affordable housing in such areas or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan

**Self Build and Custom Build Housing
Paragraphs 4.26 – 4.30 and Policy H8**

This policy and supporting text was responded to by 10 people/organisations.

Support	2
Object	1
Comment	7

Overarching Summary

- How will policy be implemented in practice
- Policy should identify other factors which will be taken into account.

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan Group and **Stansted Mountfitchet Neighbourhood Plan Group** ask how this would happen in practice and consider that it is important that it is not exploited but should enable people to have property tailored to their needs!

Thaxted Society support the policy that furthers imaginative schemes that allow and encourage access to sustainable home ownership

Developers/landowners/site promoters

- Lack of clarity as to how policy will relate to the Garden Communities and where this will be set out. The development framework is considered the most appropriate document
- The provisions of the policy can be met whilst significantly increasing supply and encouraging innovation and sustainability by encouraging development of self-build and custom homes provided it meets the following criteria
 - Type B Villages:- a) Utilises underused, previously used unproductive land. b) Is in or adjacent to the settlement; c) Is of suitable design; d) exceeds the energy performance requirements of the building regulation at the time construction commences by a minimum of 50% or carbon neutral whichever the lowest (this would more than offset any theoretical increase in energy consumption for additional travel distances).
 - Type A villages – as for Type A except d) is a minimum of 40%; plus e) Encourage small scale development of up to 30 house schemes where they provide clear community benefits which would help to make the settlements more sustainable i.e. School extensions, Community centres, Shops, Local employment centres
 - Key Villages:- as for Type B except d) is a minimum of 20%; plus f) encourage large scale development providing it contributes significantly to the cost of infrastructure improvements, i.e. Bypass, Sewage works.
 - Saffron Walden:- Allow sufficient extra housing on the outskirts of the town in order to fund the bypass and provide park & ride transport to carry loaded shopping trolleys and passengers based at or near Audley End railway station.
 - Great Dunmow:- Has generally well considered Neighbourhood Plan leave as proposed.

Individuals

- Currently the policy suggests that such proposals would be supported, but the policy needs to clearly state how factors such as lack of local public transport, or impact on landscape will be balanced against this support for self/custom build.
- More provision should be made and the idea promoted more widely.
- Affordable housing should be included within schemes of under 11 houses as well.
- Please tell us where to find NPPF
- Greater publicity should be given to self/custom build.

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Significant, Temporal and Secondary Effects

The policy will have minor positive outcomes on the sustainability objective relevant to housing, through including a policy on self-build and custom homes. Impacts are limited due to the scale of possible development and its significance to contributing to housing need at the strategic plan level.

Alternatives Considered

It is considered that any deviation from the Policy approach could be considered unsustainable in line with the need for policy on self-build and custom homes in such areas or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures/Recommendations

Through iterative working, the SA process highlighted the need for a specific policy on, or mention of self-build homes within the housing mix policy. This recommendation has been incorporated into the plan at this Preferred Options stage. No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan

Accommodation for Gypsies, Travellers and Travelling Showpeople Paragraphs 4.31 – 4.39 and Policy H9

This policy and supporting text was responded to by 93 people/organisations.

Support	9
Object	41
Comment	43

Overarching Summary

- Policy should refer to means of disposal of foul effluent.
- Need to clearly identify what the needs are and is approach of criteria policy sound.

- Need for further evidence on needs of those who no longer meet definition for planning policy purposes.
- Formally requested to evaluate evidence to determine whether there is the potential to assist in meeting the unmet need in Basildon for Traveller pitches prior to progressing Local Plan to Regulation 19.

Statutory consultees and other bodies

Environment Agency are pleased that the fifth criterion of this policy ensures that these sites should not be located in areas at risk of flooding. In terms of tidal and fluvial flood risk, where they include residential caravans that are considered to be highly vulnerable in Table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change, these sites should not be permitted in Flood Zone 3, as demonstrated in Table 3 of this guidance. We welcome Policy H9 stating that the site is, or can be, connected to physical infrastructure including, among other matter, drainage. It should be noted that a private means of foul effluent disposal is only acceptable when foul mains drainage is not feasible (in terms of cost and/or practicality).

Historic England welcomes reference to protecting the natural, built and historic environment.

East Herts District Council considers that the Plan is not clear on its approach towards Gypsies and Travellers and Travelling Showpeople, in that the text does not actually identify clearly what the needs are. The Plan describes the number of people interviewed but does not state what number of plots or pitches the Plan requires nor whether there are sufficient allocations to meet these needs. A criteria based policy is insufficient if there are needs to be met. The Plan does not seek to make provision for those who no longer meet the Planning policy for traveller sites definition i.e. Non-Nomadic Travellers. It is therefore recommended that further evidence is undertaken to clarify the position of the 'unknown' households to ensure that appropriate accommodation options are planned for. (Paragraph 4.37)

Essex County Council comment that UDC should satisfy itself that the approach of not allocating any land is sound, deliverable and meets the requirements of national planning policy. **Chelmsford City Council** supports the Council in meeting its needs within its administrative boundary. **Basildon Council** object to the District's needs being met through a criteria based policy. Objections are raised because the evidence is based on a low number of interviews with gypsies and travellers; no consideration is given to the unmet need elsewhere in Essex. Uttlesford District Council is therefore formally requested to evaluate its evidence to determine whether there is the potential to assist in meeting the unmet need in Basildon for Traveller pitches prior to progressing their Local Plan to Regulation 19.

Henham Parish Council and **Ugley Parish Council** express concern that as the correctly defined need is not actually known. The text and policy needs to be along the same lines as Table 3.4 for housing; i.e. what is the need for the plan period as correctly defined; what existing commitments are; what is the remaining requirement and which sites are being allocated. **Arkesden Parish Council** supports the statement that there is no need for any additional pitches.

Saffron Walden Neighbourhood Plan Group, Stansted Mountfitchet Neighbourhood Plan Group and Thaxted Society support the policy.

Developers/landowners/site promoters

None received

Individuals

- The text lacks clear numbers on the 'need' for additional sites or any detail of where they might be located.
- While establishing criteria for future sites is welcome, it is important to identify potential sites so that the needs of travellers can be met within the time framework of the local plan. This is evidenced by incidents of travellers using car parks and other sites because of a lack of temporary and permanent site provision for gypsies and travellers.

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Significant, Temporal and Secondary Effects

The Policy will have numerous positive impacts on social and environmental criteria in line with the need to provide inclusive access to accommodation for the Gypsy and Traveller communities. The Policy responds to meeting Traveller accommodation needs, represents an efficient use of land, and ensures access to facilities and the protection of environmental assets. Uncertain impacts however have been highlighted regarding flood risk; the Policy includes that sites are not located in an area at risk of flooding, however could be expanded to indicate what would and would not be acceptable in regards to proportions of sites that experience flood risk issues. Flooding which is a key issue for such a land use and can be considered to be more of a constraint than more permanent built development and general flooding related policy.

Alternatives Considered

No sites for Gypsy and Traveller provision were forthcoming through the Council's most recent call-for-sites process, the principle of which was in part to identify land for such purposes. It is likely at this stage that the Garden Communities will be required to incorporate a level of Gypsy and Traveller accommodation provision in order to meet any identified needs within the plan period.

Proposed Mitigation Measures/Recommendations

It is recommended that the Policy is expanded to indicate what would and would not be suitable in any forthcoming applications regarding flood risk, in response to the significance of impacts that flooding can have on this specific form of accommodation.

Officer response

Proposed changes to plan

Accessible Homes and Housing for Older People Paragraphs 4.40 – 4.41 and Policy H10

This policy and supporting text was responded to by 26 people/organisations.

Support	3
Object	9
Comment	14

Overarching Summary

- Include reference to Independent Living
- Consider increasing the types of sites the policy applies to.
- Evidence supporting the policy is required.
- Policy for delivery of C2 class uses and specialist housing required.

Statutory consultees and other bodies

Essex County Council welcomes reference to lifetime homes that are adaptable across the life-course. ECC is seeking to develop a range of supported living options and to commission services to support people living independently for as long as possible. It is therefore recommended that the [ECC Independent Living position statement](#) (2016) be referenced within this section of the Local Plan. The following text is recommended for inclusion in the Local Plan. *‘Essex County Council is the provider of social services in the District. Its Independent Living Programme is encouraging the provision of specialist accommodation in Essex as a means by which older people can continue to live healthy and active lives within existing communities. For Uttlesford District, ECC has set the target of delivering 73 additional units of specialist accommodation (33 through rental and 40 through ownership) to enable older people to live independently within the community by 2020. This target is set out in Essex County Council’s Independent Living Position Statement (2016). This approach to meeting the specialist accommodation needs of older people is intended to reduce the demand for residential/nursing home care, which is a considerably more expensive way of meeting the needs of older people, and can unnecessarily restrict independence within this age group’.*

Saffron Walden Town Council considers that the policy is the equivalent of the former Lifetime Homes policy and should apply to all developments regardless of size. The percentage for Category 3 should be 15% for both market homes and affordable homes.

Elsenham Parish Council supports the policy and has frequently drawn attention to the need for a greater provision of private sector bungalows, and it is held that the policy should be amended accordingly.

Saffron Walden Neighbourhood Plan Group and Stansted Mountfitchet

Neighbourhood Plan Group comment that in spite of having same SHMA, East Herts does not differentiate between market and affordable housing. It should apply to all new housing regardless of size of development. Suggestion: 15% Category 3 for both affordable and market housing regardless of size of housing development.

Uttlesford Futures (Employment, Economy, Skills, Environment and Transport)

comment that some evidence shows that grandparents are moving to the area to help with childcare while parents work, another factor increasing number of older people in the area.

Thaxted Society supports the policy but object to the inclusion of the caveat of 'where it is not practically achievable or financially viable'.

Developers/landowners/site promoters

- There is no supporting evidence for the need for such housing and therefore the policy is not justified and should be deleted.
- The current whole plan viability assessment supporting the local plan fails to consider policy H10 on Accessible Housing. This optional standard will increase the cost of providing each dwelling. In particular the highest standard, M4(3), will add a substantial additional cost that must be assessed as part of the viability study.
- There is no reference to development for C2 use. Figure 40 of the SHMA (2015) suggests a significant increase in the communal population for Uttlesford in particular (542 additional persons) between 2011 and 2033. The Plan recognises the need for sheltered and extra care accommodation and Appendix 2 contains a target but does not provide policies to ensure this is met. The Plan it must include policies setting out how this extra care/C2 need will be met and such policies should also seek to ensure that sufficient provision is directed to rural settlement – it will not be appropriate to simply provide extra care accommodation in urban areas, as this would displace members of rural community requiring this form of accommodation.
- It is noted that the recent Inspector's Report into the Luton Local Plan recommended deletion of a similar policy in the absence of justification for the proportion of wheelchair user housing to be required (the Luton Local Plan requiring the same provision as the draft Uttlesford Local Plan). It is recommended that modifications are made to policy H10 to make clear that the proportions are not policy requirements.
- Lack of clarity as to how policy will relate to the Garden Communities and where this will be set out. The development framework is considered the most appropriate document
- Policy recognises particular housing design requirements, but ignores any location requirements. The District is predominantly rural and it is considered that there should be an additional Rural Exception Policy which includes an allowance for developments on sites which are well related to but beyond any settlement in order to provide accommodation which is accessible and adaptable for older people. In this way self-contained specialist housing (class C3) schemes and some care (class C2) schemes could be developed in all types of settlement which will encourage local people to downsize. Allowing, appropriate developments as exceptions will help to strengthen communities and make a valuable addition to the District's housing stock.
- Consider that the best approach towards meeting the diverse housing needs of older people is by having clear and specific policies that encourage the delivery of specialist forms of accommodation such as sheltered/ retirement housing and Extra Care accommodation. This is an expectation of the NPPG and possibly the subject of further legislation through the White Paper. In the interim, we would suggest that the Policy is prefaced as follows:

- *"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. The Council will, through the identification of sites, allowing for windfall developments, and/ or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."*

Individuals

- A link to the HAPPI website would be useful.
- Access to a small personal garden helps maintain independence, health and wellbeing in many elderly people and should be included in any development for this age group.
- Plan does not mention any care for old people in these homes. there does not seem to be A&E or care for the elderly.
- The policy should also control the location and relationship of such housing to facilities and open spaces with easy access to safe pedestrian/mobility scooter routes and taking into for example account steep hills, pavement widths, road traffic volumes on nearby roads.
- The presumption should be that sites in the heart of towns and near to shops should be set aside for the elderly and the infirm. A good example is Elm Grove (next to Waitrose) in Saffron Walden.
- The policy should omit the exclusion clauses in the last paragraph and the subject to viability in the second paragraph.
- All claims of 'financial unviability' should be tested by an independent advisor, in the employ of the Council (not proffered by the developer).
- There is a need for more bungalows
- It would be good to know where the Building Regulations Requirements can be found.
- Ensuring that houses can be adapted to meet the changing needs of occupants over time is good policy

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy will ensure positive outcomes for this type of accommodation need. Impacts are minor regarding housing delivery in reflection of meeting the needs of the specific demographic to which such accommodation relates. There will however be significant positive implications regarding social inclusion, through ensuring the delivery of accessible homes and bungalows that the market would otherwise not provide but for which there is an identified need.

Alternatives Considered

It is considered that any deviation from the Policy approach could be considered unsustainable in line with the demographic profile of the Plan Area or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer response

Proposed changes to plan

CHAPTER 5 EMPLOYMENT

General Comments

This supporting text was responded to by 8 people/organisations.

Support	0
Object	4
Comment	4

Overarching Summary

- Development of a large town centre at West Of Braintree Garden Community will adversely affect the viability of Braintree
- Aspiration to achieve one job per dwelling is quite ambitious and no evidence that this target can be met
- Only airport related business should be allowed at Stansted Airport
- There should be an oversupply of industrial space to depress land values and to keep rents low
- The Local Plan must be revised to reinforce a commitment to B1(c) and B2 businesses in all three garden villages
- Greater effort required to increase local employment opportunities to reduce long commutes
- Objection to over-reliance on Stansted Airport as a driver for job creation
- No sound assessments to evidence commercial viability of creating employment and retail investment and opportunities for residents of the new settlements that would prevent them from commuting and shopping in existing urban centres and thereby exacerbating already crowded streets and parking, and in Saffron Walden exacerbating illegal air quality hot spots

Statutory consultees and other bodies

WeAreResidents.org support comments made by Saffron Walden Town Council.

SERCLE note that a large single Town Centre provided as part of WoB could have a detrimental impact on the sustainability and vigorous activity of Braintree town centre and may well affect its viability. It is evident that WoB cannot not be self-sustaining given that it has limited employment opportunities, making it a dormitory settlement reliant on commuting. The major employer in the area is Stansted but WoB has no direct access to Stansted other than by road. The AECOM aspiration is to achieve one new job per one new dwelling is acknowledged by AECOM that this "employment scenario is quite ambitious and the achievability depends on many different factors, some of which are too difficult to influence." There is no real evidence presented that this employment target can be met. BDC's assumption that 25% of the community will work from home is completely unrealistic, unfounded and there is no evidence to substantiate that whatsoever.

Developers/landowners/site promoters

Policy EMP1 supported but have following reservations and suggestions:

- Only airport related business be encouraged at the airport
- Increased space allocation at Great Dunmow will attract staff from the immediate area of Braintree and take advantage of the road links offered by the A120/A12 to docks and M11 to London and the Midlands.
- Significant space allocation in the general area of the ill-conceived Uttlesford North would support start up and larger companies building on the innovation from the Cambridge science and technology
- Industrial space Class B2 in particular should be oversupplied in order to depress land values and keep rents low this will attract and keep businesses in the area

- Welcome the policy to allow conversion of redundant agricultural buildings but see no reason why demolition and replacement with more space and energy efficient replacements where they are considered to be suitable locations
- All new commercial buildings should require solar power and battery storage as it becomes more commercially available
- The B1383 (old A11) needs to be improved with the settlements bypassed to minimise the impact of HGV's and increased traffic on the existing settlements

Individuals

- The Local Plan, should continue to encourage manufacturing of products that take advantage of Britain's skill set as opposed to low cost mass market products
- The local plan must be revised to reinforce a commitment to B1(c) and B2 businesses in all three garden villages
- There should be a strategy to provide more employment and housing for people in CDE social classes
- Strategy should include better basic skills provision and greater technical skills provision
- Greater effort required to increase local employment opportunities to reduce long commutes
- Sections on employment and retail are aspirational and vague
- No sound assessments to evidence commercial viability of creating employment and retail investment and opportunities for residents of the new settlements that would prevent them from commuting and shopping in existing urban centres and thereby exacerbating already crowded streets and parking, and in Saffron Walden exacerbating illegal air quality hot spots
- Objection to over-reliance on Stansted Airport as a driver for job creation
- Jobs created at Stansted Airport are primarily low grade
- Overestimation of jobs growth has contributed to overinflated population growth projections
- Difficult to attract new employment to District
- High grade of initiative is required
- Failure of RDA initiative to achieve regional growth due to poor level of senior

Introduction

Paragraphs 5.1 - 5.3

This supporting text was responded to by 7 people/organisations.

Support	0
Object	2
Comment	5

Overarching Summary

- Rather than "in association with new garden communities", this should read "as an integral part of new garden communities". This would seem to be a basic requirement of GC principals and would also contribute to sustainability of GCs; and
- Not enough local business or employment opportunities to match the proposed housing. Job shortfall.
- This requires good transport links to the enterprise areas.
- The policy of settling 3 new garden communities in this area and attracting the amount of high skilled and high paid work to sustain this vast volume of people to the area is not borne out based on the council's current track record, where it appears to be a hugely reliant on commuting for the current residents. More towns are not the answer but a cohesive policy to attract good quality companies and work to the area to service the current growing communities and to relieve the need for commuting and

the pressures on the transport infrastructure. Basically to make us competitive to attract jobs, rather than build these new commuter towns in inappropriate locations increasing current North Essex issues!

- I am very concerned to see that projected employment numbers at Stansted Airport, which have previously been quoted as the raison d'etre for the new housing developments in Harlow, are now being recycled and reused as 'evidence' that the Easton Park development will also supply these same employees/jobs with housing.
- The draft Plan focuses discussion of employment largely on Stansted Airport and Chesterford Park. Many new employment site identified are small. Identifying larger potential employment sites should be a priority to attract larger businesses and a greater range of employment. The plan relies heavily on residents of new settlements working locally to achieve sustainable communities, but there is little detail on how this will be achieved. In North Uttlesford, there is the opportunity to bring in large numbers of high skill and ancillary jobs by attracting high tech companies from Cambridge, as we understand that some are now unable to find single sites there of sufficient size for their long term needs.
- This statement is the 'Aim' as laid out in the development strategy relating to Thaxted. It is detailed on page 12 of the strategy under the heading 'Town Centres' Query: What is tangible? How is this to be achieved in a market town with diminishing industry and agricultural land being utilised for new homes.

Statutory consultees and other bodies

Two – Littlebury Parish Council and Thaxted Parish Council

Developers/landowners/site promoters

None

Individuals

- Rather than "in association with new garden communities", this should read "as an integral part of new garden communities". This would seem to be a basic requirement of GC principals and would also contribute to sustainability of GCs.
- Key Areas of Concern: Not enough local business or employment opportunities to match the proposed housing. Job shortfall.
- This requires good transport links to the enterprise areas.
- The policy of settling 3 new garden communities in this area and attracting the amount of high skilled and high paid work to sustain this vast volume of people to the area is not bourn out based on the council's current track record, where it appears to be a hugely reliant on commuting for the current residents. More towns is not the answer but a cohesive policy to attract good quality companies and work to the area to service the current growing communities and to relieve the need for commuting and the pressures on the transport infrastructure. Basically to make us competitive to attract jobs, rather than build these new commuter towns in inappropriate locations increasing current North Essex issues!

Sustainability Appraisal June 2017

Not applicable

Employment Land Requirements

Paragraph 5.4 – 5.10

This paragraph was responded to by 4 people/organisations.

Support	0
Object	1
Comment	3

Overarching Summary

- Please state where the Employment Land Review Update 2017 can be found.
- As currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMP1 and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Para 5.4 - Revise to include the following sentence after the fifth bullet point: It is also acknowledged that other appropriate sui-generis and complementary employment generating uses may be permitted within employment areas as guided by EMP1 and EMP2.
- The ELR seems to be based upon a direct link between population growth and employment requirement - this takes no account of the expansion requirements of existing business or inward migration (e.g. from NE London or Harlow) of businesses looking to locate in the District. Local and highly respected commercial agents, Coke Gearing has advised the respondents that it is their experience through the many enquiries they receive that urgent provision of sites is needed now to meet a known demand.
- Timeframes for the delivery of the floorspace figures quoted under Paragraph 5.7 should be specified, given that UDC has a vested interest in the delivery of the site.
- Predicted 900 jobs at Great Chesterford Research Park should not be used as a justification for the allocation of North Uttlesford Garden Village (NUGV).
- Whether the risk posed by Brexit and the impact this will have on employment and housing need has been considered.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

- Policy EMP1 and EMP2, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMP1 and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Para 5.4 - Revise to include the following sentence after the fifth bullet point: It is also acknowledged that other appropriate sui-generis and complementary employment generating uses may be permitted within employment areas as guided by Policies EMP1 and EMP2
- The respondents object to the Plan on the following basis :- Paragraph 5.4- The ELR seems to be based upon a direct link between population growth and employment requirement - this takes no account of the expansion requirements of existing business or inward migration (e.g. from NE London or Harlow) of businesses looking to locate in the District. Local and highly respected commercial agents, Coke Gearing has advised the respondents that it is their experience through the many enquiries they receive that urgent provision of sites is needed now to meet a known demand.

Individuals

- Please state where the Employment Land Review Update 2017 can be found.

- It would have been useful if the numbers quoted had timescales attached so that future relative to what can be assessed. The vested interest of UDC make this more important information.
- Predicted 900 jobs at Chesterford Research park does not warrant the building of a North Uttlesford Garden Village (NUGV). Given that Chesterford Research Park is the largest local employer to NUGV one can only surmise the dwellings will be purchased by commuters to Cambridge and London. Therefore not meeting an Uttlesford housing need.
- Has anyone considered the risk posed by Brexit on future estimates of employment and housing need? It is possible according to some that there will be severe economic consequences resulting from Brexit and it is likely that the mix of industry in the country will change. Particularly financial services and other London-focused industries. I feel there is good reason to be extremely cautious about the proposed scale of development.

Sustainability Appraisal June 2017

Not applicable

Jobs Growth

Paragraph 5.11 – 5.15

This paragraph was responded to by 7 people/organisations.

Support	0
Object	4
Comment	3

Overarching Summary

- The difference of 10 JPA between the Medium and High Growth scenario's is doubtful;
- The number of new jobs does not equal the number of houses proposed;
- Significant numbers of extra jobs will need to be provided throughout the district to avoid the planned additional housing simply increasing out commuting;
- The figures provided are broad assumptions without evidence;
- Concerns that growth is based on unreliable figures of employment. The STAL projection provided in its G2 application of 15,300 jobs looks more accurate.
- The figures provided are broad assumptions without evidence.
- Where can the BRES be found?
-

Statutory consultees and other bodies

- Littlebury Parish Council
- Takeley Parish Council
- **STANSTED AIRPORT** - There are concerns that growth is being based on unreliable figures of employment. The figure of 8,000 extra jobs comes from a report for UDC by consultants Hardisty Jones (being an increase from 10,000 jobs in 2011) whilst this appears fairly relative as the estimate of 18,000 jobs for 35mppa (as indicated from Stansted Airport employment survey) appears too high. The STAL projection provided in its G2 application of 15,300 jobs looks more accurate. In the 2015 Stansted Airport employment survey only 18.3% of airport employees are Uttlesford residents (A figure which includes overseas workers living in temporary rented accommodation in Uttlesford). It should be noted that the latest employment statistics (June 2017) show unemployment in Uttlesford at just 2.1% compared to the national average of 4.7% and a claimant count for

unemployment benefits of just 245 (0.5%) in UDC compared to a national average of 1.9%. The Airport Employment survey done in 2015 said only 18.3% of its employees lived in Uttlesford. Therefore the need to ensure transport links are sustainable is a greater priority.

The District already has high numbers of out-commuters. It is our view that this reflects both the high local skill base mentioned in the plan but also limited local employment opportunities. Significant numbers of extra jobs will need to be provided throughout the District to avoid the planned additional housing simply increasing out commuting. Appendix 4 states that at least one new job should be created in new settlements for every home built. Increasing the number of jobs over and above the numbers of new homes would enable out commuting to be reduced, improve job opportunities for all residents and the sustainability of the local economy.

Developers/landowners/site promoters

Paragraphs 5.11/12/13- these seem to be broad assumptions without evidence?

Individuals

- Doubts over the numbers given that high growth is shown as only 10JPA above medium growth. I would have expected medium growth to be between 400 and 550JPA.
- In section 19 it states "New Garden Cities must provide a full range of employment opportunities, with the aim of no less than one job per new household." The number of new jobs quoted here does not equal the number of houses proposed.
- Where can the BRES be found?

Sustainability Appraisal June 2017

Not applicable

Office Floorspace Requirements

Paragraph 5.16 – 5.17

This paragraph was responded to by one individual.

Support	0
Object	0
Comment	1

Overarching Summary

- Where can the ELR and Employment Land Monitoring be found?

Statutory consultees and other bodies (Arial, sentence case, size 11)

None

Developers/landowners/site promoters

None

Individuals

- Where can the ELR and Employment Land Monitoring be found?

Sustainability Appraisal June 2017

Not applicable

Industrial Land Requirements

Paragraph 5.18 – 5.21

This paragraph was responded to by 6 people/organisations.

Support	0
Object	0
Comment	6

Overarching Summary

- There is a surplus of vacant new warehousing space at London Stansted Airport. Takeley PC does not believe that new warehousing should be built elsewhere within its parish and that there is a suitable area within the airport to provide for ancillary businesses of the airport.
- Local Plan should make provision to encourage occupation of these units. Perhaps reduced rates for a period of time? Offer business incentive? Policy should reflect the commercial market need.
- Local Plan should provision alternative sites for office accommodation for SW. Industrial/warehouses should be converted to office accommodation to reflect market need.
- Need to identify appropriate mitigation measures to improve the capacity of the junction 8 of the M11 to take account of the cumulative impacts of growth from residential and airport related development, including aspiration for 'strategic' warehouse and distribution depots
- Saffron Walden is blighted by failure of successive administrations to address the traffic flow and pollution issues through the town. There is poor access for commercial vehicles leading to loss of retail opportunities, and poor facilities for visitors to the centre.
- The difficulty of accessing the M11 from Saffron Walden suggests that efforts be made to secure a junction nearer the town. But, it could be argued that not having a junction close to the town eases development pressures.

Statutory consultees and other bodies

Takeley Parish Council - It is noted there is a surplus of vacant new warehousing space at London Stansted Airport and little prospect of the un-used and under-used parts of the northern ancillary area at the airport being brought into beneficial use in the early part of the Local Plan. In light of this, Takeley PC does not believe that new warehousing should be built elsewhere within its parish and that there is a suitable area within the airport to provide for ancillary businesses of the airport.

Saffron Walden Town Council

- (Para 5.20 Bullet Point 3) Noting the excess in industrial and warehouse units in SW. What policies are in place to address that? Is this being addressed via the UDC Economic Development team?
Proposed Change: Local Plan should make provision to encourage occupation of these units. Perhaps reduced rates for a period of time? Offer business incentive? Policy should reflect the commercial market need.
- (Para 5.20 Bullet Point 2) **Comment:** Regarding employment, notes there is an acute lack of modern office accommodation in SW. The Local Plan should therefore seek to look for alternative land on the outskirts of town? **Proposed Action:** Local Plan should provision alternative sites for office accommodation for SW. Industrial/warehouses should be converted to office accommodation to reflect market need.

East Hertfordshire District Council - The Plan states there is an aspiration for 'strategic' warehouse and distribution depots in locations with ready access to Junction 8 of the M11. Linked to the comment on Policy SP11, such aspirations will need to take account of the cumulative impacts of growth from residential and airport related development within East Herts and Uttlesford districts on the junction and the need to identify appropriate mitigation measures to improve the capacity of the junction.

Developers/landowners/site promoters

None

Individuals

- Saffron Walden is blighted by failure of successive administrations to address the traffic flow and pollution issues through the town. There is poor access for commercial vehicles leading to loss of retail opportunities, and poor facilities for visitors to the centre.
- The difficulty of accessing the M11 from Saffron Walden suggests that efforts be made to secure a junction nearer the town. But, it could be argued that not having a junction close to the town eases development pressures.

Sustainability Appraisal June 2017

Not applicable

Opportunities within Existing 'Clusters' assessed in the ELR

Paragraph 5.24 - 5.27

This paragraph was responded to by one organisation.

Support	0
Object	0
Comment	1

Overarching Summary

- Note that the Printpack factory is a safeguarded employment site as per Appendix 6;
- Saffron Walden Business Centre not shown as an existing employment site on the Saffron Walden inset map, whilst it is shown as an Existing Employment Site in Appendix 6 (Site 18);
- The boundary of the Business Centre should be expanded to include the Homebase store.

Statutory consultees and other bodies

Saffron Walden Town Council

Note that the Printpack site is a "Safeguard employment site" as per Appendix 6. This paragraph notes that "these sites will be retained for employment use as described under policy EMP1" It is interesting it does not include the current Homebase Site as employment land. Conclusion: Error in Maps as the SW Business Centre (behind Homebase) is not shown on the employment map. We insist that the land currently occupied by Homebase is also included in the employment land map.

Developers/landowners/site promoters

None

Individuals

None

Sustainability Appraisal June 2017

Not applicable

Existing Commitments

Paragraph 5.28

This paragraph was responded to by one individual and one organisation.

Support	0
Object	1
Comment	1

Overarching Summary

- Where is the latest monitoring data?
- Great Chesterford Research Park (GCRP) and land at London Stansted Airport is not suitable for larger shed development. GCRP the site is not suitable for larger shed development and land at the airport is subject to significant constraint.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

Paragraph 5.28 “ The respondents remind the Council that these sites have already been developed and are now occupied. Whilst the Council acknowledge that new employment land needs to be allocated for future demand, which has been calculated as 10.2 ha up to 2033, the current demand, which is significant, is not being met with a ready supply of good quality employment land, as a result, the Council is missing out on job creation opportunities. The draft plan makes provision for an additional 10.2 ha, which is to form part of allocations at existing sites at Chesterford Research Park and at London Stansted Airport (Northern Ancillary Area). In the case of the former, the site is not suitable for larger shed development, which is in demand now, and in the case of the latter, the availability of land here is subject to significant constraints, see Para 3.6 below.

Individuals

Where is "The latest available monitoring data (April 2016)"?

Sustainability Appraisal June 2017

Not applicable

Saffron Walden

Paragraph 5.29

This paragraph was responded to by one individual

Support	0
Object	0
Comment	1

Overarching Summary

- What information is there on the number of people working from home and how this maybe supported, as this can help reduce traffic.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

None

Individuals

Is there any information available on the number of people working from home, mainly using IT, and how this may be supported? It does reduce traffic.

Sustainability Appraisal June 2017

Not applicable

Gaunts End, Elsenham

Paragraph 5.31

This paragraph was responded to by one individual and four organisations.

Support	0
Object	4
Comment	1

Overarching Summary

- What information is there on the number of people working from home and how this maybe supported, as this can help reduce traffic?

Statutory consultees and other bodies

Elsenham Parish Council - Gaunts End, Elsenham, is within Stansted Airport Countryside Protection Zone, and as such it should not attract further development.

Developers/landowners/site promoters

What is planned for around Elsenham and sites close to the station?

- Paragraph 5.31 this site is poorly located in terms of transport (other than car) and is the wrong side of the airport- the development is stalled due to lack of occupier interest (it is not 40% pre let).
- Comments Cheergrey Properties wish to object to the latest proposals for their site at Elsenham in the Regulation 18 Local Plan (the current draft Local Pan). The current draft Local Plan only

identifies a small and incomplete part of the overall site as an employment site (policy EMP1) rather than the site as a whole, which was shown in previous versions of the Plan. The property is referred to throughout the draft plan as either Elsenham Industrial Estate or Gaunts End. Please note that our preference is to refer to the site as City Meadows, Elsenham and this is how we shall refer to the site in this report. For the avoidance of doubt, the land which we are referring to, and which we submit should be allocated as an employment site in its entirety, is shown below in Figure 1.

- Figure 1, City Meadows, Elsenham. There has been a long process of Plan development leading up to the current draft Local Plan and extensive discussions with Cheergrey Properties in relation to the Plan and the TriSail development (approved in April 2012). Throughout that period the Council has been supportive of Cheergrey's plans for further development of the wider site until, without explanation or justification, the current draft Local Plan fails to allocate the site for development. Cheergrey Properties has had a legitimate expectation that the site would continue to be allocated for development and has invested considerable resources in providing infrastructure for growth and in preparing a planning application and EIA to further develop the site as a mixed use economic centre. This work and investment has been undermined by the recent change of policy. The current draft Local Plan fails to provide any explanation or evidence for this change of policy and, indeed, the evidence base on which the Plan is supposedly based provides compelling reasons why the site should continue to be allocated. It appears that the Council has failed to understand the vision for the site, the drivers of the local economy and the opportunity for inward investment and employment growth that further development here would provide. We expand on these points below. Change of Policy Cheergrey first made representations on the draft Uttlesford Core Strategy in November 2007 and again in April 2010. These comments identified the need and potential to allocate further employment land at City Meadows, Elsenham. In support of this we submitted to the Council a Masterplan which explained our vision for creating a mixed use economic centre for the 21st century. In April 2011 the Employment Land Review Report acknowledged that the existing estate is functioning well and recommended the allocation of further land for B1 business development, noting that development in this location is accessible by bus which provides direct links to Elsenham, Stansted Airport and Stansted Mountfitchet. The first phase of the Masterplan, the TriSail Towers, was approved by the Council in April 2012. This comprises 8370 sqm. of prestige office development in three interlinked buildings, with a mix of ancillary supporting uses at ground floor level, including a food retail outlet, a cafe, dentist and health spa. TriSail Towers is under construction and currently scheduled for completion in 2018. Following further discussions with the Council, the wider site within Cheergrey ownership was allocated for B1 business development in 2012 in Policy S2 of the Uttlesford Draft Local Plan. The Plan stated that the prestigious development planned in this location would have the potential to bring substantial economic benefits and would be likely to attract further investment and Elsenham Local Policy 4 contained detailed criteria to be complied with in developing the site with which we agreed. This site allocation was taken forward into the next version of the Plan, the Uttlesford Local Plan - Pre-Submission Consultation, April 2014, in which Elsenham Policy 7 allocated the site for B1A business use (Figure 2). Figure 2 Previous Local Plan Allocation. Elsenham Policy 7 stated that the following criteria must be met: The development will be of a high architectural standard of design which constitutes a prestigious development that may facilitate the attraction of headquarter offices; The development minimises the need for travel by private car by improving the bus service to and from the site; The development is acceptable in terms of its design, materials, traffic generation, impact on the landscape, effect on the operation of Stansted Airport and any other relevant planning considerations; The development should include landscape screening along the boundaries of the site; The development will facilitate the implementation of any associated road improvements that are necessary as a consequence, and The development is designed to mitigate adverse effects upon existing residential and community interests and may be required, by legal agreement, to provide or contribute towards wider and longer term planning benefits reasonably associated with the alleviation of any such impact. The application should be accompanied by a Transport Assessment, Approved Drainage Strategy and other required documents and any recommended improvements/remedial works will be controlled through the legal obligation. Development will need

to be implemented in accordance with the Master Plan and design guidance approved by the Council and other Development Management policies. Implementation of the Master Plan proposals will be regulated by legal obligation in association with the grant of planning permissions. Cheergrey welcomed this allocation and these criteria and successfully made representations that the policy would be strengthened if reference was also made to ancillary mixed use development as well. We reiterated that this has always been an integral part of our vision for the site, to create a high quality business and employment destination, and that a range of ancillary support uses are necessary to effectively deliver that vision, such as the ancillary retail and service uses which were planned as part of TriSail Towers. The Council accepted these arguments and the Schedule of Proposed Minor Modifications, in July 2014 amended the policy wording of Elsenham Policy 7 to include reference to ancillary supporting mixed uses. At the Examination of the Local Plan on 21 November 2014 Cheergrey gave evidence in support of the Local Plan employment strategy. Although the Plan was subsequently withdrawn because the Inspector had concerns relating to the housing strategy and Sustainability Appraisal it is noteworthy that he had no concerns with the proposed site allocation at City Meadows, Elsenham and referred to the Employment Land Review as a good example of its kind, that it provides a clear market-based picture of the types and locations of sites which should be newly allocated and he noted that the main recommendations of the report are generally taken forward into the plan. In 2015 there was a further Call for Sites and Cheergrey again submitted representations to support allocation of the wider site at City Meadows, Elsenham (Figure 1). These were supported by the Council and the representation was classified as site 01Els15. The conclusions of the Council's assessment in 2016 were that the site is available and development is achievable subject to detailed highway assessment. Given this supportive policy background, and in consultation with Council officers, Cheergrey began preparation of a further planning application for the site as a whole. This is to be a hybrid planning application, comprising a detailed planning application for a hotel and conference centre and an outline application for business uses and ancillary mixed uses on the remainder of the site. The proposed hotel would contain 250 bedrooms and include retail areas, a sports clinic and fitness suite. The proposed conference centre would be capable of accommodating 500 to 1000 people and it is envisaged that this could be used to host events, such as sporting events like badminton tournaments, or chess tournaments as well as conferences. In March 2016 WSP, on behalf of Cheergrey, outlined the scope of this planning application and requested an EIA Scoping Opinion. The Council responded in June 2016 indicating the scope of the required EIA (reference UTT/16/0709/SO). There was no further communication from the Council until the current draft Local Plan was published which failed to re-allocate the site. Since 2012 therefore there has been consistent policy support from the Council for the development of the site as a whole, both in the context of the various iterations of the draft Local Plan and in discussions with Cheergrey regarding a further planning application. Based on this engagement, Cheergrey has had a legitimate expectation that the whole site would be allocated for employment uses and has invested considerable resources in providing the infrastructure for growth and in undertaking work towards a planning application and EIA. This is now at risk since the Council has, very belatedly, appears to change its position, despite the very positive engagement it has had with Cheergrey over several years. Inconsistency with evidence base The evidence base for the current draft Local Plan strongly supports the allocation of further land at City Meadows, Elsenham. Firstly the draft Plan itself states in para. 5.31 that Planning permission has recently been granted for a substantial B1 (a) office development next to the established industrial estate in this location (Trisail Towers). This prestigious office development has the potential to bring substantial economic benefits and is likely to attract further investment. The current draft Local Plan is also linked to an Economic Development Strategy for 2016-18 which includes the following aims for the district: Promote specific and targeted propositions to attract inward investment and facilitate local business expansion Year on year increase in the number of people visiting Uttlesford Cheergrey is an established local business with plans for expansion and a successful track record of delivering inward investment in the Water Circle and at TriSail. Moreover, Cheergrey has now attracted the interest of a well-respected hotel operator in developing a hotel/conference facility so it is clear that both of these aims from the Economic Development Strategy would be achieved by retaining the

allocation at City Meadows, Elsenham. The detailed analysis on which the Plan's economic strategy is based is contained in the various employment land studies which the Council has commissioned over the years. Dating as far back as 2011, every one of these has recommended allocation of further land at City Meadows, Elsenham. The most recent of these is the Uttlesford District Employment Land Review Update (ELR), 2017 which is consistent with the earlier version of the ELR from 2016. Para. 8.2.1 of the 2017 ELR Update states The provision of larger office premises is limited, although recent developments such as at Parsonage Road Business Centre (C31) and Gaunt's End Industrial Estate (C5) are well occupied and indicate a demand for new office floorspace within the District. Developments such as TriSail Towers which is currently 40% pre-let also points towards a sustained demand for new high grade office floorspace, particularly within the south of the District in proximity to Stansted Airport. Para.8.2.4 states Access to strategic road networks and proximity to Stansted Airport within the south of the District indicates that this area is most likely to capture commercial interest in Uttlesford's office market. It will be important, in order to meet this requirement, that the District is able to safeguard and encourage a wide range of premises that cater for the varying types of existing and emerging demand. Para. 8.2.8 states there are a number of strategic development sites within proximity of Stansted Airport which could meet requirements for larger, Grade A office stock. These sites could provide opportunities for existing medium and large office occupiers within the District to grow as well as attracting inward investment from occupiers looking to capitalise on the strategic road connections within the south of the District. Consequently in section 8.3.3 the ELR recommends the allocation of B1 a/b Use Classes on Land at Gaunt's End / Elsenham Meadows (Call for sites 01Els15 and 10Els15). It states that The provision of new office space should complement existing provision and help to support and encourage a range of businesses to grow and invest within Uttlesford from start-up, micro, small to medium sized enterprises as well as larger businesses, should interest be received. The justification given for this in para. 8.3.7 is that Land north east of Elsenham (Call for sites 05Els15, 06Els15 and 07Els15) which forms part of a larger strategic mixed use proposal which could accommodate new B1 floorspace within a highly accessible location in an area of new residential growth Recommendation R4 relates to B1c, B2 and B8 Use Classes and states that the Council should support the development of employment clusters which are currently functioning well as employment locations but which have vacant land, land with derelict buildings or have underutilised land and premises. These locations could include C5 Gaunt's End Industrial Estate. Note these references are to City Meadows, Elsenham despite the confusing nomenclature used. Retention of the allocation of further employment land at City Meadows, Elsenham would therefore be consistent with every Employment Land Review which has been undertaken on behalf of the Council since 2011, with the conclusions of the Inspector who examined the 2014 Local Plan and with the Council's own Economic Development Strategy. Para. 5.4 of the current draft Local Plan states that The policies in the Local Plan have had full regard to the Employment Land Review Update 2017, yet this is clearly not the case. The failure of the Plan to re-allocate the City Meadows, Elsenham site is inconsistent with the Council's own evidence base on which the Plan is supposed to be based. Flawed methodology in the Plan The failure to allocate the site as a whole for employment uses seems to be based on a numeric projection the Council has undertaken of future employment need which quantifies future office space demand as some 21,000 sq.m. However, this whole approach is flawed and fails to understand the opportunity and locational advantages presented by high quality sites such as City Meadows, Elsenham which are close to London Stansted Airport and with good strategic accessibility. The ELR has highlighted the poor quality of much of the office stock in Uttlesford, that the office market is under-represented compared with the rest of the region and that there are high levels of out-commuting. The Plan forecast of future employment needs is based on the medium growth scenario from the ELR which is based on the historic share of regional employment which Uttlesford has provided (current draft Local Plan para. 5.11). This trend based projection seriously underestimates the true potential for future growth since it is based on an existing baseline which is so low. This approach would merely perpetuate the existing unsatisfactory position and lacks ambition. There is no recognition in the Plan of the potential to create any new demand which would diversify the existing employment base. Cheergrey has demonstrated with the

Water Circle and TriSail that it is possible to stimulate new demand in the right location and with high architectural and environmental standards. This type of 21st century, mixed use business cluster is not fully factored into the Plan projection, which is based on the current poor quality office product in the District. This means that it is highly likely that the Plan will fail to achieve the important objective which is clearly stated in the Economic Development Strategy to attract inward investment and facilitate local business expansion. Opportunity for Inward Investment Cheergrey has demonstrated with the Water Circle and TriSail development that there is a demand for high quality office space set in an attractive, mixed use business location and has been able to create a demand and a new product which does not exist elsewhere in the District. The Plan takes no account of this type of commercially driven demand. The proximity to the M11/A120 corridor and London Stansted Airport is a major benefit of this location, since Stansted is a core public transport hub with excellent connections by road, rail, air and bus services. This location is particularly attractive to larger, high value businesses, serving a regional or national market, that want to expand their operations or move away from central London and international businesses, attracted by the proximity to London Stansted airport. This is demonstrated by the fact that two new tenants have located at the Water Circle Building in anticipation of moving to TriSail once completed; namely Swedish medical IT innovator Sectra which has established its new UK headquarters at Elsenham and Fortis, which is part of the CF Capital Group. The Estate has space to grow to provide further high quality, modern accommodation in an attractive location, and the available land is in the ownership of an established developer with a proven track record of delivery. All these factors are likely to prove highly attractive to the market and will ensure a successful development which will help to transform perceptions of the employment market in Uttlesford. The Plan also fails to address the need identified in the Economic Development Strategy to increase the number of people visiting Uttlesford. Tourism development is dealt with in the Plan as a sub-set of retail development and the only policy dealing with it is policy RET3 which expresses support for tourism functions within town and local centres. Surprisingly, given the economic potential, there is no explicit policy dealing with tourism accommodation. Cheergrey has identified a need and opportunity to provide a high quality business hotel, linked to the accessibility provided by the transport hub at London Stansted Airport and has an initial agreement with an International Hotel Operator to operate a five star hotel & conference centre at Elsenham Meadows. These proposals are being developed as part of our forthcoming planning application for the site as a whole and would provide a major stimulus to the tourism sector in Uttlesford. The Cheergrey Vision for City Meadows, Elsenham The site has an established history of employment activities which extends back at least as far as the 1960s. Planning permission was granted on 9th January 1969 for the extension of the jam factory (ref SWR/0255/68). Planning applications securing ongoing enhancement of the Elsenham Estate over time have included the provision of a new entrance road and access infrastructure (approved on 16th October 1985, ref UTT/0988/85). Most recently, a series of major planning approvals have enhanced and expanded commercial operations on the Estate. On 23rd December 2002, planning permission was granted for the Water Circle development, comprising the erection of a building to house a water bottling plant, offices and the creation of new access and parking provision (ref UTT/1184/02/FUL). On 24th May 2006, planning permission was granted for the erection of the second storey office extension to the Molton Brown building (ref UTT/0546/06/FUL). In April 2012 planning permission was granted for TriSail comprising 6,978 sq.m. of offices and 1,396 sq.m. of ancillary mixed retail, cafe/restaurant and health spa facilities, together with underground parking, landscaping and ancillary works (ref UTT/1473/11/FUL). Currently the site is home to a mix of manufacturing, research, offices and development uses, including Elsenham Water Ltd, Cheergrey Properties, ABF/Elsenham Quality Foods Ltd, IT company Hytek, Molton Brown/KAO, Swedish medical IT innovator Sectra and Fortis, which is part of the CF Capital Group. These businesses are all thriving and contributing to the local economy. Currently the site provides employment for some 500 local people. The TriSail development is seen as the first phase of the development of the overall Masterplan for the site, originally submitted to the Council in 2011. TriSail will comprise modern, high-quality business space of exceptional design quality. The design is of an iconic and visually outstanding quality, comprising three inter-connected buildings and sky bridges, with an oval

footprint. The buildings are 7, 6 and 5 storeys respectively with associated parking to the north of the site in an underground structure with a landscaped roof. The elevations of the buildings are characterised by tilted and curved elevational forms and extensive use of glazed finishes. The buildings are set within an area of lowered ground, which would help to blend the buildings into the wider landscape and make efficient use of the land. Figure 3 TriSail Towers TriSail Towers inspired by billowing sails, iconic design that offers a new Financial and Commercial Centre / district for London Stansted. The existing Estate has been developed in a sustainable manner with a series of unique, high quality designs. The new development of TriSail is being planned to meet BREEAM excellent standards with on-site renewable energy and grey water systems. The site as a whole incorporates generous landscape bunds and planting and a range of outside amenities including wild flower meadows, jogging trails, picnic and recreation areas. A new roundabout junction and access road has been constructed as part of the TriSail development and public transport services are being enhanced with a dedicated public transport connection to London Stansted Airport. This also has sufficient capacity for the first phase of the new development. For subsequent phases there are opportunities to develop a new access road to the M11, in conjunction with London Stansted Airport and an adjacent landowner, which are being actively pursued. Cheergrey's vision for the site as a whole is to create a mixed use, high quality business location, building on the high architectural and environmental standards which have been established with the Water Circle and TriSail. This vision was summarised in the scope of the hybrid planning application which was outlined to the Council in the EIA scoping request in 2016. This indicated the following areas for the site as a whole Total site area 19ha Existing developed area 4.26ha Future development area 10.51ha Landscape and open space 4.23ha. The plots for future development consist of 5 parcels of land and have already been laid out in outline form. These are summarised below and shown on Figure 4. Plot 2a detailed application 13,652 sqm Hotel and Conference Centre Plot 2b detailed application 13,119 sqm Plot 2c outline application 14,059 sqm Mixed use Plot 3a outline application 12,277 sqm B1 Plot 4a outline application 9,213 sqm B1 Plot 4b outline application 12,602 sqm B1. Figure 4 Future Development Plots at City Meadows, Elsenham. It is the intention to develop the detailed scope of the outline elements of the development in the context of the EIA and in discussion with the Council. The proposed mixed uses are a key aspect of the vision for the site. This is necessary if this site is to meet its full potential as an employment location since ancillary mixed uses are an essential requirement for high-end, demanding business users these days such as gyms, retail and restaurant facilities. In this location too our market intelligence suggests that, as well as a high quality hotel and Conference Centre, there would be a strong demand for an element of serviced accommodation for short term rentals, which would be managed as part of the hotel. This would reinforce the attractiveness of this site, and Uttlesford District, as a business location and destination. The profile of firms likely to move to the site are expected to be mostly larger, high-value firms from the sector that will benefit from the site's strategic accessibility. Key sectors include: Financial and Business Services Consumer Goods Media and Entertainment (including hotel/conference facilities) Professional Support services (Consulting and Public Sector) Computing and Communication We plan to demonstrate this shortly as we build out the TriSail development and bring new, high quality, employers to the District. This is a large, attractive site, in the ownership of an established developer situated within the M11/A120 corridor and close to London Stansted Airport, a major transport hub. The site is capable of becoming a significant employment cluster and can be brought forward for delivery during the Plan period. The further allocation of employment land at City Meadows, Elsenham would be of strategic significance to the District in helping to further diversify Uttlesford's business base, by attracting inward investment, particularly from international businesses and regional corporate headquarters and back-office facilities. The proposed allocation site is adjacent to existing businesses at Elsenham and a safeguarded employment site and is the next logical phase in the development of the overall Estate. The land is in the single ownership of an established developer with a proven record of delivery. Many other employment sites within the District are either poorly located, in historic settlements or in unsuitable buildings which do not meet modern requirements. The proposals offer an opportunity to create a cluster of business and employment sites which will set a new benchmark for the

District. Uttlesford residents have high levels of skills and qualifications which will enable them to take advantage of the new employment opportunities to be created, thereby reducing levels of out-commuting which are currently at unsustainable levels. A cluster of mixed use, employment development here would create a new economic centre in the south of the District, that will complement the science and research activities provided at Chesterford Research Park. Summary Cheergrey objects to the latest proposals for their site at City Meadows, Elsenham in the current draft Local Plan, which only identifies a small part of the overall site as an employment site rather than the site as a whole which was shown in previous versions of the Plan. Change of Policy. Throughout the long period of Plan preparation the Council has been supportive of Cheergrey's plans for further development of the wider site until, without explanation or justification, the current draft Local Plan fails to allocate the site for development, despite being endorsed by the Council in the local Plan process in 2012, 2014, 2015 and 2016. We are at an advanced stage in the process of preparing a planning application and EIA for further development and the recent apparent change of policy has created uncertainty and confusion, which needs to be rectified. Inconsistency with evidence base. There are numerous references in the Plan itself and the Council's own Economic Development Strategy which support further development including references to Trisail as a prestigious office development which is likely to attract further investment. In addition, every Employment Land Review which has been undertaken on behalf of the Council since 2011 has recommended allocation of further land at City Meadows, Elsenham. Moreover, the Inspector who examined the 2014 Local Plan (which allocated the site) found the employment aspects of the Plan to be sound. Flawed methodology in the Plan. The Plan forecast of future employment needs is based on the historic share of regional employment which Uttlesford has provided. This trend based projection seriously underestimates the true potential for future growth since it is based on an existing baseline which is very low. This approach lacks ambition and does not recognise the potential of City Meadows, Elsenham to attract inward investment and stimulate and diversify the current employment base. Opportunity for Inward Investment. Cheergrey has demonstrated with the Water Circle and TriSail development that there is an opportunity to attract significant inward investment to the District with high quality, flexible office space set in an attractive, mixed use business location. The proximity to the M11/A120 corridor and London Stansted Airport is a major benefit of this location, since Stansted is a core public transport hub with excellent connections by road, rail, air and bus services. Cheergrey Vision for City Meadows, Elsenham. Cheergrey's vision for the site as a whole is to create a mixed use, high quality business location, building on the high architectural and environmental standards which have been established with the Water Circle and TriSail. This is a large, attractive site, in the ownership of an established developer. This location is particularly attractive to larger, high value businesses, serving a regional or national market, that want to expand their operations or move away from central London and international businesses, attracted by the proximity to London Stansted airport. The further allocation of employment land at City Meadows, Elsenham would be of strategic significance to the District in helping to further diversify Uttlesford's business base. In conclusion we object to the current version of the draft Local Plan and urge the Council to reinstate the allocation of our land at City Meadows, Elsenham (Figures 1 and 2) in accordance with the evidence base and with our legitimate expectations. We note that the Plan is draft form and that in the publicity surrounding the launch of this consultation the Council has pledged to make any necessary changes to the draft Local Plan before it goes out to public consultation again early in 2018 (Uttlesford life summer 2017). Councillor Rolfe, the Leader of Council has stated that Officers have looked very carefully at all the options and alternatives, and have made their recommendations based on planning evidence. This is not the final draft of the plan, but a set of recommendations. Getting the public's constructive feedback will be a key part of the process as we continue to shape the Plan. We urge you to consider this representation in this light and to respond positively to our constructive feedback.

- As Gaunts End is within the CPZ, there should be a stop on further development beyond that which has already been approved, particularly in view of the acute difficulties in road access as highlighted by two government inspectors.

Sustainability Appraisal June 2017

Not applicable

Start Hill, Great Hallingbury

Paragraph 5.32

This paragraph was responded to by one organisation.

Support	0
Object	1
Comment	0

Overarching Summary

- Given that Start Hill has now been fully developed, the ‘Vision Stansted’ site (Land west of Bedlar’s Green, Great Hallingbury) should be allocated for employment purposes.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

Paragraph 5.32 this is the Vision Stansted site, which is now fully developed and occupied. This site was put forward in a similar way to the respondents site in representations made to the draft Plan in 2012. It was subsequently allocated, an application made for its development, approval granted, the development was started immediately. The site is now fully built out and occupied by businesses that have moved into the area. Better than anything else perhaps, Vision Stansted provides evidence of demand from outside the District, it also demonstrates the popularity of the location and its proximity to J8 of the M11. The respondents and their advisors are supremely confident that an allocation on the respondents site would prove equally successful, not least because there are no similar sites that are available in the District, which are available now, in the right condition and location. The ELR makes the very point in its para 9.3.19, which states: Start Hill south of the B1256 adjacent to the Stansted Distribution Centre, Start Hill in particular offers a strategic location within close proximity to both Stansted Airport and Junction 8 of the M11 which would be very attractive to potential warehouse and distribution occupiers. □ The statement above exactly mirrors the attributes of the respondents site at Start Hill. There is no capacity available at the Stansted Distribution Centre or at Vision Stansted, therefore an additional site is needed now to meet this requirement.

Individuals

No individual response

Sustainability Appraisal June 2017

Not applicable

Proposed Sites for Additional Employment Allocations

Paragraph 5.34

This paragraph was responded to by one individual.

Support	0
Object	1
Comment	0

Overarching Summary

- There has been no consideration of employment opportunities at all in Thaxted e.g. retail, office.

Individuals

There seems to be no consideration of employment opportunities at all in Thaxted, e.g. retail, office.

Sustainability Appraisal June 2017

Not applicable

Garden Communities

Paragraph 5.35

This paragraph was responded to by two individuals and one organisation.

Support	0
Object	2
Comment	1

Overarching Summary

- Paragraph seems to re-interpret and understand Garden Community Principle 5 (GCP5) as stated in Appendix 5. Paragraph 5.35 should be closer intertwined with GCP5 should have a clear objective to meet GCP5, reducing the need to travel and provide no less than one job per household;
- Unlikely that genuine employment will materialise in developer-led artificial settlement as suggested;
- Delivery of employment will be long after delivery of housing and infrastructure.
- Nature of employment development will be small scale and largely retail/ service sector related. Are employment requirements now which are not been met due to lack of supply of available land.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

- Paragraph 5.35 from our experience and a review of these plans, the delivery of any employment will be long after delivery of the housing and infrastructure. The nature of this sort of site is that the employment development will be small scale and largely retail/service sector related. The potential for these sites to come forward and make a meaningful contribution to the requirements in the plan period is considered to be very low. It is also the case that the delivery overall of the Garden Communities is

somewhat uncertain, there are employment requirements in the District now, which are not being met due to the lack of supply of available land.

Individuals

- It is unlikely that genuine employment will materialise in Developer-led artificial settlements suggested.
- This seems to re-interpret and understate GC principle 5 as stated in Appendix 5. UDC and GC developers should have a clear objective to meet that principle, reducing the need to travel and providing no less than one job per new household within the new community.

Sustainability Appraisal June 2017

Not applicable

London Stansted Airport (Northern Ancillary Area)

Paragraph 5.36

This paragraph was responded to by one organisation.

Support	0
Object	1
Comment	0

Overarching Summary

- The Northern Ancillary Area site is subject to a number of constraints both physical, legal and in terms of servicing and access;
- These issues mean that securing land for employment development is very difficult in the short to medium term;
- Understood a significant area of this site is soon to be the subject to a planning application for a large single user; will significantly reduce the availability of land for localised SME led demand in this area.
- Any supply is subject to the operational needs of the airport operator, who is currently consulting on further expansion of the airport, which will inevitably have an impact on the appetite for non-core activities and puts a further question mark over the reliance on this site, as providing a supply of readily available land to meet the local and migratory needs of businesses.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

Paragraph 5.36 The London Stansted Airport (Northern Ancillary Area) site is subject to a number of constraints both physical, legal and in terms of servicing and access. These issues mean that securing land for employment development here is very difficult in the short to medium term. It is understood that a significant area of this site is very soon to be the subject to a planning application for a large single user, which will significantly reduce the availability of land here for localised SME led demand in this area. There are also issues and concerns associated with the allocation of future employment land provision on a site, which is monopolised by Manchester Airport Group. Any supply is subject to the operational needs of the airport operator, who is currently consulting on further expansion of the airport, which will inevitably have an impact on the appetite for non-core activities and puts a further question mark over the reliance on this site, as providing a supply of readily available land to meet the local and migratory needs of businesses.

Individuals

None

Sustainability Appraisal June 2017

Not applicable

Chesterford Research Park

Paragraph 5.37

This paragraph was responded to by five individuals.

Support	0
Object	5
Comment	0

Overarching Summary

- There is a conflict of interest with Uttlesford District Council having purchased a 50% share of the holding of the site and the site has subsequently been allocated as an employment site.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

None

Individuals

- Conflict of Interest “ Uttlesford District Council has recently bought a substantial holding in the Chesterford Research Park. The draft Local Plan states that the North Uttlesford Garden Community should maximise economic links with Chesterford Research Park. There appears to be a conflict of interest here as UDC is the part owner and planning authority for both the new settlement and the Research Park. This raises the question of whether the new settlement's location or the rationale for the existence is based on objective evidence, particularly given the inclusion of this proposed settlement in the local Plan has only been made at the last minute and immediately following UDC's investment.
- Does not Uttlesford District Council have a conflict of interest following their substantial holding in Chesterford Research Park?
- The UDC website states council purchased a 50% interest in Chesterford Research Park in May 2017. This creates a conflict of interest between their role as owners/developers of the Park and their role as a planning authority. Before their purchase of the site there appears to have been no interest in large scale residential development in the north of the district as evidenced by the minutes of the meeting held with South Cambs on 17th January 2017, however, the enthusiasm for developing North Uttlesford Garden Village appears to date from this purchase indicating that it is motivated more by financial gain for the Council than by planning principles.
- This highlights the conflict of interest for UDC in owning part of Chesterford Research Park. It is being used to justify the proposal for NUGV.

Not applicable

Training

Paragraph 5.39

This paragraph was responded to by one organisation.

Support	0
Object	0
Comment	1

Overarching Summary

- Local Plan does not mention proposed further education college/a new site for Harlow College at Stansted Airport. This is an essential vocational college, in particular to meet the needs of the airport area that will offer courses from engineering to customer service.

Statutory consultees and other bodies

Uttlesford Futures (Employment, Economy, Skills, Environment and Transport) - The Local Plan does not mention the proposed further education college/a new site for Harlow College at Stansted Airport. This is an essential vocational college, in particular to meet the needs of the airport area that will offer courses from engineering to customer service. Vocational educational links are already under discussion with the college by Uttlesford secondary schools. There is limited Adult/Life Long Learning in Uttlesford, but this is caused by overall high level of employment and low unemployment. The Airport also has an Academy to assist adults to gain work experience, train and obtain work at the airport. Getting to the airport is assisted with travel passes. The Aerozone is an airport facility for schools which provides insight into the history, jobs at the airport and importance of Science, Maths and Engineering.

Developers/landowners/site promoters

None

Individuals

None

Sustainability Appraisal June 2017

Not applicable

Electronic Infrastructure

Paragraph 5.40

This paragraph was responded to by one organisation.

Support	0
Object	1
Comment	0

Overarching Summary

- Although the Plan refers to the need for broadband to be improved, it is not ambitious enough.
- The stated target of 10Mb/s is the minimum that a modern family home needs today. This will be totally inadequate to in the future, for either domestic needs as broadcast TV gives way to on demand streamed services and home working becomes more common.
- The target should be at least 100Mb/s with technology that can be upgraded to 1GB/s as needed.
- Technologies exist to deliver these speeds in dispersed rural areas without the limitations of radio and satellite referred to and should be implemented quickly to maintain the competitiveness of the District.

Statutory consultees and other bodies

Littlebury Parish Council - Although the Plan refers to the need for broadband to be improved, it is not ambitious enough. As we move from traditional industries to a knowledge-based economy, with more working from home, world class broadband will be needed to attract and retain companies. Every premise needs high speed internet connectivity. The stated target of 10Mb/s is the minimum that a modern family home needs today. This will be totally inadequate to in the future, for either domestic needs as broadcast TV gives way to on demand streamed services and home working becomes more common. The target should be at least 100Mb/s with technology that can be upgraded to 1GB/s as needed. This is the standard to be trialled in six pilot areas (announced by government last week), and is highly likely to be the expected norm nationally. All properties in the garden villages and new developments elsewhere should be fibre enabled from Day 1. Technologies exist to deliver these speeds in dispersed rural areas without the limitations of radio and satellite referred to in the draft plan and should be implemented quickly to maintain the competitiveness of the District.

Developers/landowners/site promoters

None

Individuals

None

Sustainability Appraisal June 2017

Not applicable

Tourism

Paragraph 5.45

This paragraph was responded to by one organisation and one individual.

Support	1
Object	1
Comment	0

Overarching Summary

- The reference to the role that built heritage has to play in the tourism industry, this is welcomed;
- Tourism seems an obvious area of major employment potential that is neglected in this plan. What about provision for increased tourist accommodation? Support for local tourist, catering and entertainment industries?

Statutory consultees and other bodies

Historic England - The reference to the role that built heritage has to play in the tourism industry, this is welcomed.

Developers/landowners/site promoters

None

Individuals

Tourism seems an obvious area of major employment potential that is seriously neglected in this plan. What about provision for increased hotel, B&B and other tourist accommodation? Support for local tourist, catering and entertainment industries? The countryside is a major attraction - capitalise on this, rather than building on the fields these unwanted new communities?

Sustainability Appraisal June 2017

Not applicable

Employment Strategy

Policy EMP1

This policy was responded to by 27 people/organisations.

Support	6
Object	12
Comment	9

Overarching Summary

- Suggestion that larger business sites include space for 'incubator/new businesses'.
- We should be about proactively encouraging employment opportunities in the Garden Communities, not just supporting.
- There is no provision for new employment land outside of the Garden Communities and Stansted.
- We should explicitly support the intensification/ expansion of the Principal Employment Areas.
- The wording of EMP1 is excessively restrictive with regard to supporting (non B-class) uses.
- Concern related to permitting non airport related uses on 43 ha of land at Bury Lodge Lane. Lifting the airport restriction could have consequences for accommodating airport related growth in the future.
- Additional land should be allocated adjacent to existing employment sites in the Green Belt to allow expansion. With no provision to allow the expansion/ growth of new/ existing business and employment sites, existing firms won't be able to expand their current premises, so will need to relocate.
- We should place greater emphasis on supporting high-tech industries.
- We should support its Chesterford Research Park's further expansion to assist meeting the overall employment need.
- We should add greater focus and measures to specifically support the construction industry.

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan and Stansted Neighbourhood Plan - Prioritises employment at Stansted Airport. If houses are to be built in Saffron Walden on any scale then more effort should be made to ensure that communities are sustainable and ensure that new housing is matched by new offices etc. Otherwise, the town risks becoming no more than a commuter town for London and Cambridge.

Suggestion: Need to mention high-tech industries requiring good accessibility (digital as well as vehicular).
Need to mention high tech industry requiring office standard manufacturing space.
Prioritises employment at Stansted Airport. Suggestion: Need to mention high-tech industries requiring good accessibility (digital as well as vehicular). Need to mention high tech industry requiring office standard manufacturing space.

Saffron Walden Town Council - If houses are to be built in Saffron Walden on any scale then these communities should be sustainable with provision of new offices and other places of work, otherwise the town risks becoming no more than a commuter town for London and Cambridge. Proposed. Need also to mention the importance of high-tech industries requiring good communications (digital and transport). Needs standard office/manufacturing space.

Essex County Council - Preamble to Policy EMP1 (page 67, 79) Policy EMP1 ECC recommends that UDC recognise waste development as an employment use and that this should be set out within the supporting text introducing Policy EMP1 (paragraphs 5.24, 5.45). Although sui generis waste uses often share characteristics of light or general industrial development including warehousing, ECC recommends that Policy EMP1 include sui generis as part of the use classes listed in the policy under bullet 4 to reflect the requirements of the adopted Essex and Southend-on-Sea Waste Local Plan. Policy EMP1 (& paragraph 5.3) Employment Strategy. Also supports Section 8, in particular social infrastructure, supporting employment (5) growth (NB Linked to Sections 4 (para. 4.28) and Section 9 on housing and design, Inc. Policy H8 in particular references to CLTs and self-build homes) Garden Communities As noted under Policy SP5, ECC would urge the preparation of an economic strategy for each of the Garden Communities. The Garden Communities should be as much about employment as they are about housing; not just quantity but the quality of employment with the Garden Communities, which can provide a real opportunity for economic aspiration. Such a strategy should also ensure that the existing businesses in the area are encouraged to grow through the opportunities that Garden Communities and the enhanced infrastructure present to them. The economic strategy should identify the ways in which the public sector bodies can begin to assist these businesses with their growth and preparing them to take advantage of the opportunities through, for example, bids for business support funding to European Regional Development Fund (ERDF) or other similar such funds now and in the future. NEGC commissioned SQW and Cambridge Econometrics to carry out a North Essex Garden Communities Employment and Demographic Study. The purpose of this commission was to understand the likely future demographic patterns of the Garden Communities to ensure the appropriate provision for services is made and to develop quantified scenarios for future employment growth to inform (but not come up with) job creation targets. UDC should refer to this study and may seek to commission something similar for its evidence base to inform and aid delivery. Skills ECC notes that Section 5 (Employment) refers to UDC's Economic Development Strategy (2016-18) and its links to the Local Plan. ECC would wish to see greater focus and measures to specifically support the construction industry. The Essex Employment and Skills Board (ESB), Evidence Base District Profile 2017-18 highlights that Uttlesford has 925 construction enterprises, which has grown year-on-year from 2013 (by 145 enterprises). Across Greater Essex to meet demand, based on ESB/Construction Industry Training Board (CITB) research, there is a need to grow the workforce of this sector by between 12,000 and 24,000 people by 2021. Accordingly, ECC wishes to help ensure that consideration is given to support effective implementation and delivery of the UDC Local Plan through promoting and enabling the employment opportunities in this sector, partly in order to help provide the significant volume of new homes proposed (14,100). In particular this needs to have regard to developer responsibilities within planning, to stimulate new and local employment opportunities through Apprenticeships. With 925 construction enterprises, employing over 3,000 people in the district, there is a need for wider consideration to be given in terms of supporting local employment growth, by seeking local sub-contracting arrangements with developers. ECC supports that the Draft Local Plan seeks well-designed new developments, which in particular raises the standard of design locally and in turn introduces innovative building techniques. ECC is mindful that there is a lack of Further Education provision in the district and neighbouring districts of training in modern methods of construction has implications for house design and urban regeneration. ECC considers that by seeking developer contributions, UDC could support the provision of new courses in neighbouring districts/boroughs

where there is capacity to deliver such innovative training. This would continue to support the skills infrastructure and provide relevant skills (both adult and young people) needed for a modernising sector. ECC welcomes ongoing engagement with UDC on the above matters. It is noted that the skills shortage in construction and the development rates expected within the district is not just an UDC matter, it is experienced across Essex. ECC is therefore working with key stakeholders to address the issue, to assist in the future development and economic growth across Essex. Paragraphs 5.4, 5.45 and Policy EMP1 Employment Strategy (page 76) Grow on Space ECC supports the statement that UDC will support the provision of small scale office units to accommodate the needs of small sized businesses. However, it is recommended that the Local Plan supporting text in Section 5 includes reference to Grow on Space, and that Policy EMP1 also seeks to promote and facilitate the delivery of Grow on Space. It is important to note that other Essex Local Planning Authorities including Colchester, Braintree and Tendring emerging Local Plans include reference to Grow on Space. Recommended wording is provided below. ECC commissioned a Grow on Space Feasibility Study which found that across the county there was approximately 1 year's-worth of Industrial Grow On Space and 2.5 years worth of Office Grow On Space (which for the purposes of the study was defined as commercial workspace of between 100 and 300 sq.m). The study concluded that within UDC from July 2016 and the previous 3 years, take up of Grow on Space, versus the then availability, demonstrated that the level of available Grow On Space (across office and industrial uses) was only 1.5 years. The Essex Economic Commission also identified an inadequate supply of flexible tenures (e.g. Grow-on Space), which is holding back successful businesses that want to expand and grow. The Council will consider which interventions are the most appropriate and viable to ensure the provision of flexible local employment space (by tenure) in the plan area. The following amendment is recommended for the 9th bullet point in Policy EMP1: The Council will support the provision of small scale office units to accommodate the needs of small sized businesses including grow on space . Early Years and Childcare

It is recommended that Policy EMP1 facilitates the provision of Early Years and Childcare facilities within employment areas to reduce the need to travel and provide such facilities close to people's place of employment. Sustainable Transport ECC notes that Section 5 Employment avoids any comment about employment sites being accessible by any means of transport. It is welcomed that this policy highlights the inter-relationships and sustainable transportation links between key employment zones throughout UDC. Further discussions with ECC are welcomed to ensure that the policy wording adequately reflects the aspirations of the Transportation Authority.

Natural England - Natural England recognises the strategic importance of Stansted Airport to the local area. However it is important that existing and future proposals for expansion are properly assessed for impacts on the environment, in particular on nearby Hatfield Forest SSSI. Natural England welcomes the 4th criteria for assessment of proposals but would like to see specific mention of safeguarding and enhancing the SSSI within the policy.

Developers/landowners/site promoters

- When larger business sites are planned we suggest that there be space for 'incubator/new businesses' and then close sites for expansion and development. Information on economic growth/business development to be made available to educators in order to ensure that curriculum can take into account what skills are needed in industry (in addition to general employability) and in order to foster school/college industry links. Business development in the plan is around the science sites, Stansted Airport and A120. Is this sufficient if the aim is to develop local industry and achieve local employment to negate travelling longer distances to work? Industrial development in agricultural buildings, areas west of Saffron Walden. People often talk about most of the jobs at the airport being 'lower paid'. This is true for the starter posts, but there is evidence that once at the airport and having gained experience they progress to higher paid posts - there is a career ladder.
- Support for policy EMP1 and paragraph 5.35, which confirms that the new Garden Communities will each deliver a range of B use class employment opportunities on site. The exact scale and

nature the employment opportunities to be provided at the West of Braintree Garden Community will need to be assessed and determined through a more detailed level of master planning, via a Supplementary Planning Document, or similar. The development vision and master plan prepared by GL Hearn and submitted towards the previous Uttlesford and Braintree call for sites and Local Plan consultations identified provision for up to 10.43 hectares of employment development across the proposed Andrewsfield Garden Village. The master plan provided for two employment parks (one located next to an existing employment use), as well as a range of employment opportunities at district centres, retail and leisure uses as well as at community and educational uses. Existing employment uses within the WBGC site will also provided employment opportunities to future residents within the WBGC.

- As we have previously observed, outside of potential localised employment within the new garden villages and specific allocation at Stansted Airport, there is no provision for new employment land, and we are experiencing on a daily basis a significant shortage of supply relative to demand for such accommodation. It is clearly a significant step towards sustainability to be able to provide accommodation for employment purposes close to population centres such as Dunmow, Takeley and, of course, Bishop's Stortford, and it seems that whilst laudable for the Council's stated policy to provide and accommodate new employment opportunities, this will not be achieved by the specific details of the policy set out in this section.
- These representations are submitted on behalf of Jackson Management, the owner of Thremhall Park Business Centre. We support the allocation of Thremhall Park as a Principal Employment Area as set out at appendix 6 of the draft Plan. However, we have two concerns with regard to the wording of policy EMP1:- EMP1 does not explicitly support the intensification/expansion of the Principal Employment Areas, contrary to the recommendations of the Employment Land Review Update 2017. The wording of EMP1 is excessively restrictive with regard to supporting uses. Intensification/Expansion of Principal Employment Areas Paragraph 5.4 of the draft Local Plan states that, The policies in the Local Plan have had full regard to the Employment land Review Update 2017. The ELR sets out recommendations regarding B1 a/b use classes at paragraph 8.3.3. Recommendation 1 states that, The demand assessment estimates that under the medium demand scenario, there will be a net additional requirement for 21,000sqm of B1 floorspace in Uttlesford District over the Local Plan period to 2033. In order to meet this demand requirement, the Council should support the provision and retention of existing B1 a/b use classes across the District and in addition promote the provision of new B1 a/b use class employment land and premises within suitable locations. These locations could include Thremhall Park, Start Hill (Call for sites 04GtHal15). Paragraph 5.24 of the draft plan notes that, There are a number of opportunities within existing employment sites within the district, either through intensification of uses or limited expansion of these sites. Whilst paragraph 5.25 recognises that sites have varying degrees of potential to redevelop or intensify, paragraph 5.26 sets out, Redevelopment and intensification for employment uses on site will be supported where the need can be demonstrated for their intensification and expansion It is clear that the intensification of a number of the Principal Employment Areas, including Thremhall Park, is a specific component of employment land supply during the Plan period. However, EMP1 merely states that in regard to the existing employment sites set out at in Appendix 6 ,The existing Principal Employment Areas set out in Appendix 6 as shown on the Policies Map shall be protected for B1, B2 or B8 uses. There is therefore no provision within the policy to provide support for intensification of use despite the recommendations of the ELR and the support for these recommendations within the supporting text of the draft Plan at paragraph 5.24, 5.26. We consider that as EMP1 is entitled Employment Strategy and lists new employment allocations including within the new Garden Settlements and within the Airport, the policy should also explicitly support the intensification of existing employment sites in line with the recommendations of the ELR. If the principle of expanding/intensifying all Principal Employment

Areas is not acceptable, the policy should list those where expansion/intensification is acceptable. The ELR is clear that intensification of existing sites is a key element of employment land supply in the district and this should be recognised in EMP1. We recognise that EMP2 provides further policy guidance with regard to the Principal Employment Areas, however we have concerns that this policy is unclear and excessively negative in its wording. Our concerns are detailed within our objection to this policy. Supporting Uses The fifth bullet point of EMP1 outlines that the Principal Employment Areas shall be protected for B1, 2 and 8 uses. We are concerned that this will constrain the creation of attractive and vibrant business park environments in employment areas such as Thremhall Park, by preventing supporting uses such as on-site cafes. Successful business parks such as Thremhall look to provide a range of facilities in order to attract occupiers. The recently consented (2016) scheme for the expansion of Thremhall includes the provision of a cafe, function room and gym, and future expansion may consider providing additional/amended facilities. Such supporting uses are particularly desirable at Thremhall as the focus is on the provision of serviced office space for small to medium sized businesses who would not be in a position to provide their own facilities, but would clearly benefit from being able to access such facilities. We would therefore suggest that the EMP1 is amended to allow the provision of supporting uses within the Principal Employment Areas.

- EMP1 Support. But effective broadband and allied technology improvements are overdue. Access to technology is critical to empowering a working rural population and encouraging employment. It may be counter intuitive but technology may be one of the critical saviours of a rural economy. In this the Society opposes all change of use to residential, in any form. Available commercial space encourages use.
- Comments Whilst we support the intention to accommodate new employment opportunities in the District, we do not consider that the policy approach as set out in Policy EMP1 is the most appropriate strategy, having regard to the reasonable alternatives. In summary, our concerns are: We object to the proposal to permit non airport related uses on 43 hectares of land north of Stansted airport which is contrary to the recommendations of the Employment Land Review Update 2017 (ELRU 2017). EMP1 does not explicitly support the intensification/expansion of the Principal Employment Areas, contrary to the recommendations of the Employment Land Review Update 2017. The wording of EMP1 is excessively restrictive with regard to supporting uses. Allocation of land north east of Bury Lodge Lane. We oppose the proposal to permit non airport related uses on 43 hectares of land north of Stansted airport; this site should be retained for airport uses only and alternative sites within the vicinity of the airport should be allocated. Allowing non-airport uses in order to make effective use of land is not the most appropriate policy approach in light of the reasonable alternatives. Lifting the airport restriction could have consequences for accommodating airport related growth in the future, should the dynamics of the airport change and space be required. The reasonable alternative of allocating additional employment land within the district, with ready access to the airport, is available and would be a more robust approach. Furthermore, the change of use of 43 hectares is not based on robust evidence. The ELRU 2017 supports the release of only 18 Hectares of land (as did earlier versions of the ELR), not the 43 hectares proposed. Save for these 18 hectares, the ELRU 2017 supports airport related development within the airport boundary in line with the Airport's Sustainable Development Plan (SDP) to enable and support future growth at Stansted Airport. Similarly, the Assessment of Land North East of Bury Lodge Lane 2012 recommends only the release of only 18 hectares. Notwithstanding our objection to the principle of the change of use of this land and the conflict with the evidence base, there is conflict within the policies in the consultation document itself as to the quantum of land to be allocated for non-airport related uses. Policy ED1 refers to 43 hectares, yet Policy SP11 - London Stansted Airport refers to the Northern Ancillary Area, describes it as a 55 hectare site to be allocated for B 2 and B8 Employment uses. The table and map in Chapter 13 Non-Residential Allocations refers to the

site area twice; once as 43 hectares and once as 55 hectares. The table refers to site specific policy SA1, however, there appears to be no such policy. Clarity is required regarding the size of the area proposed for allocation for non-airport related uses and policies to deliver it. Notwithstanding this, whether it be 43 hectares or 55 hectares, this is far in excess of the 18 hectares recommended by the ELRU 2017. Intensification/Expansion of Existing Employment Areas Policy ED1 only provides for the change of use or redevelopment of existing employment sites, but not intensification or extension, contrary to Policy ED2 which does refer to extension. This is contrary to the evidence base. Paragraph 5.4 of the draft Local Plan states that, the policies in the Local Plan have had full regard to the Employment land Review Update 2017. The ELRU 2017 sets out recommendations regarding B1 a/b use classes at paragraph 8.3.3. Recommendation 1 states that, the demand assessment estimates that under the medium demand scenario, there will be a net additional requirement for 21,000sqm of B1 floorspace in Uttlesford District over the Local Plan period to 2033. In order to meet this demand requirement, the Council should support the provision and retention of existing B1 a/b use classes across the District and in addition promote the provision of new B1 a/b use class employment land and premises within suitable locations. Paragraph 5.24 of the draft plan notes that, there are a number of opportunities within existing employment sites within the district, either through intensification of uses or limited expansion of these sites Whilst paragraph 5.25 recognises that sites have varying degrees of potential to redevelop or intensify, paragraph 5.26 sets out, Redevelopment and intensification for employment uses on site will be supported where the need can be demonstrated for their intensification and expansion It is clear that the intensification of a number of the Principal Employment Areas, is a specific component of employment land supply during the Plan period. For sites within the Green Belt, additional land should be allocated adjacent to existing employment sites, to enable their expansion. With no provision to allow the expansion and growth of new and existing business and employment sites, existing firms will be unable to expand at their current premises, so will need to relocate. Relocation brings significant costs to the firm and could result in loss of firms from the District if suitable space is not available. Such a restriction on economic expansion would be contrary to Objective 2a of Chapter 2 of the consultation document. This aims to strengthen the local economy by enabling the growth of existing and new employers through the provision of suitable land and premises in sustainable locations to meet the anticipated needs and aspirations of businesses including providing opportunities for employment growth related to Stansted Airport. The 6th bullet point refers to displacement of existing businesses lost to other uses and states that the council will seek to mitigate any adverse effects. However, no provision is made to accommodate these displaced businesses. The policies maps identifying the existing employment sites show the boundaries tightly drawn so as to prevent expansion of existing businesses or provision of new employment floorspace at existing employment sites. Supporting Uses We object to the restriction to support of B Class uses only at the existing employment sites. This is considered to be in conflict with the National Planning Policy Framework (NPPF) which contains no such restrictions, being supportive of all sustainable economic growth uses. We are concerned that this will constrain the creation of attractive and vibrant business park environments in employment areas such as M11 Business Link, by preventing supporting uses such as on-site cafes. This element of the policy is in conflict with the policy support for both B Class and non-B Class employment uses at the new Garden Communities and also conflicts with Policy EMP2 which does allow some sui generis uses at existing employment sites. No explanation is given for this restriction to B Class uses only at existing employment sites. The evidence base underpinning this policy, the ELRU 2017, found that non-B use classes and sui-generis uses are not crowding out core industrial uses. We consider that non B Class employment uses should also be permitted at the existing employment locations in order to achieve the aim stated in the 5th bullet point of this policy to avoid loss of floorspace for economic development.

- Policy EMP 1 Employment Strategy and Policy EMP 2 Existing and Proposed Employment Areas. The respondents object to the Plan on the basis that it is not justified, in respect of making sufficient employment land provision. The respondent's own land at the junction of Bedlars Green Road, Dunmow Road and Start Hill, which was put forward as a proposed employment site as part of the Council's Call for site exercise in 2015. The site has not been proposed as an employment allocation in the Draft Plan, which the respondents believe is a missed opportunity, as the proposed allocations do not make adequate provision for the employment needs of the district. The respondents object to the Plan on the following basis :-

Paragraph 5.4 - The ELR seems to be based upon a direct link between population growth and employment requirement - this takes no account of the expansion requirements of existing business or inward migration (e.g. from NE London or Harlow) of businesses looking to locate in the District. Local and highly respected commercial agents, Coke Gearing has advised the respondents that it is their experience through the many enquiries they receive that urgent provision of sites is needed now to meet a known demand. Paragraphs 5.11/12/13 - these seem to be broad assumptions without evidence? Paragraph 5.28 The respondents remind the Council that these sites have already been developed and are now occupied. Whilst the Council acknowledge that new employment land needs to be allocated for future demand, which has been calculated as 10.2 ha up to 2033, the current demand, which is significant, is not being met with a ready supply of good quality employment land, as a result, the Council is missing out on job creation opportunities. The draft plan makes provision for an additional 10.2 ha, which is to form part of allocations at existing sites at Chesterford Research Park and at London Stansted Airport (Northern Ancillary Area). In the case of the former, the site is not suitable for larger shed development, which is in demand now, and in the case of the latter, the availability of land here is subject to significant constraints, see Para 3.6 below. Paragraph 5.31 this site is poorly located in terms of transport (other than car) and is the wrong side of the airport- the development is stalled due to lack of occupier interest (it is not 40% pre let). Paragraph 5.32 this is the Vision Stansted site, which is now fully developed and occupied. This site was put forward in a similar way to the respondent's site in representations made to the draft Plan in 2012. It was subsequently allocated, an application made for its development, approval granted, the development was started immediately. The site is now fully built out and occupied by businesses that have moved into the area. Better than anything else perhaps, Vision Stansted provides evidence of demand from outside the District, it also demonstrates the popularity of the location and its proximity to J8 of the M11. The respondents and their advisors are supremely confident that an allocation on the respondent's site would prove equally successful, not least because there are no similar sites that are available in the District, which are available now, in the right condition and location. The ELR makes the very point in its para 9.3.19, which states: Start Hill south of the B1256 adjacent to the Stansted Distribution Centre, Start Hill in particular offers a strategic location within close proximity to both Stansted Airport and Junction 8 of the M11 which would be very attractive to potential warehouse and distribution occupiers The statement above exactly mirrors the attributes of the respondent's site at Start Hill. There is no capacity available at the Stansted Distribution Centre or at Vision Stansted, therefore an additional site is needed now to meet this requirement. Paragraph 5.35 from our experience and a review of these plans, the delivery of any employment will be long after delivery of the housing and infrastructure. The nature of this sort of site is that the employment development will be small scale and largely retail/service sector related. The potential for these sites to come forward and make a meaningful contribution to the requirements in the plan period is considered to be very low. It is also the case that the delivery overall of the Garden Communities is somewhat uncertain, there are employment requirements in the District now, which are not being met due to the lack of supply of available land. Paragraph 5.36 The London Stansted Airport (Northern Ancillary Area) site is subject to a number of constraints both physical, legal and in terms of servicing and access. These issues mean that securing land for employment development here is very difficult in the short to medium term. It is understood that a significant area of this site is very soon to be the subject to a planning application for a large single user, which will significantly reduce the

availability of land here for localised SME led demand in this area. There are also issues and concerns associated with the allocation of future employment land provision on a site, which is monopolised by Manchester Airport Group. Any supply is subject to the operational needs of the airport operator, who is currently consulting on further expansion of the airport, which will inevitably have an impact on the appetite for non-core activities and puts a further question mark over the reliance on this site, as providing a supply of readily available land to meet the local and migratory needs of businesses. Proposed Allocation at junction of Bedlars Green Road and Dunmow Road Start Hill. The respondent's land at the junction of Bedlars Green Road and Dunmow Road extends to some 2.0 hectares. The land is well screened and accessible to the highway network, being almost immediately adjacent to Junction 8 of the M11. Discussions with the Highway Authority have revealed that a junction on to Dunmow Road would be acceptable and an initial design has been agreed. The site is bounded by a number of trees, which can be protected and would be clear of any development. The site has also been the subject of detailed phase one habitat assessments, which reveal that the site could be developed with some ecology mitigation. There is also the possibility of some ecological enhancement, with land being provided as part of any development, as a termination of the Local Wildlife designation of the Flitch Way. Surface water can be managed on the site, as part of a sustainable drainage strategy. The site is not within the Green Belt; however, it is acknowledged that the land falls within the Countryside Protection Zone (CPZ) around the airport. It should be noted however, that the author of these representations made a similar case to the Draft Local Plan abandoned in 2015, in relation to the recently developed site at Dunmow Road, Start Hill. This site, which is adjacent to the Stansted Distribution Centre, and is now known as Vision Stansted, was also in the Countryside Protection Zone at the time the representations were made. However, having regard to the planning balance, it was allocated for employment use, a planning permission was subsequently granted and the site was quickly built and occupied as predicted, due to the known demand and the lack of available employment sites in the District. This same scenario is being repeated now, it is fair to say that if a business wishes to erect a new employment shed in the District now, there are no sites currently available, which have good accessibility to the strategic highway network. The respondents put the respondent's site forward in a pre-application submission, based on a specific requirement at the time from The Samaritans, for a proposal to build their European Headquarters. Officers did not support the proposal, simply because the site was not allocated and in view of its location within the CPZ. The Samaritans, frustrated by the lack of available land and the time taken to secure a site, chose to move operations to the USA. The case made to Officers in the pre-app, continues to be valid now. That case includes details of the employment land supply that was available (September 2016) which has not improved and provides details of the list of known requirements for land held by local commercial agents Coke Gearing. These documents along with a plan of the respondent's site is to be sent separately to planningpolicy@uttlesford.gov.uk. The evidence is that allocations for future employment land being placed in just two locations (Chesterford and MAG Northern Ancillary Area) does not assist businesses seeking land that is available now, for non-office related employment development. The airport land is not available in the short to medium term and is entirely dependent on the operations of a private business, who holds the monopoly on the only available of non-office related employment development land in the District, this cannot be a healthy position and does not assist the creation of jobs in the District. The employment policies of the Draft Plan are not consistent with the advice provided to local authorities in the National Planning Policy Framework (NPPF). It cannot be said that the policies and employment strategy as proposed in the Plan, is consistent with the NPPF, which requires at para 21 that :- Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should: set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; support existing business sectors, taking account of

whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances; plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

- Support for the positive approach to job growth in the Plan and in particular support policy EMP1 and paragraph 5.35 which recognise that the new Garden Community at North Uttlesford (NUGC), alongside new homes, will provide a range of employment opportunities including B-use class employment together with the job opportunities created through the educational, healthcare, retail and community uses providing opportunities for the new residents of the community as well as for existing communities in the surrounding area. Grosvenor recognise that the exact scale and nature of the new employment opportunities will be determined through the masterplanning of the new community. Grosvenor support paragraphs 5.40 to 5.43 in also recognising the importance of the provision of reliable and fast digital infrastructure for businesses and support paragraph 5.44 in recognising its importance towards contributing to sustainable work practices that reduce the need to travel through home-working which, together with the range of employment opportunities that will be provided in the new settlement will enable a high degree of internalisation of travel-for-work journeys to be achieved. The job opportunities in the new community will complement the comprehensive employment opportunities that already exist in the immediate area including at the Chesterford Research Park, the Wellcome Trust Genome Campus, Granta Park and the Babraham Institute, access to which will be supported through a sustainable transport strategy. Grosvenor support paragraph 5.37 that recognises and supports the expansion opportunities to create an additional 900 jobs at the Chesterford Research Park which forms part of the Southern Cluster of Life Science Campuses in the area and in particular the positive relationship that the Park and NUGC can have. The Bidwells Professional Commercial Commentary upon the Economic Growth & Innovation Sector in North Uttlesford and Southern Cambridgeshire, June 2016 (submitted in response in response to the Council SLAA), identified significant additional employment potential within the Southern Cluster of life science campuses with an estimated potential growth of 3 million sq ft of additional floorspace over the next 5 years as well as highlighting the importance with the sector of achieving a positive live work lifestyle with high quality housing and community facilities in close proximity to places of work. The new settlement is also considered well located in relation to the two recognised strategic growth corridors of the London Stansted Cambridge corridor and the Oxford Milton-Keynes Cambridge corridor, with access to strategic transport infrastructure providing connectivity along these corridors including the West Anglia railway line.
- Employment and Economic Development Sustainable Uttlesford consider the priorities for sustainable economic development and employment during the Local Plan period should be Reducing number (and distance) of journeys to work through greater home working and less commuting out of the district south to Greater London which puts pressure on the local transport infrastructure eg M11 and West Anglia main line. The provision of new housing stock with tenures that fully reflect the range of employment opportunities, incomes and qualifications enjoyed by local residents; Greater support of knowledge economy campuses and workers located in South Cambridgeshire to the north of the district through the creation of the North Uttlesford Garden Village. Greater encouragement of start up businesses through the provision of incubator units at below market rents for an initial time limited period. Ensuring that SMART technologies including broadband are provided to all new housing in the Garden Villages. The

employment and economic development policies in the Plan as currently drafted Plan appear to take all our eggs in the Stansted Airport basket approach with projections that 50% of employment growth will be in service/warehousing industries. There is are no policies that relate to non airport related vocational training provision. Sustainable Uttlesford(SU) consider any application to increase the current level of permitted flights at Stansted during the plan period to be premature. SU do not consider that LPA should make the decision about the future increase of use of the single runway at Stansted. It is the responsibility of the National Government to publish a national Airport Policy including their final decision on additional runway capacity in the South East to ensure that is compliant with the Paris Climate Change Accord.

- Sustainable Uttlesford consider the priorities for sustainable economic development and employment during the Local Plan period should be Reducing number (and distance) of journeys to work through greater home working and less commuting out of the district south to Greater London which puts pressure on the local transport infrastructure eg M11 and West Anglia main line. The provision of new housing stock with tenures that fully reflect the range of employment opportunities, incomes and qualifications enjoyed by local residents; Greater support of knowledge economy campuses and workers located in South Cambridgeshire to the north of the district through the creation of the North Uttlesford Garden Village. Greater encouragement of start up businesses through the provision of incubator units at below market rents for an initial time limited period. Ensuring that SMART technologies including broadband are provided to all new housing in the Garden Villages. The employment and economic development policies in the Plan as currently drafted Plan appear to take all our eggs in the Stansted Airport basket approach with projections that 50% of employment growth will be in service/warehousing industries. There is are no policies that relate to non airport related vocational training provision.
- 5.20 recognises "There is an aspiration for "strategic warehouse and distribution depots in locations with ready access to Junction 8 of the M11" but the policy text (second bullet) introduces a restriction for non-strategic warehousing. This is assumed as an error as there are no other instances of such a text and it is inconsistent with other references to the Northside of the airport site. Furthermore, this is inconsistent with references contained within the Employment Land Review 2017 (which are reflective of the text in 5.20). The third bullet which states Support and protect the provisions of airport related commercial uses within the airport boundary as set out in Policy SP11; should be made clear that this is for sites other than the Northside allocation. Inset Plan As per comments on SA1, the site as described in the policy does not match the site in the inset plan. The inset plan shows both a yellow and brown policy area, splitting the site in two. This should be revised to show one area with references to SA1, SP11 and EMP1. Supporting Text 5.36: Inconsistent reference to 43ha should be 55ha. No likely proposition for B1 development.
- Support. Effective broadband and allied technology improvements are overdue. Access to technology is critical to empowering a working rural population and encouraging employment. It may be counter intuitive but technology may be one of the critical saviours of a rural economy. In this the Society opposes all change of use to residential, in any form. Available commercial space encourages use.
- The Council has expended significant effort in developing a strategy for the location of what is claimed to be sustainable economic and housing growth for the next 20 years. In terms of economic development it has obtained and continued to update a review of employment land a key driver of economic growth. The key conclusions of the ELR are that there should be an approach towards to the provision of employment land comprising: Support for appropriate uses within town centres; Protection, but also monitoring, of existing employment sites; Continued

growth of appropriate employment at the regionally strategic locations of Stansted Airport and Chesterford Research Park; The delivery of appropriate employment uses within the proposed new settlements; and The identification of suitable new sites to provide flexibility for additional employment growth that is for whatever reasons cannot locate to or is not appropriate on the above sites. The draft Local Plan appears to completely ignore the last of these. In short, the draft Local Plan appears to propose that, for the next 20 years, employment development within the District be constrained to, only: Town centres; Existing employment sites; Stansted Airport and Chesterford Research Park; and The proposed new settlements. We are of the view that this strategy entirely fails to reflect the conclusions and recommendations of the Council's own evidence base that supposedly provides the justification for the proposed strategy, and will fail to provide the required range and choice of land for employment development. As such, we are of the view that Chapter 3 (Spatial Strategy) and particularly Policy SP4, and Chapter 5 (Employment) and particularly Policies EMP1 and EMP2 do not provide a sound basis for employment development in Uttlesford over the plan period. We are therefore of the view that the draft Local Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy The Needs of East Hertfordshire. In addition, there is no evidence that the needs of Bishop's Stortford, within neighbouring East Hertfordshire and which immediately abuts and is therefore constrained by any proposals within Uttlesford (as well as other factors), have been taken into account or meaningfully discussed and a strategy to address those needs agreed with East Hertfordshire. On this basis, we are also of the view that the draft Local Plan fails the required duty to cooperate.

- We are pleased to note that the Regulation 18 Local Plan document refers to Chesterford Research Park as one of the key locations for employment in the District. Representations have been made at each stage of plan preparation in Uttlesford including in the 2015 Call for Sites showing how there is additional capacity within the Park to meet medium and longer term needs. In considering influences on the employment strategy, it is important to appreciate that the District works within a wider market. For Chesterford Research Park, that context is significantly affected by Cambridge and the demand that arises from research and development businesses in advanced technology sectors. The need for new floorspace is often related to the funding of new areas of research and it is vital for those providing buildings to be responsive and flexible as requirements vary and timescales can be tight. Chesterford Research Park is competing with other research parks around the sub-region and needs to be able to offer a choice of sites and building options, as well as being able to provide a mix of uses to support the region. In addition, the park will assist to support the creation of a new garden community in North Uttlesford (as detailed in Policy SP7), with links to Chesterford Research Park to be maximised. The further development and enhancement of Chesterford Research Park will be important to the creation and successful development of this new community. Chesterford Research Park is an ideal location as a focus for additional employment development within the District. There is already considerable investment in infrastructure and support services, including the Nucleus building which provides the Park with meeting rooms, restaurant, gym etc. The location is close to the M11 and Audley End and Great Chesterford Stations, it is near Cambridge and has good access to Stansted Airport. The previous Local Plans have supported the further development of the Park and that should continue. The Park development boundary for the next plan period needs to be extended as per the attached Masterplan drawing to provide flexibility and choice for the reasons set out above. Therefore whilst we welcome the support given to Chesterford Research Park in the Regulation 18 Local Plan document, the policy should also support its further expansion to assist with meeting the overall employment need and requirement to allocation additional employment sites within the District - as well as supporting a greater range of employment uses within the park.

- Policy EMP 1 Employment Strategy and Policy EMP 2 Existing and Proposed Employment Areas. The respondents object to the Plan on the basis that it is not justified, in respect of making sufficient employment land provision. The respondent's own land at the junction of Bedlars Green Road, Dunmow Road and Start Hill, which was put forward as a proposed employment site as part of the Council's Call for site exercise in 2015. The site has not been proposed as an employment allocation in the Draft Plan, which the respondents believe is a missed opportunity, as the proposed allocations do not make adequate provision for the employment needs of the district.
- The new garden community west of Braintree straddles the District boundary with Braintree District Council. As well as homes there will be a range of local employment opportunities and services. As stated in the Publication Draft Local Plan the garden community will be located close to the A120 this garden community will be conveniently located to Braintree and London Stansted Airport for employment opportunities. The Council will work closely with Braintree District Council to ensure that this garden community is jointly master planned and delivered. Previous Submissions My clients put forward the site in in May 2015, under the Call for Sites Exercise, with further details submitted in February 2016 for a site for B8 Storage or Distribution. Council Reference 03Fel15. The submission included the Master Plan reference NC_15.199-P-200, showing approximately 9,550 square metres of floor space and a landscape Nature Reserve. Plan enclosed. The site is situated between the B1256 and the A120. Comments on the Regulation Publication Draft Local Plan The Publication Draft Local Plan states that the three new Garden Communities will each deliver a range of B-use class employment opportunities on site. The exact scale and nature of the employment opportunities will be determined through the master planning of each new Garden Community. Paragraph 5.35 and EMP 1 refers. In correspondence with Ms Nicholas of UDC in June 2017 she advised that: The regulation 18 Plan identifies the new garden communities as broad location on the Key diagram and the Policies Map. However these broad locations are indicating that development is not extending south of the B1256. The Council will in time need to consider the master planning of the site and the relationship to parcels of land such as your clients and whether they are included. I suggest you make appropriate representations when the plan is published for consultation in July. Draft Braintree Council Policy SP 10 of the Publication Draft Local Plan in respect of the new Garden Community Proposal states at paragraph C Employment and Jobs: This may include space for B1, B2 and B8 businesses in the southern part of the community close to the A120 as well as on non-employment park locations throughout the Garden Community to provide for a wide range of local employment opportunities Under the BDC Proposals Map the site access and frontage sits partly within this southern area. (The access to the site). Currently in the Uttlesford Plan the site abuts the Garden Community. Land to the west and east of the site is also excluded. In Planning terms it seems illogical to exclude these areas given the proximity to the A120 for access, that the land will become isolated between the B1256 and the A120, and its usefulness for any agricultural purposes will be diminished due to isolation and proximity to surrounding large scale infrastructure and comprehensive commercial development within the Garden Community and the likely B1, B2 and B8 uses. Although the Call for Sites Form specified B8 this was completed at a time when the Garden Community had not formally been put forward. Clearly my clients site will be capable of delivering a range of B-use class employment. Matters of access to the A120 in both directions are addressed at Uttlesford Policy SP 8, point 5 advising that reconfiguration and improvements to the junctions on the A120 in this area will allow access in all directions. That enhancements and contributions will be sought for this and other highway infrastructure proposals. The proposed site will be able to make a positive contribution to support this. It should also be noted that the proposal also includes the provision of a landscape Nature Reserve which can contribute towards the overall public open space for the Garden Community. Even if the Garden Community does not come forward there are strong Planning Arguments for the allocation of the site for employment use

because of its location abutting the A120. We request that we are contacted and involved in the discussions with land owners, developers, stakeholders, consultees and the Council in the Master Planning of the Garden Community and the relationship of my clients land to the Garden Community. Thank you. Similar submissions have been made to Braintree Council under their Publication Draft Local Plan

4.0 Policy EMP1 Employment Strategy 4.1 The DLP confirms that currently, there is 1 major employment centre in the South of the District at London Stansted Airport, a key employment area at Chesterford Research Park and smaller industrial estates located in settlements such as Saffron Waldon and Great Dunmow. 4.2 Currently, there is a total of 38 employment clusters in the District, totalling 256 hectares in size, consisting of B use class, non B use class and vacant sites. There is an estimated 80.5Ha of Industrial Land and 99,000sq.m of office floorspace in the Uttlesford District. 4.3 Although there has been progression in industries such as Transport and Communication, due to the growth of London Stansted Airport, there has been a decline in jobs in manufacturing. Furthermore, the DLP has confirmed that 68.4% of the residents of Uttlesford community beyond its boundaries, often to many distant employment centres. 4.4 The DLP states that approximately 14,360 jobs will be provided over the Local Plan period. Of these, 1,500 jobs will be in office, manufacturing and warehousing. In light of this, the Employment Land Review (ELR) has confirmed that 21,000sq.m of additional floorspace is required over the Local Plan period. 4.5 Of the 14,360 jobs provided throughout the Local Plan period, 700 jobs are to be created in the warehousing sector. In addition, there are 700 jobs in the manufacturing sector which are to be lost in the Local Plan period, therefore there is no net jobs growth in the Industrial Sector over the Local Plan period. 4.6 In addition, there is a requirement to provide 10.2ha of Industrial Land between 2016 and 2033, due to the provision of new jobs. 4.7 Further to these employment land requirements, Paragraph 5.28 of the DLP states that there are 38 Safeguarded employment sites located within the District. The DLP states that some of these site have further potential to redevelop, whilst some have no potential for further redevelopment. 4.8 It is our opinion that as some of these sites have no potential for further development, they are correctly identified as not being within the range of land available for additional Land at Slamsey's Farm 9 employment in the future. As such, alternative sites which have the potential to be redeveloped for future employment should be put forward in place of those which cannot. Further comment on this can be found in Section 5.0 of this representation.

Policy, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMP1 and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Policy EMP1 - Employment Strategy - Revise Fifth bullet point to read: The existing Principal Employment Areas set out in Appendix 6 as shown on the Policies Map shall be protected for B1, B2 or B8 uses. Other appropriate sui - generis and complementary employment generating uses may I so be permitted . Once developed, strategic allocations containing B1, B2 or B8 uses are safeguarded as Principal Employment Areas. Changes of use or redevelopment within the employment areas and sites which would result in a loss of floorspace for economic development uses will be resisted.

Individuals

Four Individuals

- Sixth bullet affects should be effects

- If UDC is serious, surely the first point should be about proactively encouraging employment opportunities in the Garden Communities, not just supporting. The second point refers to 43 hectares, contrary to the 55ha in policy SP11.
- Given the plan acknowledges that most residents work outside the boundaries of Uttlesford, why is there so little in the employment strategy about improving the local transport infrastructure, eg parking (especially at railway stations), roads, local bus services? Why is it so hard to get to railway stations by public transport in Uttlesford, even from Saffron Walden (the largest town) to Audley End?
- P76, EMP1, Employment: I oppose the policy change that would allow industrial and commercial development at Stansted Airport that is unrelated to the airport.

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Significant, Temporal and Secondary Effects - The policy will have significant positive impacts on employment and economic growth, and also education and skills through work with education providers and business representatives to encourage the provision of educational and vocational training courses which match the skills required by new and emerging businesses. This, notionally, can be expected to assist in addressing high commuting patterns in the long term. There will also be minor positive impacts on access in relation to the balance of dwellings and employment provision within the Plan.

Alternatives Considered - The ELR identifies the amount of employment land and floorspace needed during the plan period and makes recommendations as to where it should be located within the District. The findings of this important piece of Plan evidence are extended to the Policy, and any other broad approaches can be seen as unreasonable as a result or otherwise not distinctly different enough from the Policy approach to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Existing Employment Areas

Paragraph 5.46

This paragraph was responded to by one organisation and two individuals.

Support	0
Object	1
Comment	2

Overarching Summary

- How does this EMP2 work with permitted rights to change from business to residential if you don't change the external appearance? Great Chesterford already has around 10 dwellings created in this way in Station Rd, Great Chesterford which is included in your employments sites schedule; more are likely to follow.
- Policy, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. Para 5.46 - Revise to read as follows: (new text underlined, deleted text strike through) The policy recognises that there is a significant amount of employment generated by appropriate sui-generis and other complementary uses, e.g. builders merchants and car showrooms, which may be permitted as part of the overall employment strategy.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

Policy, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMP1 and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Para 5.46 - Revise to read as follows: (new text underlined, deleted text strike through) "Existing and proposed employment areas which are to be retained in these uses are identified on the Proposals Map. The policy also sets out the requirements that would have to be met in order to warrant making an exception to the policy of retention and permitting changes of use to non-employment uses. The policy recognises that there is a significant amount of employment generated by appropriate sui-generis and other complementary uses in ancillary B class uses, e.g. builders merchants and car showrooms , which may be permitted should be protected as part of the overall employment strategy.

Individuals

Where is the Proposals Map? I couldn't find it at 3.73 and I can't find it now.

How does this EMP2 work with permitted rights to change from business to residential if you don't change the external appearance? Great Chesterford already has around 10 dwellings created in this way in Station Rd, Great Chesterford which is included in your employments sites schedule; more are likely to follow.

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Not applicable

Existing and Proposed Employment Areas

Policy EMP2

This policy was responded to by 16 people/organisations.

Support	2
Object	7
Comment	9

Overarching Summary

- Concerns around the level of interest for employment land in the district.
- The NPPF states that 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.'

- Policy does not acknowledge important role of supporting (non B-class) uses in establishing successful business parks.
- We should clearly support the intensification of Principal Employment Areas.
- Employment sites in the Green Belt should be reviewed so as to allow reasonable expansion of existing employment sites.
- Allocations for future employment land being placed in just two locations (Chesterford and MAG Northern Ancillary Area) does not assist businesses seeking land that is available now, for non-office related employment development.
- We should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.
- The plan should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.
- Concerns over the marketing period suggested in the policy, either being too long or too short.
- Conversion to residential should not be encouraged.

Statutory consultees and other bodies

The Thaxted Society - EMP2 Support. We would object to most instances of change based upon 'no longer viable / employment' proof, without a seriously strengthened Appendix 5

As before with improved enforcement criteria for evidence base Appendix 5

Saffron Walden Neighbourhood Plan Group - Why invite people to come up with schemes to convert industrial sites to residential? It should be done on the basis of continued vacancies. Saffron Walden has a real opportunity to build on its reputation as a centre of creativity and more could be done to encourage further employment along the lines of Fairycroft House, with studio space for artists and workshop/creative opportunities. More needs to be done to help and encourage start-ups. Suggestion: Conversion of industrial to commercial should be allowed and new sites should be built with flexible accommodation that can be used as commercial or light industrial.

Stansted Neighbourhood Plan Steering Group - Why invite people to come up with schemes to convert industrial sites to residential? It should be done on the basis of continued vacancies. More needs to be done to help and encourage start-ups. Suggestion: Conversion of industrial to commercial should be allowed and new sites should be built with flexible accommodation that can be used as commercial or light industrial.

Saffron Walden Town Council - Conversion to residential should not be encouraged.

Essex County Council - Policy EMP2 Existing and Proposed Employment Areas (page 77) and Appendix 5 Marketing Assessment Information Whilst ECC is broadly supportive of the Marketing Assessment described within Appendix 5 of the Draft Local Plan, ECC recommends that UDC review the minimum period of time (12 months), outlined in the draft Local Plan, that commercial property is required to be marketed for when requesting a change of use within a designated employment site. ECC is mindful of the need to deliver housing, and given the strength of residential property values in UDC compared to commercial property development, ECC wish to ensure that any fluctuations in the performance of the commercial property market do not result in an unnecessary loss of commercial workspace in the district. ECC is also mindful that there are variations in approaches across Essex, and therefore it is recommended the UDC review the minimum marketing period given the existing evidence would suggest that a marketing period of 2 years will be applicable for a number of employment types. Further discussions with ECC are welcomed on this matter. ECC would welcome exploring whether varying marketing strategies may be adopted dependent on the use class, nature of the employment allocation (whether it is a newly proposed site or older employment site) and if there is a specific short fall in a particular use class.

Thaxted Parish Council - To be commended - Support policy

- Draft Policy EMP2 sets out the policy criteria against which proposals to change the use of existing employment areas will be judged. Turnstone St Neots Ltd has an interest in Land at Ashdon Road, Saffron Walden. Land at Ashdon Road is identified as an existing employment site. As the Council, will be aware, land at Ashdon Road was granted outline planning permission in 2014 for the mixed use development of the land. In broad terms, land to the west of the central access was approved for residential use and land to the east of the access drive was approved for commercial use. Following the grant of planning permission, all of the existing employment buildings were demolished and cleared from the site. A new (replacement) Ridgeons building has since been constructed and the remaining commercial land parcels have been serviced and prepared for development. The commercial land parcels are illustrated on the attached masterplan (drawing S035/P103) as being phases 1a (Ridgeons), 1b, 3 and 5. The commercial land at Ashdon Road has been the subject of a comprehensive marketing campaign since August 2014. This marketing exercise has been unsuccessful with no interest in the commercial land for class uses being raised. Of those parties who have registered a general interest in commercial/industrial floor space, the reasons for not pursuing land at Ashdon Road have included the poor access, especially for HGV's, the fact that site is not large enough and has poor road side visibility, together with competition from established sites that are better suited to their needs. The National Planning Policy Framework advises at paragraph 22 that Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative use of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable communities. □ The marketing of the site is on-gong but it has already been established that there is no reasonable prospect of the remaining commercial land at Ashdon Road being brought forward for commercial use. With the Ridgeons plot already having been delivered (phase 1a), it is considered correct to retain employment use to the phase 1b land which sits in front of the Ridgeons store. Residential use of this land would not be appropriate. In the case of Phase 3 and Phase 5, both land parcels are however suitable for residential use. In the absence of any market interest for commercial/employment uses, it is clear from paragraph 22 of the NPPF that the emerging Local Plan should avoid the long term protection of these parts of the Ashdon Road site. To continue to protect these development phases for commercial use would fail to have regard to market signals and would be in conflict with national guidance. In order for Policy EMP2 to be consistent with national policy and therefore sound, the Draft Policies map should be redefined with the protected Employment land designation relating to phases 1a and 1b only, as shown on the attached drawing, (drawing S035/P103). While this revision will reduce the amount of protected employment land it will still provide policy protection for the following: 1.8ha of land for a Sui Generis Builder's Merchant providing 5,939m² of floor space Phase 1a 0.76ha of land providing 3,650m² of B1 or B2 floorspace Phase 1b In total therefore, across land known now as Phases 1a and 1b, 9,589m² of floorspace either has been delivered or is available for commercial development. The outline application that was approved in 2014 established the commercial use of all commercial land phases at Ashdon Road (i.e phases 1a, 1b, 3 and 5). The consented development was assumed capable of delivering 11,347m² of either B class floorspace and/or a Sui Generis builder's merchant. 84% of the commercial floorspace original assumed either has or can still therefore be delivered if the Employment area designation on the polices map were to relate to phases 1a and 1b only. While it is considered that phases 3 and 5 should no longer be given policy protection because of the clear market signals that have been established through the extensive marketing of the site, the suggested revision to the Policies Map will ensure that an extensive area of commercial land/floorspace is retained. The proposed revision to the polices map is therefore in accordance with national guidance, the aims and objectives of the Local Pan

to retain viable employment areas near to residential areas, is effective and justified and therefore sound. By releasing phases 3 and 5 for residential development, land at Ashdon Road will also be capable of delivering much needed housing to help address the Council's housing shortfall. It would also release a deliverable brownfield housing site that can support the Council's Spatial Strategy for growth, which, as discussed further in our corresponding representations, is currently found to be unbalanced, not based on credible evidence and is ultimately undeliverable and unsound. Suggested revision: Amend the Policies Map for Saffron Walden to identify only Phases 1a and 1b, as illustrated on the attached drawing, (drawing S035/P103) as being an Existing Employment site Notwithstanding the above, Turnstone St Neots Ltd object to the current wording of Policy EMP2. As set out above, the land which is currently zoned for employment use has been the subject of an extensive marketing campaign. This marketing campaign has confirmed that there is no reasonable prospect of this employment land coming forward for employment use. As drafted, Policy EMP2 states that change of use of existing and proposed employment sites will only be supported where all of the policy criteria is met. In short this requires a development to demonstrate that the alternative/proposed uses provide an essential community benefit which cannot be located elsewhere, that the proposed use would not conflict with any existing commercial uses and that the site is not viable for commercial use. If it is demonstrated that the commercial land is no longer viable, or in the case of proposed employment sites, that there is no market interest and no reasonable prospect of any interest emerging, and if it is demonstrated that the proposed change of use will not conflict with any existing or potential employment use of surrounding land, the change of use proposal should be supported. The further policy test of demonstrating that the proposed use will satisfy an essential community benefit which cannot be located elsewhere in the area is an additional policy burden that is unjustified and unnecessary. In the case of land at Ashdon Road, it has already been demonstrated that Phases 3 and Phases 5 are not suitable for commercial use as there is no market interest. These development plots about residential land parcels and the use of these land parcels for residential use is the most appropriate use of the land. There is no policy justification, having regard to the NPPF to also require applications to demonstrate that housing cannot be located elsewhere within the area. As a result, and in order to ensure Policy EMP2 is consistent with national policy and therefore sound, it is requested that bullet point 1 be deleted. Suggested revision delete bullet point 1 of Policy EMP2

- We support the allocation of Thremhall Park as a Principal Employment Area as set out at appendix 6 of the draft Plan. Our concerns with policy EMP2 mirror those raised for EMP1, namely first that no explicit support is given for the intensification/expansion of Principal Employment Areas, and second, the policy does not acknowledge the important role of supporting uses in establishing successful business parks. Intensification/Expansion of Principal Employment Areas We are concerned that the wording of EMP2 is not sufficiently clear in its support for the intensification of Principal Employment Areas. As set out in our representation to EMP1, the intensification of a number of these areas is a specific component of employment land supply in district as set out in the Employment Land Review Update 2017 and should therefore receive explicit support. Policy EMP2 refers to safeguarding Principal Employment Areas for B-class uses. It does set out policy for the change of use or redevelopment or extension of sites or premise but in fact the policy only relates to proposals for uses other than those identified above (ie non B-class uses). As such the policy does not clearly offer support for the expansion/intensification of Principal Employment Areas for employment uses. Given, as set out in full in our response to policy EMP1, expansion/intensification of sites including Thremhall Park is a key component of employment land supply during the Plan period, we consider that EMP2 should offer clear support for this within the policy wording. Supporting Uses Our representation regarding EMP1 sets out our concern regarding the restrictive approach to supporting uses such as cafes within Principal Employment Areas given the importance of these uses to creating a vibrant and successful business park environment at Thremhall Park. This concern applies equally to policy EMP2, which specifically seeks to exclude non-B Class uses.

The criteria set out within EMP2 concerning proposals for non-B Class uses (community benefit, lack of conflict with B class uses and demonstrable proof of the non-viability B class use) do not reflect the role of supporting uses and should be revised to permit their existence and acknowledge their importance.

- Whilst we support the safeguarding of existing employment sites for employment use, we object to the restrictive nature of this policy. We welcome the reference in Policy EMP2 to change of use or redevelopment or extension however, do not consider that the wording of the policy does indeed support these. In summary, our concerns are: EMP2 does not explicitly support the intensification/expansion of the Principal Employment Areas, contrary to the recommendations of the Employment Land Review Update 2017. The wording of EMP2 is excessively restrictive with regard to supporting uses. Intensification/Expansion of Existing Employment Areas We are concerned that the wording of EMP2 is not sufficiently clear in its support for the intensification of existing employment sites; despite referring to 'redevelopment or extension', Policy EMP2 makes no provision for these. As set out in our representation to EMP1, the intensification of a number of these areas is a specific component of employment land supply in district as set out in the Employment Land Review Update 2017 and should therefore receive explicit support. Policy EMP2 primarily relates to applications for the change of use to non-employment uses. It is negatively worded so as to restrict the approval of such applications other than in exceptional circumstances. None of the provisions of the policy are relevant to an application for the intensification, redevelopment or expansion of an existing employment site, for the same use or change to another employment use not falling within Class B. It is therefore assumed that applications for redevelopment or extension for employment uses will be determined in accordance with national policy, which is supportive. Whilst this is welcomed and will be effective in non-Green Belt areas, it will not allow the expansion of employment sites in the Green Belt. The NPPF is clear at paragraph 83 that Green Belt boundaries, should only be altered through a review of the Local Plan. Therefore, unless the Green Belt boundaries are set so as to allow reasonable expansion of existing employment sites, they will be prevented from growth and development in their existing locations for the entirety of the plan period. We suggest the insertion of an additional policy, dealing specifically with growth and expansion of new and existing businesses which reflects the policy support for economic development in the NPPF. Specifically, a policy to support sustainable economic growth and the growth and expansion of all types of business and enterprise in the District to allow existing businesses to grow without relocating. Without the ability to expand at their current locations, established businesses could be lost from the district which would be contrary to Objective 2a of Chapter 2 of the consultation document. This aims to strengthen the local economy by enabling the growth of existing and new employers through the provision of suitable land and premises in sustainable locations to meet the anticipated needs and aspirations of businesses including providing opportunities for employment growth related to Stansted Airport. We also suggest the boundaries of existing employment sites within the Green Belt be reviewed in order to allow expansion of sites. For example, SLAA sites 03Sta15, 04Sta15 and 05Sta15, Land adjacent to M11 Business Link, Parsonage Lane, Stansted, would all allow expansion of an existing established employment site. The Green Belt Review considers the boundaries of this employment site only in the context of the whole of land parcel 8 which stretches from Stansted Mountfitchet to Bishop's Stortford. Whilst this is judged to make a strong contribution to the Green Belt, the wider parcel serves a very different purpose from the small SLAA sites adjacent to the employment site. Supporting Uses The policy as drafted supports B Class uses only, with recognition for non-B Class uses only supported where they are auxiliary to the B Class uses. The supporting text recognises that other types of employment are to be provided in the district, but are not provided for in the employment policies. It is not clear why this is the case and we consider that other employment uses are of equal importance and that changes of use to other employment uses, whether B Class or not, should be permitted within the existing employment sites under this policy. Our representation regarding Employment Sites

approach to supporting uses such as cafes within existing employment areas given the importance of these uses to creating a vibrant and successful business park environment. This concern applies equally to policy EMP2, which specifically seeks to exclude non-B Class uses.

- Policy EMP 1 Employment Strategy and Policy EMP 2 Existing and Proposed Employment Areas. The respondents object to the Plan on the basis that it is not justified, in respect of making sufficient employment land provision. The respondent's own land at the junction of Bedlars Green Road, Dunmow Road and Start Hill, which was put forward as a proposed employment site as part of the Council's Call for site exercise in 2015. The site has not been proposed as an employment allocation in the Draft Plan, which the respondents believe is a missed opportunity, as the proposed allocations do not make adequate provision for the employment needs of the district. The respondents object to the Plan on the following basis :- Paragraph 5.4 - The ELR seems to be based upon a direct link between population growth and employment requirement - this takes no account of the expansion requirements of existing business or inward migration (e.g. from NE London or Harlow) of businesses looking to locate in the District. Local and highly respected commercial agents, Coke Gearing has advised the respondents that it is their experience through the many enquiries they receive that urgent provision of sites is needed now to meet a known demand. Paragraphs 5.11/12/13 - these seem to be broad assumptions without evidence? Paragraph 5.28 The respondents remind the Council that these sites have already been developed and are now occupied. Whilst the Council acknowledge that new employment land needs to be allocated for future demand, which has been calculated as 10.2 ha up to 2033, the current demand, which is significant, is not being met with a ready supply of good quality employment land, as a result, the Council is missing out on job creation opportunities. The draft plan makes provision for an additional 10.2 ha, which is to form part of allocations at existing sites at Chesterford Research Park and at London Stansted Airport (Northern Ancillary Area). In the case of the former, the site is not suitable for larger shed development, which is in demand now, and in the case of the latter, the availability of land here is subject to significant constraints, see Para 3.6 below. Paragraph 5.31 this site is poorly located in terms of transport (other than car) and is the wrong side of the airport- the development is stalled due to lack of occupier interest (it is not 40% pre let). Paragraph 5.32 this is the Vision Stansted site, which is now fully developed and occupied. This site was put forward in a similar way to the respondent's site in representations made to the draft Plan in 2012. It was subsequently allocated, an application made for its development, approval granted, the development was started immediately. The site is now fully built out and occupied by businesses that have moved into the area. Better than anything else perhaps, Vision Stansted provides evidence of demand from outside the District, it also demonstrates the popularity of the location and its proximity to J8 of the M11. The respondents and their advisors are supremely confident that an allocation on the respondent's site would prove equally successful, not least because there are no similar sites that are available in the District, which are available now, in the right condition and location. The ELR makes the very point in its para 9.3.19, which states : Start Hill south of the B1256 adjacent to the Stansted Distribution Centre , Start Hill in particular offers a strategic location within close proximity to both Stansted Airport and Junction 8 of the M11 which would be very attractive to potential warehouse and distribution occupiers The statement above exactly mirrors the attributes of the respondent's site at Start Hill. There is no capacity available at the Stansted Distribution Centre or at Vision Stansted, therefore an additional site is needed now to meet this requirement. Paragraph 5.35 from our experience and a review of these plans, the delivery of any employment will be long after delivery of the housing and infrastructure. The nature of this sort of site is that the employment development will be small scale and largely retail/service sector related. The potential for these sites to come forward and make a meaningful contribution to the requirements in the plan period is considered to be very low. It is also the case that the delivery overall of the Garden Communities is somewhat uncertain, there are employment requirements in the District now, which are not being met due to the lack of supply of available land. Paragraph 5.36 The

London Stansted Airport (Northern Ancillary Area) site is subject to a number of constraints both physical, legal and in terms of servicing and access. These issues mean that securing land for employment development here is very difficult in the short to medium term. It is understood that a significant area of this site is very soon to be the subject to a planning application for a large single user, which will significantly reduce the availability of land here for localised SME led demand in this area. There are also issues and concerns associated with the allocation of future employment land provision on a site, which is monopolised by Manchester Airport Group. Any supply is subject to the operational needs of the airport operator, who is currently consulting on further expansion of the airport, which will inevitably have an impact on the appetite for non-core activities and puts a further question mark over the reliance on this site, as providing a supply of readily available land to meet the local and migratory needs of businesses.

Proposed Allocation at junction of Bedlars Green Road and Dunmow Road Start Hill. The respondent's land at the junction of Bedlars Green Road and Dunmow Road extends to some 2.0 hectares. The land is well screened and accessible to the highway network, being almost immediately adjacent to Junction 8 of the M11. Discussions with the Highway Authority have revealed that a junction on to Dunmow Road would be acceptable and an initial design has been agreed. The site is bounded by a number of trees, which can be protected and would be clear of any development. The site has also been the subject of detailed phase one habitat assessments, which reveal that the site could be developed with some ecology mitigation. There is also the possibility of some ecological enhancement, with land being provided as part of any development, as a termination of the Local Wildlife designation of the Flich Way. Surface water can be managed on the site, as part of a sustainable drainage strategy. The site is not within the Green Belt; however, it is acknowledged that the land falls within the Countryside Protection Zone (CPZ) around the airport. It should be noted however, that the author of these representations made a similar case to the Draft Local Plan abandoned in 2015, in relation to the recently developed site at Dunmow Road, Start Hill. This site, which is adjacent to the Stansted Distribution Centre, and is now known as Vision Stansted, was also in the Countryside Protection Zone at the time the representations were made. However, having regard to the planning balance, it was allocated for employment use, a planning permission was subsequently granted and the site was quickly built and occupied as predicted, due to the known demand and the lack of available employment sites in the District. This same scenario is being repeated now, it is fair to say that if a business wishes to erect a new employment shed in the District now, there are no sites currently available, which have good accessibility to the strategic highway network. The respondents put the respondent's site forward in a pre-application submission, based on a specific requirement at the time from The Samaritans, for a proposal to build their European Headquarters. Officers did not support the proposal, simply because the site was not allocated and in view of its location within the CPZ. The Samaritans, frustrated by the lack of available land and the time taken to secure a site, chose to move operations to the USA. The case made to Officers in the pre-app, continues to be valid now. That case includes details of the employment land supply that was available (September 2016) which has not improved and provides details of the list of known requirements for land held by local commercial agents Coke Gearing. These documents along with a plan of the respondent's site is to be sent separately to planningpolicy@uttlesford.gov.uk. The evidence is that allocations for future employment land being placed in just two locations (Chesterford and MAG Northern Ancillary Area) does not assist businesses seeking land that is available now, for non-office related employment development. The airport land is not available in the short to medium term and is entirely dependent on the operations of a private business, who holds the monopoly on the only available of non-office related employment development land in the District, this cannot be a healthy position and does not assist the creation of jobs in the District. The employment policies of the Draft Plan are not consistent with the advice provided to local authorities in the National Planning Policy Framework (NPPF). It cannot be said that the policies and employment strategy as proposed in the Plan, is consistent with the NPPF, which requires at para 21 that :-

Planning policies should recognise and address potential barriers to investment,

including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should: set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances; plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

- Policy, as currently worded would appear to restrict development within existing and proposed employment areas to Class B uses. It is considered that such a restriction is unnecessary and is likely to unduly prohibit sustainable employment generating development, which may otherwise be delivered. For these reasons Policies EMP2 and EMPI and the supporting text at paragraphs 5.46 and 5.4 as currently drafted are not compatible with National Planning Policy set out in the NPPF and do not represent the most appropriate approach to planning for sustainable economic development. Consequently, it is considered that the draft Local Plan remains unsound' in the context of paragraph 182 of the NPPF and requires amendment as set out below, which would address our objections. Requested Amendments To allow for sustainable economic development opportunities to be delivered at the Chelmsford Road site in particular, the following amendments to the employment policies and text are requested. Policy EMP2 - Existing and Proposed Employment Areas - revise to read as follows (new text underlined and deleted text strike through): Existing and proposed employment areas identified as such on the policies map will be safeguarded for offices, warehouses, industrial and appropriate auxiliary B class employment supporting ' sui generis' and other uses. Planning permission will only be granted for the change of use or redevelopment or extension of sites or premises in these areas for uses other than those identified above in exceptional circumstances where all of the following criteria are met: The proposed use provides an essential community or employment generating benefit which demonstrably cannot be located elsewhere within the area it serves The proposed use would not conflict with any existing or potential other employment uses in the employment area in terms of environmental, traffic generation or any other planning matters; and Where the applicant is able to provide demonstrable proof that the employment use is no longer viable or suitable. The non-viability of employment uses would need to be proven either by marketing or an independent assessment in accordance with the requirements set out in Appendix 5.
- The Council has expended significant effort in developing a strategy for the location of what is claimed to be sustainable economic and housing growth for the next 20 years. In terms of economic development it has obtained and continued to update a review of employment land a key driver of economic growth. The key conclusions of the ELR are that there should be an approach towards to the provision of employment land comprising: Support for appropriate uses within town centres; Protection, but also monitoring, of existing employment sites; Continued growth of appropriate employment at the regionally strategic locations of Stansted Airport and Chesterford Research Park; The delivery of appropriate employment uses within the proposed new settlements; and The identification of suitable new sites to provide flexibility for additional employment growth that is for whatever reasons cannot locate to or is not appropriate on the above sites. The draft Local Plan appears to completely ignore the last of these. In short, the draft Local Plan appears to propose that, for the next 20 years, employment development within the District be constrained to, only: Town centres; Existing employment sites; Stansted Airport

and Chesterford Research Park; and The proposed new settlements. We are of the view that this strategy entirely fails to reflect the conclusions and recommendations of the Council's own evidence base that supposedly provides the justification for the proposed strategy, and will fail to provide the required range and choice of land for employment development. As such, we are of the view that Chapter 3 (Spatial Strategy) and particularly Policy SP4, and Chapter 5 (Employment) and particularly Policies EMP1 and EMP2 do not provide a sound basis for employment development in Uttlesford over the plan period. We are therefore of the view that the draft Local Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy. The Needs of East Hertfordshire In addition, there is no evidence that the needs of Bishop's Stortford, within neighbouring East Hertfordshire and which immediately abuts and is therefore constrained by any proposals within Uttlesford (as well as other factors), have been taken into account or meaningfully discussed and a strategy to address those needs agreed with East Hertfordshire. On this basis, we are also of the view that the draft Local Plan fails the required duty to cooperate.

Policy EMP 1 Employment Strategy and Policy EMP 2 Existing and Proposed Employment Areas. The respondents object to the Plan on the basis that it is not justified, in respect of making sufficient employment land provision. The respondent's own land at the junction of Bedlars Green Road, Dunmow Road and Start Hill, which was put forward as a proposed employment site as part of the Council's Call for site exercise in 2015. The site has not been proposed as an employment allocation in the Draft Plan, which the respondents believe is a missed opportunity, as the proposed allocations do not make adequate provision for the employment needs of the district.

Individuals

Two Individuals responded

Please remove "sui generis" from line 4 and replace with plain English.

P77, EMP2: The conversion of industrial sites to residential should be discouraged.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

This policy seeks to retain employment areas which will have positive impacts on the supply of sustainable employment provision and the provision of employment based training opportunities by safeguarding existing employment areas and only allowing a change of use from employment in exceptional circumstances. The flexibility in the policy ensures an ability to respond to future conditions in light of the potential unviability of employment land in the future, however maintains a stance of that reflects the disparate location and provision of employment land across the district. The policy therefore responds to a sustainable use of land as a resource within a local context, whilst also complying with paragraph 22 of the NPPF ('Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities'). There will additionally be secondary positive impacts on promoting accessibility and encouraging the use of sustainable travel by retaining existing and proposed employment sites, ensuring that settlements remain sustainable in providing both jobs and homes where this is evident.

Alternatives Considered

One alternative policy approach has been considered reasonable.

- Alternative EMP2(a): Allow the release of existing industrial estates for residential purposes, where there is a developer interest and the site is well located, and seek to find compensatory provision as and when the need arises.

Summary of effects and reason for rejection

Although the alternative could arguably be considered NPPF compliant and in adherence to a presumption in favour of sustainable development, allowing the release of existing industrial uses for residential purposes can be seen as a generally unsustainable approach within the context of Uttlesford and in response to a concentration of the District's employment land at Stansted airport. For this purpose, the alternative can be seen to have uncertain impacts regarding accessibility and sustainable transport as well as economic growth, in the absence of any details as to the location, sustainability and general quality of compensatory provision. For these reasons the alternative has been rejected.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Non-Estate Employment Uses

Policy EMP3

This policy was responded to by 6 people/organisations.

Support	1
Object	0
Comment	5

Overarching Summary

- EMP3: As before with improved enforcement criteria for evidence base Appendix 5;
- Again, why invite change of use?
- Change of use should not be encouraged beyond what is already permitted development. To note Saffron Walden Business Centre (map18) is not shown on Saffron Walden inset map "is not shown as employment area. Proposed Change: Note error on map which needs to be amended
- To be commended - Support policy

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan Steering Group - Again, why invite change of use?

Walden Town Council - Change of use should not be encouraged beyond what is already permitted development. To note Saffron Walden Business Centre (map18) is not shown on Saffron Walden inset map is not shown as employment area. Proposed Change: Note error on map which needs to be amended

Thaxted Parish Council - To be commended - Support policy

Developers/landowners/site promoters

The Thaxted Society - EMP3 As before with improved enforcement criteria for evidence base Appendix 5.
As before with improved enforcement criteria for evidence base Appendix 5

Individuals

- No individuals responded.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Employment sites which are located outside of industrial estates provide a large proportion of the employment in the district and are important contributors to the local economy. It is therefore important that safeguards are made through policy to ensure these sites are retained for employment uses where they are viable but allow flexibility to respond to instances where sites are no longer suitable for employment. The flexible approach taken forward in this policy safeguards employment sites in the first instance but allows for sites that have outlived their viability to be changed into more suitable uses providing justification is proven. This ensures that employment provision is suitably and sustainably located and could also provide additional land for residential development which would have positive impacts on addressing housing need. Ensuring that uses are more suitably located would also positively impact on accessibility and will lead to a comparative reduction in vehicle emissions.

Alternatives Considered

One alternative policy approach has been considered reasonable.

- Alternative EMP3(a): Policy to protect all existing employment sites from changes to other uses

Summary of effects and reason for rejection

This alternative will have a range of positive, negative and uncertain impacts on sustainability objectives. There will be uncertain impacts on townscapes, should existing employment land be protected in perpetuity and this will also give rise to negative impacts regarding the sustainable use of land. There will be uncertain impacts on accessibility to jobs and housing growth, should viable residential development be deemed unsuitable on previous although vacant employment land. This is also unlikely to stimulate further employment development, should safeguarded land be undesirable. It is acknowledged that it is important to retain sites; however such a policy approach is inflexible, would not respond well to growth and development needs on a district-wide basis and does not conform to elements of National Policy. As such, this approach has been rejected.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Existing Employment Areas

Paragraph 5.48

This paragraph was responded to by one individual.

Support	0
Object	0
Comment	1

Overarching Summary

- Accepting that rural economy needs protecting, maybe, 1% of housing stock could be released on an agricultural tenancy, therefore giving low paid farmworkers a home.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

None

Individuals

- Accepting that rural economy needs protecting, maybe, 1% of housing stock could be released on an agricultural tenancy, therefore giving low paid farmworkers a home.

Sustainability Appraisal June 2017

Not applicable

Rural Economy

Policy EMP4

This policy was responded to by 5 organisations and 2 individuals.

Support	4
Object	1
Comment	2

Overarching Summary

- Broadly in support of this policy, as recent experience has shown that re-allocation of vacant farm buildings and agricultural use to full scale employment use provides a welcome supply of new accommodation and a sensible re-use of otherwise redundant buildings.
- Support wholeheartedly. Examples are both imaginative and visionary. Re-use and adaptation should be the bywords for rural commercial development and the Society's policy of encouraging a revival in crafts and making fits well with this policy.
- Support the Policy. Please ensure more bridleways are provided that link up to the existing network.
- The plan abuses the local environment.
- Rural Economy - No mention of sustainability.
- Saffron Walden also needs a hotel badly as Cambridge cannot meet current demand. Saffron Hall is limited in its offering as rooms are needed for orchestras etc.
- Schemes should be encouraged to generate their own energy and to minimise use of the car.
- Welcome requirements within this policy for development proposals to respect landscape character. Request that a similar level of protection is added for the wider historic environment.
- The policy seeks to encourage tourism and therefore it would be pertinent to refer to the potential that developments of tourist and leisure facilities may have in enhancing, better revealing and providing access to the historic environment.

Statutory consultees and other bodies

Coke Gearing Limited - Once again we are broadly in support of the Council's policy here, as in our recent experience re-allocation of vacant farm buildings and agricultural use to full scale employment use provides a welcome supply of new accommodation and a sensible re-use of otherwise redundant buildings.

The Thaxted Society - EMP4 Support wholeheartedly. Examples are both imaginative and visionary. Re-use and adaptation should be the bywords for rural commercial development at Uttlesford and the Society's policy of encouraging a revival in crafts and making fits well with this policy.

Saffron Neighbourhood Plan Steering Group - No mention of sustainability. Schemes should be encouraged to generate their own energy and to minimise use of the car. Saffron Walden also needs a hotel badly as Cambridge cannot meet current demand. Saffron Hall is limited in its offering as rooms are needed for orchestras etc.

Historic Environment - We welcome the requirements within this policy for development proposals to respect landscape character. We request that a similar level of protection is added for the wider historic environment. The policy seeks to encourage tourism and therefore it would be pertinent to refer to the potential that developments of tourist and leisure facilities may have in enhancing, better revealing and providing access to the historic environment. The policy also identifies the role that the re-use of rural buildings has to play in supporting the local rural economy. The reuse of traditional buildings and finding viable uses for vacant or derelict historic buildings can help support a vibrant rural economy provided the reuse of the building is commensurate with its conservation.

Developers/landowners/site promoters

None

Individuals

Two Individuals responded.

Thank you for finally mentioning equestrian. We contribute a lot to the local economy. Please ensure more bridleways are provided that link up to the existing network.

The plan abuses the local environment.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

This policy would have positive impacts on the natural environment where a criterion stipulates that development will only be permitted where it protects or enhances the character of the countryside and its biodiversity value. The policy will also have significant positive secondary effects on landscape, through re-use, and also the sustainable use of land. Impacts on the historic environment are uncertain in association with the possibility that redundant rural buildings are historic in nature and could be non-designated heritage assets that otherwise are not covered by policy within the Plan.

Alternatives Considered

One alternative policy approach has been considered reasonable.

- Alternative EMP4(a): For the re-use of rural buildings outside development limits to be limited to employment purposes; or if demonstrably unviable, then for another non-residential use, or for residential use only if all other types of use are demonstrably unviable (as proven either by Summary of effects and reason for rejection

Although paragraph 28 of the NPPF requires Local Plans to promote a strong rural economy by enabling the growth and expansion of rural businesses and enterprises through the conversion of existing buildings. Nevertheless, Permitted Development rights allow the change of use of agricultural buildings for a range of uses subject to certain criteria being met. The Preferred policy approach only applies in those cases where planning consent is required. The implications of the Policy are that not all buildings will necessarily be appropriate for some form of beneficial use; however the alternative can be seen to conflict with the

possibility that rural buildings may be suitable for non-employment uses and a general presumption in favour of sustainable of non-employment development in such areas. For this reason the alternative has been rejected in favour of a less constrained approach as espoused in the Policy. The alternative is also likely to lead to fewer schemes being viable in rural areas, which remain redundant and do not improve local landscape and townscape as a result.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

CHAPTER 6 Retail

Retail

Paragraphs 6.1- 6.9

This supporting text was responded to by 14 people/organisations.

Support	1
Object	4
Comment	9

Overarching Summary

- Retail in smaller towns should be supported where retail is being lost to accommodation
- Query on location of Uttlesford Retail Study (2016) in Local Plan
- Food_superstores do not capture nearly all the main food-shopping spend in the District
- The Local Plan seeks to address the loss of village services where possible and it would be interesting to know which items address this issue
- Village services should be a requirement

Statutory consultees and other bodies

No comments received.

Developers/landowners/site promoters

No comments received.

Individuals

- Where is the Uttlesford Retail Study (2016)? There is an Uttlesford Retail Capacity Study. Is this what is meant?
- Better design of retail and commercial units on the edges of towns would give a stronger sense of identity with the historic centres.
- Where is the Uttlesford Economic Development Strategy (2016-2018)? It is not held in the Retail section of Local Plan evidence and background studies
- Support should be given for retail in smaller towns such as Thaxted, where retail is being lost to accommodation.
- A significant proportion of expenditure on comparison spend albeit.
- This section is hardly consistent with 6.6. Saffron Walden and Great Dunmow food superstores do not capture nearly all the main food-shopping spend in the District. Residents of Elsenham and Stansted Mountfitchet shop either in Stansted Mountfitchet or in Bishop's Stortford.
- Stansted Mountfitchet now has a medium-sized Co-operative store.
- This may be true about Thaxted, but it is rather dismissive. Thaxted residents need support to retain local retail
- This section states, the Local Plan seeks to address the loss of village services where possible. It would be interesting to know which items address this issue.
- Village services should be a requirement. Is there costing for maintaining health and well-being in small communities with such services compared with no services? Perhaps the potential for saving money would change the "where possible" into "definite provision".
- Policy supported.

No policies to appraise.

Retail Strategy

Paragraphs 6.10- 6.11

This policy was responded to by 3 people/organisations.

Support	0
Object	1
Comment	2

Overarching Summary

- Out of Town retail cannot be encouraged at NUGC to the detriment of Saffron Walden.
- Traffic consequences will be significant and adverse.
- Whether it would be appropriate for retail provision in the proposed neighbourhood centres to be restricted to just a supermarket and small convenience shops for a settlement of this size.

Statutory consultees and other bodies

Clerk Great Chesterford Parish Council - It is noted that a town centre first approach is adopted. NUGC will therefore be reliant on Saffron Walden for retail. This is the predictable outcome. Out of Town retail cannot be encouraged at NUGC to the detriment of Saffron Walden (and the inevitable traffic consequences for all). It is therefore highly unrealistic to suggest that NUGC can have a sustainable retail offering. It may well have local shops/chemists etc, (as backed up by paragraph 6.17) but independent shops of the depth and history of Saffron Walden will not be achieved at NUGC and so the retail focus will, rightly, remain at Saffron Walden. The traffic consequences will be significant and adverse. Policy RET1 specifically states that retail development will need to ensure the totality and viability of Uttlesford's existing town and local centres and the scale of development will need to be consistent with the hierarchy which has Saffron Walden at the top.

Developers/landowners/site promoters

Clearly, retail providers have an interest in supporting new housing but this conflicts with AECOM's concerns that no large single Town Centre be provided as part of WoB since this could have a detrimental impact on the sustainability and vigorous activity of Braintree town centre and may well affect its viability. In addition, AECOM acknowledge that a development of this scale could have the potential to act as a competitor location and thus impact the resilience of established centres, especially Braintree Town Centre. BDC themselves have suggested that the level of new retail provision for the new settlement should be limited. They also question whether it would be appropriate for retail provision in the proposed neighbourhood centres to be restricted to just a supermarket and small convenience shops for a settlement of this size. This is an important point which seems to have been ignored.

Individuals

- Where is the Uttlesford Retail Study (2016)?

Town and Local Centres Strategy

Paragraphs 6.12- 6.17 and Policy RET1

This policy was responded to by 24 people/organisations.

Support	7
Object	7
Comment	10

Overarching Summary

- Saffron Walden NP note no mention of increasing SW town centre retail area with a need to support independent shops in Saffron Walden to maintain character of town
- Saffron Walden Town Council support policy noting hierarchy of Saffron Walden/do not support out of town retail
- Littlebury Parish Council consider the growth of on line shopping/impact not addressed
- Stansted Mountfitchet NP consider 30 minutes of free parking needed Grafton/Lower Street
- Braintree District welcome inclusion of local centre for West of Braintree/consider likely that the size of the West of Braintree garden community may require a town centre in the long term
- Thaxted Society support with improved compliance
- Thaxted Parish support
- Individuals note new developments need to be sustainable, doubt that the Garden Communities will reach the size/pace necessary to support local retail services, travelling to Saffron Walden requires a car, retail outside of Saffron Walden only where not viable in the town centre
- Developers consider West of Braintree Garden Community provide local centres for day to day needs, within walking or cycling distance
- Switch from A1 retail to a range of service uses including A3/A4 and D1 and D2.
- The new communities should provide retail floor space in order to meet the day-to-day needs of the new settlements residents and to create a vibrant centre in order to encourage social interaction and a sense of community.
- New retail opportunities are supported in Thaxted village to ensure its longer term vitality and viability.
- Important that daily retail needs are met at the outset to minimise traffic movements and develop the community.

Statutory consultees and other bodies

The Thaxted Society - RET1 Support but with improved compliance.

Saffron Walden Neighbourhood Plan Steering Group - No mention of increasing the retail area in SW town centre. How does providing the retail development for North Uttlesford Garden Village work? Where will people park? Suggestion: Need to support independent shops in Saffron Walden to maintain character of town.

Stansted Neighbourhood Plan Steering Group - The best way of maintaining the vitality of Stansted Mountfitchet is to allow 30 minutes or so of free parking at Crafton Green and Lower Street Suggestion: Plus - better provision of on-street parking for impulse in-out quick shopping

Braintree District Council - Policy RET1 Town and Local Centres Strategy BDC welcomes the recognition of the West of Braintree garden community has a local retail centre in the policy. However we would welcome clarification if this is related to only the Plan period. Whilst the changing nature of town centres and retail makes future requirements difficult to predict, it is likely that a town the size of the West of Braintree garden community is likely to require a town centre in the long term.

Saffron Walden Town Council - Note Saffron Walden Business Centre is not shown on the policies map Query, this policy notes that floor space for a convenience store by 2026 of 5,000sqm but this is contrary to page 19 (last para) which notes there is not additional employment floor space in SW. No mention of increasing the retail area in SW town centre. Query: We support this policy noting the hierarchy of Saffron Walden. The town does not need a supermarket of this size the floor space represents a superstore, not a convenience store. Need to support independent shops to maintain the character of the town. Also note that we wish to protect the town centre and we do not at all support out of town retail parks. New developments need to be sustainable. Query this discrepancy.

Littlebury Parish Council - There should be sufficient properties in garden villages eventually for most of their regular retail needs to be provided within the settlement. However, it is important that daily retail needs are met at the outset to minimise traffic movements and develop the community. The growth of on line shopping, and its impact on established shopping centres is not addressed. Out of town retail should be minimised.

Thaxted Parish Council - Supported

Developers/landowners/site promoters

- Support policy RET1, requiring the provision of local centres at each of the three proposed Garden Communities. The development vision and master plan submitted by GL Hearn on behalf of ANSC (July 2017 update enclosed) identified three district centres, two of which would be provided within the ANSC controlled land, and one within the Boxted Wood development promoted by Galliard Homes. Each district centre would be served by a food store and community uses and an employment park. Each district centre would be split in to 3 hamlets with every hamlet containing a local shops and communities uses, allotment / community orchard and neighbourhood play areas. Local primary schools would also be accessible within each hamlet. In summary, it is envisaged that the West of Braintree Garden Community (WBGC) should provide local centres that provide for the day to day needs of the new community, within walking or cycling distance. Further detailed master planning relating to the local centres for the WBGC will need to be progressed through a Supplementary Planning Document, framework or similar.
- Once again we are broadly supportive of the Council's policies and approach in relation to their retail strategy; however this needs to be adopted flexibly given the clear impact of the internet, amongst other influences, on the viability of many town centres. The practical effect of this is to switch demand from A1 retail to a range of service uses including A3/A4 and D1 and D2. In the circumstances we believe the Council should adopt a flexible approach, particularly for smaller units within the town centre, in accordance with the General Development Order in order to maintain the viability of the core town and local centres.
- Support policy RET1 requiring the provision of a local centre at the North Uttlesford Garden Community with the type and scale of the retail floor space determined through the masterplan process and commensurate with the scale of the new settlement. Grosvenor support Paragraph 6.17 recognising that the new communities should provide retail floor space in order to meet the day-to-day needs of the new settlements residents and to create a vibrant centre in order to encourage social interaction and a sense of community. As identified in paragraph 6.14 of the Plan, provision of food and drink retail in particular can increase the number of residents shopping locally, reducing unnecessary travel and in particular encourage walking. The provision for the North Uttlesford Garden Community will seek to create a mixed retail offer in order to meet these needs, encourage local shopping whilst being mindful of complimenting the retail offer of the established District centre market town of Saffron Walden as noted in Paragraph 6.10, whilst also seeking opportunities, where appropriate, to prevent further loss of expenditure to centres outside of the District as identified in Paragraph 6.9.
- 3. Retail (Policy RET1) Policy RET1 - Town and Local Centres Strategy 3.1 We support the identification of Thaxted as a 'Local Centre'. 3.2 Thaxted plays an important role in providing for the local community and tourists. It is important new retail opportunities are supported in the village to ensure its longer term vitality and viability.

- We seem to have many coffee bars and charity shops. In so far as the former add to sociability that's fine. More mention should be made of the markets held in the town square on Tuesdays and on Saturdays.
- Paragraph 6.14 supported
- The wording in paragraph 6.16 suggests unawareness that Stansted Mountfitchet now has a medium-sized Co-operative store
- The new garden communities should provide for more than the top-up shopping suggested in the second sentence - and indeed that sentence is not consistent with the end of the paragraph.
- No artificial new settlements please.
- It is unreasonable/unsustainable to force inhabitants of towns the size (and bigger!) of Saffron Walden to shop elsewhere by only providing for top up shopping!! People will have to use cars to go shopping in SW I strongly object. I ran out of time/gave up at this point.
- It is indicative of the irresponsible attitude to development in Elsenham that the village has increased by over 60% and yet there is apparently no need for it to be included in the Retail Strategy.
- Doubtful that the proposed Garden Villages will reach the necessary dwellings at a sufficient pace in order to support local retail services.
- It is likely that Garden Villages will become wholly dependent upon door step deliveries derived from internet shopping.
- This is in conflict with Policy TA2, as travelling to and from Saffron Walden to use retail services will require a car to accommodate goods and this does not encourage a modal shift to sustainable transport.
- Any retail development outside of Saffron Walden town centre should only be permitted where it can be demonstrated that it is unviable to locate it within the town centre.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

This policy effectively safeguards retail provision in the district which would positively ensure employment provision in this sector. Positive impacts will also be associated with maintaining the district's historic centres as these correspond to town and local centres which this policy seeks to maintain the character and function of. There will be positive impacts on accessibility and the use of sustainable transport through town and local centres benefitting from established transport interchanges for the wider area.

Alternatives Considered

No alternative approaches can be considered reasonable as the policy reiterates the thread of sustainable development as espoused in the NPPF. Any alternative that deviates from this approach would either be contrary to NPPF and therefore an unsound approach, or not distinctly different from the Policy to be considered an alternative for the purposes of identification and assessment within this SA.

Proposed Mitigation Measures / Recommendations

Through iterative working, it was recommended within a draft SA that the Garden Communities be included and defined within the retail hierarchy as appropriate (as per paragraph 23 of the NPPF), in order to inform future proposals for retail, leisure uses in the latter stages of the plan period and an indication of their status beyond. It was further recommended that the new settlements are categorised as equivalent to local centres within the retail hierarchy, so as to adhere to Garden City principles. This recommendation has been factored into the Policy. As such, no mitigation measures or recommendations are proposed at this stage.

The Location and Impact of New Retail Development

Paragraphs 6.18 and Policy RET 2

This policy was responded to by 9 people/organisations.

Support	3
Object	0
Comment	6

Overarching Summary

- Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council add out of town retail only if no town centre site/convenience stores are needed on developments more than 500m from retail centres
- Harlow Council welcome recognition of retail hierarchy/future retail floor space for each garden community could be linked to Retail Impact Assessment threshold in Policy RET2 (1000m2).
- The Thaxted Society support with improved compliance
- Developer considers threshold in proposed Policy RET2 is not based on any empirical evidence/ should be 750sqm for out of centre retail development
- Individual want out of centre applications to show they will provide a net increase in jobs

Statutory consultees and other bodies

The Thaxted Society support Policy RET2 however with improved compliance. It is also the Society established policy.

Saffron Walden Neighbourhood Plan Steering Group - Should add to policy that any retail development outside town centres must demonstrate unviability or impracticality of the development being in the town centre. Suggestion: Convenience stores are needed on developments more than 500m from retail centres.

Stansted Neighbourhood Plan Steering Group - Should add to policy that any retail development outside town centres must demonstrate unviability or impracticality of the development being in the town centre. Suggestion: Convenience stores are needed on developments more than 500m from retail centres. (FHP combined shop/community centre).

Saffron Walden Town Council - Should add to policy that any retail development outside town centres must demonstrate unviability or impracticality of the development being in the town centre. Proposed Change: Amend wording as proposed. Also note that convenience stores are needed on developments more than 500m from retail centres.

Harlow District Council - Retail Policy (Para 6.9 Policy RET 1 RET2 and RET5) The recognition given that it is an unrealistic position for settlements in Uttlesford to compete against Harlow's retail sub-regional role is welcome given the largely rural nature of Uttlesford District. Future retail floor space for each garden community could be linked to the Retail Impact Assessment threshold mentioned in Policy RET2 (1000m2).

Developers/landowners/site promoters

- On behalf of our client, Sainsbury's Supermarkets Ltd, we submit representation in respect of the Uttlesford District Council Regulation 18 Local Plan Consultation. Whilst Sainsbury's currently does not have any stores within the District, Sainsbury's has a keen interest in emerging planning policy for the District. Proposed Policy RET2 suggests the requirement for an impact assessment to be submitted with proposals of more than 1,000 sqm on sites outside town and local centres. However, the retail capacity study prepared by Swills (July 2016) does not recommend any threshold. The

threshold outlined in proposed Policy RET2 is therefore not based on any empirical evidence. On this basis, we consider that in order for the Council to be able to assess the cumulative effects of out of centre development, the threshold should be 750sqm for retail development. We trust these representations will be taken into account in the next iteration of the Local Plan and would be grateful if you could keep us informed of the progress of the Plan.

Individuals

- Applications for retail development outside of town centres should robustly demonstrate that they will provide a NET increase in employment. That is that there will be a net increase in jobs once all the jobs they have destroyed in the town centres have been deducted from the new jobs they claim their new retail outlet will provide.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There will be positive impacts on the economic function of existing town centres as a result of the Policy. The Policy seeks to protect town centres for suitable retail uses in the first instance, however is flexible enough to ensure that each scheme for out of centre retail is judged and determined on its own merits.

Alternatives Considered

No alternative approaches can be considered reasonable as the policy reiterates the thread of sustainable development as espoused in the NPPF. Any alternative that deviates from this approach would be contrary to NPPF and therefore an unsound approach.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed at this stage.

Town and Local Centres and Shopping Frontages

Paragraph 6.19- 6.21 and Policy RET3

This policy was responded to by 13 people/organisations.

Support	6
Object	0
Comment	7

Overarching Summary

- Saffron Walden Town Council query if prevents A3 uses in the town centre/reduces protection
- Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council consider reduces protection/ prioritise primary shopping frontages to remain so, especially in Saffron Walden, not allow change of use from A1
- The Thaxted Society opposes any change of use from retail/considers the encouragement of revived crafts and arts to fulfil both retail growth and tourist attraction.

Statutory consultees and other bodies

The Thaxted Society - RET3 The Thaxted Society as a matter of policy opposes any change of use from retail to residential. Whilst there is merit in a mix, and the policy suggests conversion of 1st floors to residential, where these are separate they deny new forms of retail now emerging. A business may prove viable where the owner lives above. At Thaxted we consider the encouragement of revived crafts and arts to fulfil both retail growth and tourist attraction. Thaxted has a long tradition of 'making' and at the Society

we have lobbied for this to be recognised and encouraged. Live work makes low profit commerce viable, sustainable, and appropriate.

Saffron Walden Neighbourhood Plan Steering Group - This policy is supposed to protect retail but in fact reduces the protection. We should be increasing the amount of primary shopping frontage, not reducing it. We do not want to allow any change of use from A1 without planning consent. Suggestion: This policy needs to be flexible in the right places but prioritise Primary shopping frontages to remain so, especially in Saffron Walden.

Stansted Neighbourhood Plan Steering Group - This policy is supposed to protect retail but in fact reduces the protection. We should be increasing the amount of primary shopping frontage, not reducing it. We do not want to allow any change of use from A1 without planning consent. Suggestion: This policy needs to be flexible in the right places but prioritise Primary shopping frontages.

Saffron Walden Town Council - This would not allow food/restaurants in King Streets or the Market Square? This policy is designed to protect retail but reduces the protection in reality. We should be increasing the amount of primary shopping frontage, not reducing it. We do not want to allow change of use from A1 without planning permission Proposed : This policy needs to be flexible in the right places but prioritise Primary frontages to remain so, especially in Saffron Walden.

Developers/landowners/site promoters

No comments received.

Individuals

- Keep and protect key retail

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

This policy effectively safeguards retail provision in the district which would positively ensure employment provision in this sector. Positive impacts will also be associated with maintaining the district's historic centres as these correspond to town and local centres which this policy seeks to maintain the character and function of. There will be positive impacts on accessibility and the use of sustainable transport through town and local centres benefitting from established transport interchanges for the wider area.

Alternatives Considered

One alternative policy approach has been considered reasonable.

- Alternative RET1(a): To delete the policy and let the market determine acceptable uses. The alternative of deleting the policy would be contrary to the NPPF which states in paragraph 23 that Local Plans should, 'define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations.' As such, this alternative can be deemed unreasonable and uncertain and negative impacts have been highlighted for relevant SA objectives. The Council sought to progress Policy RET1 above as it reflects the NPPF; referring to primary and secondary shopping frontages and what type of uses will be permitted in these areas.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed at this stage.

Loss of Shops and Other Facilities

Paragraphs 6.22 – 6.23 and Policy RET4

This policy was responded to by 8 people/organisations.

Support	6
Object	1
Comment	1

Overarching Summary

- Thaxted Society consider criteria for viability in Appendix 5 be strengthened and then enforced
- Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council request policy to prevent pubs from becoming Express stores under permitted development rights.

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan Steering Group - Support Comment: Can you clarify whether this would effectively prevent pubs from becoming Express stores for leading supermarket chains under permitted development rights?

Stansted Neighbourhood Plan Steering Group – Support the policy. Can you clarify whether this would effectively prevent pubs from becoming Express stores for leading supermarket chains under permitted development rights?

Saffron Walden Town Council support this policy

The Thaxted Society - Beyond what UDC may not do this policy may be improved. The suggestion of future availability to offset immediate loss is unacceptable. Thaxted has suffered commitments unfulfilled and promises of future benefit that are not enforced. Again the examination of criteria for viability at Appendix 5 should be strengthened and then enforced!

Developers/landowners/site promoters

- Support paragraph 6.22 which states that local shops, services and facilities located outside of designated town and local centres can be of importance to the communities they serve

Individuals

- Support paragraphs 6.22 and 6.23.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

This policy seeks to protect village shops and other facilities which are considered important to the local communities and rural areas they serve. In recent years there has been a continual loss of village services including village shops, public houses, places of worship, village halls and health service provision which communities rely on. The policy will have a significant positive impact on promoting accessibility as it seeks to prevent the loss of facilities and services which serve the rural community. This also seeks to retain local employment opportunities. Protecting rural services ensures that people in rural communities have easy access to them which also adheres to the notion of social inclusion across the District. Furthermore, retaining village shops and other local facilities maximises the potential for rural communities to walk and cycle to them which positively impacts on encouraging the use of sustainable methods of travel.

Alternatives Considered

One alternative policy approach has been identified as reasonable.

- Alternative RET4(a): To remove the current controls and allow changes of use of existing services in response to market conditions regardless of the availability of other alternatives.

The alternative of removing current controls would have greater uncertainty as to whether services and facilities will be retained. This alternative approach would also offer no level of flexibility for future needs or possible village expansion. The Council rejected this approach due to the danger of a loss of rural facilities adversely impacting on the social wellbeing of rural communities and selected the Policy approach due to positive impacts in this regard.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed at this stage.

New Shops in Rural Areas

Paragraph 6.24 and Policy RET5

This paragraph and policy was responded to by 7 people/organisations.

Support	5
Object	0
Comment	2

Overarching Summary

- Saffron Walden Town Council supports with requirement on foot/cycle paths
- The Thaxted Society concerned over new retail beyond development Limits/protect centre
- Thaxted Parish Council requires footpaths cycle paths to access such development
- Saffron Walden/Stansted Neighbourhood Plan Steering Group requires policy to support all community facilities, e.g. churches, pubs, schools, halls, museums etc

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan Steering Group - Support. Why not can this policy not support all community facilities, e.g. churches, pubs, schools, halls, museums etc.?

Stansted Neighbourhood Plan Steering Group - Support. This policy should support all community facilities, e.g. churches, pubs, schools, halls, museums etc.

Saffron Walden Town Council support this policy to add appropriate footpaths/cycle paths are provided by developers/applicant to access facility Support policy with amended wording as proposed

The Thaxted Society - New retail beyond DL. Whilst this does not apply at Thaxted it is worth noting that a policy allowing development for community amenity, even commercial, misunderstands the simple fundamental of the holistic community centre. A small village has a precarious balance of purpose however ancient and moving beyond that centre may destroy that balance.

Thaxted Parish Council - Policy RET5 (page 87) Comment: To add appropriate footpaths/cycle paths are provided by developers/applicant to access facility Support policy with amended wording as proposed

Developers/landowners/site promoters

No comments received.

Individuals

- Support paragraph 6.24.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

This policy seeks to protect village shops and other facilities which are considered important to the local communities and rural areas they serve. In recent years there has been a continual loss of village services including village shops, public houses, places of worship, village halls and health service provision which communities rely on. The policy will have a significant positive impact on promoting accessibility as it seeks to prevent the loss of facilities and services which serve the rural community. This also seeks to retain local employment opportunities. Protecting rural services ensures that people in rural communities have easy access to them which also adheres to the notion of social inclusion across the District. Furthermore, retaining village shops and other local facilities maximises the potential for rural communities to walk and cycle to them which positively impacts on encouraging the use of sustainable methods of travel.

Alternatives Considered

One alternative policy approach has been identified as reasonable.

- Alternative RET5(a): To remove the current controls and allow changes of use of existing services in response to market conditions regardless of the availability of other alternatives.

The alternative of removing current controls would have greater uncertainty as to whether services and facilities will be retained. This alternative approach would also offer no level of flexibility for future needs or possible village expansion. The Council rejected this approach due to the danger of a loss of rural facilities adversely impacting on the social wellbeing of rural communities and selected the Policy approach due to positive impacts in this regard.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed at this stage.

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CHAPTER 7 Transport

Introduction

Paragraph 7.1- 7.19/ Policy T1

Paragraph 7.1

This supporting text was responded to by 4 people/organisations.

Support	0
Object	1
Comment	3

Overarching Summary

- Repetition causing confusion should be addressed for clarity.

Statutory consultees and other bodies

Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

Repetition of sentence beginning "There are also noticeable....."

Coordinator Stansted Neighbourhood Plan Steering Group

As above

Developers/landowners/site promoters

Bloomhall

Repetition causing confusion should be addressed for clarity. Suggest deletion of the final two sentences so that paragraph 7.1 reads as follows: "Transport is a key issue in the District with above average long distance car commuting and impacts on strategic and local transport infrastructure. There are also noticeable strategic and local congestion hotspots around the District, for example Junction 8 of the M11 and Saffron Walden that has an Air Quality Management Area (AQMA)."

Individuals

The second sentence is repeated

Paragraph 7.2

This supporting text was responded to by 8 people/organisations.

Support	0
Object	4
Comment	4

Overarching Summary

- Insufficient detail on transport impacts/mitigation
- Lack of public transport/effective IDP/ employment provision for NUGC
- 22500 dwellings proposed between Rayne and Braintree on A120/limited assessment

- Rat running via Stebbing, Felsted, and Dunmow

Statutory consultees and other bodies

None

Developers/landowners/site promoters

None

Individuals

- Insufficient detail on transport impacts/NUGC car based/no mitigation on A505/1301/Ickleton rat run
- Lack of public transport
- Lack of effective IDP
- Lack of employment provision for NUGC
- 22500 dwellings proposed between Rayne and Braintree on A120/limited assessment
- Rat running via Stebbing, Felsted, and Dunmow

Introduction

Paragraph 7.3

This supporting text was responded to by 6 people/organisations.

Support	0
Object	1
Comment	5

Overarching Summary

- Bridleway network is fragmented, inadequate and requires improvement
- Non-motorised multi user paths instead of shared pedestrian/cycling paths that damage bridleway network
- Such paths available to widest group of users as possible for North Uttlesford Garden Community design
- Paths to be correctly designated either bridleway or restricted byway
- The A120 is already saturated several times a day
- Some repetition/remove

Statutory consultees and other bodies

CABO Essex and Cambridgeshire British Horse Society

Both the Cambridgeshire and Essex RoWIPs state that the bridleway network is fragmented, inadequate and requires improvement. The creation of shared pedestrian/cycling paths only serve to fragment the network for equestrians, fragmentation which is unlikely to be repaired given funding and expenditure constraints. Shared pedestrian/cycling routes are therefore extremely damaging to the bridleway network and contrary to both the Cambridgeshire and Essex RoWIPs. The Uttlesford Local Plan should require the

creation of non-motorised multi user paths available to the widest group of users as possible for the North Uttlesford Garden Community design. The path should then be correctly designated as either a bridleway or restricted byway. Multi user paths rather than restricted shared pedestrian and cycling paths should be included in all the projects going forward in Uttlesford. The recently reviewed Design Manual for Roads and Bridges HD42 specifically requires the inclusion of opportunities for high quality NMU access including equestrians.

Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

Repetition of phrase, "has been taken....." Comment: It obviously hasn't because of BSN development in BS

Coordinator Stansted Neighbourhood Plan Steering Group

As above

Developers/landowners/site promoters

None

Individuals

The A120 is already saturated several times a day/Braintree plan states that they expect the west of Braintree Garden community to generate approx 600 cars per hour (for 2 hours each morning / evening) accessing the (so far non existent) A120 junction at Rayne. A120 cannot cope

Remove repetition/ Delete duplicated words "has been taken"

Sustainability Appraisal June 2017

NA

Officer response

Proposed changes to plan

Paragraph 7.4

This supporting text was responded to by 2 people/organisations.

Support	0
Object	0
Comment	2

Overarching Summary

Often no reliable alternatives to car travel/lack of a good public transport network. What is planned?

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan Steering Group

Is not the issue that there are often no reliable alternatives to car travel? There is a lack of a good public transport network. What is planned for Saffron Walden?

Stansted Neighbourhood Plan Steering Group

Is not the issue that there are often no reliable alternatives to car travel? There is a lack of a good public transport network. What improvements are planned? There is also the problem that a car is considered

essential in what is primarily a rural district and once a car is owned, it is cheaper to use it in preference to public transport.

Developers/landowners/site promoters

None

Individuals

None

Paragraph 7.5

This supporting text was responded to by 11 people/organisations.

Support	0
Object	2
Comment	9

Overarching Summary

NUGC creates dormitory town for South Cambridgeshire research parks employees/shoppers in Saffron Walden

Additional policies needed to improve public transport

Need cycle way from Latchmore Bank A1060 into Bishops Stortford

Acknowledge role Bishop's Stortford plays in delivering services and transport to UDC

The dominant mode of travel in Uttlesford is the car/ GCs located where need to travel will be minimised/ but rail, as the most sustainable means of transport, does not feature

The walking network in Saffron Walden is not "well connected"/one pedestrian crossing

Statutory consultees and other bodies

Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

Notes that low bus use and services are challenging so Local Plan should include some incentives to make public transport more attractive, viable and affordable. Suggestion: Additional policies needed to improve public transport

Coordinator Stansted Neighbourhood Plan Steering Group

Notes that low bus use and services are challenging so Local Plan should include some incentives to make public transport more attractive, viable and affordable. Suggestion: Additional policies are needed to improve public transport such as partnership deals between MAG, ECC and central government for infrastructure investment.

Saffron Walden Town council

Notes that Low bus use and services are challenging- then the Local Plan should include some incentives to make use of public transport more attractive, viable and affordable. Proposed: Additional policies required to make public transport more attractive and viable

Hallingbury Parish Council

Transport. 7.5 and 7.6 We are fortunate in Little Hallingbury to have a regular bus service, although many people do use cars. We are pleased to see that some of the cycling infrastructure is to be improved, and would like to propose, in order to alleviate some car use, a cycle way from Latchmore Bank A1060 into Bishops Stortford. This could promote good health by encouraging people to cycle into the town, and take cyclists off this very busy main road, making a safer journey for both cyclists and motorists. It would also encourage walking. The east side of the road is within the Uttlesford District up to Beldhams Lane.

Thaxted Parish Council

Paragraph 7.5 (page 88) Comment: Notes that Low bus use and services are challenging- then the Local Plan should include some incentives to make use of public transport more attractive, viable and affordable. Proposed Action: Additional policies required to make public transport more attractive and viable.

Great Chesterford Parish Council

It is absurd to suggest that NUGC provides a sustainable pattern of growth and minimised need to travel. It does no such thing. It creates a dormitory town for employees of research parks in South Cambridgeshire and shoppers in Saffron Walden. It is not directly connected via rail to any other retail centres and will be almost exclusively reliant on car journeys. Any retail offering or employment offering on site will be limited, and local in nature.

Developers/landowners/site promoters

Bloomhall

Paragraph 7.5 fails to acknowledge the role Bishop's Stortford plays in delivering services and transport connections to the population of Uttlesford. The second sentence of paragraph 7.5 should be reworded to read as follows: "Saffron Walden and Great Dunmow along with Bishop's Stortford provide key services to a wide rural hinterland but have constraints to how much further growth can be accommodated especially Saffron Walden the former."

Individuals

The dominant mode of travel in Uttlesford is the car. Travel to work is heavily car based at 71% of trips, with journeys by train and by foot around 10% each, and levels of cycling and bus journey are negligible

As part of the solution GCs located where need to travel will be minimised/ use of sustainable transport modes can be maximised but rail, as the most sustainable means of transport, does not feature in the plan

Ignores strategic value of Wendens Ambo served by the most efficient rail service in Uttlesford

The walking network in Saffron Walden is not "well connected". There are numerous key sites around the town that have narrow or missing pavements. There are very few pedestrian crossings at major junctions, only one marked pedestrian crossing along the entire length of London Road/High St/Bridge St

Unrealistic to try and minimise travel when the plan acknowledges that most residents work outside the district boundaries/transport needs to be encouraged to allow/ facilitate residents to get to work/tourism

Paragraph 7.6

This supporting text was responded to by 12 people/organisations.

Support	0
Object	4
Comment	8

Overarching Summary

- Consider electric bikes
- Implement existing cycling strategy
- Lack of public transport network
- Include equestrians on cycle routes
- Lack of detailed transport assessment
- Complete the Flitch Way Bridle path from Takeley to Dunmow South roundabout
- All new developments should be made to include safe cycle routes to the nearest transport hub.

Statutory consultees and other bodies

CABO Essex and Cambridgeshire British Horse Society

Paragraph 7.6 The Uttlesford Cycling Strategy 2014 frequently refers to cyclists using and in some case upgrading bridleways yet excludes equestrians from its proposed cycle routes. This is unacceptable and contrary to the policy adopted by Cambridgeshire County Council Greenways.

Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

What about electric bikes? They are likely to become more popular. Saffron Walden NP team would like the Uttlesford Cycling Strategy to be implemented

Coordinator Stansted Neighbourhood Plan Steering Group

What about electric bikes? They are likely to become more popular. Suggestion: More help is needed from UDC and ECC in helping to improve and establish cycle paths. Stansted Mountfitchet has been left isolated in this regard. Emphasis is on Saffron Walden and Great Dunmow and the A120 corridor, despite National Cycle Route No 1 routed through the village. B1383 has a cycling heritage going back around 100 years we should be linked into this strategy!

Saffron Walden Town Council

SWTC would welcome implementation of the Uttlesford Cycling Strategy together with details of any proposals.

Thaxted Parish Council

Paragraph 7.6 (page 89) Comment: Thaxted would welcome implementations of the cycling strategy and support the exploration of a cycle path between Thaxted and Saffron Walden Proposed Action: Include in plan

Developers/landowners/site promoters

None

Individuals

Transport issues are a major area of concern/no evidence of detailed transport assessment having been undertaken/non car travel to and from work are not based on factual evidence.

People are likely to continue to travel to work by car in an area where car ownership is significantly higher than the national average

Any allocation to the South of Dunmow needs to provide for the completion of the Flich Way Bridle path from Takeley to Dunmow South roundabout

Pitifully unambitious

Insert "and" after 2014

New developments should be made to include safe cycle routes to the nearest transport hub.

All the villages around Stansted Airport should have safe dedicated cycle paths into the airport to enable local staff to cycle to work

There is a significant need for improvement in cycle infrastructure throughout Uttlesford.

The Uttlesford Cycle Strategy is comprehensive/sets out what is needed, how it can be achieved and how the planning process could be utilised to provide infrastructure/need to integrate into plan/deliver it

Introduction

Paragraph 7.7

This supporting text was responded to by 8 people/organisations.

Support	0
Object	3
Comment	5

Overarching Summary

No modelling has been carried out to consider the impact of NUGC on Saffron Walden

The proposed alternative route to avoid the SW town centre still passes through the AQMA

What will happen if the Peasland Road TRO is not implemented

Saffron Walden traffic solutions must not to encourage more heavy traffic through Thaxted

Statutory consultees and other bodies

Saffron Walden Town Council

What will happen if the Peasland Road TRO is not implemented? What is the fall-back plan? We object to this policy as it conflicts with SWTC policy. Query: fall back option if SWTC challenge against the TRO is successful.

Great Chesterford Parish Council

An extraordinary admission by UDC. No modelling has been carried out to consider the impact of 5000 dwellings 4 miles from the town centre. The people of Saffron Walden may not be aware of this fact, but it is self-evident that supporting NUGC without such modelling will be potentially devastating for traffic movement in Saffron Walden.

Developers/landowners/site promoters

None

Individuals

The proposed alternative route to avoid the town centre still passes through the AQMA/untrue to claim that this, " will help to reduce vehicular pollution and manage air quality in the AQMA"

No evidence strategy for Peaslands Road (i.e. removing parking) will be beneficial to traffic volumes, junction capacity or air quality improvement.

What will happen if the Peasland Road TRO is not implemented

Saffron Walden traffic solutions must not to encourage more heavy traffic through Thaxted

Proposed changes to plan

Paragraph 7.8

This policy and supporting text was responded to by 3 people/organisations.

Support	0
Object	0
Comment	3

Overarching Summary

No solution has been found to address unacceptable traffic impacts in Saffron Walden

Need southern ring road for Saffron Walden

Statutory consultees and other bodies

Saffron Walden Neighbourhood Plan Steering Group

Notes the additional traffic in Saffron Walden and acknowledges that no solution has been found to address unacceptable traffic impacts. Suggestion: UDC needs to address this in the Local Plan as it constitutes severe (paragraph 32 of the NPPF says Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

Saffron Walden Town Council

Notes the additional traffic in SW, noting that no solution is currently found to address unacceptable traffic impacts. Action: UDC to find solution to this and this must be included within the Local Plan. Paragraph 32 of the NPPF says that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

Developers/landowners/site promoters

No developers/landowners/site promoters responded

Individuals

No "solution" to the Saffron Walden road system problems that would not include a new road which can provide access from the west side of town to the east side without using the existing domestic. Need a "Southern Ring" would solve the problem.

Introduction

Paragraph 7.9

This supporting text was responded to by 6 people/organisations.

Support	0
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Object	2
Comment	4

Overarching Summary

Add future and existing Section 106

Points to NUGC being car-reliant

Needs a reference to Air Quality

Query plans for the Kier site/150 homes

The proposal for full transport and air pollution studies of Saffron Walden is sound

Statutory consultees and other bodies

Saffron Walden Town Council

Talks about Existing S106 contributions so this infers that additional S106 contributions would not be sought? Should also stop calling it Kier Site and call it Land North and South of Thaxted Road. Comment: We object to first sentence of 7.9 as it is factually incorrect. Add future and existing Section 106.

Any further details available now on this separate Saffron Walden town transport study? Any schedules or timescales for it? This assumes further development and intent to further develop this land more than the 150 homes in the Local Plan and yet there would be no need to further develop as the 14,100 required during the Local Plan period have already been met. There also needs to a reference to Air Quality. Query: Further details required from UDC re SW traffic study Query the intent or assumption that the Kier site will be developed further to the 150 homes as proposed in the Local Plan.

Great Chesterford Parish Council

This paragraph is very clear, and points to the overwhelming fact that NUGC is and will be a car-reliant proposal. Any other suggestion is not based on any evidence which has been presented to date.

Developers/landowners/site promoters

None

Individuals

Saffron Walden - all roads lead to centre/medieval in design. Thaxted Road/parts of Peaslands Road have on-street parking - few off-road spaces. Banning parking not popular. Katherine Semar apart no primary schools in convenient places for sustainable traffic flow at school opening /closing. A ring road would take away some traffic but big risks. History and geography create a Gordion Knot.

No evidence to support 150 homes on the Kier site would be "acceptable". No modelling has been done on the impact on traffic flows or junction capacity across Saffron Walden

The proposal for full transport and air pollution studies of Saffron Walden is very sound. They should be undertaken before any decisions are made on the scale and sites for any further housing.

Paragraph 7.10

This supporting text was responded to by 6 people/organisations.

Support	0
Object	5
Comment	1

Overarching Summary

Easton Park GC can only make traffic congestion considerably worse in Great Dunmow

Travelling from NUGC to Audley End for London trains

Most sustainable transport impact small-scale, incremental development, following historic and natural growth of rural towns and villages

For NUGC what public transport, how will it be paid for and who will have control?

Even if NUGC is considered to have the least traffic impact, very substantial trip movements, mostly by car

Statutory consultees and other bodies

None responded

Developers/landowners/site promoters

Clare College Cambridge

Although the NUGC is considered to have the least traffic impact (in combination with the other two garden communities) the building of up to 5000 new homes and other uses will generate very substantial trip movements, most of which will be by private cars (71% for travel to work as stated in para 7.15

Individuals

Easton Park/10k homes can only make traffic congestion considerably worse in Great Dunmow

Ignored north south commuters/those travelling from NUGC to Audley End for London trains

These new settlements are inappropriate/most sustainable transport impact small-scale, incremental development, following historic and natural growth of rural towns and villages

For NUGC what public transport, how will it be paid for and who will have control?

Even if NUGC is considered to have the least traffic impact, very substantial trip movements, mostly by car

Paragraph 7.11

This supporting text was responded to by 4 people/organisations.

Support	2
Object	1
Comment	1

Overarching Summary

Allocate Beldham's Lane for housing on fringe of Bishops Stortford given services

Recognise the importance of Bishop's Stortford in providing UDC services

Reflect high car ownership in parking provision for new developments

Seems realistic/cycling as a leisure activity also attracts tourism, if investment in good cycle paths

Statutory consultees and other bodies

None

Developers/landowners/site promoters

Bloomhall

The recognition that for many residents of Uttlesford the "facilities are concentrated in centres outside of the District" is welcomed; however, there is a failure by the council to recognise the importance of Bishop's Stortford in providing these services and the positive contribution to sustainable housing delivery that additional an allocation on the fringe of Bishop's Stortford could make to the delivery of sustainable housing within the district in close proximity to shops, services and public transport links. The land south of Beldams Lane, Bishop's Stortford (call for sites reference 03GtHal15) is serviced by a bus route that stops twice on Beldams Lane and within walking distance of the railway station and the town centre. A residential allocation for 180 dwellings in this location would encourage greater walking and cycling trips to access everyday services and facilities helping the council to effectively meet the requirement for sustainable development.

Individuals

Reflect high car ownership in parking provision for new developments

Recognise the importance of Bishop's Stortford in providing UDC services

Seems realistic/cycling as a leisure activity also attracts tourism, if investment in good cycle paths

Paragraph 7.12

This policy and supporting text was responded to by 4 people/organisations.

Support	0
Object	1
Comment	3

Overarching Summary

Welcomed but failure to recognise importance of Bishop's Stortford

Not only improve existing services but improve where possible to encourage use of public transport.

The local press has recently reported that bus services are to be or have been reduced.

Statutory consultees and other bodies

Saffron Walden Town Council

Not only improve existing services but add to the provisions where possible to encourage use of public transport. Proposed Amendments: Amend wording. Correct spelling of realistic

Thaxted Parish Council

Comment: Not only improve existing services but add to the provisions where possible to encourage use of public transport. Proposed Action: Amend wording

Developers/landowners/site promoters

Bloomhall

The recognition that "areas for growth are identified where people will have the best access to facilities and the opportunity to make best use of public transport " is welcomed; however, there is a failure by the council to recognise the importance of Bishop's Stortford in providing these services and the positive contribution that an additional allocation on the fringe of Bishop's Stortford could make to the delivery of sustainable

housing within the district in close proximity to shops, services and public transport links. The land south of Beldams Lane, Bishop's Stortford (call for sites reference 03GtHal15) is serviced by a bus route that stops twice on Beldams Lane and within walking distance of the railway station and the town centre. A residential allocation for 180 dwellings in this location would encourage greater walking and cycling trips to access everyday services and facilities helping the council to effectively meet the requirement for sustainable development.

Individuals

Bus services to be reduced. Difficult to understand what positive impact UDC is having on achieving outcomes that preserve existing services let alone increase services

Paragraph 7.13

This supporting text was responded to by 6 people/organisations.

Support	1
Object	3
Comment	2

Overarching Summary

Equestrians should be included on all Multi User paths unless it is not possible to do so, following consultation with the BHS.

Existing facilities mentioned are insufficient for existing use - so growth equals over demand/there needs to be effective planning of new facilities.

Must be rigidly enforced when planning applications are made. Multiuser paths are not the safest way to proceed. Cycle routes should be separated from footways.

Be radical and provide cycle paths generating electricity.

Statutory consultees and other bodies

Essex and Cambridgeshire British Horse Society

Paragraph 7.13: Equestrians should be included on all Multi User paths unless it is not possible to do so, following consultation with the BHS.

Developers/landowners/site promoters

None

Individuals

Existing facilities mentioned are insufficient for existing use - so growth equals over-demand/there needs to be effective planning of new facilities.

Must be rigidly enforced when planning applications are made. Multiuser paths are not the safest way to proceed. Cycle routes should be separated from footways.

Be radical and provide cycle paths generating electricity.

Paragraph 7.14

This supporting text was responded to by 5 people/organisations.

Support	1
Object	2

Comment	2
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Overarching Summary

Omits that Flitch Way is mostly a definitive Bridleway, not a cycleway/mention of equestrian users

Flitch Way is a country park is for leisure activity not be viewed as an alternative Cycle highway

Statutory consultees and other bodies

Bridleways Development Officer Essex Bridleways Association

We note that the Flitch Way is particularly mentioned but again it omits the fact that for the majority of its length it is a definitive Bridleway, NOT a cycleway. It also omits the fact that the Flitch Way Action Group is working with both Essex County Council and other stakeholders to join up the severed section of the Flitch Way at Great Dunmow. This severed section will be accessible to ALL users, including equestrians, and this paragraph should have these several inaccuracies amended prior to publication of the Submission Draft.

Essex and Cambridgeshire British Horse Society

The British Horse Society (BHS) supports the comments made by Essex Bridleways Association with regard to the provision of equestrian access within this paragraph.

Developers/landowners/site promoters

None

Individuals

The Flitch Way is a country park intended for leisure activity/not be viewed as Cycle Super Highway for commuters to access local towns safely

Flitch Way is a bridleway as is the planned connecting link through Dunmow. The existing Flitch Way is a public right of way available for all non motorised users to enjoy. Paragraph 7.14 discriminatory/ makes no reference to horse riders. All references to cyclists/walkers need amending to include horse riders.

Flitch Way Action Group seeks to create a bridleway, not a cycleway to reconnect the severed parts of the Flitch Way.

Paragraph 7.15

This supporting text was responded to by 9 people/organisations.

Support	0
Object	5
Comment	4

Overarching Summary

Need more ambitious modal shift for garden communities/step change

Travel plans must be supported by a robust series of measures, infrastructure and incentives/penalties

Locate growth in areas where need to travel minimised/ maximise use of sustainable transport modes

Creating a self-contained garden village/serving life sciences defeated by topography and location

NUGC selection is incompatible with creating a self-contained garden village

Destinations for employment, education and social centre walkable or within 5 to 15 minutes easy cycling distance.

Residents will have to travel long distances by road for employment by the evidence in this Plan

Statutory consultees and other bodies

Braintree District Council

Modal Shift as currently worded the paragraph suggests that a modal shift of between 5 and 10% from single occupancy car use may be possible in the Plan period. However by referencing the garden communities earlier on in the paragraph the assumption may be that a similar modal shift is being targeted. In fact a much more ambitious modal shift is being proposed in the garden communities with the opportunities that they offer and the commitment to active and sustainable transport modes. The wording of the paragraph would therefore benefit from amendments.

Essex County Council Environment, Sustainability and Highways

Transportation (paragraph 7.10 and 7.15) Transportation (paragraph 7.15) ECC recommends that the wording within paragraph 7.15 be amended to read "That for Garden Communities a more ambitious shift away from single occupancy vehicle trips is required, in order to reduce the impact on the highway network. Travel plans must be supported by a robust series of measures, infrastructure and incentives/penalties to ensure delivery. It is acknowledged that this wording may be appropriate for most sites within UDC but it is important to note that the Garden Communities will need to deliver a step-change in terms of modal shift away from (single-occupancy) car travel. Similarly to comments expressed for paragraph 7.15, in paragraph 7.16 the Garden Communities should be identified separately in this section of the text with strengthened planning criteria, particularly around sustainability and identifying a need for a step change in in the use of sustainable transport and the number of internal trips within the development. ECC recommends that in paragraph 7.17 a Travel Plan Coordinator will be required to be provided and not nominated. ECC also recommends that paragraph 7.19 includes reference to the following documents Essex Design Guide; Essex County Council Developers Guide to Infrastructure Contributions; Public Rights of Way Guide. These documents will help to ensure that highway aspects of developments are designed and implemented to a high standard. Passenger Transportation ECC notes that there is reference to encouraging sustainable travel, however there is little in terms of actual expectations, either in terms of new/increased bus / community transport service provision, new ~passenger transport benefitting a infrastructure or indeed plans around for example car sharing schemes / discounted season ticket schemes / travel plan development and management, which would have been ways to evidence that UDC had given due regard to sustainable transport. ECC requires clarity with regard to passenger transport type, hours of operation and actual frequencies that UDC is aspiring to achieve preferably on a district wide basis but certainly in terms of the main towns and the new Garden Communities. ECC recommends that the Local Plan make reference to the ECC bus strategy documents, which outlines the expectation that residences are constructed within 400m actual walking distance of a bus stop (and indeed the levels of infrastructure that might be expected at new or upgraded bus stops. A significant proportion of the existing approved developments fall well outside of the 400 metre distance expectation unless plans are already in motion for the provision of additional bus services (eg through section 106 agreements) not evident within the Draft Local Plan. Within the transport section, in paragraph 7.12 UDC does say that it seeks to actively work with developers, bus operators and/or the ECC Transport teams to develop the passenger transport offer. ECC seeks discussion with UDC on this matter to ensure there is a commitment to the production of a sustainable travel strategy for the District. ECC notes that Section 7 entitled Transport accepts that the district has poor levels of bus service provision and that such services are difficult to operate commercially. It displays positive support for the requirement to introduce developer specific travel plans, although it is not clear at what scale of development these become an expectation. Additionally whilst it refers to a requirement for Travel Plan co-ordinators to be appointed to measure performance against targets, it would be more productive for these developers to fund a UDC or ECC officer post to undertake this work in an

independent and impartial basis. Whilst details of expectations regarding transport issues such as parking standards and charging points are expressed, requirements / expectations for passenger transport services and infrastructure are not similarly detailed. ECC requires further joint working with UDC to ensure that appropriate reference to sustainable transport and delivery is clearly articulated and evidenced within or in documents supporting the Local Plan. Public Health ECC recommends further engagement with ECC to ensure that appropriate consideration is given to the range of Public Health matters relevant to land use planning. For instance ensuring that the health benefits associated with active travel are appropriately highlighted within the transportation section of the Local Plan. ECC also recommends that the Local Plan refers to the most up to date and relevant transportation plans, e.g. the Essex Cycling Strategy and Uttlesford Local Cycling Action plans published in 2016/17.

Developers/landowners/site promoters

Bloomhall

As well as the garden communities all residential allocation should be located in areas where " the need to travel will be minimised and the use of sustainable transport modes can be maximised." To this end the Council is encouraged to look again at the Bishop's Stortford Fringe and notably the land south of Beldams Lane which represents a sustainable location for future residential development of approximately 180 dwellings between the existing residential edge of Bishop's Stortford to the north and the allotments and sewage works to the south (call for sites reference 03GtHal15), which provides access to services, facilities and the public transport network with minimal additional infrastructure requirements.

Individuals

NUGC selection is incompatible with this/principles of creating a self-contained garden village that serves life sciences outside of its boundary contradictory/defeated by topography and location

Destinations for employment, provisions, education and social centre should be walkable or within 5 to 15 minutes easy cycling distance.

Valleys are long/thin, separated by sharp steep slopes/those at the extreme have a more distance to travel to amenities

Movement within NUGV not supportable/large numbers of residents will travel long distances by road for employment

Paragraph 7.16

This supporting text was responded to by 1 people/organisations.

Support	0
Object	0
Comment	1

Overarching Summary

Take account of on-demand services/car sharing/spaces for community vehicles

Statutory consultees and other bodies

Littlebury Parish Council

There is an increased use of on-demand app based services such as Uber and Zip car. The combination of these technologies with autonomous vehicles may lead to the decrease in private car ownership and increased use of pool cars. This is already happening in the under 30 age group in the US. Car sharing should be encouraged by planning conditions, with the provision of parking (and charging) spaces for

community vehicles, as is offered now at a new development of flats on the outskirts of Chelmsford and many outside the District.

Developers/landowners/site promoters

None

Individuals

None

Paragraph 7.18

This supporting text was responded to by 6 people/organisations.

Support	2
Object	1
Comment	3

Overarching Summary

Saffron Walden is choked with traffic already/need by pass to reduce traffic in the town

Need more than culture change/Improve access to rail

need plan for electric car infrastructure

no safe walking/cycle routes to key facilities or school

Innovation needed- community run services/ speed up local journeys or journeys to railway hubs.

Statutory consultees and other bodies

None

Developers/landowners/site promoters

None

Individuals

Saffron Walden is choked with traffic already e.g. Radwinter Rd/Thaxted Rd junction worsening/need a by-pass to reduce traffic in the town

A sustainable transport culture (can you go to work on a culture?) Improve access to rail if want sustainable transport

need plan for electric car infrastructure in this plan

No safe walking/cycle routes to key facilities or school

Innovation needed e.g. community run services/ speed up local journeys or journeys to railway hubs.

Paragraph 7.19

This supporting text was responded to by 3 people/organisations.

Support	0
Object	1
Comment	2

Overarching Summary

Henham 7/7a bus service service is running at a loss but is essential

Travel Plan too vague, urgent need for better public transport, area is isolated, no bus connection between Great Dunmow and Bishops Stortford, re-establish a rail service/better bus services for Great Dunmow

Statutory consultees and other bodies

None

Developers/landowners/site promoters

None

Individuals

Henham 7/7a bus service service is running at a loss but is essential

Travel Plan too vague, urgent need for better public transport, area is isolated, no bus connection between Great Dunmow and Bishops Stortford

Re-establish rail service/better bus services for Great Dunmow

State where are Essex County Council Highways Development Management Policies/Parking Standards

Policy T1

This policy and supporting text was responded to by 34 people/organisations.

Support	5
Object	9
Comment	20

Overarching Summary

- Uttlesford Futures [education] note getting to work relies on car, lower use of cars not possible in isolated villages, key public transport role of Stansted/its limitations, encourage buses to call at GCs/employment sites - Genome/Stansted excellent, improve cycle and footpaths to existing and new sites, wider political pressure needed to draw in resources
- Clare College consider NUGC not located where it can be linked to services by a range of transport options/cycle routes will be problematic/ train station too far away
- Little Easton Parish Council consider TA1 incompatible with Vision - SP2 due to Easton Park GC given high reliance on car and presence of M11 J8 that is close to capacity, only aspiration for employment/highway measures, reliance on rail improvements that are not programmed
- Little Chesterford Parish Council consider NUGC not located where it can be linked to services and facilities, cycle routes problematic, train station too far away and too much gradient to be used, aspirational accessibility and integration, impacts on A505 untested
- Little Chesterford Parish Council consider NUGC does not meet aims of the policy with no access plans/reliance on B184/Saffron Walden, A505 already at capacity
- Chrishall Parish Council state new growth should be linked to existing facilities by cycle paths/footpaths/roads dangerous/reduce pollution/needed prior to commencement
- Essex County Council note Travel Plans and Transport Assessments/Statements are very different
- Essex Bridleways/Cambs Horse Society want all opportunities taken to enhance the off road network so accessible to all users including equestrians

- The Thaxted Society supports policy that reduces car use/journeys/public transport limited/avoid bridge to nowhere/lobby government for sustainable transport
- Saffron Walden Town Council support policy but need definition of appropriate and safe network
- Saffron Walden/Stansted Mountfitchet NPs want towns and garden villages linked with cycle paths with opportunity for NPs to go into more detail
- Coke Gearing concerned too aspirational, too car reliant, no account of reality/need to expand existing car parking facilities around railway stations e.g. Stansted Mountfitchet, Elsenham, Chesterford

- Individuals;

Requested more comprehensive study for NUGC/A505 at capacity/two GC option better impact
Great Dunmow lack rail link/frequent bus service

No need to be negative about reducing car use, given the rural nature of our area

Mitigation proposed will not cope with growth/too aspirational

Car sharing sensible as an option but cannot legislate to force people down this path

- Developers;

Travel Plans for major developments should be defined/exempting specialised housing for older people as a low traffic generator

Support Council ambition to reduce need to travel by car/increase the use of public transport/
should be located in locations which are sustainable

Statutory consultees and other bodies

Uttlesford Futures (Employment, Economy, Skills, Environment and Transport)

Getting to all the sites listed above is likely to be by car as is the case with existing business sites, like Shire Hill. Further thought to be given to encouraging buses to call at employment sites and to improve cycle and footpaths to existing and new sites. Developments (housing and business) congregating around Dunmow because of the A120. Question is will it cope and will improvements be in time to take the additional traffic. The only route to rail from Dunmow will be A120 or encouraging by improvement to services particularly buses from Dunmow to Stansted Airport for rail connection. Longer cycle/walk paths across district that have safety factored in, especially connecting to employment sites. Longer cycle/walk paths across district that have safety factored in, especially connecting to employment sites. Buses to and from employment sites are excellent (e.g. Genome centre) and these should be encouraged or included in Section 106 agreements. Stansted will still be the bus hub. Better services needed to it and timetabling to allow buses to connect. The airport is and will be the largest employment area. Most jobs there are shifts and main transport is by car and public transport does not work well unless you are able to go by train or on the buses that come from Harlow/Bishops Stortford (not Uttlesford). Transport (capability to move about) probably the area of most concern for every aspect of ESEET and where the solutions are not easy to find and those we do have are costly and where hard to obtain necessary finance. The wishes in the Local Plan are laudable, but wider political pressure needed to draw in resources and link to plans underway in Cambridgeshire (light rail and cycleways). Lower use of cars is just not possible in isolated villages that are extremely rural.

Director Coke Gearing Consulting

Once again we are disappointed that the Councils fine words and aspirations in relation to the provision of transport and infrastructure are not borne out by the reality. The dispersal, strategy and provision of new settlement will, to some extent, alleviate some of the concerns that had previously been raised in relation to the existing towns and villages. However it is clear that our infrastructure is not adequate for the projected growth in terms of population, and in particular in relation to sustainability, is too heavily dependent upon

the private car rather than public transport. In order to encourage more use of public transport it would be sensible to see expansion of existing car parking facilities around railway stations such as Stansted Mountfitchet, Elsenham and Chesterford, allowing people from minor districts to use public transport and reduce the use of the car in terms of commuting. Provision of additional car parking on the edges of principal towns, particularly Saffron Walden and Great Dunmow, with further consideration given to pedestrianisation of the retail core, would help to enhance and improve the environment and experience of these centres for both the visitor and resident alike, and help to underpin the financial viability and continuing prosperity of these locations whilst reducing car movements and improving sustainability targets.

Development Officer Essex Bridleways Association

Policy TA1: Disappointed to note that this Policy, whilst suggesting that existing equestrian rights of way and other routes are preserved, there is no aspiration included to seek opportunities for enhancement so that as much of the off-road network is accessible to ALL users, including equestrians. This Policy should be re-worded to include an aspiration to improve such access.

Essex and Cambridgeshire British Horse Society

As above

The Thaxted Society

TA1 Thaxted Society supports policy which reduces car use / journeys. It is essential that in requiring mitigating factors from developers re, public transport links for example, that there is a likelihood of delivery, otherwise this is a failed policy and utterly unenforceable. Public transport in Uttlesford is severely limited and asking a developer to provide links to a lacking service smacks of the bridge to nowhere. Some infrastructure needs improvement before and without private sector participation. Our new MP has made this a clear priority and government should be lobbied to help. At the Society we see growth and sustainable transport provision as symbiotic.

Clerk Little Easton Parish Council

In brief: TA1 is sound in isolation but fails to sustain the spatial vision; TA1 is incompatible with SP2; TA1 renders the Local Plan ineffective for failing to provide joint working cross boundaries. The high reliance on private cars is noted in the council's studies and elsewhere in the plan and rightly the plan's policy is that development should not cause severe congestion on the main road networks. The studies note that the M11 junction 8 interchange, linking the A120, is close to capacity. The Local Plan says currently 58 percent of residents commute beyond Uttlesford. Whilst the plan expresses the desire that the new garden communities will provide employment and services within their bounds substantial commuting will occur. In the case of Easton Park this will add to the congestion at junction 8, as foreseen in paragraph 5 of policy SP6. Furthermore, the plan's aspiration for the garden communities to provide employment and offer services and facilities will attract inward traffic. The district council lacks the powers to develop the required road network and, because the plan offers no assurance that the relevant authorities and agencies will cause its development the plan is both ineffective and thereby contrary to the requirements of the National Planning Policy Framework, and renders policy TA1 incompatible with SP2. Moreover, policy SP11 supports the growth of Stansted Airport, which is reliant on both the M11 and West Anglia rail links. The rail operator has recently lengthened some airport serving trains from eight to 12 cars to tackle existing capacity restraints. Use of the airport as a local transport hub as envisaged by the plan (for example, see paragraphs 3.9 and 3.15) would become unsustainable without further investment and significant infrastructure additions, yet the rail operator has not planned for the increase in use that Easton Park would cause.

Saffron Walden Neighbourhood Plan Steering Group

Towns and garden villages should be linked with cycle paths. Travel plans need to have demonstrable outcomes. Suggestion: Opportunity for NP to go into more detail in terms of appropriate surfaces, fencing, lighting etc. Shared ROWs should be 2 m wide.

Stansted Neighbourhood Plan Steering Group

Rights of Way, cycling, pedestrian Towns and garden villages should be linked with cycle paths. Suggestion: Opportunity for NP to go into more detail in terms of appropriate surfaces, fencing, lighting etc. Cycleways should be separated from pedestrian routes but where shared ROWs should be a minimum of 2 m wide.

Saffron Walden Town Council

Support this policy but need a definition of appropriate and safe network Query: How will this policy be implemented in relation to site access? UDC needs to ensure that this is set out in travel plans and that these have measurable outcomes

Planning Little Chesterford Parish Council

Policy INF1- Infrastructure delivery & TA1- Accessible development. The development of the NUGV as currently proposed does not meet these policies The policies state: Development must take account of the needs of new and existing populations. It must be supported by the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from development. This is particularly important for the new garden communities. The capacity of the access to the main road network and the capacity of the road network itself must be capable of accommodating the development safely and without causing congestion. However, the available plans for NUGV do not support this, for example: No firm transport or access plans the only access to the site is via B184. To access the nearest services in the attractive historic market town of Saffron Walden, traffic will be funnelled down the narrow Bridge Street, affecting Air Quality Management Zones and adding to existing congestion. The only planned improvement is that to the A505/A1301 roundabout, which is already at capacity at peak periods and beyond. Plans for this improvement have not been agreed with South Cambridgeshire, where it is located, and the costs provided in the evidence are up to £10 million less than those estimated by South Cambridgeshire. Dualling of the A505 to remediate some of these problems is not planned until 2033 at the earliest. The traffic assessment in plan does not appear to be consistent with experience of congestion at this junction and does not take proper account of predicted growth from in neighbouring areas such as South Cambridgeshire, North Herts and West Suffolk. We suggest that a more comprehensive and up to date study is made. The railway station at Great Chesterford does not have potential to increase parking and peak services are at capacity.

Chrishall Parish Council

Policy TA1 states new developments should be linked to existing facilities by cycle paths and footpaths. Chrishall Parish Council would comment that this is a requirement to be undertaken for all existing communities, particularly the villages, to reduce climate changing vehicle emissions, and improve infrastructure as it is too dangerous to use the road system, especially for children. Further, such infrastructure should be installed before any development granted permission to ensure it is delivered. Climate change will be a growing issue and must be a key consideration in allowing any development.

Essex County Council Environment, Sustainability and Highways

ECC recommends that bullet 2 of the policy be amended to read that maintains or improves road safety . It is recognised that not all development may improve road safety, as for instance more people in a locality may lead to an increase in the chance of accidents happening. ECC recommends that bullet 5 be altered to split the reference to Travel Plans and Transport Assessments/Statements as they are very different. It is recommended that the text be amended to Transport Assessment/Statements will be required on all developments creating significant impact on the highway to assess the impact and potential mitigation required. In terms of the reference to Travel Plans a reference should read Travel Plans will be required for

specific development proposals to ensure a reduction in single occupancy car travel will be achieved through a series of measures and incentives/penalties and targets, on larger developments a travel plan co-ordinator will be required. ECC recommends that Policy TA1 is amended to refer to the need to provide safe, direct walking and cycling routes between new developments and schools / other community infrastructure, together with appropriate design for these new facilities that encourages and delivers sustainable travel. ECC also recommends ensuring that new developments are planned to link with existing cycling and walking infrastructure wherever possible, to help promote and deliver sustainable travel.

Thaxted Parish Council

Comment: Define what is meant by severe congestion? Also to note; back to inconsistency see point 16
Proposed: Opportunity for NP to go into more detail in terms of appropriate surfaces, fencing, lighting etc.
Shared ROW should be 2 m wide. Support this policy

Clerk Great Chesterford Parish Council

Transport planning for NUGC has not been properly assessed or considered by UDC, and is very far from co-ordinated to reduce the need to travel by car. In fact, it is located and designed to be a development to and from which people will have to drive. It is demonstrable that the road network is not capable of accommodating the thousands of peak and even off-peak trips 5000 houses would create, whether in Saffron Walden, Great Chesterford or the villages in South Cambridgeshire. NUGC is not located where it can be linked to services and facilities via a range of transport options. As set out elsewhere in this Submission, the reality is that buses can provide a limited service, which will in of itself create issues in Saffron Walden and Great Chesterford, rail travel is only utilisable if cars are used to access the appropriate stations (Great Chesterford not being one of these) and cycling and walking will have limited appeal, not least for commuters. Clearly, road safety cannot be improved by the NUGC development, it will be worsened. Travel plans and transport assessments have not been provided for NUGC. Clearly, before such a huge development can be approved, the travel implications need to be thoroughly assessed. They demonstrably have not. Very similar issues are applicable to Policy TA2 in relation to sustainable development. Aspirational statements concerning accessibility and integration into the wider community and existing networks have not been tested and are plainly inconsistent with the concept of NUGC which is isolated, does not have direct rail access and relies so heavily on the car.

Clare College

The proposed NUGC is not located where it can be linked to services and facilities by a range of transport options. Cycle routes will be problematic. The train station is likely to be too far and the route with too much gradient to be well used. Inevitably the private car will be the preferred option to access the railway station where there is currently not enough car parking spaces. Clare College reserves the right to submit further representations on the transport assessment

Individuals

- Individuals;

Requested more comprehensive and up to date study for NUGC, Impact on Saffron Walden, A505 at capacity/two GC option better impact/not best impact option – put the growth in villages instead Great Dunmow lacks rail link/frequent bus service

No need to be negative about reducing car use, given the rural nature of our area/more balanced Mitigation proposed will not cope with growth/aspiration does not reflect impossibility of massive investment

Bus companies, ECC and UDC have just gone through review/taken services out of the system

Car sharing sensible as an option but cannot legislate to force people down this path

Developers/landowners/site promoters;

McCarthy and Stone

Policy TA1 and supporting Paragraphs 7.16 makes reference to Travel Plans for major developments. Major development should be defined, either exempting specialised housing for older people as a low traffic generator particularly during peak hours or be establishing a threshold for application based on anticipated traffic movement rather than a number of units. An older person's scheme will generate considerable less traffic movement than a conventional scheme of the same number. The imposition of the travel plan on such a small traffic generating development will place a burden on the management of the scheme which in turn places a financial burden and may not make best use of officer's time in implementing and monitoring.

Enodis Property Developments Limited

We support the Councils ambition to reduce the need to travel by car and increase the use of public transport. Homes should be located in locations which are sustainable. Sites for residential development located in the Districts villages should be accessible by public transport such as Little Dunmow, where residents can reach one of the two major towns in Great Dunmow in approx. 8 minutes by bus or cycle in approx. 15 minutes. Considerations of major roads such as A Roads should be a factor in considering accessible development sites (such as the proximity of the A120 to Little Dunmow).

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There will be a small positive impact on air quality and climate change issues addressed through tackling congestion, reduced dependence on the private car and mitigation measures to reduce impacts. There will be however be significant positive impacts regarding accessibility and sustainable transport through a commitment to reduce the need to travel by car, increase public transport use and cycling and walking, and improve accessibility through collaborative working with operators. In addition to this, the policy acknowledges the needs and requirements of the wider district population and notions of inclusive access by appreciating that private car use is unavoidable in rural areas, and seeks to assess road capacities as part of development proposals. There will be positive impacts on social inclusion by incorporating a wide range of transport needs for different demographics within the district through the policy, and also regarding the consideration of infrastructure requirements such as road capacities, pedestrian and cycle routes at the outset of new development and development proposals.

Alternatives Considered

National policy requires Transport Statements or Transport Assessment to be produced for development that generates significant amounts of movement. Paragraph 35 of the NPPF also states that Local Plans should “protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; incorporate facilities for charging plug-in and other ultra-low emission vehicles; and consider the needs of people with disabilities by all modes of transport.” The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures/Recommendations

No mitigation measures or recommendations are proposed at this stage.

Policy TA2 – Sustainable Transport

This policy was responded to by 26 people/organisations.

Support	4
Object	8
Comment	14

Overarching Summary

Uttlesford Futures acknowledge ageing population/rural isolation recognise essential bus services, community travel, Dart scheme wanting encouragement of buses to call at employment sites,

Highways England Support plan policies aimed at reducing need to travel by private car, such as improved walking, cycling public transport infrastructure, and broadband

Essex Bridleways Association/Essex & Cambs Horse Society welcome mention of equestrian access but want proactive approach to enhancement of network from new growth

Sustainable Uttlesford want a more strategic approach to link all the new expanded settlements to nearest service centres e.g. A120 Bishops Stortford/Braintree, objective to minimise car journeys/NUGC assisting this by providing housing for knowledge economy

Network Rail supports increasing rail patronage/measures subject to business case

The Thaxted Society supports policy that reduces car use/journeys/public transport limited/avoid bridge to nowhere/lobby government for sustainable transport

Saffron Walden Town Council Supports this policy/seek definition of appropriate/safe network

Saffron Walden Neighbourhood/Stansted Plan Steering Groups request Rights of Way, cycling, pedestrian Towns and garden villages should be linked with cycle paths/Opportunity for NP to go into more detail

Littlebury Parish Council all new developments must be connected by safe walking and cycling routes to the local facilities they will use/design of new settlements should incorporate a comprehensive network

Clerk Little Easton Parish Council concerned Easton Park would be relatively isolated and motor transport will be the only realistic mode for residents

Essex County Council welcomes improving sustainable transportation connectivity between Braintree Stansted and Bishop Stortford/ amend bullet point 1 reference to multi-users/as it is noted that not all routes can accommodate multi users

Individuals_note; Rail is most sustainable form of transport, In UDC no route to the Wellcome Institute, no safe route from Great Chesterford to Saffron Walden.or Saffron Walden to Chesterford Research Park or Thaxted to either Great Dunmow or Saffron Walden. Need a critical mass of people on bikes/supporting infrastructure/cycle and pedestrian-only routes from settlements to places of work/essential services

Require; Investment in the existing public transport across region/detailed plan for links for the proposed developments, Cycle/pedestrian routes meander not sustainable unless to wider network, Cycling got to be easy, appealing and safe.

Statutory consultees and other bodies

Highways England

We support the policies in the plan aimed at reducing the need to travel by private car, such as improved walking, cycling and public transport infrastructure, and the provision of high speed broadband allowing people to more easily communicate and work remotely reducing the demand for travel.

Uttlesford Futures (Employment, Economy, Skills, Environment and Transport)

Acknowledge ageing population and rural isolation with recognition of some essential bus services, community travel and furthering the Dart scheme. (Essex are, however, reducing bus services)

Development Officer Essex Bridleways Association

Policy TA2 We note that in the second bullet point, equestrian access is briefly mentioned and this is welcomed, albeit that it appears to be a secondary consideration. We would prefer to see it written into this Policy an aim to be far more proactive in seeking access enhancements, especially via developer contributions within new developments.

Essex and Cambridgeshire British Horse Society

As above

Sustainable Uttlesford

There needs to be a more strategic approach to sustainable transport (including cycleways) to link continuously all the new, expanded and existing settlements along the A120 corridor to nearest service centres eg Bishops Stortford and Braintree. The use of Stansted Airport as a rail and bus interchange is not sufficient for residents and will only provide, in the main, for out-commuting for employment purposes into Greater London. Both proposed Garden Villages in the A120 corridor should have a number of pedestrian and cycle links to the Flich Way. A core objective of the Local Plan should be to reduce the number of private car journeys to work and out-commuting from the district. The proposed North Uttlesford Garden Village will assist in achieving this objective by providing housing for knowledge economy workers in the adjoining Greater Cambridge area. Plans should be made for the proposed Garden Village to develop links to the proposed Cambridge Light Railway scheme along the A1307 corridor and the existing cycleway network into the city. We would query why no mention is made in the proposal of the proximity of the Babraham Research Campus on A1307 which the North Uttlesford Garden Village would serve. In order to improve the Stations accessibility the feasibility of relocating the Great Chesterford station on the West Anglia line should be investigated. Consideration should be given to making J9 of the M11 accessible in both north and south directions.

Network Rail

Network Rail is in full support of increasing rail patronage as a function of sustainable transport use. However, the Local Authority should engage with Network Rail at the earliest possible opportunity to develop railway solutions efficiently and through the right processes. Investment in the railway will always be subject to business case development and value for money so it is therefore important to work together to achieve this for Uttlesford District Council.

Saffron Walden Town Council

Supports this policy

Saffron Walden Neighbourhood Plan Steering Group

Rights of Way, cycling, pedestrian Towns and garden villages should be linked with cycle paths. Suggestion: Opportunity for NP to go into more detail in terms of appropriate surfaces, fencing, lighting etc. Cycleways should be separated from pedestrian routes but where shared ROWs should be a minimum of 2 m wide.

Stansted Neighbourhood Plan Steering Group

Towns and garden villages should be linked with cycle paths. Travel plans need to have demonstrable outcomes. Suggestion: Opportunity for NP to go into more detail in terms of appropriate surfaces, fencing, lighting etc. Shared ROWs should be 2 m wide

The Thaxted Society

TA1 Thaxted Society supports policy which reduces car use / journeys. It is essential that in requiring mitigating factors from developers re, public transport links for example, that there is a likelihood of delivery, otherwise this is a failed policy and utterly unenforceable. Public transport in Uttlesford is severely limited and asking a developer to provide links to a lacking service smacks of the bridge to nowhere. Some infrastructure needs improvement before and without private sector participation. Our new MP has made this a clear priority and government should be lobbied to help. At the Society we see growth and sustainable transport provision as symbiotic.

Littlebury Parish Council

All new developments must be connected by safe walking and cycling routes to the local facilities they will use. The design of new settlements should incorporate a comprehensive network, with mechanisms to build it at the same time as the housing. Bus use in Uttlesford is low, mainly due to infrequent services and high fares. The recent removal of subsidies from bus routes by Essex County Council has resulted in high increases in fares; this has reduced access to public transport for people who most need it, such as those on low incomes, the young, those with mobility issues and those living in isolated rural villages. The availability of demand responsive transport vehicles is poor. Improvements to the bus transport network across the whole of Uttlesford would need to be implemented in order to reduce increasing car use by new and existing residents who need to travel for employment or leisure. Recognising the rural nature of the District, this may require public funding, but would help achieve air quality and other UDC targets, as well as delivering a core inclusive community.

Clerk Little Easton Parish Council

In relation to new garden cities, the sustainable modes of transport (other than bus) would be largely restricted to the town's boundaries. In the case of the proposed Easton Park, the site is confined by Stansted Airport to the west, the A120 to the south and uncertain connection with the few unclassified village roads to the north and east. Easton Park would be relatively isolated and motor transport will be the only realistic mode for residents.

Saffron Walden Neighbourhood Plan Steering Group

Towns and garden villages should be linked with cycle paths. Travel plans need to have demonstrable outcomes. Suggestion: Opportunity for NP to go into more detail in terms of appropriate surfaces, fencing, lighting etc. Shared ROWs should be 2 m wide.

Stansted Neighbourhood Plan Steering Group

Rights of Way, cycling, pedestrian Towns and garden villages should be linked with cycle paths. Suggestion: Opportunity for NP to go into more detail in terms of appropriate surfaces, fencing, lighting etc. Cycleways should be separated from pedestrian routes but where shared ROWs should be a minimum of 2 m wide.

Saffron Walden Town Council

Support this policy but need a definition of appropriate and safe network Query: How will this policy be implemented in relation to site access? UDC needs to ensure that this is set out in travel plans and that these have measurable outcomes

ECC recommends that bullet point 1 of the policy be amended by replacing reference to multi-users with appropriate , as it is noted that not all routes can accommodate multi user. ECC welcomes improving sustainable transportation connectivity between Braintree, Stansted and Bishop Stortford.

Developers/landowners/site promoters

No developer/landowners/site promoters responded

Individuals

Request make M11 J9 accessible both north/south, invest in existing public transport across region/detailed plan for links for the proposed developments

Rail is our most sustainable form of mid- long distance transport

Cycle/pedestrian routes meander not sustainable unless to wider network

Need a critical mass of people on bikes/supporting infrastructure/cycle and pedestrian-only routes from settlements to places of work/essential services.

Cycling got to be easy, appealing and safe/from UDC no route to Wellcome Institute, no safe route from Saffron Walden to Great Chesterford or Chesterford Research Park or Thaxted to Great Dunmow/Saffron Walden.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Alternatives Considered

National policy requires Transport Statements or Transport Assessment to be produced for development that generates significant amounts of movement. Paragraph 35 of the NPPF also states that Local Plans should “protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; incorporate facilities for charging plug-in and other ultra-low emission vehicles; and consider the needs of people with disabilities by all modes of transport.” The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

**Policy TA3 – Provision of electric Charging Points for Vehicles
Paragraph 7.20 -7.22**

This supporting text was responded to by 6 people/organisations.

Support	2
Object	2
Comment	2

Overarching Summary

Need policy on Electric Charging provision that is not in new development

Government anticipates all new vehicles must be hybrid or electric by 2040

Why not insist on charging facilities for development with no get outs

Statutory consultees and other bodies

None

Developers/landowners/site promoters

None

Individuals

Need policy on Electric Charging provision that is not in new development

Government anticipates all new vehicles must be hybrid or electric by 2040.

Developers free to design developments without charging facilities/claim 'impractical' Why not insist.

Para 7.22 In the second line, the phrase in new development is repeated.

Policy TA3

This supporting text was responded to by 22 people/organisations.

Support	7
Object	8
Comment	7

Overarching Summary

East Herts Council supports approach to encouraging modal shift and making provision for electric charging points but thresholds need to be clarified/10% minimum provision

Saffron Walden/ Stansted Neighbourhood Plan Steering Groups/Saffron Town Council support policy but request higher thresholds/20% for flats/min 7Kw

The Thaxted Society support with greater number of charging points required

Littlebury Parish Council request every new house/apartment have capability/substantial numbers in the public realm/existing settlements

Essex County Council note flats provision too low/ need to future proof provisions in this policy

Individuals support charging point provision/straightforward to put in new buildings/assist AQMA/use higher targets

Developers request test of electric charging(a home charge point is £1400) /broadband via Whole Plan Viability Assessment/ensure do not threaten growth delivery

Statutory consultees and other bodies

East Hertfordshire District Council

East Herts Council supports the Councils approach to encouraging modal shift and making provision for electric vehicle charging points. However, it is considered that Policy TA3 is confusing and not well-related to the supporting text. The wording in this policy in respect of provision for flats (<50 units) does not correspond with the intentions of the preceding paragraph 7.22, which seeks 10% minimum provision. It is therefore unclear whether Policy TA3 intends that there would only be one charging point space per 50 flats or whether there would be at least 10% provision, to accord with paragraph 7.22, via the (subject to minimum provision as above) wording. If the latter is the case then the 10% minimum provision should be spelt out specifically within the policy as a reference to supporting text would not constitute formal policy. In order avoid any other ambiguity in the interpretation of the policy wording it is suggested that One parking bay marked out for use by electric vehicles only (which may be taken to imply that there would only be one space provided) be replaced with One parking bay marked out only for use by electric vehicles.

Saffron Walden Town Council

Support but request that a higher percentage of charging points are installed as electric vehicles (including bikes) are already a significant proportion of new vehicle sales. Note that this conflicts with 7.22 which states 10% for flatted development. Amend: Amend policy to allow 20% provision for flats. Also add or to latest agreed standards.

Saffron Walden Neighbourhood Plan Steering Group

Change to according to agreed standards at the time. Housing requirements are laudable but 2% for flats is insufficient. Should be a minimum of 20% Suggestion: 20% minimum but perhaps 2% was a typo? Para 7.22 says 10%

Stansted Neighbourhood Plan Steering Group

Change to according to agreed standards at the time. Housing requirements are laudable but 2% for flats is insufficient. Should be a minimum of 20% Suggestion: 20% minimum but perhaps 2% was a typo? Para 7.22 says 10% Suggest 20% in view of recent government strategy. Charging points need to be minimum 7Kw.

The Thaxted Society

Support but request that a higher percentage of charging points are installed. Recommendation: Amend policy to allow greater provision of charging points.

Littlebury Parish Council

There must be adequate provision for electric car charging. Every new house and apartment should have the capability. Additionally, substantial numbers of charging points are required in the public realm and existing settlements, including provision for homes with no on plot parking. The current proposal is completely inadequate.

Essex County Council

It is noted that the provision for electric parking seems very low for flats especially considering the government announcement on diesel and petrol cars not being made after 2040 and the industry consensus that electric cars will come along before then. Electric charging points will be especially important in areas Air Quality Management Areas (AQMAs) such as Saffron Walden. ECC is keen to futureproof the provisions set out in this policy and welcomes further engagement and dialogue.

Developers/landowners/site promoters

Persimmon Homes Essex

In considering development plan policies, Para 173 of the NPPF stresses the importance of ensuring viability, including having regard to the costs of any requirements likely to be applied to development. According to the Energy Savings Trust the typical cost for a home charge point and installation is approximately £1,400. It is unclear whether such an assessment has been undertaken in relation to the proposed policy and its impact upon development viability. Notwithstanding the above, the NPPF contains a clear requirement that such facilities should only be required where practical. It is considered that the practicality of delivery should be a factor when it comes to incorporating charging plug-in. For instance, it may not be practical to make provision where parking is provided off-plot (such as in a parking court or within a communal area). It is also considered that the policy should consider the practicality of delivery. There are a range of different technologies for charging. It would be more practicable if the requirement related to on-plot parking adjacent to the property it serves. Furthermore, that the requirement relates to the ability to make a connection (i.e. the development delivers a suitably sited separate electrical spur) which would allow for a charging unit for an electric vehicle to be installed by the householder (should they choose to do so).

Grant and Bloor

Policy TA3 Provision of Electric Charging Points for Vehicles 7.1 The principle of the provision of electric car charging points is broadly supported; this is relatively straightforward to incorporate within the building fabric. For example, charging points can readily be provided to domestic garages. However the policy requires refining to make it clearer what kinds of developments are to be covered by the policy; it currently covers only residential and other development.

Gladman

Policy TA3 Provision of Electric Charging Points for Vehicles and Policy INF4 High Quality Communications Infrastructure 6.12.1. The Council should ensure that the requirement for electric charging points for each new property and the provision of high quality communications infrastructure are properly tested through the Whole Plan Viability Assessment. Plans should be deliverable and sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Therefore, the Council should assess the likely cumulative impacts on development in their area of all existing and proposed local standards and policies through a comprehensive and robust Viability Assessment to ensure that the cumulative impact of these standards and policies does not put the implementation of the Plan at serious risk.

Individuals

Charging point provision supported/straightforward to incorporate in building fabric e.g. domestic garages

Charging points important in areas Air Quality Management Areas (AQMAs) such as Saffron Walden

Higher targets for electric vehicles/any targets should be justified

Developers request test of electric charging(a home charge point is £1400) /broadband via Whole Plan Viability Assessment/ensure do not threaten growth delivery/

The lowest impact scenario is one that disperses housing across towns and villages

modal shift of 10% not achievable based on the distance to available services

Two Garden Community scenario has less impact

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There will be positive impacts on sustainable travel through the policy approach in contributing to the viability of electric or hybrid car usage. Additionally, there will be positive impacts on reducing pollution and carbon emissions.

Alternatives Considered

Paragraph 35 of the NPPF states that Local Plans should “protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; incorporate facilities for charging plug-in and other ultra-low emission vehicles; and consider the needs of people with disabilities by all modes of transport.” The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Paragraph 7.23/Policy TA4 – Vehicle Parking Standards

This supporting text was responded to by 3 people/organisations.

Support	2
Object	1
Comment	0

Overarching Summary

Text supported/reference needed

Statutory consultees and other bodies

None

Developers/landowners/site promoters

None

Individuals

Text supported

Location of Essex County Council Parking Standards, Design and Good Practice needed

Policy TA4 – Vehicles Parking Standards

This policy was responded to by 18 people/organisations.

Support	4
Object	4
Comment	10

Overarching Summary

Elsenham Parish Council concerned Residential Parking Standards document was last updated in February 2013 - two parking spaces for each three bedroom house inadequate

Saffron Walden Town Council refer to as identified within the local Neighbourhood Plan

Saffron Walden/ Neighbourhood Plan Steering Group Neighbourhood Plan Steering Group request referring to locally agreed standards/any such policy identified within the local Neighbourhood Plans

Littlebury Parish Council - Garages should be of adequate size for modern cars, to maximise the use of off street parking.

Little Easton Parish Council note policy should go further and support car parking initiatives away from new development that can be accommodated in balance with policy TA2.

Elsenham Parish Council concerned Residential Parking Standards document was last updated in February 2013, and it is overdue for review.

Thaxted Parish Council Comment: To add as identified within the local Neighbourhood Plans/Development Management should not allow discounting

Essex County Council note Essex Vehicle Parking Standards have been updated in Essex Design Guide

Developer supports policy subject to review of relevant parking standards when published

Individuals want increased car parking capacity is needed for local people at railway hubs, including Stansted Airport, no new development without parking space for at least two vehicles

Statutory consultees and other bodies

Saffron Walden Town Council

To add and/or any policy as identified within the local Neighbourhood Plans. Amend policy as proposed

Saffron Walden Neighbourhood Plan Steering Group

Change to based on locally agreed standards or as outlined in the relevant Neighbourhood Plan □ A policy should encourage alternatives to internal combustion engine by offering parking reductions where alternative transport is used (e.g. electric, hydrogen, hybrid cars, cycles) Suggestion: The local NP should be able to determine these based on parking issues and levels of car ownership. Development Management should not allow discounting of car parking spaces in flatted developments due to the existing parking problems, high car ownership in the area and the necessity of having a car.

Stansted Neighbourhood Plan Steering Group

Change to based on locally agreed standards or as outlined in the relevant Neighbourhood Plan. Car sharing is used on some apartment blocks and should be encouraged. A policy should encourage alternatives to internal combustion engine by offering parking reductions where alternative transport is used (e.g. electric, hydrogen, hybrid cars, cycles) Suggestion: The local NP should be able to determine these based on parking issues and levels of car ownership. Development Management should not allow discounting of car parking spaces in flatted developments due to the existing parking problems, high car ownership in the area and the necessity of having a car. Limits on parking in blocks if needed could be set by annual rental for spaces rising in value for each additional vehicle

The Thaxted Society

Support per Thaxted Society policy

Littlebury Parish Council

Garages should be of adequate size for modern cars, to maximise the use of off street parking.

Little Easton Parish Council

The policy looks only at the site of new development and does not take account of the parking of vehicles originating from the development when they access existing employment, services and facilities. The policy should go further and support car parking initiatives away from new development that can be accommodated in balance with policy TA2.

Elsenham Parish Council

The Residential Parking Standards document was last updated in February 2013, and it is overdue for review and revision. Several shortcomings in current standards and practices are outlined below. Uttlesford is a rural area, with a high percentage of car ownership and a consequent pressure on parking spaces. The current provision of two parking spaces for each three bedroom house is demonstrably inadequate. The practice of allowing a reduction in visitor parking spaces if there is greater than a minimum provision for individual houses should be discontinued. Visitors do not park on spare parking spaces allocated to other households. Visitor parking spaces must be distributed evenly over sites as a whole. Where three parking spaces are provided these should not be end to end. Few households are prepared to engage in triple-shuffling of vehicles, with a consequent increase in parking on roads and pavements.

Thaxted Parish Council

Comment: To add ~and/or any policy as identified within the local Neighbourhood Plans. The local NP should be able to determine these base on parking issues and levels of car ownership. Development Management should not allow discounting. Proposed Action: Amend policy as proposed

Essex County Council

ECC wishes to highlights that the Essex Vehicle Parking Standards have been updated within the Essex Design Guide

Developers/landowners/site promoters

Enodis Property Developments Limited

Support this policy subject to a review of the Councils relevant parking standards when published.

Individuals

Increased car parking capacity is needed for local people at railway hubs, including Stansted Airport

No new development without parking space for at least two vehicles

Sustainability Appraisal June 2017

Car ownership in the District is high and limiting parking within residential development will not necessarily discourage ownership but instead cause displacement of vehicles and inappropriate parking. It is therefore important that adequate vehicle parking is provided in new developments. The Council approved the Essex County Council document "Parking Standards, Design and Good Practice" in January 2010 as well as all intervening updates to the guide. The Policy acknowledges the use of private vehicles, with maximum standards at origins and minimum standards at destinations. This will have uncertain rather than negative impacts on air quality in light of both a desire to minimise private vehicle trips and provide parking to reflect car ownership. The principal aim of this policy is to provide adequate parking to avoid obstruction of the road network and to meet the District's needs. These have been identified as significant issues within the District evidenced by high levels of vehicle ownership and issues surrounding previous parking standards that sought to restrict parking provision at both origins and destinations. By addressing this issue, access both to and within new development should be viable and sustainable and promoting cultural change. There will be positive impacts on townscape at both origins and destinations, social inclusion and accessibility. There will also be positive impacts on sustainable transport uptake through the standards' general approach, but also the inclusion of suitable parking for cycling and powered two wheelers.

Alternatives Considered

Paragraph 39 of the NPPF requires local planning authorities to take into account the following when setting local parking standards: “accessibility of the development; the type, mix and use of development; the availability of and opportunities for public transport; local car ownership levels; and an overall need to reduce the use of high-emission vehicles.” With this in mind, there is no direct alternative within the adopted ECC Parking Standards. An alternative of not adopting the ECC Parking Standards would be: Alternative TA4(a): To not adopt the ECC Parking Standards and assess proposals on a case by case basis, responding to local context.

The alternative would have uncertain impacts on all relevant sustainability objectives, largely due to there being no set guidelines for developers through effective policy. It is possible that the approach could lead to improvements in townscape and deliver appropriate parking provision in the District; however it is felt that this alternative would be contrary to aspirations to speed up the planning process in the absence of any set guidelines to refer to. There is also the possibility that unsuccessful applications would appeal on such grounds without any policy direction to base refusal on. Additionally, the ECC Parking Standards have been devised with the District Council’s input. For these reasons the alternative was rejected in favour of the Policy approach.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed at this stage.

Policy TA5 – New Transport Infrastructure or Measures

This policy and supporting text was responded to by 38 people/organisations.

Support	4
Object	9
Comment	24

Overarching Summary

Highways England recognise that large parts of the district are rural/access for public transport difficult/SRN close to capacity with most concern over M11 J8 and Galleys Corner in Braintree/Careful planning to ensure growth in right place with facilities/steep change in public transport/GCs of size to internalise trips/coordinate timing of facilities and jobs

Braintree support inclusion in policy of reference to Braintree Branch line

Essex Bridleways Association request amend policy to Multi-user route improvements enhance multi-user connectivity with definitive Bridleway/No cycle links to Flitch Way

Birchanger Parish Council concerns that any new development at Stebbing/Little Easton/Dunmow only exacerbate the situation/any new development at Junction 8 should be routed underground

Saffron Walden Town Council request major revision/mention of the Cambridge to Haverhill Light Railway. Need new cycle paths/M11 new junctions north of Junctions 8/8A and improvements to Junction 9

Saffron Walden Neighbourhood Plan Steering Group requests mention of B1383/Cambridge to Haverhill light railway/ new paths, e.g. Walden to Hinxton and Wimbish/a strategy to improve the M11

Stansted Neighbourhood Plan Steering Group request mention of B1383/strategy to improve the M11 with air quality monitoring in Stansted Mountfitchet

The Thaxted Society Support. However where Saffron Walden has problems with through traffic and its mitigation it follows, a priori, so does Thaxted.

Littlebury Parish Council request garages should be of adequate size for modern cars, to maximise the use of off street parking.

Little Easton Parish Council concerned over limitation of district council planning for large scale urban development/ flawed by the absence of binding commitments from delivery bodies

Littlebury Parish Council requests plan set targets for traffic reduction, to reduce congestion and emissions, and take account of technology/change over to electric cars

Developers; Support proposed transport measures in Saffron Walden/movement across town/need for Eastern Distributor Road/plan for future expansion/agree development must be supported by infrastructure, services and facilities/role of providers and Council

Individuals; Spatial vision needs more than cooperation/actual investment, need relief roads to take traffic away from Saffron Walden centre, mention improvements impact on roads in and around Saffron Walden/Public Transport Provision/Walking and cycling improvements should be expanded where appropriate to include horse riding/Flich Way improvements/bridleway and the linking route will have bridleway status/ new junction on the M11 after Junction 8a to effectively give a bypass

Statutory consultees and other bodies

Highways England

We have been talking to the District for a long time about aspirations for growth, it is recognised that large parts of the district are rural and access to public transport difficult. Parts of the strategic road network (SRN) running through the district are already close to capacity and cannot reasonably cope with large amounts of additional development without significant improvement. The M11 J8 and although not in the district Galleys Corner at Braintree are giving particular concern with regards to capacity. It has been recognised that the A120 between Braintree and the A12 is nearing capacity, most noticeably at peak times. Essex County Council has been examining the feasibility of upgrading this route to a dual carriageway. With a view to submitting this for inclusion into a future RIS-2. Until housing and employment is committed the above schemes can really only deal with existing challenges allowing for a limited amount of growth as the designs are based on previously envisaged growth rates rather the much more ambitious level proposed in these consultations. This means the need careful planning to ensure proposed development is in the most appropriate place with the necessary facilities and infrastructure available at the right time and a steep change both in the provision and take up of public transport, if this level of development is to be sustainable. These sites are of a size to be able to internalise their own trips careful planning and delivery will be required to make sure that services, jobs and infrastructure come forward at the same time as demand is increased by new homes. If not there is a danger that trips will not be captured on site and the impact of the development on the surrounding network could be unsustainable.

Bridleways Development Officer Essex Bridleways Association

It is obvious from this Policy that any mention of equestrian access being included is not the case bearing in mind the title Walking and Cycling improvements and yet again it goes into detail of linking cycling improvements with the Flich Way. We suggest that this Policy is amended to Multi-user route improvements and that multi-user connectivity is enhanced with this definitive Bridleway. It is also interesting to note that such access proposed solely for pedestrians and cyclists extends to the junction with the M11 which of course is managed by Highways England. Highways England are very much on board with the need to provide safe crossings in connection with the Strategic Road Network (of which the M11 is part) and has a policy in place which requires them to consider all vulnerable road users, including equestrians, as part of their remit. They are also very proactive in ensuring that full consultation with such user groups is part of their planning process. Page 588

consistent with such policies, and in view of this, we suggest that access for all vulnerable road users, including equestrians, is catered for here as the Plan likely to be found unsound by an Inspector because of this issue.

CABO Essex and Cambridgeshire British Horse Society

Supports the above

Birchanger Parish Council

Parish Council has concerns that any new development at Stebbing or Little Easton and Dunmow will only exacerbate the situation further, as would an additional exit from the services onto the Birchanger A120 roundabout. The Parish Council would argue that any new development at Junction 8 should be routed underground and the existing landscaping enhanced to protect the village from increased noise. It is becoming impossible to access the exits from the village at either end at certain times during the day due to the huge increase in traffic which the developments in the area have already brought. A new development, already started, just off the A120 in Bishop's Stortford will make the situation much worse. Birchanger has concerns that any proposal to add an additional exit at the A120 roundabout would bring the area to gridlock throughout the day. A new service station to serve southbound traffic could be constructed at the proposed Junction 7a as there are times when the existing car parking area at the services is at over capacity. Stansted Airport has plans to increase and the emphasis must be on development elsewhere to ease the pressures on both the M11 and the A120 by ensuring that no further developments impact on the already overstrained road systems in the South West of the District.

Saffron Walden Town Council

Insufficient policy - needs major revision. No mention of the Cambridge to Haverhill Light Railway. Need new cycle paths and road links. Proposed Action: There need to be improvements to the M11 with new junctions north of Junctions 8/8A and improvements to Junction 9

Saffron Walden Neighbourhood Plan Steering Group

No mention of the B1383. This is already at overcapacity. What will be done to mitigate this? No mention of the Cambridge to Haverhill light railway. Only talks about existing cycle paths but should be calling for new paths, e.g. Walden to Hinxton and Wimbish Suggestion: There needs to be a strategy to improve the M11 with new junctions north of Junctions 8/8a through talks with Highways

Stansted Neighbourhood Plan Steering Group

No mention of the B1383. This is already at overcapacity. What will be done to mitigate this? No mention of the Cambridge to Haverhill light railway. Only talks about existing cycle paths but should be calling for new paths, e.g. Walden to Hinxton and Wimbish Suggestion: There needs to be a strategy to improve the M11 with new junctions north of Junctions 8/8a through talks with Highways England. However, air quality should be monitored within Stansted Mountfitchet

The Thaxted Society

Support. However where Saffron Walden has problems with through traffic and its mitigation it follows, a priori, so does Thaxted.

Littlebury Parish Council

Garages should be of adequate size for modern cars, to maximise the use of off street parking.

Little Easton Parish Council

As regards a statement of policy, TA5 (apart from the last paragraph concerning Saffron Walden) merely says the district council will co-operate with others. **Page 589** it illustrates the limitation of a district council

in planning for large scale urban development. All key transport assets (especially road and rail links) are provided, owned and managed by other authorities, agencies and corporations. The spatial vision of the Local Plan is dependent on more than co-operation from these other bodies and needs actual investment and delivery. The Local Plan is fatally flawed by the absence of established, certain and binding commitments from the other relevant authorities, agencies and corporations.

Littlebury Parish Council

Car ownership and use in Uttlesford is already above the national average. The Plan should set targets for traffic reduction, to reduce congestion and emissions, and take full account of changing technology and transport options. The Plan does not take account of the planned reduction of use of fossil fuels or the evolution of electric vehicles, including autonomous vehicles. It should take account of the announcements by Government and manufacturers about the major change over to electric (and hydrogen fuel cell) vehicles that is expected to occur in the mid 2020s i.e exactly the period the plan covers. The adoption of electric vehicles will actually reduce pollution and noise. Although bus, cycle and walking routes will be incorporated into the design plan for the new settlements, it will be imperative to link these with improved facilities across the rest of the district to support integration of the new developments into the wider community and to prevent increased car use across the district. The provision of cycle paths in Uttlesford is inadequate, as is the proposal within the plan that improvements are limited to the path already in place from Saffron Walden to Wendens Ambo and improvements to the Flitch Way. Recreational cycling is very popular locally; Saffron Walden has one of the most successful Triathlon clubs in the country. In addition, there are substantial benefits to be had from developing cycling routes for both recreation and utility cycling. The Cam valley from NUGV to Gt Chesterford, Littlebury, Saffron Walden and Newport is virtually flat, and the distances to employment sites, schools, shops and stations are within the range considered to be viable for utility cycling. Developing continuous, connected, safe routes in this part of the District should be a high priority. It would reduce car movements, and there is an opportunity to link such a network to Whittlesford station and Cambridgeshire employment sites, benefiting new and existing Uttlesford residents. It could potentially attract more visitors to Saffron Walden. Significantly, it would also help UDC meet targets in its existing policies on health, recreation and air quality.

Elsenham Parish Council

The Residential Parking Standards document was last updated in February 2013, and it is overdue for review and revision. Several shortcomings in current standards and practices are outlined below. Uttlesford is a rural area, with a high percentage of car ownership and a consequent pressure on parking spaces. The current provision of two parking spaces for each three bedroom house is demonstrably inadequate. The practice of allowing a reduction in visitor parking spaces if there is greater than a minimum provision for individual houses should be discontinued. Visitors do not park on spare parking spaces allocated to other households. Visitor parking spaces must be distributed evenly over sites as a whole. Where three parking spaces are provided these should not be end to end. Few households are prepared to engage in triple-shuffling of vehicles, with a consequent increase in parking on roads and pavements.

Thaxted Parish Council

Comment: No Mention of the road link between Dunmow and Cambridge, those using the already over capacity B184 will flood rural communities. What will be done to mitigate this? There could be some consideration to weight limits of vehicles using this route, in particular to prevent construction traffic using the Thaxted route. Please see our additional point under the heading Land east of the mead Thaxted
Proposed Action: UDC to respond and consider suggested points re weight limits.

Essex County Council

ECC considers that this policy lacks clarity and purpose. It is recommended that further information from UDCs transportation consultants White Young Green should be included to provide greater clarity on the mitigation required to address planned growth. ECC recommends that the first paragraph of the policy is

amended to read The provision of new or enhanced transport infrastructure and initiatives will be pursued and implemented in partnership with the relevant transport providers. Developer funding for or provision of highway and transportation works and measures will be sought as appropriate The following measures have been identified and others will come forward through assessment of specific sites. This amendment provides greater clarity regarding the intention of the policy and includes reference to developer contributions or provision of highway infrastructure. ECC recommends that within the rail improvement section of Policy TA5 that it seeks to facilitate the use of rail travel and reduce the impact on the highway network. This may be accomplished by ensuring that there is a choice of sustainable travel modes at railway stations. It is recommended that the following sentence be included within the policy, Improved accessibility for rail stations that will serve new developments, including cycle parking, cycle and pedestrian routes, bus infrastructure. ECC recommends that the Walking and Cycling Improvement section of Policy TA5 includes the following: Schemes within the Essex Cycling Strategy and Uttlesford Cycling Strategy. This will ensure that these schemes may be considered and secured through developer funding as appropriate. The Strategic Highway Improvement section of the policy should include reference to the M11 and A120 in the text; this will ensure that the whole strategic network in UDC is referenced. ECC recommends that the Local Improvements section of the policy be renamed to read Local Highway Improvements. It is also recommended that the following sentence be included in the policy, as Saffron Walden is not the only place where transport improvements are required New developments will be assessed for their impacts on the network and where necessary, capacity, safety and enhancements to transport provision will be required from the developer to mitigate the impact on the network or linking to the network. Flitch Way All proposed developments should use existing links (access points) onto the Flitch Way. This is not to say that new networks of footpaths and bridleways should not be created around the Flitch Way spine but that no further direct access nodes should be created on to this recreational spine. All developments should include a minimum of a 20 metre buffer strip of greenspace and these should be established and maintained as appropriate to the adjacent habitat along that part of the Flitch Way.

Surface water run-off as a result of development should be managed away from the Flitch Way. Increased wear on the surfaced route as a result of increased development should be recognised and appropriate levels of contributions from developers should be secured to fund improvements to the running surface. All proposed developments should be designed to avoid the rear boundaries of properties abutting the Flitch Way or designated Greenspace. All developments should include secure boundaries adjacent to the Flitch Way These considerations and requirements apply to a number of new developments, in particular the new allocations including the following: Site Policy SP8 (Land West of Braintree) GtDUN2 (Land W and SW of Great Dunmow) LtDUN1 (Dunmow Skips site, Little Dunmow) TAK2 (Land at Dunmow Road, Little Canfield, Takeley TAK2 (Brewers End, Takeley) TAK2 (Chadhurst, Takeley) TAK1 (Land between 1 Coppice Close and Hillcroft, S of B1256, Takeley Street, Takeley). It is acknowledged that some developments among these may already have planning permission and where that applies it may not be possible to apply these design considerations. East Hertfordshire Council

Policy TA5 New Transport Infrastructure or Measures: This policy currently contains a significant amount of wording that would be better placed in supporting text where it relates to measures that have already been implemented. It is suggested that the policy would be better served by splitting out the narrative around these areas to a preceding paragraph and that a more succinct policy, listing only measures yet to be delivered, should be developed.

Epping Forrest District Council

It would be helpful if any future supporting text makes reference to the fact that the strategic highways infrastructure requirements are identified in the Memorandum of Understanding on Highways and Transport Infrastructure in the West Essex/East Hertfordshire HMA (signed March 2017).

Braintree District Council

Policy TA5 New Transport infrastructure or Measures BDC strongly welcomes the inclusion within this policy of the measures to improve the Braintree branch line which if completed would provide a more

regular and reliable service from Braintree and Freeport railway stations. However the wording in the policy indicates that scheme has been approved for control period 6 which BDC do not believe is the current position. However BDC would welcome the support of UDC in moving this scheme forward.

Uttlesford Futures (Employment, Economy, Skills, Environment and Transport

Upgrades of M11, smart motorway plans, and junctions serving Uttlesford. Relief roads needed to take traffic from town centres, particularly Saffron Walden.

Manchester Airports Group

This policy would benefit from specific cross references to INF1, SP6 and SP8 as well as Stansted Airports role in capacity planning for the future of the road network in partnership with the Councils and HE. Specifically, the policy references the ECC traffic model (in Strategic Highway Improvements), but the policy should be clarified that developments will be assessed utilising the model.

Historic Environment Planning Adviser, East of England Historic England

All proposed infrastructure schemes should take into consideration their impacts on heritage assets and their setting alongside archaeological potential of route options.

Network Rail

Improvements are proposed along the whole route and not limited from Cambridge to Stansted. The Train Operating Company is Abellio Greater Anglia (rather than Abellio Western Anglia). Abellio Greater Anglia's franchise commitments are for full renewal of rolling stock and an attendant new timetable, to and from London, Cambridge and Norwich. Long term it is envisaged that Crossrail 2 will link up with the West Anglia Mainline to provide greater connectivity to and from the local area. Braintree Branch Line " The Braintree Branchline Capacity Increase project is still in early development and a solution to increase the service from 1 to 2 trains per hour has yet to be finalised. It is worth noting that funding has not been guaranteed for this scheme from the Department for Transport. There are two dynamic loops identified as needed north of Witham for enhancement, these are also not funded for delivery. We would therefore welcome support and funding for further development and delivery. Level Crossings In general the need to close level crossings should be considered where any development is likely to increase or change the nature of usage at a crossing. Closure of level crossings will help improve safety, reduce the number of accidents and also help to increase capacity of the network and maintain a robust railway timetable. In the nineteenth century, when the railways were constructed, many level crossings were provided because they were the cheapest form of making good the interruptions in land and public highways that resulted. Level crossings were acceptable on a low speed steam- powered railway, but trains have become faster, quieter, and more frequent, and the law and society have rightly become more concerned with safety. Level crossings collectively pose the greatest risk to safety on the railway network. That is to say, almost half of non-suicide deaths (or injury equivalents) on the railway network are attributable to level crossings. It is widely acknowledged that closure of level crossings is the most effective way to remove the risk. It is therefore Network Rail policy to close level crossings where possible, and this is set out in the document Transforming Level Crossings 2015 -2040 (attached). It is Office of Rail and Road (ORR) policy that Network Rail must work to reduce level crossing risk by 25% by 2018, including through closure of crossings. As a result, to aid in achieving the Governments targets of level crossing closures Network Rail would welcome a policy to support level crossing closures within the Local Plan. We are happy to discuss specific level crossings further if this would aid policy formation and justification.

Chrishall Parish Council

There is currently money available from the development at Stansted to undertake a study of the longer term treatment of the A120 Corridor in relation to committed and possible development. The study may be quite significant in terms of monitoring wider proposals in the local development plan with regard traffic flow

and forecast which is already seen as a major issue. It is known that further development along the A120 corridor is going to impact Junction 8.

Clare College Cambridge

Reliance is on possible, but as yet unfunded, long term highway improvements which would be integral to the development of the NUGC. Clare College reserves the right to submit further representations on the transport assessment

Developers/landowners/site promoters

Pelham Structures Ltd

Policy TA5 - New Transport or Infrastructure Measures Strategic highway improvements as well as the improvements required to the B1383 (old A11) thought should also be given to how this could also access a new M11 junction either to the north or south of Newport to reduce north-south flows on the B1383.

Persimmon Homes Essex

Whilst it is agreed that development must be supported by the provision of infrastructure, services and facilities, a significant amount of the items identified rely upon third parties (including public and statutory bodies) or wider investment decisions (such as those made by Network Rail, Highways Agency, Broadband Providers). Policies TA5 and INF1 should be amended to recognise the role the Councils has in terms of influencing, co-ordinating and delivering infrastructure and connectivity. Policies TA5 and INF1 should also be amended to recognise the role that obligations through s106 or CIL should make in addressing infrastructure needs arising from the new development. It is important that the totality of costs to be borne by the proposed level of development is adequately assessed. In light of Para 173 of the NPPF, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.

Kier Living Ltd

We support Policy TA5 in that it requires transport measures in Saffron Walden to support movement across town and more sustainable travel behaviour to provide opportunities for traffic to avoid the centre. However, there needs to be clearer policy guidance in relation to the need or otherwise for a link road between Radwinter Road and Thaxted Road, or indeed a more substantial Eastern Distributor Road. The Local Plan Inspector, in assessing the allocation within the former Draft Plan, stated that in the context of the allocation being sound, there were risks to its effectiveness in terms of the way that the scheme was being brought forward this related to the uncertainty about the way a master plan would evolve in circumstances where clarity was needed to provide the link road between Thaxted Road and Radwinter Road. It was clear from his report that further information on the link roads function and specification was required and as result of the policys lack of clarity and content, this had implications on the Draft Plans effectiveness. Importantly at paragraph 3.12, the Inspector states if the necessary evidence and clarity about this matter could have been brought forward and a sound approach outlined, this could potentially have been resolvable by consultation upon an appropriate Major Modification. The Reg 18 Plan must, therefore, provide more certainty about what is required in respect of highways improvements in Saffron Walden. Whilst the draft allocation at Thaxted Road can be self-contained, and come forward on its own without any link road without having a negative impact on the highway network, the District and County Council should be planning for future expansion and should provide greater clarity about what will be required.

Individuals

Mention improvements impact on roads in and around Saffron Walden/Public Transport Provision/need many buses especially a shuttle service from multiple points in Saffron Walden to Audley End Station.

Walking and cycling improvements should be expanded where appropriate to include horse riding/Fritch Way improvements/bridleway and the linking route will have bridleway status.

Walden Road cycle route example of patching onto an existing road. Any new routes must be better designed. Consider cycle paths in Holland.

Bypass at Newport could run parallel to the M11 - thus minimizing noise impact/south of village opposite Sparrows Hill. At a stroke it would make Newport a pleasanter village to live in

Plan should include proposals for consultations on future infrastructure - Saffron Walden where traffic greatly increased by shoppers from North Uttlesford Garden Community

If possible, a new junction is needed on the M11 after Junction 8a to effectively give a bypass

Add cycleway between Newport and Quendon along existing footway and verge/proposed in Newport Quendon & Rickling Neighbourhood Plan

Sustainability Appraisal June 2017

The Policy will ensure that accessibility is maximised alongside new growth and also seeks to remedy existing deficiencies in a range of transport networks. This will see significant positive impacts on accessibility and infrastructure related sustainability objectives. There will also be significant positive impacts on sustainable travel.

Alternatives Considered

Paragraph 35 of the NPPF states that Local Plans should “protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; incorporate facilities for charging plug-in and other ultra-low emission vehicles; and consider the needs of people with disabilities by all modes of transport.” The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed at this stage.

CHAPTER 8 - Infrastructure

Introduction

Paragraph 8.1 - 8.5/Policy INF1

This supporting text was responded to by 18 people/organisations.

Support	0
Object	6
Comment	12

Overarching Summary

- The Environment Agency generally concurs with the issues raised on water infrastructure although notes impacts on rivers/need for detailed water cycle strategy to verify the assumptions in the stage one WCS. Without a detailed Water Cycle Study before submission plan unsound.
- National Trust require amended definition of Green Infrastructure/NPPF Annexe 2 - network of multifunctional green space
- Landowner requested mention of Places of Worship in paragraph 8.1
- Individuals mention, concerned that facilities will become more overstretched e.g. education, health, roads, limited public transport
- Housing must be accompanied by facilities/but not happening with existing growth and new growth with be the same

Statutory consultees and other bodies

Regional Planning Advisor National Trust

This defines Green Infrastructure as Designed landscapes (including Country Parks) and natural/semi-natural green space. This definition should be amended in line with the definition set out in Annex 2 of the NPPF - network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. As indicated above, the National Trust considers that a Green Infrastructure Strategy is required.

Environment Agency

The Regulation 18 Local Plan and the Infrastructure Delivery Plan has highlighted several issues regarding water infrastructure in the proposed growth plan. The Environment Agency generally concurs with the issues raised with regard to water infrastructure, however we do feel it is important to reiterate certain points. Upgrades to water infrastructure will be necessary to accommodate the projected growth in the local plan. Provision of suitable infrastructure will be a major factor with regards to the achievable scale, distribution and timing of this plan. We consider it imperative that these issues are addressed before any of the plans can be fully implemented. In the Hertfordshire and North London area, Thames Water will need to be an active participant in the delivery of the proposed plans. Elsenham is connected to the Stansted Sewage Treatment Works (STWs). There is single pipe connection which passes underneath the M11. There is a need for the Council and developers to work closely with Thames Water to understand any constraints and/or upgrades required to accommodate the proposed residential allocations in the Elsenham area. Takeley has its own small STW which discharges into the upper reaches of the Pincey Brook. The dilution capacity of the receiving watercourse is low especially during dry periods of the year. Any changes to the present discharge arrangements will need to be carefully assessed. There will be a need for the Council to understand any constraints on additional demands placed on this treatment works. The Environment Agency will work closely with Thames Water to ensure high environmental standards continue to be met. The figures given in the Local Plan are in line with those used in recent previous documents (e.g. the updated water cycle study and the IDP). However, the water cycle study was only completed to stage 1 standard. The statements of where upgrades will take place and sewage will be received in Policies SP6, 7

and 8 pre-empt the very necessary stage 2 water cycle study. At this stage, we cannot be certain that the necessary upgrades are possible, or that an appropriate revised permit will be granted. Given that the rivers which flow through Uttlesford are only headwaters, the presence of enough dilution to support the proposed WRC extensions is not a given, and the permitted nutrient limits required could be extremely challenging to meet. Policy SP8 also pre-empts the water cycle study for the North Essex Garden Communities Integrated Water Management Strategy (IWMS) currently being completed by AECOM (also discussed further on this response). In this study, at stage 1 draft stage, the feasible options for the west of Braintree community also include building an entirely new WRC, with discharge split between the rivers Brain and Blackwater. We would recommend slightly changing the phrasing of these policies such that upgrading the WRCs mentioned is phrased as an option under investigation or the "currently preferred option rather than as a certainty.

Water Quality/ Wastewater comments Paragraph 9.5 Conclusions For New Settlements on page 61 of the Water Cycle Study (WCS) Update, dated January 2017, suggests that an alternative foul drainage solution for a New Settlement at Great Chesterford could be conveyance to Saffron Walden catchment if viable. Although we provided updated datasets we were not consulted on the conclusions of the WCS Update. Little detail is provided regarding the assessments carried out in that WCS Update, but it is our opinion that conveyance of large volumes of foul sewage to Saffron Walden would not likely be a viable option. The environmental capacity is severely constrained in the local watercourse (The Slade) where there is limited dilution available for an increase in sewage discharge volumes. The WCS Update conclusion goes on to state that Consultation indicates that both Thames Water and Anglian Water have concerns regarding the level of growth and it is recommended they are engaged by the site promoters as early as possible. We note that paragraphs 3.1.9 and 3.1.10 of the Uttlesford IDP: Addendum and Summary Paper make the respective points: Para 3.1.9: Provision of water infrastructure is critical and could be a risk to the spatial distribution of growth in the local plan period. Growth at the proposed new garden communities will place additional burdens on foul water capacity. Para 3.1.10: The EA has advised that the level of discharges into water courses is currently at its limit and that additional permits for increased discharges may not be granted. We echo the concern expressed by the water companies, but suggest that further detailed WCS assessments should be carried out in order to properly assess the potential impact of the New Settlement(s) at all locations. The WCS should form part of an evidence base to demonstrate that the quantum of growth proposed in the Local Plan can be delivered sustainably and without causing a breach of environmental legislation. Encouraging site promoters to engage with the water companies is to be encouraged but this in itself will not prevent a breach of environmental legislation and is not a substitute for a full and proper WCS assessment ahead of the Local Plan being finalised/approved. As matters stand, we consider that in the absence of further detailed WCS assessments, including the outputs of the North Essex Garden Communities IWMS, the evidence base supporting the Uttlesford proposed new settlements does not, in our view, fully engage with National Policy and the National Planning Practice Guidance. We consider it is not consistent with the National Policy position and is therefore unsound.

Developers/landowners/site promoters

Regeneration Adviser Diocese of Chelmsford Paragraph 8.1 should mention places of worship to be compliant with section 70 of the NPPF

Individuals

Essential any required infrastructure improvements in place before any further development in UDC, e.g. Takeley, existing infrastructure is unable to cope now

No plan to support this aspiration in the case of North Uttlesford Garden Village

Previous expansions in Uttlesford resulted in little done to increase facilities e.g. primary schools bursting at the seams in Dunmow and Takeley, doctors surgeries almost full/Takeley doesn't have one

West of Braintree infrastructure cannot cope with the current levels of development in the area/poor roads schools siting portakabins/doctors waiting times increased due to woodlands park/flitch green but no public transport, additional secondary schools/doctors surgeries, A120 becomes gridlocked at peak times

Education not addressed in this plan? One or more new secondary schools is needed in the district. SWCHS cannot cope/Thaxted's children not getting in/education outside the district

Green infrastructure/need to preserve/add to off road network/green infrastructure/rights of way available to horse riders, cyclists and walkers/horse riders most vulnerable of all road users

UDC has mountain to meet local health care needs - wait 5 weeks for a family GP appointments and 4 weeks for a midwife appointment even in the holiday season

Annual rainfall is diminishing/Garden Communities and economic development will increase demand on a contracting water supply/ reduce rain water seeping through to the aquifer

Too passive/effective infrastructure needs lots of work - as in Cambridgeshire over the last 20 years.

Policy INF 1

This policy and supporting text was responded to by 51 people/organisations.

Support	14
Object	9
Comment	28

Overarching Summary

- The Environment Agency generally concurs with the issues raised with regard to water infrastructure although notes impacts on rivers/need for detailed water cycle strategy
- The Skills agency supports the policy/add reference to key education documents would assist it
- Sport England Welcome the policy in principle and its intention regards making provision although note that a robust evidence base needs to support it
- The national trust consider that a green infrastructure study is required
- Natural England pleased to see Green Infrastructure included/ need for a Green Infrastructure policy that applies generally to development
- Historic England note infrastructure should consider impacts on heritage assets and their setting, as well as archaeological potential
- Saffron Academy Trust support allocations enable the expansion of the primary school site so that Saffron Primary School can have two forms of entry
- West Essex Clinical Commissioning Group note existing GP practices in the area do not have capacity to accommodate significant growth although begun to address capacity issues
- Uttlesford Citizens Advice Bureau issues are access to services and cost of public transport
- Wendens Ambo Parish Council note that the provision of facilities are outside the control of UDC
- Clerk Elsenham Parish Council note substantial growth here on a piecemeal but basis, with concerted and imaginative attempt to correct it
- Takeley Parish Council notes liaison with Braintree District Council and East Herts District Council and others remain a priority/cumulative impact adequately assessed/health care provision in the accident & emergency site needed
- Rayne Parish Council notes this section of the plan most critical in terms of what it could do to ease opposition to the West of Braintree site
- Thaxted society support policy but "Delivery in a timely manner" needs clarification i.e. loophole
- Great Chesterford Parish Council note timely delivery of infrastructure cannot be achieved until infrastructure requirements properly assessed/costed with potentially crippling costs

- Essex County Council supports inclusion of policy setting out broad requirements for delivery of infrastructure to support development/but ensure aligns with ECC model policy for Infrastructure Delivery and Impact Mitigation.
- Developers of preferred GCs support policies
- Individuals concern facilities will become more overstretched e.g. education, health, roads/lack of targets/thresholds/enforcement, no evidence to support delivery of GCs, smaller scale development makes no contribution

Statutory consultees and other bodies

Great Chesterford Parish Council

Timely delivery of infrastructure cannot be achieved unless and until the infrastructure requirements have been properly assessed and costed. NUGC will create a huge infrastructure cost, and require infrastructure the likes of which we haven't seen in north Uttlesford for over a hundred years. No studies have adequately assessed the impact on Saffron Walden, Great Chesterford, the A11/M11, the railway or the villages and roads of South Cambridgeshire. Deciding on NUGC before this work is carried out is absurd given the potential cost could very easily cripple any development. Securing the site for no more than 1.5 times agricultural land value in accordance with Garden City principles is the only way there is even a fighting chance of this happening. A S106 package would be far too large if commercial land value is paid for the site by a developer, so corners will be cut, and infrastructure back-filled once the inevitable problems are encountered. In the case of most of the issues identified, solutions are not likely to be able to be delivered for a whole host of reasons including lack of national funding, no local support, no network rail support, land ownership issues, County Council funding and the need to develop housing much faster than the pace of infrastructure delivery which is always very slow and hugely costly. Most if not all of the key infrastructure players have not even been consulted on NUGC let alone given any kind of assurances that the necessary infrastructure (once identified and costed) will be delivered. No timescale is even remotely possible as a result.

Essex County Council

ECC supports the inclusion of Policy INF1 which sets out the broad requirements for the delivery of infrastructure to support development. However, it is recommended that UDC reviews this policy to ensure it aligns with the ECC model policy for Infrastructure Delivery and Impact Mitigation. This will ensure the full range of infrastructure is considered and that planning permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. Such an approach would align with the policies included in the North Essex authorities Local Plans and would provide a consistent approach given the cross boundary Garden Community allocation at West of Braintree. An amended policy should cover the following: Specify when developers are required to either make direct provision or to contribute towards development for the provision of local and strategic infrastructure required by the development (including land for new schools); Requirements for all new development to be supported by, and have good access to all necessary infrastructure; Requirement to demonstrate that there is or will be sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed impacts of a scheme (i.e. not just those on the site or its immediate vicinity) and regardless of whether the proposal is a Local Plan allocation or a windfall site; When conditions or planning obligations will be appropriate - as part of a package or combination of infrastructure delivery measures or likely to be required to ensure new developments meets this principle; and Consideration of likely timing of infrastructure provision phased spatially or to ensure provision of infrastructure in a timely manner. The recommended wording for an amended Infrastructure delivery and impact mitigation policy is provided below: Policy X: Infrastructure delivery and impact mitigation. Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity as is required will prove sustainable over time both in physical and financial terms. Where a development proposal requires

additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Council and the appropriate infrastructure provider. Such measures may include (but not exclusively) financial contributions towards new or expanded facilities and the maintenance therefore on-site construction of new provision; off-site capacity improvement works; and/or the provision of land. Developers and land owners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance. The Council may consider introducing a Community Infrastructure Levy (CIL) and would implement such for areas and/or development types where a viable charging schedule would best mitigate the impacts of growth. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL. For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided in the glossary appended to this Plan. Exceptions to this policy will only be considered whereby: it is proven that the benefit of the development proceeding without full mitigation outweighs the collective harm; a fully transparent open book viability assessment has proven that full mitigation cannot be afforded, allowing only for the minimum level of developer profit and land owner receipt necessary for the development to proceed; full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts; and obligations are entered into by the developer that provide for review at appropriate interval(s) and appropriate additional mitigation in the event that viability improves prior to completion of the development. To support the above policy and other Local Plan policies, it is recommended that the following term is included in the Glossary Infrastructure means any structure, building, system facility and/or provision required by an area for its social and/or economic function and/or well-being including (but not exclusively): a. affordable housing b. broadband c. community and social facilities d. cultural facilities, including public art e. drainage and flood protection f. education and childcare g. emergency services h. facilities for specific sections of the community such as youth or the elderly i. footways, cycleways and highways j. green infrastructure k. healthcare l. live/work units and lifetime homes m. open space n. public transport o. sports, leisure and recreation facilities p. waste recycling facilities. ECC also recommends the inclusion of the following text as part of the policy preamble. The addition is required to ensure developers consider the ECC Developers Guide to Infrastructure Contributions, where infrastructure provision is a responsibility of the county council and not UDC. Examples are schools and early years and childcare provision, highways and transport, and flood and water management and sustainable drainage systems. In considering the potential requirements from development on ECC services and infrastructure reference should be made to the ECC Developers Guide to Infrastructure Contributions (2016) or amended versions. Early Years and Child Care - ECC is mindful that families do not always access Early Years and Child Care facilities close to where they live. For some families it makes sense to access childcare closer to where they may work or in close proximity to railway stations. Furthermore families with under-5 year old children may move house to larger properties close to where they want to send their child to school. Providers of childcare are independent businesses and dependent upon the market and the sustainability of their own business. This can mean that providers of childcare can open or can close at short notice. ECC recommends that given there are changing circumstances for the provision of Early Years and Child Care facilities; any increase in numbers of dwellings will need further analysis of the current childcare. This will allow ECC to determine whether there is a need for possible increased numbers of childcare places. Where there may be large numbers of vacancies it would be detrimental to open new provision. Using Policy SP3 entitled The Scale and Distribution of Housing Development, ECC has highlighted the required increase in child care needed to ensure there are adequate facilities for the future population within UDC. Appendix 3 (attached) also highlights more detailed evidence including current childcare provision for each location and provides a narrative regarding the type of facility that may be developed. Table 1 outlines the required increase in childcare arising from Local Plan growth. Ward/Village/Settlement Required Increase in Childcare New Garden Communities Easton Park Community Wards include Thaxted and the Eastons 162 childcare places North Uttlesford - Two nearest wards include Wendon Lofts, Great Chesterford, Newport Littlebury 171 childcare places West of Braintree 87 childcare places Market Towns Saffron Walden - Three wards within Saffron Walden,

Saffron Walden Shire, Saffron Walden Audley 21 childcare places Great Dunmow - Wards include Great Dunmow South and Barnston 66 childcare places

Takeley Parish Council

Liaison with Braintree District Council and East Herts District Council and other local authorities must remain a priority as it is clear the cumulative impact from other areas not in the same District need to be adequately assessed. In particular health care provision in the form of an Accident & Emergency facility. site must be identified and monies pooled from smaller developments for healthcare as a matter of urgency for hospital Where large scale developments are planned the District must make sure there is clause that land is preserved for Hospital space houses should not be built on that land instead, as this will impact everyones amenity. Other areas previously considered suitable for warehousing must not be overlooked especially where access and other ancillary facilities could complement a hospital building instead

Saffron Academy Trust

Saffron Academy Trust was successful in its bid to operate the new Saffron Primary School, which will be developed by Essex County Council. A site for the new school has been provided through the Section 106 Planning Agreement covering the development now being progressed by Linden Homes at Radwinter Road in Saffron Walden (planning reference UTT/13/3467/OP). Although the medium term local need is for a two-form entry primary school, the current site provides only for one form of entry. However, we note that further land could be made available to expand the current site to accommodate a second form of entry. We would strongly support policies that secure appropriate further land to expand the site and would ask that in finalising housing allocations in Saffron Walden, the Local Plan prioritises allocations that enable the expansion of the primary school site so that Saffron Primary School can accommodate two forms of entry.

Historic England

All proposed infrastructure schemes should take into consideration their impacts on heritage assets and their setting, as well as archaeological potential.

Planning Little Chesterford Parish Council

Policy INF1- Infrastructure delivery & TA1- Accessible development. The development of the NUGV as currently proposed does not meet these policies. The policies state: Development must take account of the needs of new and existing populations. It must be supported by the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from development. This is particularly important for the new garden communities. The capacity of the access to the main road network and the capacity of the road network itself must be capable of accommodating the development safely and without causing congestion, However, the available plans for NUGV do not support this, for example: No firm transport or access plans the only access to the site is via B184. To access the nearest services in the attractive historic market town of Saffron Walden, traffic will be funnelled down the narrow Bridge Street, affecting Air Quality Management Zones and adding to existing congestion. The only planned improvement is that to the A505/A1301 roundabout, which is already at capacity at peak periods and beyond. Plans for this improvement have not been agreed with South Cambridgeshire, where it is located, and the costs provided in the evidence are up to £10 million less than those estimated by South Cambridgeshire. Dualling of the A505 to remediate some of these problems is not planned until 2033 at the earliest. The traffic assessment in plan does not appear to be consistent with experience of congestion at this junction and does not take proper account of predicted growth from in neighbouring areas such as South Cambridgeshire, North Herts and West Suffolk. We suggest that a more comprehensive and up to date study is made. The railway station at Great Chesterford does not have potential to increase parking and peak services are at capacity

Rayne Parish Council

This section of the overall plan is the most critical in terms of what it could do to ease opposition to the West of Braintree site. At present the commitment in the current version of the plan falls short in several ways. A

prime example is in Policy INF1 which states: Policy INF1 - Infrastructure Delivery Development must take account of the needs of new and existing populations. It must be supported by the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from the development. This is particularly important for the new garden communities. Each development must address physical, community, social and green infrastructure. In assessing capacity, developers will provide evidence as to whether existing infrastructure can be used more efficiently, or whether the impact of development can be reduced through promoting behavioural change. New development will only be permitted if the necessary on and off-site infrastructure that is required to support it, and mitigate its impact, is either already in place, or there is a reliable mechanism in place to ensure that it will be delivered in a timely manner. A combination of funding sources will be sought to deliver the infrastructure required to deliver the spatial strategy. Developers will either make direct provision or contribute towards the provision of infrastructure required by the development either alone or cumulatively with other developments. Planning obligations and phasing conditions will be required where necessary to ensure that development meets the principles of this policy. This is not definitive enough in its terminology and the commitment regarding the timing of the delivery of the Infrastructure will contribute in resolving the issues of unsoundness. The revisions below are recommended: Policy INF1 - Infrastructure Delivery Development must take account of the needs of both the new and existing populations. It must be supported by the early delivery of infrastructure, services and facilities necessary to meet the needs arising from the development and before the development starts. This is particularly important for the new garden communities and for the existing residents living close to, or impacted by, the Garden Community . Each development must address physical, community, social, blue and green infrastructure. In assessing capacity, developers will provide evidence and demonstrate its effectiveness and suitability , as to whether existing infrastructure can be used more efficiently, or whether the impact of development can be reduced through promoting behavioural change (details of the timelines associated with such behavioural change can be demonstrated and accepted as a reasonable approach). New development will only be permitted if the necessary on and off-site infrastructure that is required to support it, and mitigate its impact, is already in place. A combination of funding sources will be sought to deliver the infrastructure required to deliver the spatial strategy. Developers will either make direct provision or contribute towards the provision of infrastructure required by the development either alone or cumulatively with other developments. These provisions/contributions have to covered by formal legal agreements that avoid issues where developers hold local authorities to ransom when altering, for example, social housing Planning obligations and phasing conditions will be required and imposed where necessary to ensure that development meets the principles of this very important policy policy. It is recognised and accepted that the provision of infrastructure up-front is expensive in terms of cash-flow but not as high as the cost of the Local Plan failing completely. A key aspect of the Transport proposals is a determination to increase the amount of cycling and walking that residents undertake. This is laudable but unrealistic, especiall in the short term. Comment is made about the Flitch Way and it would be good to be in a position to totally support this initiative. However a situation already exists at Fentons Road bridge in Rayne, where the condition of the bridge has meant the closure of the Flitch Way. This is an ECC responsibility and the closure is down to insufficient/poor quality maintenance. This leads to a conclusion that Fentons Road bridge is not a one-off. Many lessons on how not to protect the Flitch Way are evident in Great Dunmow and Canfield and lessons have to be learnt. It is a prime example of a lack of longer-term planning and the outcome of panic measures in producing the current Local Plan The viability of the Eastern Link Road□ could have a major adverse impact on the whole of the WoB community and has to be clarified at the earliest opportunity.

Chrishall Parish Council

Infrastructure: Chrishall Parish Council would express grave reservations about the lack of infrastructure planning for the proposed developments. Any future development must have infrastructure planned and built prior to the building of any dwelling. Roads, shops, services including doctors, schools, dentists etc must be planned and in situ before houses have been built and inhabited. This must be a priority and must be made a condition of any planning permission.

In developing the final Local Plan document, care should be taken to ensure that emerging policies will not have an adverse impact on healthcare provision within the plan area and over the plan period. In instances where major policies involve the provision of development in locations where healthcare service capacity is insufficient to meet the augmented needs appropriate mitigation will be sought. Policies should be explicit in that contributions towards healthcare provision will be obtained and the Local Planning Authority will consider a developments sustainability with regard to effective healthcare provision. The exact nature and scale of the contribution and the subsequent expenditure by West Essex CCG and NHS England will be calculated at an appropriate time as and when schemes come forward over the plan period to realise the objectives of the draft local plan. Plans and policies should be revised to ensure that they are specific enough in their aims, but are not in any way prescriptive or binding on West Essex or NHS England to carry out certain development within a set timeframe and do not give undue commitment to projects. With regard to the current primary healthcare provision in Uttlesford there are 10 GP practices, 4 branch surgeries and 1 community hospital in Saffron Walden. These are the healthcare services available that this district council local plan must take into account in formulating future strategies. Growth in terms of housing and employment, is proposed across a wide area and would likely have an impact on future healthcare service provision. Existing GP practices in the area do not have capacity to accommodate significant growth. In terms of optimal space requirements to encourage a full range of primary care services to be delivered with the community there is an overall capacity deficit, based on weighted patient list sizes, within the 10 GP practices providing services in the area. West Essex CCG have begun to address capacity issues in the area and there are a number of proposals in the pipeline: Great Dunmow is being considered for options to integrate a hub type facility. A new facility has recently opened in Stansted Mountfitchet with some room for growth but the Elsenham growth and capacity needs to be understood. A feasibility study has been completed for Saffron Walden, highlighting options for the GP practices and the potential use of the Community Hospital site. Thaxted surgery is being developed to increase capacity with a double floor extension planned. Hatfield Heath capacity requires consideration with regard to any local development. Optimal space standards for primary care are set for planning purposes only. This allows us to review the space we have available and identify the impact development growth will have in terms of capacity and service delivery. Space capacity deficit does not prevent a practice from increasing its list size, however it may impact on the level and type of services the practice is able to deliver. West Essex CCG and NHS England are currently working together to help plan and develop new ways of working with our primary care facilities, in line with the Five Year Forward View, to increase capacity in ways other than increasing physical space. Existing health infrastructure will require further investment and improvement in order to meet the needs of the planned growth shown in this local plan. The developments contained within would have an impact on healthcare provision in the area and its implications, if unmitigated, would be unsustainable.

Manchester Airports Groups (MAG)

Supported and welcomed reference to: combination of funding sources will be sought to deliver the infrastructure required to deliver the spatial strategy. Developers will either make direct provision or contribute towards the provision of infrastructure required by the development either alone or cumulatively with other developments. However, the delivery of the necessary improvements in the long term to the Strategic Road Network will be contingent on the ability to do this. Further progress must be made on either CIL or a sound mechanism and strategy to utilise S106 contributions (which carry limits on numbers to pool contributions). The plan risks being un-sound without such progress.

Sustainable Uttlesford

The development of a parallel Infrastructure Implementation Plan to provide for current deficits and future needs in the provision, including sites, of community infrastructure eg education, health, sporting, green and age specific uses eg youth and elderly spaces/services.

Town Clerk Saffron Walden Town Council

Define timely delivery. This should say at defined, pre-agreed trigger points. Should include reference to community shopping facilities. Broadly support this policy Action: Support but request change re defining the time to have specific trigger points

The Thaxted Society

INF1 Support. ' Delivery in a timely manner' needs clarification. The phrase is a loophole through which many a benefit or mitigation has been lost. Enforcement and intention should be declared.Â South East Education and Skills Funding Agency.

Supports policy. In light of the requirement for all Local Plans to be consistent with national policy, you will have no doubt taken account of key national policies relating to the provision of new school places, but it would be helpful if they were explicitly referenced or signposted within the document. In particular: - The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72). - The ESFA supports the principle of Uttlesford District safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. - Uttlesford District should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development [1] (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system. [1] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf The ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD). The DPD provides policy direction and establishes the Councils approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them), whether by extension to existing schools or on new sites. The DPD includes site allocations as well as policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to an evidence based approach to planning for new schools in the emerging Uttlesford Local Plan, securing site allocations for schools as well as providing example policies to aid delivery through Development Management policies. Ensuring there is an adequate supply of sites for schools is essential and will ensure that Uttlesford District can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the area over the plan period. The ESFA note that Essex County Council has produced a Developers Guide to Infrastructure Contributions (revised 2016) that includes an explanation of contributions towards expanding existing schools and creating new schools. It would be helpful and relevant for this document to be referenced within the Local Plan in the section alongside policy INF1 which covers developer contributions.

Sport England

The policy is welcomed in principle as it intends to ensure that new development makes appropriate infrastructure provision including community sports facilities. The policy proposes to use the Councils evidence base including the Playing Pitch Strategy for identifying infrastructure needs. While using the evidence base to inform needs is the appropriate approach in principle which would accord with paragraph 73 of the NPPF in relation to sports facilities, regard should be had to separate comments made on policy INF2 about the robustness of the Councils evidence base for sport. It is considered necessary for these comments to be addressed to ensure that policy INF1 can be implemented as a robust evidence base is required for informing and justifying sports facility needs.

Regional Planning Advisor National Trust

This defines Green Infrastructure as Designed landscapes (including Country Parks) and natural/semi-natural green space. This definition should be amended in line with the definition set out in Annex 2 of the NPPF - network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. As indicated above, the National Trust considers that a Green Infrastructure Strategy is required.

Environment Agency

The Regulation 18 Local Plan and the Infrastructure Delivery Plan has highlighted several issues regarding water infrastructure in the proposed growth plan. The Environment Agency generally concurs with the issues raised with regard to water infrastructure, however we do feel it is important to reiterate certain points. Upgrades to water infrastructure will be necessary to accommodate the projected growth in the local plan. Provision of suitable infrastructure will be a major factor with regards to the achievable scale, distribution and timing of this plan. We consider it imperative that these issues are addressed before any of the plans can be fully implemented. In the Hertfordshire and North London area, Thames Water will need to be an active participant in the delivery of the proposed plans. Elensham is connected to the Stansted Sewage Treatment Works (STWs). There is single pipe connection which passes underneath the M11. There is a need for the Council and developers to work closely with Thames Water to understand any constraints and/or upgrades required to accommodate the proposed residential allocations in the Elsenham area. Takeley has its own small STW which discharges into the upper reaches of the Pincey Brook. The dilution capacity of the receiving watercourse is low especially during dry periods of the year. Any changes to the present discharge arrangements will need to be carefully assessed. There will be a need for the Council to understand any constraints on additional demands placed on this treatment works. The Environment Agency will work closely with Thames Water to ensure high environmental standards continue to be met. The figures given in the Local Plan are in line with those used in recent previous documents (e.g. the updated water cycle study and the IDP). However, the water cycle study was only completed to stage 1 standard. The statements of where upgrades will take place and sewage will be received in Policies SP6, 7 and 8 pre-empt the very necessary stage 2 water cycle study. At this stage, we cannot be certain that the necessary upgrades are possible, or that an appropriate revised permit will be granted. Given that the rivers which flow through Uttlesford are only headwaters, the presence of enough dilution to support the proposed WRC extensions is not a given, and the permitted nutrient limits required could be extremely challenging to meet. Policy SP8 also pre-empts the water cycle study for the North Essex Garden Communities Integrated Water Management Strategy (IWMS) currently being completed by AECOM (also discussed further on this response). In this study, at stage 1 draft stage, the feasible options for the west of Braintree community also include building an entirely new WRC, with discharge split between the rivers Brain and Blackwater. We would recommend slightly changing the phrasing of these policies such that upgrading the WRCs mentioned is phrased as an option under investigation or the "currently preferred option rather than as a certainty.

Thames Water

Thames Water support the content of Policy INF1 which highlights that new development will only be permitted if the necessary on and off-site infrastructure that is required to support it and mitigate its impact is either already in place or there is a reliable mechanism in place to ensure that it will be delivered in a timely manner. In relation to wastewater infrastructure delivery such a policy is required to ensure that there is 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 or pollution of land and water courses. In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. Thames Water has limited powers under the Water

Industry Act 1991 to prevent connection to its network ahead of infrastructure upgrades. As such Thames Water relies heavily on the planning system to ensure infrastructure upgrades are provided ahead of development. Planning mechanisms to ensure the timely delivery of any upgrades alongside development may include the use of conditions to phase development or Grampian Style conditions to ensure necessary upgrades to the wastewater network are delivered in advance of the occupation of development. Pre-application discussions. In order to ensure that drainage requirements of development proposals are understood and that any upgrade requirements are identified, all developers should be encouraged to contact Thames Water Developer Services in advance of the submission of planning applications. Thames Water recommend that developers engage with them at the earliest opportunity to establish the following: The developments demand for wastewater infrastructure both on and off site and can it be met; and The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Uttlesford Citizens Advice Bureau

We are also aware that physical access to services and the cost and provision of public transport are consistent issues within our client base. Therefore the delivery of infrastructure ahead of new housing completions will be crucial. Particularly: Low cost transport options including pathways for walking and cycling Regular, subsidised or free bus transport options Affordable and accessible parking Access to advice services, district council services, employment support, mental health services and community support Facilities such as schools, GP surgeries, shops and cashpoints within a reasonable travel distance Community facilities to prevent isolation and encourage community cohesion, such as sports centres, day centres, outdoor community space and youth services We would be pleased to provide further statistics relating to our work in the district should these be useful.

Wendens Ambo Parish Council

WAPC believes UDC will have little or no control over this as roads, rail services, doctors surgeries, broadband etc are dependent on external parties. Currently there is little evidence to date of priority being given to Uttlesford District by Essex County Council in respect of basic services such as road repairs. How will UDC prevent houses being built before roads, broadband etc are confirmed and timetabled to be put in place in time? Uttlesford is already lagging behind and there are no guarantees for any of these essential services.

Elsenham Parish Council

Development in Elsenham has been permitted on a piecemeal but substantial basis, with no regard for the cumulative effect on, for example, road access or recreational provision or pressure on the surgery. There is a need for a concerted and imaginative attempt to correct the inadequacies, in addition to ensuring that better practice is adopted in future.

Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

Why leave it all to developers? There is a danger that they offer but don't deliver. Major infrastructure (i.e. roads) should be highways and not expected to be funded by developers unless absolutely necessary but sports facilities, green spaces, parks, community halls etc should be funded by Section 106 and land provided for schools. More community centres are needed in the district and more community open spaces that can be used for theatre, music and other community activities. In reality, UDC needs to develop a sports strategy (not just an audit of facilities). A separate policy is needed on future provision and improvement of sports facilities, Suggestion: definition is needed for timely delivery. This should ordinarily be set at 30% of the development being completed. All trigger points should be clearly defined and monitored. All facilities should be designed to Sport England standards.

Coordinator Stansted Neighbourhood Plan Steering Group

Why leave it all to developers? There is a danger that they offer but don't deliver. Major infrastructure (i.e. roads) should be highways and not expected to be funded by developers unless absolutely necessary but sports facilities, green spaces, parks, community halls etc should be funded by Section 106 and land provided for schools. More community centres are needed in the district and more community open spaces that can be used for theatre, music and other community activities. In reality, UDC needs to develop a sports strategy (not just an audit of facilities). A separate policy is needed on future provision and improvement of sports facilities Suggestion: definition is needed for timely delivery. This should ordinarily be set at 30% of the development being completed. All trigger points should be clearly defined and monitored. Major road infrastructure should be scheduled to be delivered early in the development. All facilities should be designed to Sport England standards UDC needs to make more commitment to improve green spaces, recreational and sporting facility provision

Natural England

Natural England is pleased to see Green Infrastructure (GI) included on the list of infrastructure requirements. We feel, however, that there is a need for a GI policy that applies generally to development to be included within the document.

Developers/landowners/site promoters

Development must be dependent upon the delivery of infrastructure, including transport improvements

Grosvenor recognise timely delivery of infrastructure, services and facilities to meet the needs arising from the NUGC supporting the content of Policy INF1 and paragraphs 8.3-8.5/ new facilities will have benefits beyond the new settlement to the wider area encouraging behavioural change

NUGC to include range of infrastructure both on-site and off-site including a network of new walking and cycling paths, new roads and road improvements, education including pre-school, primary and secondary provision, open spaces/sports pitches/facilities, and health facilities

The scale of NUGC will allow the proposed new community to be largely self-sustaining with regards to key services including education, health, community facilities and retail.

These facilities will themselves generate jobs in addition to any employment uses that come forward with the new community/location of the new settlement close to a number of major employment sites provides opportunities to provide sustainable transport options for the benefit of new residents.

Not bound by existing drainage infrastructure on site offering the opportunity to reduce the level of flood risk both within the development area and to downstream communities taking account of matters of water quality and biodiversity through the implementation of Sustainable Drainage Systems (SuDS).

Whilst reviewing on and off site flood risk, existing assets such as culverts and embankments can be assessed to identify opportunities to mitigate flood risk and where possible provide betterment.

Individuals

Unlikely any developer will be able to deliver or demonstrate that they can deliver the infrastructure required such as public transport, roads/require national/county scale planning and funding

No infrastructure in place to cope with the influx of extra householders and their families in the areas proposed: medical, roads, rail, bus, waste and sewerage disposal

Very reasonable in terms of expecting developers to show how existing infrastructure has to be adequate, or have mechanisms in place to provide it - but a specific timeframe needed/ financial burden clearer, to get penalties if terms of planning are breached.

Behavioural change only suitable if guarantees from the developers that it will occur within a stipulated time, and there are contractually binding remedies should that change not be achieved

Tudor Park allowed to get away with bare minimum/not even required to provide adequate pedestrian access to the Saffron Walden on the south side of Ashdon Road

No evidence to support delivery of NUGC

Current development in Saffron Walden not matched by improvements in infrastructure - schooling, road transport, air quality, town centre congestion, medical facilities are all being impoverished

Need metrics for education and health/timely too vague/need trigger

Smaller scale developments will continue to get away with nil or negligible contribution

Saffron Walden needs a ring road around centre to relieve congestion/pollution improve the health and wellbeing of residents, People need will not cycle or walk around Saffron Walden/NUGV if not safe.

Imperative have access to rail/bus links including access by foot and cycle at growth inception for jobs schools, doctors, retail ect.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy will have significant positive impacts on ensuring infrastructure delivery to support new development. The Policy is not implicit as to the specific infrastructure requirements that could be required of new development due to its strategic nature, however additional objectives that could be expected to positively affected include biodiversity (through green and blue infrastructure), water resources, minimising flood risk, sustainable travel and access, health and education and skills.

Alternatives Considered

Due to the high level approach of the policy in ensuring sustainable development (and where possible self-sustainability in regard to Garden Communities), no other approaches or alternatives could be considered reasonable.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer response

Proposed changes to plan

Paragraph 8.6 - 8.13/Policy INF2

This supporting text was responded to by 22 people/organisations.

Support	2
Object	5
Comment	15

Overarching Summary

- Essex County Council consider need up to date/robust sports pitch evidence and strategy

- Saffron Walden/Stansted Mountfitchet Neighbourhood Plan Steering Groups consider already deficiency in public green space, sports facilities, allotments and require Angst standards are met, most settlements within 400 metres of a green space but not all, use Fields in Trust guidelines
- Saffron Walden Town Council cannot suggest that there is sufficient provision in Saffron Walden
- Thaxted Parish Council provision noting only 3 public gardens in Uttlesford
- Essex and Cambridgeshire British Horse Society mention of the rights of way network as an essential part of the links between green spaces.
- Elsenham YFC ask include references on location of additional playing space that will be created

Statutory consultees and other bodies

Essex County Council

Robust assessments of need for pitches and built sports facilities provide a clear understanding of what is required in an area, provide a sound basis on which to develop policy, determine planning applications and make informed decisions for sports development and investment in sports facilities. It has been identified by ECC and partners, with an interest in sports and recreational facilities, that the UDC evidence base for its Local Plan within this subject area is not sufficiently up-to-date and robust in other respects. This could leave the Local Plan open to challenge accordingly. In summary, from a Local Plan perspective the Councils policies relating to the protection of existing facilities and securing new provision through the significant amount of new development that is planned will not be considered robust and may be challenged by developers in the absence of a robust evidence base. Furthermore, there is a risk that new development will not provide the facilities that are responsive to the community's needs as the evidence base may not be sound. Sport England would usually seek to support local authorities when applying its policies in relation to protecting, enhancing and providing facilities but in the absence of a robust evidence base it may be difficult for them to support UDCs position. ECC is promoting a range of actions and activities, such as through Active Essex, and is concerned with promoting higher levels of activity and sports participation throughout the county for the benefit of its residents. This also reflects ECCs Public Health role and helps to promote its public health interests. To rectify this, in the interests of ensuring a sound Local Plan, ECC and Sport England would recommend that UDC works with these parties (and others if necessary) to develop a robust and reliable evidence base to support and inform these areas of the Local Plan and its IDP.

Elsenham YFC

Elsenham YFC would ask that the local plan be altered to include references to the specific location of additional playing space that will be created in the district.

Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

Sports Facilities: Note that there is already an identified deficiency in public open green space, sports facilities and allotments Suggestion: The Local Plan needs to address the existing deficiency by ensuring that Fields in Trust and ANGsT standards are followed and take note of Sport England advice in this area.

Para 8.7 Most settlements within 400 metres of a green space Comment: But not all are! There are a lot of developments without

Para 8.10 Delete this paragraph because it is confusing and conflicts with 8.6 and 8.8. Also, the district is so short of sports pitches that it cannot allow existing ones to go for housing development. Suggestion: More playing pitches are needed than UDC is proposing. Fields in Trust guidelines must represent the minimum level provided for all new development.

Para 8.13 "in consultation with the local community" Not clear. Suggestion: Needs to say and Local Parish or Town Council as local community is not specific Neighbourhood Plan Coordinator Stansted Mountfitchet

Neighbourhood Plan Coordinator Stansted Mountfitchet

Note that there is already an identified deficiency in public open green space, sports facilities and allotments Suggestion: The Local Plan needs to address the existing deficiency by ensuring that Fields in Trust and ANGSt standards are followed and take note of Sport England advice in this area.

Para 8.7 Most settlements within 400 metres of a green space Comment: But not all are! There are a lot without. Comment Access to footpaths does not count.

Para 8.10 as above

Para 8.13 as above

Saffron Walden Town Council

This is factually incorrect. It is just worthy of note, but this also should not suggest that there is sufficient in Saffron Walden. Proposed Action: Sentence to be amended - look at the number of public parks and spaces in other Towns & Villages around the Uttlesford area. By only showing those in SW it also gives the impression that there is sufficient in town already and this is not the case.

Define "As good as", This is subjective. They must be to the standard acceptable by the current owner. What about where new provision, land is owned by a different person? Comment: Amend

Thaxted Parish Council

Is this factually correct. Only 3 public gardens in Uttlesford? Proposed Action: Query this

Para 8.12 Should define 'Local community' also as town/parish council and Neighbourhood Plan team. Comment: Amend

Essex and Cambridgeshire British Horse Society

Paragraph 8.12: There is no mention of the rights of way network which is an essential part of the links between green spaces.

Developers/landowners/site promoters

None

Individuals

Cannot find documentation

Policy INF 2

This policy and supporting text was responded to by 24 people/organisations.

Support	4
Object	13
Comment	7

Overarching Summary

- Sport England require provision of natural and semi natural green space
- The National Trust considers that ideally a specific Green Infrastructure Strategy is required/standards needed in the policy on semi natural/natural green space

- Essex County Council recommends clarification is required to ensure does not apply to schools/ surplus school fund better education facilities/need for school to expand including on playfields
- East Herts Council consider policy is unclear what the standards for sports provision/facilities
- Saffron Walden Town Council note protection of allotment land/cannot simply dispose of allotment land/improve standards
- Saffron Walden/Stansted Mountfitchet Neighbourhood Plans note standards not enough/gardens becoming smaller
- Wendens Ambo Parish Council note provision of facilities outside the control of UDC/ no guarantees
- Takeley Parish Council notes concerned square footage per person for amenity space is too low/easier for parish to get play facilities via grant than land
- Thaxted society support policy note Future obligations must be tied to enforcement mechanisms
- Thaxted Parish Council note allotments are protected/with duty to protect/amend policy
- Littlebury Parish Council note provision is far below other LPAs
- Dunmow and District Chamber of Trade and Commerce consider better car parking needed
- Individuals concerned standards too low/lacking teeth, over use of management companies/held to ransom/enforcement of standards poor
- Developers consider most open space standards too onerous/ease thresholds

Statutory consultees and other bodies

National Trust

Policy INF2 - Protection and Provision of Open Space, Sports Facilities and Playing Pitches Para.114 of the National Planning Policy Framework (NPPF) states that LPAs should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of biodiversity and green infrastructure. The National Trust considers that a specific Green Infrastructure Strategy is required. Although reference is made to green infrastructure in several policies, a proper holistic strategy that refers to population growth against areas of green infrastructure is required so that the LPA and developers know what is required at each development to mitigate impact on the Hatfield Forest and other areas of public open space. A strategy is required so that there is clarity regarding the availability of green open recreation resource in relation to population and to ensure that new development will benefit biodiversity and considers accessibility to green spaces and the protection and enhancement of historic landscapes. Whilst an Open Space, Sport Facility and Playing Pitch Strategy was prepared as part of the evidence base, this is now over 5 years old. Since the time of this assessment over 2000 new homes have been built in the District and the recommendations may no longer be appropriate. This Strategy recommended additional provision of amenity green space and semi-natural green space. Section 8 of the Draft Plan on Infrastructure makes it clear that green infrastructure includes natural/semi-natural green space. It indicates that there is an irregular pattern of natural and semi-natural greenspace across the District and there is a poor level of provision in many parishes. However, Policy INF2 does not include any requirements relating to the provision of natural/semi-natural green space within new developments. As a minimum, Policy INF2 in the Local Plan should include the standards for natural/semi-natural green space recommended in the Open Space, Sport Facility and Playing Pitch Strategy. However, ideally the National Trust would like to see an up to date Green Infrastructure Strategy which could more appropriately address the requirements for different types of open space within new developments.

Essex County Council

ECC notes that Policy INF2 states Development will only be permitted if it would not involve the loss of open space for recreation, including allotments, playing pitches or sports facilities, except if: Replacement facilities will be provided of an equivalent or increased size and quality to serve the needs of the area; and which will be made available before development of the existing site begins; or It can be demonstrated that disposal will facilitate alternative investment in sports or leisure related activity(page 104). ECC recommends that further clarification is required to ensure that it is clear the above policy provision do not apply to schools. It is noted that surplus school land may on occasions be disposed of to fund better

education facilities i.e. not sports or leisure. Schools may need to expand on to former playing pitches/open spaces if they are to meet the demand generated by growth proposals in this draft Local Plan.

East Hertfordshire District Council

Policy INF2: Protection and Provision of Open Spaces, Sports Facilities and Playing Pitches: The Plan is unclear what the requirements are for open space for sport and recreation, including built facilities and outdoor playing pitches. Policy INF2 only sets standards for the provision of amenity green space, provision for children and young people and allotments. There is no standard or requirement for sports facilities including indoor facilities or outdoor playing pitches.

Takeley Parish Council

There is concern that the square footage per person for amenity space is too low. This needs to be increased to provide better social health and wellbeing amenity. 2 square metres for a child allows them two floor tiles. Leaps and LAPs should increase to 10 square metres in parallel to amenity green space. Reason: there are always grants for equipment that parish councils can obtain but recreational space cannot be regained at a later time. (The increase could mean fewer pieces of equipment but not exclude some basic provisions.) It would also be preferable if Amenity Greenspace could increase to 15 square metres or more per person. It is important the two things are defined by different numbers to avoid confusion that they are two separate requirements. The minimum garden space is considered 30 square metres for a 2 household occupancy and 50 sq metres for a 3 bed dwelling so other recreational amenity green space should reflect similar, ie 15 sq metres per person. Saffron Academy Trust

The Thaxted Society

INF2 Support robustly. Future obligations must have enforcement mechanisms tied to them Education and Skills Funding Agency.

Thaxted Parish council

Comment: But note the protection of allotment land under 1904 allotment act. Each Parish Council has a DUTY to make provisions for allotments. Proposed Action: Amend policy as proposed and note query re allotment land. And in addition, consider Using standards set by Fields in Trust and Natural England in relation to Green Space

Dunmow and District Chamber of Trade and Commerce

There is no mention of public car parks and not a lot on future sporting facilities. This is a poor District Plan

Sport England

The intentions and content of the policy are broadly supported as it represents an appropriate approach to securing sports facility provision required to meet the needs generated by new development as well as safeguarding existing sports facilities that are required for meeting community needs. However, the separate representation made on this policy relating to the evidence base that supports it requires consideration. Furthermore, the following specific comments are made on the policy: Criterion b The wording of criterion b of the policy is not consistent with paragraph 74 of the NPPF or Sport Englands playing fields policy that is applied as a statutory consultee to planning applications affecting playing fields <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/playing-field-land/> The policy appears to (or is likely to be interpreted to) support ~enabling development i.e. non-sports development involving the loss of sports facilities that would fund the provision of new or improved sports facilities. Enabling development would not accord with Government policy and should therefore not be provided for in this policy. Paragraph 74 of the NPPF does allow for development for alternative sports and recreational provision, the needs for which clearly outweigh the loss. This allows the principle of sports facilities to be developed directly on existing sport/recreation facility sites where it can be demonstrated that

the need for them outweigh the impact on the facilities affected. This is similar to exception E5 of Sport England's playing fields policy. For example, the construction of a sports hall on a playing field could potentially accord with this policy approach. However enabling residential development on a playing field for instance that would fund a new sports facility would not accord with this approach. To address this concern it is requested that criterion (b) be replaced with wording that is consistent with the criteria in paragraph 74 of the NPPF. Green Space Standards The policy requires green spaces to be provided in accordance with the standards identified in the policy. However, the list of standards only applies to a few types of open space categories and there is no standards or alternative approach for assessing how development (outside specific requirements in site allocation policies) should make provision for indoor or outdoor sports facilities which policy INF2 covers. A more strategic concern is that even if the policy was amended to include standards for sports facilities, the use of generic standards for sports facilities would be inappropriate for the following reasons: The use of generic standards for securing provision in new development would not fully satisfy the CIL Regulation 122 tests. Sport England has prepared an advice note on this matter which can be made available which provides detailed advice on the issues associated with using such standards in relation to compliance with the CIL Regulations which is based on legal advice and recent case law. Consequently, there is potential for the use of the standard to be challenged in practice by developers. A potential generic standard such as outdoor sports or playing pitches does not allow the needs of individual sports to be distinguished and would not necessarily result in new development making a proportionate amount of provision for the individual sports. A generic standard would not consider the use of Sport England's Playing Pitch Calculator which is a new tool that is now being widely used by local authorities to calculate the additional playing pitch needs generated by a new development (where an up-to-date and robust playing pitch strategy is in place) and identify the costs associated with meeting this need which can then be used as a basis for developer contributions. To address this concern, it would be appropriate to set out how new development should make provision for indoor and outdoor sports facilities having regard to the above advice and the separate representations made about the Council's evidence base, which, if satisfactorily addressed would provide an alternative approach to standards to address this matter.

Policy INF2 and other key policies in the plan such as INF1 and the policies applying to the proposed Garden Communities will be informed and justified by the Council's evidence base for sport which consists of the Open Space, Sport Facility and Playing Pitch Strategy (2012) and the subsequent Sports Facilities Development Strategy (2016). In response to the Issues and Options consultation in 2015 and in response to the Council's consultation on the 2016 strategy (in consultation responses dated 1 June 2015 and 16 October 2015 and at a meeting on 13 August 2015) concerns have been raised regarding the Sports Facilities Development Strategy. While the detail of the concerns are set out in the above correspondence (which Sport England can share with the Council again), in summary the strategy (and the preceding 2012 strategy) is not considered to represent a robust and up to date evidence base, as required by paragraph 73 of the NPPF for a range of reasons. It is not considered that it would be possible to retrospectively address these issues through amendments being made to the existing evidence base as many of the issues relate to the methodology for preparing the evidence. Without the issues raised in previous correspondence being addressed, the evidence base to justify policies such as INF2 which seek to protect existing facilities, support proposals for new/enhanced facilities or secure provision through development could be subject to challenge. Detailed guidance on the importance of having robust and up-to-date assessments of sports facility needs for underpinning local plan policies is set out in Sport England's 'Planning for Sport Forward Planning Guide' (2013) which can be downloaded from www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/. This guidance advises that without a robust and up-to date evidence base for sport, local plans can be found unsound and explains the importance of having the evidence base in place for meeting the various tests of soundness. Sport England's recent experience has shown that where local plans have not been supported by up-to-date and robust assessments of need for sports facilities, Inspectors have requested that this be an issue that requires discussion at the public examination of the plans. I would advise that most local planning authorities have prepared (or are preparing) up-to-date sports facility strategies (incorporating needs assessments) in advance of plans being considered at examination in order to ensure that the plans are

sound. Furthermore, if the policy is used for determining planning applications, developers are likely to challenge the evidence base especially in the context of the need to protect existing facilities or provide for sport in new development through planning obligations or CIL. To address these concerns, it is requested that the Council prepares an up-to-date sports facility strategy (indoor and outdoor sports) incorporating a comprehensive assessment of needs which will provide the robust evidence to support policies such as INF and INF2 as well as site allocation policies including the Garden Community site policies. In Sport Englands view, this approach would be justified to allow the local plan to be consistent with paragraph 73 of the NPPF. As well as meeting the needs of the local plan, the preparation of such strategies may also assist with delivering corporate Council objectives e.g. assisting with the health and well-being agenda, reviewing the future of Council owned assets, sports development, influencing investment on school sites, external funding bids etc. A robust evidence base for sport will also be needed to support the identification of strategic priority projects in the Councils Infrastructure Delivery Plan if CIL is implemented in due course. This would also apply if the Council continues to use planning obligations to secure developer contributions towards new and enhanced sports facilities instead as set out above. Following completion of the strategies, policy INF2 and other policies where applicable should be reviewed to add any specific sports facility needs that provision should be made for including site allocations and to review the approach towards securing sports facility provision through new development (i.e. an alternative approach to generic standards). Detailed advice on the preparation of sports facility strategies/assessments can be found on Sport England's website at www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/ and further advice can be provided upon request. Sport England would be happy to meet the Council to discuss this response and other representations made on the local plan with a view to reaching a mutually agreeable solution before the local plan examination stage. Without prejudice to our position on the evidence base that supports the policy, separate comments have been made on the content of policy INF2.

Wendens Ambo Parish Council

WAPC believes UDC will have little or no control over this as roads, rail services, doctors surgeries, broadband etc are dependent on external parties. Currently there is little evidence to date of priority being given to Uttlesford District by Essex County Council in respect of basic services such as road repairs. How will UDC prevent houses being built before roads, broadband etc are confirmed and timetabled to be put in place in time? Uttlesford is already lagging behind and there are no guarantees for any of these essential services.

Littlebury Parish Council

The proposed level of provision of sports fields and recreational facilities are far below those of adjoining authorities. This is inadequate, and should be increased to similar levels. Doing so will help UDC achieve targets on existing policies on health, among others.

Saffron Walden Town Council

But note the protection of allotment land under 1904 allotment act, you cannot simply dispose of allotment land without Secretary of State permission. Allotment allocation is only 40% of recommended allocation. Need to define Quality etc. within the policy. Paragraph (b) to add and improved facilities Paragraph (c) to note that there is a preference for the provision to be within the site. Policy should state that provision should be to Sport England Design/Fields in Trust/Natural England standards Comment: We object to this policy in its current format as it is not well defined. It needs to be far more detailed and specific. Policy should also state that provision should be to Sport England standards and that provision of accessible green space and sports pitches should be to Fields in Trust and Natural England ANGsT standards as a minimum.

Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

There is not enough! The allocation of 10 sq m is really mean! More of the development site needs to be set aside for green space, trees etc. More playing pitches and other sports facilities needed. The provision of allotments is only 40% of the level normally recommended. With gardens becoming smaller, these are likely to become more important. Housing numbers should not be based on the gross hectarage of the site. Provision also needed for burial space. Suggestion: Developers should be made to follow the standards set by Fields in Trust and Natural England

Coordinator Stansted Neighbourhood Plan Steering Group

There is not enough! The allocation of 10 sq m is really mean! More of the development site needs to be set aside for green space, trees etc. More playing pitches and other sports facilities needed. The provision of allotments is only 40% of the level normally recommended. With gardens becoming smaller, these are likely to become more important. Housing numbers should not be based on the gross hectarage of the site. Provision also needed for burial space. The policy plans for the towns and villages have two designations: Protected Open Space and Allocated Green Space Sites but we cannot find a policy that provides mention or protection of these spaces. Have we missed this? Suggestion: Developers should be made to follow the standards set by Fields in Trust and Natural England Provide a policy that sets out the function and protection of Protected Open Space and Allocated Green Space Sites.

Developers/landowners/site promoters

Iceni Projects

LAND AT HARVEY WAY/ASHDON ROAD, SAFFRON WALDEN Introduction Iceni Projects Ltd represents the landowners of the above site, referred to as 06Saf15 in the Strategic Housing Land Availability Assessment (SHLAA) 2015. A plan of the site is enclosed with this letter. Set-out below are our representations on the Draft Local Plan that is currently the subject of public consultation. These are submitted on behalf of the landowners. Comments on the Draft Local Plan and Evidence Base The site is designated in the Plan as Protected Open Space. This is essentially a designation that has once again been carried forward from the Adopted Local Plan. It is a reasonable expectation that the Council would have prepared some form of evidence base document to assess any new proposed areas of open space and to review existing open spaces to be carried forward, in order to ensure they continue to perform the necessary functions of open space. This is particularly so given the significant need for housing and other types of development in the district. Existing open spaces that no longer perform the necessary functions can be a far more sustainable option for development than allocating further land on the edges of settlements. Having consulted the evidence base, it is noted that an Open Space, Sport Facility and Playing Pitch Strategy was published in 2012. However, this included a site size threshold of 0.2 hectares, so the site at Harvey Way/Ashdon Road was not covered as it only extends to 0.17 hectares. Therefore, it appears that there is no evidence relating to the site, let alone any evidence to justify its retention as Protected Open Space. Site Assessment The site is under-utilised land that is not accessible to the public and has the potential to become an eyesore if left unmanaged. Its characteristics have remained the same for a considerable number of years. It is clear that the historic designation of the site was based purely on the wider visual amenity value the site was considered to offer, as opposed to its individual visual quality, ecological or recreational value. The planning landscape has altered significantly since the site was designated in the Adopted Local Plan and there is a need to consider whether this visual amenity value is outweighed by other factors. Given that Uttlesfords and Saffron Waldens development needs cannot be met within existing settlement boundaries, there is a need to maximise development on sustainably located sites such as this, thereby reducing the amount of development required in the countryside. Through the SHLAA process, it was demonstrated that development could be provided on the site that would provide a visual benefit by strengthening of the street scene via unified frontages on both Harvey Way and Ashdon Road. Combined with the need to maximise development within settlements, it is considered that the benefits of development on the site would outweigh the loss of the open space. Changes required to the Plan Ordinarily, the findings above would point to the Protected Open Space designation being removed from the site and the site being allocated for development instead. However, it is understood that the Local

Plan will not allocate any sites that have a capacity of less than 10 dwellings. In these circumstances it is proposed that the Protected Open Space designation be removed and this will have the effect of facilitating the development of the site as a windfall site. The Draft Local Plan anticipates 8.5% of the overall housing requirement being delivered via this source of sites. They provide an important contribution and it is vital that the Local Plan facilitates the development of sustainable windfall sites such as this one in order that the housing requirement can be met. We trust that the above is clear and look forward to working proactively with you to address the necessary changes to the Draft Local Plan.

Grant and Bloor

Policy INF2 Protection and Provision of Open Space, Sports Facilities and Playing Pitches 8.1 MGH and BH object to the low threshold for on-site provision of allotments. As currently worded, the policy requires on site provision for all schemes over 10 units. This is an unnecessarily onerous requirement that may not always be appropriate on all schemes. For example, a scheme of 10 units in a town centre location or a flatted scheme are both unlikely to be suitable for on-site allotment provision. This low threshold is inappropriate and could prevent the efficient use of land in certain locations and therefore make the Plan ineffective. 8.2 To remedy this objection it is recommended that the on-site threshold be raised to 50 with a note that such on-site provision will take into account the specifics of the scheme and the site location.

Grosvenor Britain & Ireland

Grosvenor Britain & Ireland (Grosvenor) support the recognition given to open space by Policy INF2 and Paragraphs 8.6-8.13 of the Plan in providing for healthy and active lifestyles. Provision of accessible open spaces at the North Uttlesford Garden Community can benefit existing communities in the North of the District where at present the land has very limited access rights with only one Public Right of Way. The provision of a variety of Open Space integrated into the new settlement will form a vital aspect of the placemaking approach providing opportunities for structural planting of new trees and hedgerows as well as integration of sustainable drainage features providing rich biodiversity and interest to the settlement. The North Uttlesford Garden Community will include a variety of open spaces including for recreation, play, sports pitches and allotments forming part of a network of green infrastructure and will seek to retain and enhance existing trees and hedgerows on the site

Individuals

Residents have to contribute to the management company/held to ransom/ lodge a sum with Parish so that leaps, laps and other open spaces can be maintained by them as part of the village infrastructure

Implies nothing enforceable for sports provision/define what is appropriate on-site

Amenity Space too low/use Sport England Standards

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There will be significant positive impacts on health and social inclusion, and minor positive impacts on general infrastructure related sustainability objectives as a result of the policy

Alternatives Considered

The Policy approach ensures that open space and sports provision is ensured in new development whilst also taking a flexible and pragmatic approach in relation to development opportunities on land currently designated for such purposes. It is considered that any alternative approach could not be considered reasonable or otherwise distinctly different from the policy approach to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer response

Proposed changes to plan

Paragraph 8.14 -8.22/ Policy INF3

This supporting text was responded to by 15 people/organisations.

Support	0
Object	6
Comment	9

Overarching Summary

- Biggest health issue is lack of hospital beds
- Extra stress on services/residents
- ECC recommends paragraph 8.15 includes reference to the Uttlesford Health and Wellbeing Strategy, which also includes specific health targets
- Paragraph 8.15 Health and Well-being should mention places of worship to be compliant with section 171 of the NPPF
- Implies wrongly no improvements to walking/cycling
- Improve access to documents
- Health benefits of horse riding/exercise associated with the care of horses well documented/need more specific requirements for the provision of bridleways/NMUs
- This needs to be made much stronger. Liaison is inadequate- experience has shown that the health facilities are not expanded in line with demand. There should be a clause in developments that nothing can be occupied until such time as the infrastructure is in place. So Surgery provision etc. should be available as soon as new residents arrive, not some years later as happened at Stansted
- Health and Well-being should mention places of worship to be compliant with section 171 NPPF
- No evidence of how these aspirations will be delivered

Statutory consultees and other bodies

Essex County Council

ECC recommends that paragraph 8.15 includes reference to the Uttlesford Health and Wellbeing Strategy, which also includes specific health targets.

CABO Essex and Cambridgeshire British Horse Society

Paragraph 8. 19: The health benefits of horse riding and all the exercise associated with the care of horses, are well documented. 75% of riders are female and many in the older age group, a group which is not high on the exercise league table within the general public. The provision of good equestrian access is vital to encourage/enable more people to benefit from equestrianism. The Plan should include more specific requirements for the provision of bridleways/NMUs

Developers/landowners/site promoters

Regeneration Adviser Diocese of Chelmsford

Paragraph 8.15 Health and Well-being should mention places of worship to be compliant with section 171 of the NPPF. Section 171 of the NPPF states: Health and well-being “ Local planning authorities should work with public health leads and health organisations to understand and take account of the health status

and needs of the local population (such as for sports, recreation and places of worship) including expected future changes, and any information about relevant barriers to improving health and well-being.

Paragraph 8.22 Health and Well-being should mention places of worship to be compliant with section 171 of the NPPF. Section 171 of the NPPF states: Health and well-being “ Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship) including expected future changes, and any information about relevant barriers to improving health and well-being.

Individuals

- Biggest health issue is lack of hospital beds
- Extra stress on services/residents
- Is this meant to justify not improving infrastructure in that residents should have to walk or cycle to work/ school?
- Cannot find documentation
- What and where is the 2008 publication by the Children’s Food Trust?
- This needs to be made much stronger. Liaison is inadequate- experience has shown that the health facilities are not expanded in line with demand. There should be a clause in developments that nothing can be occupied until such time as the infrastructure is in place.
- There is no evidence of how these aspirations will be delivered in the case of North Uttlesford Garden Village or between it and the existing community at Great Chesterford

Sustainability Appraisal June 2017

Not Applicable

Policy INF3

This policy was responded to by 19 organisations and individuals.

Support	3
Object	5
Comment	11

Overarching Summary

- Sport England welcome the principle of this policy but require HIAs include an assessment of design/promotes physical activity, embeds active design principles/how design promotes activity
- The Thaxted Society regard wellbeing as cornerstone to society policy
- Wendens Ambo Parish Council believe UDC has little or no control over these issues
- East Hertfordshire District Council commends requiring a HIA but require other aspects such as design included
- Saffron Walden Neighbourhood Plan Steering Group want a requirement that HIA be carried out/threshold of 10 units
- Stansted Neighbourhood Plan Steering Group want HIA threshold of 10 units
- Saffron Walden Town Council want HIA threshold of 10 units
- The Thaxted Society support/established policy
- Essex County Council seeks clarification as to who UDC sees advising the HIA once submitted/ECC lead on reviewing/requires further details of process
- Thaxted Parish Council want HIA threshold reduced
- Landowners/developers/retailers concerned policy not justified by evidence, better focused on design of all types of built development at the site
- Individuals concerned over obesity/wish to strictly control fast food outlets

Statutory consultees and other bodies

- Planning Manager Sport England
- Chairman The Thaxted Society
- Clerk Wendens Ambo Parish Council
- Principal Planning Officer East Hertfordshire District Council
- Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group
- Coordinator Stansted Neighbourhood Plan Steering Group
- Town Clerk Saffron Walden Town Council
- The Thaxted Society
- Principal Planner Essex County Council Environment, Sustainability and Highways
- Thaxted Parish Council

Planning Manager Sport England

The principle of this policy is welcomed but the policy and/or the supporting text should recognise that HIAs should include an assessment of how developments have been designed to provide environments that encourage physical activity. Sport England & Public Health England's Active Design guidance (2015) <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/> sets out Government endorsed guidance on how the design and layout of new developments can be planned to provide the opportunity to make communities more active and healthier and aligns with Government planning policy in section 8 of the NPPF. The guidance includes 10 design principles that promote activity, health and stronger communities through design. Sport England is currently working with stakeholders such as local planning authorities to activate the guidance in practice through seeking to embed these principles into planning policy and design documents at the local level to help provide a framework for informing and assessing the design of proposals through the development management process. Of particular relevance in the local context is that Sport England is working closely with Essex County Council and the Essex districts/boroughs (including Uttlesford DC) through the Essex Planning Officers Association on the review of the Essex Design Guide (EDG) and is part funding the EDG review. The Active Design principles will be embedded into the EDG review which will provide advice on how the principles can be practically applied in a range of residential environments. In this context, it is considered important that HIAs for major developments give consideration to how design can encourage activity as this will assist with alignment with the EDG review as well as helping to deliver the wider activity and healthy lifestyle outcomes through new development in Uttlesford district.

CHAIRMAN THE THAXTED SOCIETY

INF3 Wellbeing is a cornerstone to Society policy in this respect

Clerk Wendens Ambo Parish Council

WAPC believes UDC will have little or no control over this as roads, rail services, doctors surgeries, broadband etc are dependent on external parties. Currently there is little evidence to date of priority being given to Uttlesford District by Essex County Council in respect of basic services such as road repairs. How will UDC prevent houses being built before roads, broadband etc are confirmed and timetabled to be put in place in time? Uttlesford is already lagging behind and there are no guarantees for any of these essential services.

Principal Planning Officer East Hertfordshire District Council

Policy INF3 Health Impact Assessments: Whilst East Herts Council commends Policy INF3 on

requiring Health Impact Assessments, it is considered that the policy is limited to health facilities and restricting fast food takeaway uses, but omits other aspects such as the use of design tools to enable preventative health and wellbeing measures such as fit trails, formal and informal recreation, green spaces, street trees and priorities for walking and cycling over vehicle use. The Plan is non-committal on community spaces and places for worship apart from within the rural area. The Plan contains many policies on design, including on sustainable design, the environment and historic environment, which East Herts Council supports.

Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

Health Impact Assessments (50 units) Good to see this policy but why no requirement to carry them out. Why 50? Means that in a rural environment like Uttlesford, a lot of smaller settlements make no contribution. Also, a smaller development for the elderly would require a health assessment. I was shocked to hear that the NHS were routinely not informed of new developments! Suggestion: Either change to 10 and make the rules the same as affordable housing or have a set amount per roof towards health.

Coordinator Stansted Neighbourhood Plan Steering Group

Â Good to see this policy but why no requirement to carry them out? Why 50? Means that in a rural environment like Uttlesford, a lot of smaller settlements make no contribution. Also, a smaller development for the elderly would require a health assessment. We are shocked to hear that the NHS is not routinely informed of new developments! Suggestion: Either change to 10 and make the rules the same as affordable housing or have a set amount per roof towards health.

Town Clerk Saffron Walden Town Council

50 units seem high. Health assessments should be made for smaller units especially where designed for elderly etc. In a rural district such as Uttlesford it is important that all developments, however, large make a contribution towards health Proposed: Consider reduction in policy. Change to 10 and make the rules as for affordable housing or levy a set amount per roof.

The Thaxted Society

Support. Thaxted Society established policy.

Principal Planner Essex County Council Environment, Sustainability and Highways

ECC in its Public Health role support liaison with NHS England and the Clinical Commissioning Group when looking at developments but would strongly encourage interaction with ECC Public Health colleagues for more specific advice on health improvement and ill-health prevention that impacts on a population level. ECC seeks clarification as to who UDC sees advising and reviewing the HIA once submitted. ECC Public Health would be the lead on reviewing HIA as they hold the responsibility for health and wellbeing and therefore would be required to be part of any review and mitigation process. The need to assess the impact of development on people's health and wellbeing is supported. ECC considers such assessments are a good evaluation tool to assess the impact of a development on the health of a community, to help develop potential ways to improve the quality of air and environment (including building resilience to climate change) and to make the local greenspace and leisure facilities more accessible. ECC seek clarification regarding the process being considered to determine the health impact of new development proposals, and in particular: How is the impact of health of new development to be undertaken? Who is to be consulted on the health impact assessments provided by developers? Is the impact of individual and/or cumulative impacts of development to be monitored? Also further clarification on the implementation of these aspects is sought following consultation on the Draft Local Plan, to ensure ECC works with UDC and developers to deliver high quality healthy places in which people can live and work.

Thaxted Parish Council

Comment: The limit of 50 means that smaller settlements like those in rural communities such as Thaxted make no contribution. Proposed Action: Consider reduction

Developers/landowners/site promoters

- Kentucky Fried Chicken (Great Britain) Limited
- Grosvenor Britain & Ireland
- Persimmon Homes Essex
- Planning Manager - Local Plans (South and East) House Builders Federation
- Pelham Structures Ltd
- Manor Oak Homes

Kentucky Fried Chicken (Great Britain) Limited

The policy focus on assessing the impact of specific uses is not justified by any evidence. It would be better to focus on the design of all types of built development at the site and area level to secure basic planning objectives. These include securing and protecting sustainable access (often by walking or cycling) to particular types and quantities of open space and other facilities. Managing health impacts is not an "add-on" to planning, but a core part of its purpose and should apply to all development. Furthermore, there is nothing inherent to hot food takeaways that necessitates greater scrutiny than any other retail uses. Many high street bakeries, coffee shops, cafes and pubs sell food of similar energy density and nutritional value to eat in or to take away. We suggest requiring assessment of characteristics such as walkability and distance to facilities (including a range of leisure and food options) be included within Design and Access Statements, which are already required by law for major developments. With regard to the funding of health services, this is primarily met through national insurance and taxation. Any contributions to infrastructure have to be defined in terms of scope and meet the tests at paragraph 204 of the National Planning Policy Framework.

Grosvenor Britain & Ireland

Grosvenor Britain & Ireland (Grosvenor) support Policy INF3 and Paragraphs 8.14-8.24 of the Plan in recognising the importance of Health and Well-being to communities. The North Uttlesford Garden Community will include facilities for the health and well-being of its residents including open space and provision for walking and cycling to encourage healthy lifestyles and community health buildings and facilities.

Persimmon Homes Essex

Persimmon supports the policy objectives which seek to improve health and wellbeing. INF3 requires a health impact assessment for identified development. The development plan should consider as part of its evidence base the broad implications of the allocations on health services and the necessary future capacity and infrastructure necessary to serve the needs arising. The Council should work with the Health providers to ensure that measures can be put in place to mitigate the impact from the planned growth as timetabled. It is considered that this policy unduly places the burden on the developer to assess existing capacity, impacts and outline mitigation. This seeks to delegate the Council's responsibility to assess impact and work in partnership to facilitate development. A Policy INF3 should therefore: State that HIA should be based upon published publically available data (or provide some guidance or SPD) State that the Council will work proactively with Health Providers and developers to ensure that the growth planned within the district is facilitated in a timely manner

Planning Manager - Local Plans (South and East) House Builders Federation

Health Impact Assessments We recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for all residential applications of more than 50 units to undertake a Health Impact Assessment (HIA) is unnecessary and an additional burden on applicants.

The PPG sets out that HIAs may be a useful tool to use where there is expected to be significant impacts but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. As such where a development is in line with policies in the local plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring an HIA. We trust that these issues will be considered carefully by the Council and look forward to further consultation on the next iteration of the Local Plan. I would also like to be placed on your consultee database and receive updates on any further consultations with regard to the emerging Local Plan.

Pelham Structures Ltd

Health Impact Assessments 44. Policy INF3 Health Impact Assessments requires all new developments of over 50 units to provide a Health Impact Assessment (HIA). It is considered that this is an unnecessary burden on applicants. Planning Guidance sets out that HIAs may be a useful tool to use where there is expected to be significant impacts 45. As such the Local Plan will already have considered the impact of development on the health and well-being of communities and set out policies to address any concerns. Where a development accords with the policies in the local plan, an HIA should not be required.

Manor Oak Homes

Health Impact Assessments 61. Policy INF3 Health Impact Assessments requires all new developments of over 50 units to provide a Health Impact Assessment (HIA). It is considered that this is an unnecessary burden on applicants. Planning Guidance sets out that HIAs may be a useful tool to use where there is expected to be significant impacts. 62. As such the Local Plan will already have considered the impact of development on the health and well-being of communities and set out policies to address any concerns. Where a development accords with the policies in the local plan, an HIA should not be required.

Individuals

The UK has the highest level of obesity in Western Europe, ahead of countries such as France, Germany, Spain and Sweden (NHS report, 2013).

One in four of our population is obese, with the projection being half our population by 2050.

The presumption in Uttlesford should be AGAINST the granting of more planning consents and licenses to fast-food take-aways.

The starting point for health impact assessments should be 10 and developers asked to contribute an amount per roof.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There will be direct positive impacts on health and wellbeing as a result of the requirements of the Policy for Health impact Assessments from relevant developments. This is likely to additionally ensure secondary positive impacts on sustainable travel and infrastructure delivery, where the Policy (and HIAs) seek contributions towards new or enhanced provision of infrastructure, ensuring developments are designed to encourage safe walking and cycling, and provide consciously-designed open space, sport, recreational facilities and services and facilities to create opportunities and reduce barriers associated with healthy living.

Alternatives Considered

The Policy approach ensures that health impacts and improvements are identified and ensured through relevant developments as stipulated within the policy criterion. It is considered that any alternative approach could not be considered reasonable or otherwise distinctly different from the policy approach to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations
No mitigation measures or recommendations are proposed.

Officer response

Proposed changes to plan

Paragraph 8.24 – 8.28/Policy INF4

This supporting text was responded to by 5 people/organisations.

Support	2
Object	0
Comment	3

Overarching Summary

- Support this
- Communities should be community (singular)
- Overhead fibre cables possible/cheaper to do this than to install the same cables in underground conduit
- Provide good broadband to some existing areas first

Statutory consultees and other bodies

Saffron Walden Town Council

Support this paragraph

Developers/landowners/site promoters

None

Individuals

Communities should be community (singular)

Overhead fibre cables possible/cheaper to do this than to install the same cables in underground conduit

Provide good broadband to some existing areas first

Where can details of the Superfast Essex Programme be found?

Sustainability Appraisal June 2017

Not Applicable

Policy INF4

This policy was responded to by 16 organisations and individuals.

Support	4
Object	3
Comment	11

Overarching Summary

- Wendens Ambo Parish Council considers UDC have little or no control over provision/little priority being given by ECC on basics
- The Thaxted Society considers high level technological provision bedrock of expansion in a rural area/correct provision of broadband needed
- Saffron Walden Town Council broadly support
- Essex County Council acknowledges requirement for high speed broadband/recognises that district's rural nature means alternatives
- Thaxted Parish Council broadly support
- The Thaxted Society Support/considers high level technology bedrock of expansion in a rural area
- Saffron Walden Neighbourhood Plan Steering Group considers most broadband should be fibre based
- Stansted Neighbourhood Plan Steering Group want fibre based/free Wi-Fi in commercial centres
- Individuals want high speed broad extended out of towns/Villages to more rural locations, address existing deficiencies, essential for all premises
- Developers consider supportive in behaviour change, precondition for business, should not prevent development where no connection possible, whole plan viability testing needed,

Statutory consultees and other bodies

- Clerk Wendens Ambo Parish Council
- Chairman The Thaxted Society
- Town Clerk Saffron Walden Town Council
- Principal Planner Essex County Council Environment, Sustainability and Highways
- Thaxted Parish Council
- The Thaxted Society
- Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group
- Coordinator Stansted Neighbourhood Plan Steering Group
- Director Coke Gearing Consulting

Clerk Wendens Ambo Parish Council

WAPC believes UDC will have little or no control over this as roads, rail services, doctors surgeries, broadband etc are dependent on external parties. Currently there is little evidence to date of priority being given to Uttlesford District by Essex County Council in respect of basic services such as road repairs. How will UDC prevent houses being built before roads, broadband etc are confirmed and timetabled to be put in place in time? Uttlesford is already lagging behind and there are no guarantees for any of these essential services.

Chairman The Thaxted Society

INF4 Support. The Thaxted Society considers high-level technological provision to be the very bedrock of expansion in a rural area. The correct provision of broadband, and further oncoming communication paradigms, can provide connectedness and cohesion on a local level. Good communications availability contributes to the sustainability of the area.

Town Clerk Saffron Walden Town Council

Broadly support

The Thaxted Society

Support. The Thaxted Society considers high-level technological provision to be the very bedrock of expansion in a rural area. The correct provision of broadband and further oncoming communication

paradigms can provide connectedness and cohesion on a local level. Good communications availability contributes to the sustainability of the area.

Principal Planner Essex County Council Environment, Sustainability and Highways

ECC acknowledges the reference to high speed broadband in Policy INF4 that requires all new dwellings and non-residential buildings to be served by a superfast broadband connection, installed on an open access basis. The policy recognises that due to the District's rural nature there will be some properties and areas where it may be uneconomic to provide superfast broadband via fibre to serve small numbers of properties. In these circumstances, alternative technologies to provide broadband such as fixed wireless technology or radio broadband should be provided to be considered.

Thaxted Parish Council

Broadly support

Neighbourhood Plan Coordinator Saffron Walden Neighbourhood Plan Steering Group

Most broadband should be fibre based, otherwise developers will just use any old copper wiring they can get hold of. Also, Wi-Fi should be provided in areas where broadband is not superfast in order to increase connectivity.

Coordinator Stansted Neighbourhood Plan Steering Group

Most broadband should be fibre based, otherwise developers will just use any old copper wiring they can get hold of. Also, Wi-Fi should be provided in areas where broadband is not superfast in order to increase connectivity. Suggestion: Free, open Wi-Fi in commercial centres for social and recreational facilities, e.g. Lower Street, will sustain and promote area as a social hub

Director Coke Gearing Consulting

It cannot be overstated that one of the preconditions for any business seeking to be established within the locality would be the availability of superfast broadband. This applies equally to homeworkers, to SMEs or to larger corporate concerns, and whilst again the aspirations of the Plan are honourable, it seems to us that the delivery has been poor and there is no reason to believe that the Council would be in a position to improve or expedite a faster roll out of this vital service.

Cannot be overstated that superfast broadband is precondition for any business to be established/delivery poor thus far

Developers/landowners/site promoters

- Grosvenor Britain & Ireland
- Persimmon Homes Essex
- Policy Planner Gladman
- HFT

Grosvenor Britain & Ireland

Grosvenor Britain & Ireland (Grosvenor) support Policy INF4 and Paragraphs 8.25-8.29 of the Plan in recognising the importance of digital infrastructure to businesses and communities including in achieving behavioural change around travel through encouraging greater internalisation of journeys through enabling home-working.

Persimmon Homes Essex

Whilst the NPPF established that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. By stating all, new dwellings must be served by super-fast broadband potentially

allows for the Council to refuse a development without such provision or imposing a Grampian condition preventing a development from being occupied until such networks are provided. The provision of super-fast broadband is not in the control of the developer who requires a third party provider for such infrastructure.

Some growth should be allowed without super- fast broad band as its provision not in gift of the developer/reliant on other parties

It is also the case that the house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand. Whilst it is acknowledged that it may not be possible to provide fibre cable connections, the alternative means of wireless or radio broadband is not always practical and again is not within the control of the developer. In seeking to extend broadband to homes the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. In light of the above, the policy is considered unsound and is not supported.

A policy recognising the above/working with providers for delivery rather than reliant upon developers

Policy Planner Gladman

6.12. Policy TA3 Provision of Electric Charging Points for Vehicles and Policy INF4 High Quality Communications Infrastructure 6.12.1. The Council should ensure that the requirement for electric charging points for each new property and the provision of high quality communications infrastructure are properly tested through the Whole Plan Viability Assessment. Plans should be deliverable and sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Therefore, the Council should assess the likely cumulative impacts on development in their area of all existing and proposed local standards and policies through a comprehensive and robust Viability Assessment to ensure that the cumulative impact of these standards and policies does not put the implementation of the Plan at serious risk.

The Council should ensure electric car parking requirements are properly tested via whole plan viability assessments/avoid putting delivery at risk

HFT

Emerging Policy HI: Housing Density It states that for sites adjacent to settlements, density should be 30-50 dwellings per hectare. However, it is not entirely clear how housing in more rural locations would be considered. If an application were determined using this parameter, this would likely be too dense to suit a countryside setting. Some flexibility may therefore need to be considered with this policy for rural locations, moving forwards. The policy should therefore be amended to ensure that delivering a lower density (where appropriate) in rural locations will be policy compliant.

Individuals

- The high quality and superfast broadband should be extended out of the towns and villages to those living in more rural locations. Broadband providers should extend their service areas to all houses and the District Council should support this.
- Again this proposal affects new developments without mentioning the existing deficiencies in broadband infrastructure for many rural local communities. What is being done NOW about speeding up the process of making high-speed broadband available to all local rural communities?
- Ultrafast broadband will be essential for all premises within this plan timescale. Current plans (with BDUK) do not go far enough and are already outdated.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy will ensure direct positive impacts on employment and economic growth through the associations of homeworking with superfast broadband. The District is predominantly rural, with additional issues surrounding transport interconnectivity to many rural areas. As such, the Policy approach can be viewed as critical to ensuring sustainable development, with secondary positive impacts realised for those sustainability objectives related to sustainable transport (in reducing private vehicle trips and commuting) and also ensuring supporting infrastructure to growth in the District and improving existing conditions.

Alternatives Considered

In view of the baseline conditions within the District regarding accessibility and commuting patterns, it is considered that any alternative approach could not be considered reasonable or otherwise distinctly different from the policy approach to warrant assessment within this SA.

Mitigation Measures / Recommendations

No mitigation measures or recommendations

CHAPTER 9 DESIGN

Introduction

Paragraphs 9.1- 9.4

This supporting text was responded to by 5 people/organisations.

Support	3
Object	1
Comment	1

Overarching Summary

- Importance of design in adequate parking
- Wording of policies considered not 'woolly' and not assertive
- Policy wording considered 'unrealistic' as evidenced by West of Braintree Village plans
- No support for parking courts

Statutory consultees and other bodies

Saffron Walden Town Council and Thaxted Parish Council support the UDC supported for adopting The Design Companion for Planning and Placemaking, TfL (Urban Design London) 2017

Developers/landowners/site promoters

No comments received.

Individuals

- Design in adequate parking is important
- Provision of adequate parking close to properties
- No parking courts
- Wording of policies described as woolly and not imperative
- Ineffective wording of policies resulted in "unrealistic" West of Braintree Garden Village plans

Design and Local Distinctiveness

Paragraphs 9.7 and Policy D1: High Quality Design

This policy and supporting text was responded to by 21 people/organisations.

Support	7
Object	4
Comment	10

Overarching Summary

- The policy should refer to Secured by Design (SBD) and criteria for accreditation
- Silver Accreditation should be requisite minimum standard for street lighting
- The 'historic environment' should be used and not heritage assets as in text
- Developments should be designed to encourage healthy and active lifestyles
- Policy should reference Sport England's and Public Health England's 'Active Design' guidance
- Policy to specify garden sizes e.g. 50sq m. for 2 bed and 100sq m. for 3-bedhouses
- Nationally described space standards to apply to all new development
- Evidence is required to support implementation and adoption of internal space standards
- Considerations when imposing internal space standards:
 - Need – evidence on size and type of dwellings being built in UDC and consideration of impact on starter homes;
 - Viability – impact adopting standards to be part of viability assessment taking into account potential impact of larger buildings on land supply as well as affordability of larger homes
 - Time – transitional period required to allow developers to factor in new policy on space standards
- Space standards requirement should be deleted as it is not evidenced
- "Good Design" criteria is highly subjective so it needs to be codified
- Policy D1 fails to make provision for the following criteria in Saved Policy GEN 2

Statutory consultees and other bodies

Essex Police consider that the policy should include more reference to "secured by design" (SBD). Criteria to achieve Silver SBD and Gold SBD accreditation should also be included in the policy. Silver SBD accreditation should be the requisite minimum for street lighting.

Historic England welcomes the principle that all new development should respond positively to the local character and create high quality spaces. Use of the term "historic environment" rather than heritage assets is recommended.

Sport England consider that the policy should be amended to include an additional design principle along the lines that developments should ensure that they promote healthy and active lifestyles through providing the opportunity for encouraging physical activity in the design of developments. The supporting text to the policy should refer to Sport England's and Public Health England's 'Active Design' guidance <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/> which provides Government endorsed guidance on how the design and layout of new developments can be planned to make communities more active and healthier e.g. principles relating to walkable communities, co-location of facilities, multi-functional open space, active buildings etc.

Sport England is working with Essex County Council, Essex districts/boroughs (including UDC) on the review of the Essex Design Guide. The Active Design principles will be embedded into the EDG review which will provide advice on how the principles can be practically applied in a range of residential environments. In this context, it is considered important that policy D1 addresses how design can encourage activity as this will assist with

alignment with the EDG review as well as helping to deliver the wider activity and healthy lifestyle outcomes through the design of new development in Uttlesford district.

Saffron Walden Town Council and Thaxted Parish Council broadly support the policy especially inclusion of DCLG standards

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group consider that the requirement to meet nationally described space standards should apply to all new development. Also neighbourhood centre provision to be included when designing major development sites and provision of neighbourhood centres should be added to the policy. Policy to specify garden sizes e.g. 50sq m. for 2-bedhouses and 100sq m. for 3-bedhouses.

The Thaxted Society considers building design in the visual environment as paramount. At Thaxted responses to the vernacular and narrative are important as they are influenced by history. The Thaxted Building Design Guide clarifies the Society's preferences.

Developers/landowners/site promoters

- Attempt at delivery of high quality and design is supported
- Limited definition of "high quality"
- Policy should reference suitable standards/SPD documents and national policy relied on when considering proposals
- Evidence is required to support implementation and adoption of standards
- Considerations when imposing internal space standards:
 - i. Need – evidence on size and type of dwellings being built in UDC and consideration of impact on starter homes;
 - ii. Viability – impact adopting standards to be part of viability assessment taking into account potential impact of larger buildings on land supply as well as affordability of larger homes
 - iii. Time – transitional period required to allow developers to factor in new policy on space standards
- Impact assessment of space standards not carried out as no evidence supporting size and buildings being built in UDC
- Reference to space standards should be deleted from policy since evidence not sufficient to warrant inclusion of assessment of impact on delivery
- Developer to work closely with UDC, local stakeholders and community to develop initial ideas for Garden Community

Individuals

- High housing density due to basing calculations on gross area
- No allowance for open space, SUDs allocation etc.
- "Good Design" criteria is highly subjective

- Good Design should be codified to include for e.g. minimising heating requirement by optimisation of solar gain and /or inclusion of mechanical ventilation with heat recovery (MHVR) systems in new builds
- Developers to be firmly encouraged to adopt RIBA and other professional organisation recommendations or Planning Consent would be withheld.
- Policy D1 fails to makes provision for the following criteria in Saved Policy GEN 2 GEN2: Development will not be permitted unless its design meets all the following criteria and has regard to adopted Supplementary Design Guidance and Supplementary Planning Documents.
 - d) it helps to reduce the potential for crime;
 - e) it helps to minimise water and energy consumption;
 - g) It helps to reduce waste production and encourages recycling and reuse;
 - h) It minimises the environmental impact on neighbouring properties by appropriate mitigating measures;
 - i) It would not have a materially adverse effect on the reasonable occupation and enjoyment of a residential or other sensitive property, as a result of loss of privacy, loss of daylight, overbearing impact or overshadowing.
- How will high quality be defined? There should be a provision whereby applications will not be considered from developers who have been found to be inadequate in the past. In practice, developers seek to build a collection of their standard designs. Specific guidelines are needed, e.g.:
 - No false chimneys;
 - No false bricked-up windows;
 - Façades to be varied, even where the basic design is the same;
 - Variations in basic design in order to give variety to roof outlines;
 - No terraces;
 - No more than four houses in a straight line;
 - Storey heights to be restricted to 2.5 in rural areas, where the top storey is genuinely and completely in the roof space, and not used as a device to build three-storey blocks of flats;
 - Minimum pavement widths.
 - Little evidence of contemporary design in Uttlesford
- A step change is required and plan to move forward in this respect
- Contemporary buildings need to be distinctive and of current age
- Not a pastiche of historic style or some supposed “rural ideal”
- New development should be compatible with existing development and not too distinctive as to stand out

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy can be seen as likely to have significant positive impacts on townscapes, through a design-led approach underpinned by good design principles and reflecting a thorough site appraisal. The Policy will also have minor positive impacts on the natural environment, through required consideration within applications, as well the historic environment / assets, sustainable transport through high quality pedestrian access and also access.

Alternatives Considered

The District has a notable amount of historic settlements and the Policy seeks to ensure protection of these through the design requirements of new development. In light of this, it is considered that any alternative approach could not be considered reasonable or otherwise distinctly different from the policy approach to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Car Parking Design

Paragraph 9.8 and Policy D2

This policy and supporting text was responded to by 12 people/organisations.

Support	2
Object	2
Comment	8

Overarching Summary

- Policy should include provision for cycle parking in residential developments
- Paragraph 9.8, second sentence to read to be amended to read, 'If it is provided in the right place **or of sufficient quantity**, it is unlikely to be used properly'
- Omission of parking provision for bikes, motorbikes, buses or visitors, carer and delivery vehicles
- On-street parking only a design option where street widths are more than adequate
- Parking courts should be avoided
- Further discussion recommended by Essex County Council Environment, Sustainability and Highways to ensure consistency with the SUDs/Flood Risk Strategy with regards to permeable car parking courts
- Electric charging points should be provided within property curtilages

Statutory consultees and other bodies

Saffron Walden Town Council suggests the second sentence should be amended with an addition to read as follows 'If it is provided in the right place **or of sufficient quantity**, it is unlikely to be used properly.'

Stansted Neighbourhood Plan Steering Group supports the policy for avoiding parking courts. However, the policy does not mention bikes, motorbikes, buses or visitors, carer and delivery vehicles. It is suggested to outlaw parking courts for houses as they do not meet Secured by Design standards. Motorbikes and cycles should be given priority and on-street parking with parking laybys and open aspect should be encouraged. On-street parking a design option where road widths are more than adequate.

Thaxted Parish Council believes that the policy should include that rear courtyards are to be avoided.

Saffron Walden Neighbourhood Plan Steering Group states the policy is supported for avoiding parking courts. However, the policy does not mention bikes, motorbikes, buses or visitors, carer and delivery vehicles. It is suggested to outlaw parking courts for houses as

they do not meet Secured by Design standards. Motorbikes and cycles should be given priority and on-street parking with parking laybys and open aspect should be encouraged. On-street parking a design option where road widths are more than adequate.

Essex County Council Environment, Sustainability and Highways recommends further discussions to determine the extent to which permeable external car parking may be delivered in future to ensure consistency with the SUDs/Flood Risk Strategy.

Takeley Parish Council suggests that the policy should include ensuring off-road parking thereby promoting amenity for road users. Parking provision should be provided above the minimum parking standards to allow for extra requirements. Parking bays, not owner owned should be incorporated into new road pavements to ensure extra visitor parking. Residential parking should be off-road. Safe electric charging points for cars should be within property curtilages.

THE THAXTED SOCIETY believes that parking design should avoid use of the phrase informal parking as this wrongly suggests police flexibility. Informal parking should be referred to as anti-social parking.

Saffron Walden Town Council suggest that the policy should include that rear parking courts should be avoided.

Sport England advises that incorporation of cycle parking design in residential environments should be included in the policy. The policy should refer to the importance of adequate cycle provision in prominent locations on new house frontages in secure and covered storage facilities.

The review of the Essex Design Guide is considering cycle parking design and it will be appropriate to refer to this in the supporting text.

Developers/landowners/site promoters

No comments received.

Individuals

- No reference to motorbikes, bikes, buses or visitors' vehicles e.g. carer, doctor, grocery delivery
- Parking courts should be avoided as not always used
- Vehicles in parking courts not within sight of the house and this is against Secured by Design Standards
- Electric charging points should be included in all communal car parks i.e. existing public car parks and those in affordable housing
- Retro fitting charging points would be costly they should be incorporated into new builds
- Will new houses have electric charging points?
- More houses to be provided with garages to avoid clogging streets with on-street parking
- How many "street trees" are planned?
- Provide reasonable space in front of houses

- Pay more attention to public green space in front of houses

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Significant, Temporal and Secondary Effects

The Policy is not directly relevant to any specific sustainability objectives, however there can be seen to be minor positive impacts associated with social inclusion and well-being through car parking that is fit for purpose and overlooked to ensure natural surveillance and ‘designing out crime.’

Alternatives Considered

It is considered that any alternative approach could not be considered reasonable or otherwise distinctly different from the policy approach to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Small Scale Development/Householder Extensions

Policy D3

This policy and supporting text was responded to by 6 people/organisations.

Support	5
Object	1
Comment	0

Overarching Summary

- Policy should be amended to read *“Proposals for small scale development, including extensions to existing buildings, must be of a high standard of design, responding to or improving the site and surrounding area and not have a detrimental impact on flood risk”.*
- Requirement for a specific consideration of the historic environment within design policies
- Policy supported

Statutory consultees and other bodies

Essex County Council Environment, Sustainability and Highways recommend that policy D3 includes wording that seeks to ensure that any development should not have a detrimental impact on flood risk. ECC recommends that the first policy provision be amended

to read - *“Proposals for small scale development, including extensions to existing buildings, must be of a high standard of design, responding to or improving the site and surrounding area and not have a detrimental impact on flood risk”.*

Historic England commends the need for development to be responsive and relate to surrounding areas and existing buildings is supported. However, Historic England seeks a specific requirement for the consideration of historic environment within Local Plan design policies which seek to draw on opportunities offered by the historic environment and reflect local character and distinctiveness. Contemporary development should not be stymied but should require an appreciation of the significance and character of the historic environment in producing a high design standard.

Saffron Walden Town Council, Thaxted Parish Council, Stansted Neighbourhood Plan Steering Group and THE THAXTED SOCIETY support the policy.

Developers/landowners/site promoters

No comments received.

Individuals

No comments received.

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Significant, Temporal and Secondary Effects

For many households an extension to their property ensures accommodation to meet changing needs. However, it is important where an extension is permitted that it is compatible with the design and setting of the existing building and does not adversely impact the surrounding area or nearby neighbours. This is also true of small scale development. The policy will have positive impacts on the historic environment through ensuring that home extensions retain the character of the area and are designed to respect the existing building. There will be positive contributions to meeting specific housing needs regarding type and size, and also in addressing social inclusion and health by enabling the adaptation of homes to meet the changing requirements of residents whilst also preventing development that would adversely affect neighbours in terms of overlooking and restricted light.

Alternatives Considered

It is considered that any deviation from the Policy approach could be considered unsustainable in line with the Policy’s criteria or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer Response

Proposed changes to plan

Development Frameworks and Codes

Paragraphs 9.10 – 9.16 and Policy D4

This policy and supporting text was responded to by 37 people/organisations.

Support	8
Object	12
Comment	17

Overarching Summary

- Major developments required at minimum to provide a sports facility plan/strategy as part of green infrastructure plans
- Query on what constitutes 'large development' and 'strategic development'
- Town and parish councils should be involved in strategic and major developments
Suggestion to amend paragraph 9.14 to read 'Particular regard and consideration must be afforded to the delivery of local community or shopping centres and school provision. Early delivery of these facilities will ensure provisions for the 1st / 2nd cohort of residents'
- The policy should stipulate a trigger point for provision of facilities
- Building for Life 12 Assessments should apply to all developments of 50+houses not just new settlements
- An adopted Masterplan for Easton Park should be annexed to SP6 at the Regulation 19 consultation stage
- 4th bullet point in Policy D4 be amended to – "*A green infrastructure plan setting out the network and typology of green spaces, links, flood mitigation areas and areas of ecological importance*" (page 115).
- Wording of the 3rd paragraph in Policy D4 is amended to read – "*Development frameworks should be informed by best practice landscape and urban design principles. Applications.....*"
- The fifth bullet point (Policy text) should be amended to read '*A green infrastructure plan setting out the network and typology of green spaces, links and areas of ecological importance and opportunities for the creation of sustainable drainage schemes including attenuation ponds/ infiltration basins and swales.*'
- Policy should include reference to the historic environment
- The West of Braintree Garden Community development approach merits a separate section in the policy which can be built on in a site specific DPD
- Detailed code should be specified
- Policy is supported on condition that enforcement will be proactive and effective
- Equestrians should be mentioned and included in Policy D4
- Definition of "strategic" needs clarification to ensure that Plan is effective

- Requirement of Development Frameworks is regarded as an additional phase in the planning decision making process and is unjustified, not effective and not supported by national policy
- The policy considered overly onerous and does not specify when the policy will be applied
- Not clear whether the policy refers specifically to Garden Communities and strategic sites allocated through the Local Plan
- Area Design Codes are considered more appropriate for a 10,000 unit Garden Community at Easton Park to be built over 20 years
- Clarification is required on whether Policy D4 expects outline or reserved matters submissions to be accompanied by the Building for Life Assessment
- Unclear whether framework is to be adopted as SPD or approved by the Council as guidance. SPD adoption will add to delivery timetable and cause delay
- Proposed rewording of Paragraph 9.10, "*Proposals for strategic development sites (500+ dwellings or 50,000 sq. m) large scale development, including the new garden communities, major and strategic development sites, should be informed by a masterplan that comprises part of a development framework for the site. This should place the site in its wider context and avoid narrowly looking at landownership boundaries.*"
- UDC should develop its own Design Code, consult on it and ensure rigorous compliance once adopted
- Design codes can provide greater certainty and control over design quality in long term
- Design code to cover, building heights, depths and widths, street typologies, landscape treatments as well as façade treatments
- New large settlements (estates) are not appropriate for the district
- Large settlements are artificial and ignore historic structure of area

Statutory consultees and other bodies

Natural England welcomes the policy requirement to prepare a Green Infrastructure plan for strategic sites.

Essex County Council Environment, Sustainability and Highways recommends that the wording of the 4th bullet point in Policy D4 be amended to – “A green infrastructure plan setting out the network and typology of green spaces, links, flood mitigation areas and areas of ecological importance” (page 115). Also recommended is the amendment of the wording of the 3rd paragraph in Policy D4 to read –“Development frameworks should be informed by best practice landscape and urban design principles. Applications.....”

Environment Agency welcomes the requirement for Green Infrastructure plan is welcome. Such a plan provides an opportunity to link with the design of surface water management for a development especially where SuDS in the form of attenuation ponds/infiltration basins and other methods such as swales are recommended as principal form of water drainage.

Environment Agency recommend that the fifth bullet point is amended to read as follows: ‘A green infrastructure plan setting out the network and typology of green spaces, links and areas of ecological importance and opportunities for the creation of sustainable drainage schemes including attenuation ponds/ infiltration basins and swales.’

Historic England advises that the policy should include reference to historic environment and how this is a key consideration in good place making.

Braintree District Council notes that the approach to be taken forward for West of Braintree will be different from other sites since this is driven by Local Authorities and as such a separate section in the policy may be appropriate which can be built on within the site specific DPD.

Sport England welcomes the principle of development frameworks for major developments. It is recommended that major developments (Garden Communities) should be required at minimum to provide a sports facility plan/strategy as part of the green infrastructure plans. The sports facility plan/strategy would consider the strategic provision of indoor and outdoor facilities. Experience suggests that provision of sports facility plan/facility is helpful to all stakeholders in masterplanning process.

Thaxted Parish Council and Saffron Walden Town Council and Stansted Neighbourhood Plan Steering Group query what constitutes “large scale development”

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group believe that town and parish councils need to be involved in proposals for large scale developments including garden communities, major and strategic development sites. Landscape treatment schemes should comprise local species and low maintenance. The developer has to maintain landscape scheme until adoption by the local Council.

Saffron Walden Town Council and Thaxted Parish Council propose an addition to paragraph 9.14 to read ‘Particular regard and consideration must be afforded to the delivery of local community or shopping centres and school provision. Early delivery of these facilities will ensure provisions for the 1st / 2nd cohort of residents’

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group note that phasing needs to be more specific to ensure early provision of convenience stores, schools and community facilities. The policy should stipulate a trigger point for provision of facilities e.g. by the time 30% of the development is completed.

Stansted Neighbourhood Plan Steering Group believes that Building for Life 12 Assessments should apply to all developments of 50+houses not just new settlements. All new developments should be designed to offer shortest well-lit pedestrian routes through a development. Current Essex Design Guide on road widths is too narrow and this should be stipulated to 6.5 metres to allow lorries to pass. The provision and phasing of supporting facilities (schools etc.) should be mandatory.

Saffron Walden Town Council suggests addition of “and community facilities” to the 2nd bullet point and the last bullet point should be phrased to ensure community provision is supplied to the first cohort of residents. The provision and phasing of supporting facilities (schools etc.) should be mandatory. Building for Life 12 assessment should apply to all new developments. All new developments should be designed to allow the shortest routes for

pedestrians to key destinations. Current advice from Essex Highways results in roads that are too narrow and dangerous.

Dunmow Town Council requires the adoption of a Masterplan to guide the Garden City development during the plan period. The Masterplan has to address broad areas of growth, new road access, buffering areas, heritage identification, landscape and ancient woodland mitigation measures. The Masterplan has to be annexed to the Local Plan Policy 6 in the Regulation 19 consultation.

Thaxted Parish Council suggests addition of “and community facilities” on 2nd bullet point. On the last bullet point, phasing of works should ensure that provision of community facilities is supplied to the first cohort of residents.

THE THAXTED SOCIETY notes that conditions that add positive and often mitigating detail to development remain moribund and redundant without robust enforcement. The Plan relies on both condition and requirement and this is pointless without enforcement. This policy is supported on the presumption that there will be renewed and invigorated enforcement.

Elsenham Parish Council notes that the Local Plan is a policy document and should not have provisional statements as to what can be used or should be considered. A detailed design code should be specified.

Essex Bridleways Association and British Horse Society want equestrians to be mentioned and included in Policy D4. They also state that the green infrastructure plan should set out the aspiration for informal recreation accessible for all users. Uttlesford should follow neighbouring authorities in aspiration to enhance equestrian access via green infrastructure of their proposed garden cities.

Developers/landowners/site promoters

- Objection to the requirement for the preparation and approval of Development Frameworks prior to planning application submission
- The requirement of Development Frameworks is regarded as an additional phase in the planning decision making process and is unjustified, not effective and not supported by national policy
- What constitutes “strategic development?”
- Policy D4 should be amended to allow Development Frameworks and Outline Planning Applications to be submitted in parallel.
- Development Frameworks for strategic sites should not to be approved prior to submission of planning applications.
- The wording “prior to submission” should be amended to read “prior to approval”.
- Area Design Codes are considered more appropriate for a 10,000 unit Garden Community at Easton Park to be built over 20 years. Policy to be amended to require approval of Design Code/Area Code prior to approval of any reserved matters application.
- Clarification is required on whether Policy D4 expects outline or reserved matters submissions to be accompanied by the Building for Life Assessment
- The policy is overly onerous and does not specify when the policy will be applied

- It is not clear whether the policy refers specifically to Garden Communities and strategic sites allocated through the Local Plan
- If requirement is applicable to all potential development of a strategic scale then definition of strategic scale should be included in the policy
- Policy may prevent non-allocated sustainable sites coming forward because the Council might not agree to the Development Framework
- The requirement for the preparation of Development Framework documents and Design Codes adds an additional layer to the planning process
- The requirement also entails additional time, cost, and expenditure of resources for both the applicant and the Council.
- What constitutes “strategic” development is not defined and there is a danger of inappropriate application to small-medium size allocation.
- A properly drafted Design & Access statement achieves a similar outcome to a Development Framework or Design Code.
- Wording of the Policy should be revised to:
 - exclude small – medium sized developments or
 - identify individual sites such as Garden Communities and larger urban extensions or
 - set a threshold beyond which Development Frameworks will be required e.g. 1,000 units
- Policy is unclear on whether design code is required over and above a development framework or it can be included in the framework
- Unclear whether framework is to be adopted as SPD or approved by the Council as guidance. SPD adoption will add to delivery timetable and cause delay
- No definition of “strategic sites” in glossary of terms
- Council to outline development framework programme for strategic sites as the requirement to have and “Adopted” Strategic Masterplan could delay matters
- Definition of “strategic” needs clarification to ensure that Plan is effective
- Definition of Strategic Development Sites could be defined as those sites comprising 500+ dwellings or 50,000+sq. m. of commercial floorspace
- First sentence of D4 should be reworded to read: *“Development frameworks shall be prepared for all strategic development sites (500+ dwellings or 50,000+ sq. of commercial floor space) to be approved by the Council prior to submission of any planning application.”*
- Current range of developments of 10+ dwellings or 1,000 sq. m. requiring preparation of a masterplan prior to approval is considered too wide.
- This wide range (10+ dwellings or 1,000 sq. m.) has potential to frustrate delivery and adds unnecessary work to the planning system and an undue burden on council officers and developers.
- Proposed rewording of Paragraph 9.10, *“Proposals for strategic development sites (500+ dwellings or 50,000 sq. m) large scale development, including the new garden communities, major and strategic development sites, should be informed by a masterplan that comprises part of a development framework for the site. This should place the site in its wider context and avoid narrowly looking at landownership boundaries.”* The advantage of the above would be to ensure a comprehensive delivery of significant developments (500+ dwellings or 50,000 sq. m) as well as facilitate delivery of smaller sites.

- ANSC as principal landowners have prepared a development vision and masterplan alongside the proposed development by Galliard Homes of land at Bosted Wood
- A copy of the development vision and masterplan was submitted towards Regulation 19 Braintree Local Plan

Individuals

- Developers need to be given tangible deadlines for the provision of infrastructure e.g. community facilities to be provided when 30% of the site is completed
- Development Frameworks and Codes should include necessary improvements to highway and transport infrastructure required to take place at outset of development or prior to occupation
- Highway and transport infrastructure should be triggered at agreed capacity to ensure improvements are in place before they become necessary
- Need for equestrian access not fully considered
- UDC should develop its own Design Code, consult on it and ensure rigorous compliance once adopted
- Design codes can provide greater certainty and control over design quality in long term
- Design code to cover, building heights, depths and widths, street typologies, landscape treatments as well as façade treatments
- New large settlements (estates) are not appropriate for the district
- Large settlements are artificial and ignore historic structure of area

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The inclusion of this Policy within the Plan is integral to the development of sustainable development emerging from the principle of Garden Communities at this stage. The Policy will have significant positive impacts associated with sustainable travel, accessibility, health and social inclusion, and education and skills. These themes are required to be integrated within self-sustainable new communities in the form of supporting infrastructure, and the process of development frameworks for all strategic development ensures that forthcoming applications factor in sustainable themes through their initial identification at the plan-level.

Alternatives Considered

The Policy, in introducing development frameworks for strategic development proposals maximises the potential for sustainable outcomes to be realised through a plan-led approach. It is considered that any deviation from the Policy approach could be considered unsustainable in line with the Policy's criteria or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Design Review

Paragraph 9.19 and Policy D5

This policy and supporting text was responded to by 18 people/organisations.

Support	2
Object	8
Comment	8

Overarching Summary

- The size and complexity of West of Braintree development requires a site specific solution and policy may be too restrictive
- All major development should be subject to a Design Review
- All major schemes should not be subject to a Design Review
- Design should be in accordance with an adopted Neighbourhood Plan requirements as well as complementing the area
- Local Town and Parish Councils should be consulted and included in discussions on design
- Where a Neighbourhood Plan adopts a design guide as part of its Heritage and Character Assessment, this should be used.
- Application of the Essex Design Guide to new settlements regarded as inappropriate as development should reflect the age they being are planned
- All projects should be subject to design review regardless of size or being “in important and/or sensitive” locations
- Clarification required on whether “emerging schemes” refers to emerging reserved matters submissions
- Referral of all strategic and major developments is not proportionate
- Requirement for a design review assessment is too onerous, restrictive and the Policy encourage and not require
- Policy D5 needs to clarify a development threshold to trigger the Design Review process
- Policy D5 has the potential to frustrate delivery by using a Design Review Panel operated by Shape East
- Suggested rewording of Policy “*Where necessary the Council will require emerging schemes for the new garden communities, strategic and major development sites to be assessed through design review. Equally, smaller sites in important and or sensitive locations will also be subject to design review. The Council may seek to refer schemes to the East of England Design Review Panel operated by Shape East an independent review panel where it may be helpful in reaching an appropriate design solution. The Council encourages design review to take place early in the process to allow scope for input into the emerging design. The final scheme submitted to the Council should include a report on the design review process and how the scheme has responded to this.*

Statutory consultees and other bodies

Braintree District Council opines that the policy maybe too restrictive as it is too early to specify a specific process and company to undertake the design review. The size and complexity of the scheme will require a site specific solution to achieve the best results and may not accord with the policy

Saffron Walden Town Council and **Thaxted Parish Council** recommend that paragraph 9.19 should be amended to clarify that all major development will be subject to a design review.

Saffron Walden Town Council recommends an addition to the Policy should stating that Design will be in accordance with any specific requirements of Neighbourhood Plan and will complement the area as identified within the Heritage and Character Assessment. It is also recommended to delete “it is envisaged” (paragraph 9.19) to make the statement more positive.

Thaxted Parish Council considers that design should be in accordance with any specific requirement laid out in the adopted Neighbourhood Plan and should complement the area as identified in the Heritage and Character Assessment.

Littlebury Parish Council believes that the application of the Essex Design Guide to new settlements is inappropriate because developments should reflect the age in which they are being planned and developed which currently gives greater scope to incorporate energy generation and management discretely.

Elsenham Parish Council believes that all projects should be subject to design review regardless of size or being “in important and/or sensitive” locations.

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group consider that Local Town and Parish Councils should have a say on design and be included in discussions. Where a Neighbourhood Plan adopts a design guide as part of its Heritage and Character Assessment, this should be used.

THE THAXTED SOCIETY supports the policy.

Developers/landowners/site promoters

- Policy 5 should clarify whether “emerging schemes” refers to emerging reserved matters submissions
- Policy 5 should make it clear that the Design Review will need to have regard to the Design Code/Area Design Code approved in accordance with Policy 4
- Referral to Shape East is not considered a mandatory requirement enshrined in the development plan
- It is suggested that the Policy 5 should be amended as follows: *Where necessary the Council will require emerging schemes for the new garden communities, strategic and major development sites to be assessed through design review. Equally, smaller sites in important and or sensitive locations will also be subject to design review. The Council may seek to refer schemes to the East of England Design Review Panel operated by Shape East an independent review panel where it may be helpful in reaching an appropriate design solution. The Council encourages design review to*

take place early in the process to allow scope for input into the emerging design. The final scheme submitted to the Council should include a report on the design review process and how the scheme has responded to this.

- Design Review required for new Garden Communities but not for all strategic and major development sites
- Design Council's Design Review Principles and Practice (2013) guidance state that referral of schemes for design review to be proportionate and referring all strategic and major developments is not proportionate
- Referral of all strategic and major development schemes is not justified and will introduce delays in the planning process
- The requirement for design review assessment is too onerous, restrictive and the Policy should be reworded to say that the Council encourages assessment through a design review
- A design review should not be obligatory on all large schemes
- No definition is provided for what constitutes "strategic" or "major" development
- Design Review is considered unnecessary and should be removed from the Policy
- Policy D5 should be amended to encouraging design review rather than requiring it
- Object to Policy wording
- It is not clear at what point the Design Review Panel will participate in the preparation of the Strategic Masterplan and Design Codes or comment on detailed design arising
- UDC is seeking to front load the design process (Masterplans and Design Coding) therefore there is no need for the involvement of a Design Review
- What is the difference between "major developments" and strategic allocations?
- Policy D5 needs to clarify a development threshold to trigger the Design Review process
- Policy D5 has the potential to frustrate delivery by using a Design Review Panel operated by Shape East
- Use of a Design Review Panel should be optional for developments less than 500 or more dwellings or 50,000 sq. m commercial floor space
- Policy needs rewording to clarify when use of Design Review is appropriate
- For clarity deletion of the following is suggested:
 - "and major" (1st sentence);
 - "Equally, smaller sites in important and or sensitive locations will also be subject to design review." (second sentence); and
 - Addition of, "suggest the referral of" and deletion of "refer."

Individuals

No comments received.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The scale of growth outlined within the plan over the plan period is such that meeting OAN for housing is a significant challenge on comparison to past housing requirements. The Policy will have significant positive impacts on landscapes / townscapes through the requirements of design review. The requirements of the policy can be seen to emanate from the fabric of the District and local characteristics related to the historic environment and landscapes. With this in mind, secondary positive impacts are realised on the preservation and enhancement of the historic environment and cultural heritage.

Alternatives Considered

The Policy, in introducing design review for strategic development proposals maximises the potential for sustainable outcomes to be realised at the outset of the development management process. It is considered that any deviation from the Policy approach could be considered unsustainable in line with the Policy's criteria or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Innovation and Variety

Policy D6

This policy and supporting text was responded to by 7 people/organisations.

Support	6
Object	1
Comment	0

Overarching Summary

- Avoidance off-the –shelf house designs is supported
- Delete last sentence as considered unenforceable and unmanageable
- Query on how and who will judge the design competitions
- New houses should complement the local area

Statutory consultees and other bodies

Elsenham Parish Council recommends a specific ban is recommended for 'off-the-shelf' housing types. In Elsenham there has been talk about respecting the local vernacular but in practice developers have offered a mix of their standard designs.

Thaxted Parish Council recommends deletion of last sentence since it is considered unenforceable and unmanageable.

Saffron Walden Town Council supports policy.

Stansted Neighbourhood Steering Group and Saffron Walden Neighbourhood Steering Group query how the completion will be judged and by whom?

THE THAXTED SOCIETY supports the principle of avoidance of all off the shelf design. New homes and buildings in Thaxted should look like they belong in Thaxted or Uttlesford. New design is strongly supported. Good design may incalculate local detail and respond to it whilst maintaining its modernity and sustainability.

Developers/landowners/site promoters

No comments received.

Individuals

No comments received.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The scale of growth outlined within the plan over the plan period is such that meeting OAN for housing is a significant challenge on comparison to past housing requirements. The Policy will have significant positive impacts on landscapes / townscapes through the encouragement of development proposals that establish bespoke design solutions and residential typologies. The requirements of the policy can be seen to emanate from the fabric of the District and local characteristics related to the historic environment and landscapes. With this in mind, secondary positive impacts are realised on the preservation and enhancement of the historic environment and cultural heritage.

Alternatives Considered

The Policy, in encouraging bespoke design solutions and residential typologies for development proposals maximises the potential for sustainable outcomes to be realised at the outset of the development management process. It is considered that any deviation from the Policy approach could be considered unsustainable in line with the Policy's criteria or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Self and Custom-build Housing

Paragraph 9.21-9.23 and Policy D7

This policy and supporting text was responded to by 10 people/organisations.

Support	5
Object	1
Comment	4

Overarching Summary

- Larger sites to provide 5% of self-build land
- Suggested that all sites of 150 or more homes should provide 5% self-build land
- Designs should be in accordance with specific requirements in Neighbourhood Plans
- Queries on how self-build will be identified, how those registered will be notified, and how appropriateness of design will be determined

- Plot passports should include all matters and not leave it to plot owner to decide
- Flexibility should be adopted to allow self-build beyond development limits
- Small plots of land outside villages and conservation areas should be available for development
- Hamlets should be allowed to expand rather than barn conversions that are not in keeping with surrounding housing style

Statutory consultees and other bodies

Saffron Walden Town Council suggests that larger sites should provide 5% self-build land.

Thaxted Parish Council considers that the last sentence of paragraph 9.23 should include the following wording, “however, the plot owner must consider that the design will be in accordance with any specific requirements laid out in the adopted Neighbourhood Plan, and will complement the area as identified within the Heritage and character assessment.”

Stansted Neighbourhood Plan Steering Group queries how self-build land will be identified; how those on the register will be notified and how appropriateness of design will be determined? It is also suggested that all sites of 150 or more homes should provide 5% self-build land. Neighbourhood Plans and Design Statements have to be taken into account

THE THAXTED SOCIETY believe that plot passports should include all matters and not leave matters for plot owner to decide because owners’ decisions might not respond to historic vernacular and narrative as well as the owner’s taste not always proving acceptable.

Developers/landowners/site promoters

- Requirement of adoption of a flexible approach to self-build homes beyond Development Limits to address objectively assessed need
- D7 is unnecessary because scale, mass, layout, landscape and appearance can be controlled through outline and full planning applications
- Individual plot passports add further layer of work and do not improve design
- Policy D7 should be deleted from the Plan

Individuals

- Small plots of land outside villages and conservation areas should be available for development
- Hamlets should be allowed to expand rather than barn conversions that are not in keeping with surrounding housing style

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy’s requirement for the preparation and submission of site masterplan and individual plot passports for self / custom build homes will ensure minor positive impacts on townscape.

Alternatives Considered

The National Planning Policy Framework requires Councils to plan for a mix of new housing based on current and future demographic trends, market trends and different groups within the community, including self-build homes. With this at the forefront of the Policy's approach, and in line with the evidence outlined in the SHMA, there can be considered no reasonable alternatives that exist for exploration.

Proposed Mitigation Measures / Recommendations

Through iterative working, a draft SA of the Plan recommended that the Plan also include the Council's approach to any self-build home applications that might come forward in the plan period. This has been factored into the Plan through this Policy. As such, no mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Sustainable Design and Construction

Paragraph 9.24 and Policy D8

This policy and supporting text was responded to by 20 people/organisations.

Support	4
Object	8
Comment	9

Overarching Summary

- Wording of the 4th paragraph of Policy D8 be amended to read, *“Waste, recycling and storage areas should be provided. Equally, a system that reduces water consumption and allow for the reuse of grey water is encouraged. Development should not increase flood risk on or off site.”* (page 118).
- Policy wording seen as unambitious and too loose
- Policy should be amended to include waste access
- Green roofs should be encouraged
- Policy needs to be more specific on provision of waste areas for flats.
- Policy needs clarification as it might be misinterpreted as applying to all developments of all scales
- The policy makes no specific reference to the historic environment or to visual impact and setting
- Policy D8 is not in line with PPG and Ministerial Statement of July 2015 stating that improvements in technical build standards are to be delivered through Building Regulations
- Use of BREEAM Standards and Home Quality Mark is an unnecessary financial burden on developers

- Both BREEAM standards and Home Quality Mark have not undergone a formal public consultation and UDC should not allow the Building Research Establishment Ltd. to dominate assessment of Sustainable Design and Construction
- New builds should exceed BREEAM standards and current Building Regulations

Statutory consultees and other bodies

Stansted Neighbourhood Plan Steering Group notes that the policy wording is unambitious and too loose. Developments offering innovative recycling and waste disposal systems are welcome. All housing should include solar panel installation or equivalent if required by owner/occupier.

Saffron Walden Town Council recommends an addition to read, 'Houses with roof solar panels and water recycling schemes will be encouraged'. We would also like to see a policy on green roofs as suggested. Amend policy to include waste access (...be provided) out of sight of the frontages of properties but with easy access to the road to allow for rubbish collections. 'Developments that offer innovative recycling and waste disposal systems will be particularly welcomed'? (Already the case in many countries)

'The use of green roofs in new builds will be encouraged, especially for flat or shallow-pitch structures. Green roofs reduce water run-off, enhance sound and thermal insulation, and support local biodiversity.'

Thaxted Parish Council suggests an amendment to policy to include accessible waste areas by both residents and refuse lorries. Policy needs to be more specific on provision of waste areas for flats.

Saffron Walden Neighbourhood Plan Steering Group considers the policy wording as unambitious and too loose. Water recycling schemes should also be encouraged. Proposed addition to first sentence, "(..... be provided) out of sight of the frontages of properties but with easy access to the road to allow for rubbish collections". Is it worth adding 'developments that offer innovative recycling and waste disposal systems will be particularly welcomed'? All housing should include solar panel installation or equivalent if required by owner/occupier.

Essex County Council Environment, Sustainability and Highways recommend that the wording of the 4th paragraph of Policy D8 be amended to read, "*Waste, recycling and storage areas should be provided. Equally, a system that reduces water consumption and allow for the reuse of grey water is encouraged. Development should not increase flood risk on or off site.*" (page 118). ECC notes that this amendment is consistent with the National Planning Policy Framework paragraphs 102 and 103.

Environment Agency supports the thrust of this policy especially the third paragraph which requires proposals for new development demonstrating how resource efficiencies and climate change adaptation measures will be incorporated. Policy D8: Sustainable Design and Construction includes systems that reduce water consumption and allow for the reuse of grey water is encouraged. Again we are in favour of this approach.

Historic England is of the opinion that as currently drafted the policy makes no specific reference to the historic environment or to visual impact and setting. This policy is likely to refer to new build developments only, but that is not clear and could be interpreted as applying to all developments of all scales. Modern construction techniques on a listed

building may detrimentally affect existing historic fabric and risk damage to the heritage asset. It is recommended that the policy is clarified as at this stage as it's remit is unclear to prospective applicants and decision makers.

THE THAXTED SOCIETY supports the policy.

Dunmow and District Chamber of Trade and Commerce considers that investment in highest levels of energy efficiency new homes is an extremely costly way of saving carbon but investing in improvement of existing homes is dramatically more cost effective

Sustainable Uttlesford believes that the LPA should aim for PASSIV house standard for social and rented stock. All housing stock should include SMART and green technologies especially the provision of superfast (or subsequent generations) broadband.

Developers/landowners/site promoters

- Sustainable design and construction of new development is addressed at national level including outside planning e.g. Building Regulations. Arbitrary requirement beyond this is not justified.
- Policy D8 is not in line with PPG and Ministerial Statement of July 2015 stating that improvements in technical build standards are to be delivered through Building Regulations
- No need to show how a proposal is in line with Building Regulations or provide Energy Assessments as this is dealt with through Building Regulations
- Ministerial Statement (July 2015) and PPG paras 56-001 to 56-023 show that Government's intention is to deliver the vast majority of improvements in technical building standards through Building Regulations.
- Part L of the Building Regulations deals with energy demands and carbon dioxide emissions therefore there is no need to require evidence on these matters when applying for planning permission.
- Ministerial Statement (July 2015) and PPG paras 56-001 to 56-023 show that the vast majority of improvements in technical building standards are to be achieved through Building Regulations
- Part L of Building Regulations require details on energy demands and carbon dioxide emissions and inappropriate to require evidence on these matters when applying for planning permission.
- Both BREEAM standards and Home Quality Mark have not undergone a formal public consultation and UDC should not allow the Building Research Establishment Ltd. to dominate assessment of Sustainable Design and Construction
- BREEAM provides no rural weighting in its assessment to take into account challenges of rural districts
- Use of BREEAM Standards and Home Quality Mark is an unnecessary financial burden on developers without delivering Sustainable Design and Construction
- Policy D8 should be reworded as follows to make the Plan effective for the reasons stated above:

"Proposals for new development are required to embed sustainable design and construction techniques from the outset.

Applications for development will need to demonstrate accordance with the appropriate Building Regulations and or BREEAM standards in force at the time of submission. Housebuilders are encouraged to register for assessment under the Home Quality Mark.

This should show how resource efficiencies and climate change adaptation measures will be incorporated through aspects such as the layout of the proposed development, orientation, massing, landscaping and building materials.

Waste, recycling and storage areas should be provided. Equally, systems that reduce water consumption and allow for the reuse of grey water are encouraged. The impact on flood risk from development should be minimised.

Development should maximise the opportunities for using of on-site renewable forms of energy."

Individuals

- All new builds should incorporate intrinsic photovoltaic panels in design and not extrinsic (added on by contractor as an afterthought)
- New builds should exceed BREEAM standards and current Building Regulations
- Planning consent should be refused where it is clear that only lip-service is being paid to the BREEAM recommendations
- Policy is full of weak phrases: '*Housebuilders are encouraged to register for assessment under the Home Quality Mark*'. What does 'encouragement' mean? Clearly not a requirement.
- '*Development should maximise the opportunities for using of on-site renewable forms of energy.*' Slightly better, but 'should' is far weaker than 'must'. It doesn't seem to be a planning requirement either.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The Policy will ensure positive outcomes for a range of sustainability objectives, this includes significant impacts associated with townscape, and minor positive impacts on water related criteria, and cultural heritage and climate change through climate change adaptation measures. These impacts on a plan level are maximised through Policy D9 below.

Alternatives Considered

The Policy, in requiring sustainable design and construction techniques, as well as climate change adaptation measures, maximises the potential for sustainable outcomes to be realised at the outset of the development management process. It is considered that any deviation from the Policy approach could be considered unsustainable in line with the Policy's criteria or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Paragraph 9.26

This paragraph was responded to by 2 people/organisations.

Support	0
Object	1
Comment	1

Overarching Summary

- Phrases such as “allow latitude” and “subject to viability” perceived as weak and undermining UDC’s stance on climate change
- Query on location of Planning Practice Guidance

Statutory consultees and other bodies

No comments received.

Developers/landowners/site promoters

No comments received.

Individuals

- Where is the Government’s Planning Practice Guidance?
- Phrases such as “allow latitude” and “subject to viability” undermine Council’s statement on climate change in para 9.25
- Real threat of viability on life on planet for current and next generations not being calculated
- Paragraph 9.26 shows that UDC is not serious about climate change

Sustainability Appraisal June 2017

No policies to appraise.

Officer Response

Proposed changes to plan

Energy Hierarchy

Paragraph 9.27

This paragraph was responded to by 1 person/organisation.

Support	0
Object	1
Comment	0

Overarching Summary

- The paragraph is considered a lack of massive support for energy reduction measures

Statutory consultees and other bodies

No comments received.

Developers/landowners/site promoters

No comments to receive.

Individuals

- This is a massive statement of lack of support for energy reduction measures, "*Some of these can be relatively expensive and..... viability of the project and may therefore not be enacted.*"
- This is a policy statement which says that we will put aside all requirements for a low carbon strategy, just as long as the houses get built.
- Politicians need to take the lead for the responsible sustainable way and create an environment in which developers have to operate.

Sustainability Appraisal June 2017

No policies to appraise.

Officer Response

Proposed changes to plan

Design Optimisation

Paragraph 9.29

This paragraph was responded to by 2 people/organisations.

Support	2
Object	0

Comment	0
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Overarching Summary

- Paragraph is supported.

Statutory consultees and other bodies

Saffron Walden Town Council and Thaxted Parish Council support the paragraph.

Developers/landowners/site promoters

No comments received.

Individuals

No comments received.

Sustainability Appraisal June 2017

No policies to appraise.

Officer Response

Proposed changes to plan

Fabric Improvement

Paragraph 9.30

This paragraph was responded to by 2 people/organisations.

Support	2
Object	0
Comment	0

Overarching Summary

-

Statutory consultees and other bodies

Saffron Walden Town Council and Thaxted Parish Council support the paragraph text.

Developers/landowners/site promoters

No comments received.

Individuals

No comments received.

Sustainability Appraisal June 2017

No policies to appraise.

Officer Response

Proposed changes to plan

Renewable Energy Sources

Paragraph 9.31

This paragraph was responded to by 3 people/organisations.

Support	0
Object	2
Comment	1

Overarching Summary

- Policy wording is considered not strong and assertive enough

Statutory consultees and other bodies

None

Developers/landowners/site promoters

No comments received.

Individuals

- Local Plan needs revision to strengthen phrases such as “consideration should be given to the following.....LP Section 9.31 and “.....encouraging the supply and use of appropriate renewable energy and low carbon technologies.....” The local plan must be revised to strengthen these objectives by replacing ‘encourage’ with ‘mandate’ and ‘should’ with ‘shall’.
- "Consideration" of renewable energy is not enough; please take a lead on this and insist on, at the very least, solar panels on all houses. (This can be done aesthetically if it is incorporated into the design)
- Another weak phrase: ‘*Consideration should be given to the following technologies:*
- Consider, but feel free not to implement...

Sustainability Appraisal June 2017

No policies to appraise.

Officer Response

Proposed changes to plan

Minimising Carbon Dioxide Emissions

Policy D9

This policy and supporting text was responded to by 19 people/organisations.

Support	5
Object	8
Comment	6

Overarching Summary

- No specific reference to historic environment or visual impact and setting
- Historic England invites a specific policy relating to inclusion of renewable technologies in Conservation Areas with regard to historic buildings and wider historic landscape
- Proposed 30% improvements on Building Regulations is too high
- Policy D9’s Energy Requirement places rigid expectation on all development and may make schemes unviable
- Policy sets requirement beyond scope of national technical standards for energy efficiency
- Policy D9 is not consistent with National Policy and guidance and should be deleted
- Policy D9 first sentence should be amended to read, “*Development proposals for both commercial and residential buildings should demonstrate that they have applied the Energy Hierarchy, as set out in the Local Plan and, in doing so, have achieved a*

Dwelling Emission Rate (DER) which is 30% 10% lower than the Target Emission Rate (TER) required by Building Regulations Part L 2013 Edition."

- 30% lower than TER considered a very a very weak target. A wealthy, well-resourced district like Uttlesford should be taking a far stronger lead!
- The get out clauses here: 'as far as practical,' 'where it is feasible', and worse of all, 'economic' mean: let's get it cheap now – let future generations pay.... These phrases should be removed.
- PASSIV houses should be given priority

Statutory consultees and other bodies

Historic England - Policy does not make a specific reference to historic environment or to visual impact and setting. Historic England invites a specific policy relating to the inclusion of renewable technologies within Conservation Areas and with regard to historic buildings and wider historic landscape. A sustainable approach should secure a balance between benefits that such development delivers and environmental costs it incurs. The policy should seek to limit and mitigate any such cost to the historic environment.

Reference for developing policy in this area is <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/>

Saffron Walden Town Council and **THE THAXTED SOCIETY** support the policy.

Thaxted Parish Council suggests the inclusion: 'Houses with roof solar panels and water recycling schemes will be encouraged.' Policy is supported.

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group believe that the cheapest way to install solar panels is by the developer. If solar panels considered standard then this should apply to market housing. Energy saving initiatives should be availed to market housing.

Developers/landowners/site promoters

- Policy D9's Energy Requirement places rigid expectation on all development and may make schemes unviable and this may be recognised by inclusion of clauses such as (1) applicable only where financially to do so and (2) that its imposition or element of it may not be possible with specialised housing schemes.
- Policy not in line with PPG and Ministerial Statement (July 2015) indicating that improvements in technical build standards should be through the Building Regulation regime and therefore no need for planning applications to provide Energy Assessments as these are dealt with via the Building Regulation regime.
- Policy sets requirement beyond scope of national technical standards for energy efficiency
- In 2015 the Government made it clear that such matters had to be addressed through Building Regulations rather than through planning policy (PPG ID 56-001-20150327)
- As drafted the policy conflicts with this requirement
- Policy D9 is not consistent with National Policy and guidance and should be deleted

- Ministerial Statement (July 2015) and PPG paras 56-001 – 56-023 clarify extent to which planning system has in delivery of additional technical building standards
- No need to demonstrate how Building Regulations will be met
- Energy demands and carbon dioxide emissions are required to accord with Part L of the Building Regulations
- Ministerial Statement (July 2015) and PPG paras 56-001 – 56-023 clarify extent to which planning system has in delivery of additional technical building standards
- No need to demonstrate how Building Regulations will be met
- Energy demands and carbon dioxide emissions are required to accord with Part L of the Building Regulations
- Proposed 30% improvements on Building Regulations is too high
- 10% improvement is more achievable without affecting viability too much
- Policy D9 first sentence should be amended to read, "*Development proposals for both commercial and residential buildings should demonstrate that they have applied the Energy Hierarchy, as set out in the Local Plan and, in doing so, have achieved a Dwelling Emission Rate (DER) which is 30% 10% lower than the Target Emission Rate (TER) required by Building Regulations Part L 2013 Edition.*"

Individuals

- PASSIV houses should be given priority although this may mean reduced profit for builders but it's in the interest of current and future residents in the District
- Expressions like "where practicable", "wherever feasible" are weak and obvious get-out clauses for developers
- Need to apply metrics to which conformity is required to gain consent for a new build
- "as far as practicable ", and "where feasible and economic" should not be in the text: minimising energy loss and incorporating renewable energy sources should be the guiding principles in designing and building, not add-ons which can be marginalised for 'economic' reasons...
- This does not go far enough. If the Council is serious about reducing carbon emissions, there should be binding requirement that all homes built in the proposed new garden villages are built to zero emission standards.
- Dwelling Emission Rate (DER) should be 30% lower than the Target for Emission Rate (TER) set out in Building Regs 2013.
- 30% lower than TER is a very weak target. A wealthy, well-resourced district like Uttlesford should be taking a far stronger lead!
- Other weak policies follow: '*Evidence that, as far as practicable, the development's fabric performance has been improved to minimise energy loss (Fabric Improvement).*'
- '*Evidence that renewable energy sources have been considered and incorporated into the development where it is feasible and economic to do so.*'
- The get out clauses here: 'as far as practical,' 'where it is feasible', and worse of all, 'economic' mean: let's get it cheap now – let future generations pay.... These phrases should be removed.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Ensuring that carbon emissions are minimised and that new development is as energy efficient as possible, is a key tenet of sustainability and sustainable development. The Policy will have significant positive impacts in this regard.

Alternatives Considered

It is considered that any deviation from the Policy approach could be considered unsustainable in line with the Policy's criteria or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Highly Energy Efficient Buildings

Policy D10

This policy and supporting text was responded to by 10 people/organisations.

Support	7
Object	1
Comment	2

Overarching Summary

- Extent to which planning system has in delivery of additional technical building standards is clarified in Ministerial Statement (July 2015) and PPG paras 56-001 – 56-023
- Energy demands and carbon dioxide emissions are required to accord with Part L of the Building Regulations
- Standards for energy efficient buildings considered low
- All new housing should be built with solar panels
- PASSIV housing standard should apply to all social housing delivered by the Local Plan
- All new housing stock should include SMART and green technologies especially superfast or subsequent generations broad band

Statutory consultees and other bodies

Saffron Walden Town Council and Thaxted Parish Council support the policy.

Saffron Walden Neighbourhood Steering Group and Stansted Neighbourhood Steering Group support the policy but consider that the policy should cross reference to other policies.

Developers/landowners/site promoters

- Ministerial Statement (July 2015) and PPG paras 56-001 – 56-023 clarify extent to which planning system has in delivery of additional technical building standards
- No need to demonstrate how Building Regulations will be met
- Energy demands and carbon dioxide emissions are required to accord with Part L of the Building Regulations

Individuals

- As I read it council will condescend to look favourably on truly sustainable development, but really aren't promoting, requiring or insisting on it
- Why not set the bar of really energy efficient housing in Uttlesford? Show some leadership?
- If all new housing were to be built with solar panels, it is said we could solve our energy shortage
- The LPA should aim for PASSIV house standard for the social rented housing stock delivered by the plan.
- All housing stock should include SMART and green technologies especially the provision of superfast (or subsequent generations of) broadband

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Ensuring that carbon emissions are minimised and that new development is as energy efficient as possible, is a key tenet of sustainability and sustainable development. The Policy will have significant positive impacts in this regard.

Alternatives Considered

It is considered that any deviation from the Policy approach could be considered unsustainable in line with the Policy's criteria or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

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CHAPTER 10 ENVIRONMENT

ENVIRONMENT GENERAL

This policy and supporting text was responded to by 4 people/organisations.

Support	0
Object	4
Comment	0

Overarching Summary

- Concern raised over lack of environmental assessments on site allocations
- No assessments of effects on historic environment attributable to additional traffic from developments
- Local Plan has to commit to provision of substantial green spaces in proposed Garden Communities
- Failure to implement adequate sustainable travel infrastructure whilst developing east of Saffron Walden will exacerbate already illegal pollution levels of the Saffron Walden AQMA.
- New development contributes to loss of habitats and small green spaces do not mitigate large scale development
- Population increase will mean more carbon emissions form additional traffic
- Light pollution in a 'dark area'

Statutory consultees and other bodies

WeAreResidents.org is concerned about the lack of environmental impact assessments on site allocations. There is no assessment on effects of additional traffic attributable to any developments on the historic centre of Saffron Walden, on conservation areas or any historic assets.

Developers/landowners/site promoters

No comments received.

Individuals

- New build development contributes to habitat loss and provision of small greenspaces that are over managed and overused do not mitigate large scale development.
- Local Plan has to commit to substantial green spaces in the three Garden Communities including areas that are restricted to public access.
- Failure to implement adequate sustainable travel infrastructure whilst developing east of Saffron Walden will exacerbate already illegal pollution levels of the Saffron Walden AQMA.
- The countryside will be damaged and rural integrity will be undermined.

- Increased population means increased private and support vehicles resulting in an increased risk of CO₂ emissions.
- Light pollution will impact on the unique character of the currently "dark area".
- No overriding case presented for the unnecessary and unsustainable loss of the natural environment to rare species of flora and fauna and wildlife as well as the detrimental impact on the historic environment. This is contrary to NPPF sections 11 and 12.

Sustainability Appraisal June 2017

No policies to appraise.

Officer Response

Proposed changes to plan

Introduction

Paragraph 10.1

This supporting text was responded to by 1 organisation.

Support	0
Object	0
Comment	1

Overarching Summary

- Much of the evidence remains the same as at 2015
- Specific Brief Heritage Impact Assessments (HIA) considered insufficient
- Full HIAs recommended for each of the three Garden Communities
- All potential sites need to be appraised against historic impacts
- Policy concern with renewable energy is why make specific provisions when out of date 2008 evidence identified a gap in provision and not obstructions to installation
- No need to include problematic provisions for renewable energy in policy

Statutory consultees and other bodies

Historic England (HE) notes that NPPF paragraph 169 states that Local Authorities have to have up-to-date evidence for the historic environment to assess the significance of heritage assets and contribution to the environment. In 2015 at the Issues and Options Stage, HE recommended that UDC undertake a historic environment review, as well as an audit to identify potential gaps or out-of-date information. Much of the evidence in the Evidence Base remains the same as in 2015. Specific brief Heritage Impact assessments (HIAs) 2017 are insufficient. Full HIAs should be taken for each Garden Community location. The Full HIAs should contain maps, photographs and diagrammatically show where viewpoints were taken from.

All potential sites need to be appraised against historic impacts. It is imperative to have robust evidence base for soundness of the Plan. Each HIA has to assess the suitability of each area for development and impact on historic environment. If HIAs conclude that development is acceptable for development then findings to inform Local Plan Policy including development criteria and a strategy diagram which expresses development criteria in a diagrammatic form.

Renewable Energy – The source of additional policy concern with renewable energy is unclear and it has risen to an extent that specific provisions are being made in a number of DM policies. The evidence base for renewable energy is dated 2008 and is therefore already out of date. The evidence base concludes that there is a gap in provision and does not identify any particular obstruction limiting installation and therefore no justification for including such problematic provisions within the policies.

Developers/landowners/site promoters

No comments received.

Individuals

No comments received.

Sustainability Appraisal June 2017

No policies to appraise.

Officer Response

Proposed changes to plan

Protecting the Historic Environment

Paragraph 10.2 – 10.5 and Policy EN1

This policy and supporting text was responded to by 30 people/organisations.

Support	10
Object	5
Comment	15

Overarching Summary

- Policy specifically addressing Heritage at Risk is welcome
- Strengthen policy by outlining proactive approach to addressing Heritage at Risk
- Policy should be consistent with NPPF wording and legislation and should not contradict, add to or take away from NPPF or Legislation
- The term historic environment should be used instead of heritage assets

- Historic landscape characterisation should be included in the Plan
- No policy on shopfronts in either Design or Environment Chapters
- Recommendation to reference Neighbourhood Plans where appropriate
- Policy EN1 regarded as contradictory to SP6 (Easton Park Garden Community) as EN1 principles cannot be demonstrate in proposed development
- North Uttlesford Garden Community (NUGC) does not protect or enhance the significance of heritage assets both on-site and in Great Chesterford.
- Policy regarded as ambiguous and not providing sufficient protection to historic assets
- All heritage assets should be safeguarded
- Development at West of Braintree Garden Community (WoBGC) contradicts Government policy on ancient woodlands and urges consideration of viable alternative sites
- New towns should be sited near major employment opportunities and not as in the case of UDC proposals

Statutory consultees and other bodies

Historic England (HE) advises that the term historic environment should be used instead of heritage asset. Policy provision to specifically address Heritage at Risk is welcome. However, the policy could be strengthened by outlining a positive and proactive approach to address Heritage at Risk (include assets on national and local Heritage at Risk Registers) where necessary using statutory powers to issue, undertake enforcement action, urgent works and repair notices where harm is identified, or there is immediate threat or serious risk to the preservation of a heritage asset.

It is important that the Policy is consistent with NPPF wording and legislation and does not contradict, add to or take away from NPPF or Legislation. Check each section very carefully to ensure this is the case. Nuances in wording are important and it is crucial that Local Plan Policy does not re-interpret national policy. It is suggested that relating to historic landscape characterisation should be included in the Plan. The Plan does not contain a policy on shopfronts either in the Design or Environment Chapter. A Development Management policy should be in place to successfully manage shopfront changes.

Thaxted Parish Council and Saffron Walden Town Council support the policy as it seeks to protect historic buildings and fabric.

Stansted Neighbourhood Steering Group believe that reference should be made to Neighbourhood Plan by adding “and Neighbourhood Plans” after Design Village Statements.

Thaxted Parish Council recommends an addition to text after Town and Village Statements “in addition, some who have emerging or adopted Neighbourhood Plans”.

Saffron Walden Neighbourhood Steering Group considers that the text should make reference to Neighbourhood Plans and reword last sentence to include Neighbourhood Plans.

Saffron Walden Town Council consider that the text should make reference to Neighbourhood Plans and should be amended accordingly. Should there be a cross reference to local listing within the conservation area appraisals? Note that road and air traffic also a source of pollution.

Great Dunmow Town Council believes that Policy EN1 contradicts with Policy SP6 (Easton Park Garden Community) as principles of EN1 are not being demonstrated.

Chesterford Parish Council believes that North Uttlesford Garden Community (NUGC) does not protect or enhance the significance of heritage assets both on-site and in Great Chesterford.

Thaxted Parish Council queries whether there should there be a cross reference to local listing within conservation area appraisals?

Little Chesterford Parish Council believes that the Policy as drafted is ambiguous and does not provide sufficient protection to historic assets. In order to remove the ambiguity it is recommended to add “.....will be supported only where”. The development of North Uttlesford Garden Village (NUGV) will cause irreparable damage to a highly sensitive historic environment contrary to Policy EN1, national policy and core planning principles regarding the historic environment.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over ‘buildings at risk.’

Saffron Walden Neighbourhood Steering Group and Stansted Neighbourhood Steering Group support the policy but want it noted that there is also impact from pollution and air traffic. The Word “restoration” should be replaced by “conservation”. Is there any opportunity to included mitigating harm to old buildings?

THE THAXTED SOCIETY believes that Policy EN1 should safeguard all heritage assets including those at risk. The preference for Thaxted would be a reassurance that ‘planning’ will safeguard any heritage asset on any agreed list.

Developers/landowners/site promoters

No comments received.

Individuals

- Replace 'restoration' with conservation as the former equates with bad, fakery' and the latter denotes good and authenticity.
- Add text referring to mitigation of harm to historic buildings from road traffic pollution e.g. regular cleaning of pargetting more frequently along busy roads in Saffron Walden.
- Development at West of Braintree Garden Community will not protect historic assets. This development contradicts Government policy on ancient woodlands and advises consideration of viable alternative sites.
- No comment.
- No indication that NUGV development will enhance or protect either historic features or landscape
- Where are the Conservation Area appraisals and the town and Village design Statements?
- Support
- No possibility of achieving development in NUGV which will protect and enhance the environment.
- Policy is supported but add "including air traffic" to the end of the last sentence.
- No comment
- Provision of three new Garden Communities will change a predominantly rural area "irreplaceable resource."
- West of Braintree Garden Community will dwarf and aid decline of historic towns of Braintree and Great Dunmow as well as dramatically affect surrounding ancient villages.
- Stebbing Green is the only open green between the 2 towns.
- New towns are not mandatory and should be sited near major employment opportunities and not as in the case of UDC.
- Local Plan is set to ruin the landscape and increase flooding potential; and
- Why not use land for a windfarm for renewable energy?
- The proposed NUGV development puts at risk economic opportunity that the current landscape contributes to
- Area adjacent to NUGV settlement is extremely important and should be left alone
- Due to historical and archaeological the NUGV site is highly unsuitable for development.
- Important to preserve historic environment for future generations
- Environment should be allowed to continue developing

Significant, Temporal and Secondary Effects

There will be positive impacts on landscapes and townscapes in regards to new development and the requirements for proposals. This is also the case for the policy's principle aim and historic environment objectives. The possibility for enhancement is ensured through working positively to safeguard heritage assets identified as 'at risk' by working in partnership with land owners, Essex County Council, Historic England and other heritage bodies to secure a sympathetic restoration and re-use.

Individual impacts regarding reducing carbon emissions will only be realised at the local level in conjunction with relevant development management policies; as such no impacts have been realised. Reducing carbon emissions through retrofitting or modifying heritage assets has the potential for negative impacts on either the asset in question or in regards to the need to reduce building emissions and the policy acknowledges such a threat and the need to avoid any negative precedents. The SA welcomes the approach of the council to weigh each proposal on its own merits and not commit to an overall policy stance. Despite this, a similar approach could be included within the policy regarding the incorporation of SuDS in any forthcoming schemes that may affect the historic environment, assets or their settings

Alternatives Considered

Paragraph 126 of the NPPF requires Local Plans to set out "a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats". The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

It is recommended that a similar stance within the policy that acknowledges the incompatibilities between the protection and enhancement of heritage assets and energy efficiency measures be included regarding the incompatibility between such assets and SuDS.

Officer Response

Proposed changes to plan

Design of Development within Conservation Areas

Paragraphs 10.6 – 10.8 and Policy EN2

This supporting text and policy was responded to by 20 people/organisations.

Support	12
Object	2
Comment	6

Overarching Summary

- Word 'essential' should be deleted as it implies less stringent test than that required by obligatory consideration in statutory provisions
- Character and appearance of conservation area should be considered whether it is essential or not
- Remove the word 'overall' in Bullet Point 3
- Historic England would welcome the provision of any future designation of conservation areas within Uttlesford
- Village Design Statements regarded as vital to the preservation of important characteristics and historic significance of villages
- Non-consideration of outline planning applications in conservation areas supported
- What constitutes substantial pollution?
- Policy EN2 not in conformity with NPPF guidance para 132-134 because NPPF states that if harm is deemed substantial then the proposal needs to achieve substantial benefits to outweigh that harm.
- Paras 132-134 relate specifically to designated heritage assets i.e. the more important the asset the more weight attached to it
- Policy to be amended to reflect guidance

Statutory consultees and other bodies

Historic England requires the word 'essential' to be deleted from the first sentence as it implies a less stringent test than that required by obligatory consideration in statutory provisions. The character or appearance of a conservation area should be considered irrespective of whether it is essential or not. The word 'overall' in Bullet Point 3 should be removed. The Local Plan process provides a basis for continued update and management of Conservation Management Plans identifying each conservation area's local identity and distinctiveness. The Plan will be more robust where it directs future development to take account of special and the distinctive character of conservation areas with emphasis on the cumulative result of the built form, materials, spaces, street patterns, uses and relationships to surrounding features such as surviving historic buildings and street patterns. HE would welcome the provision of any future designation of conservation areas within Uttlesford as well as specific provision for landscape setting of different parts of the area.

Great Canfield Parish Council support the continued support of Village Design Statements where approved by UDC. The Parish Council views Village Design Statements as vital to the preservation of important characteristics and historic significance of villages.

Saffron Walden Town Council notes that solar panels can be installed on a non-listed building without planning permission.

Saffron Walden Town Council, Thaxted Parish Council, Saffron Walden Neighbourhood Steering Group, and Stansted Neighbourhood Steering Group support the policy.

Saffron Walden Town Council and Thaxted Parish Council support the principle of non-consideration of outline planning applications in conservation areas.

Stansted Neighbourhood Plan Steering Group requires the deletion of 'Design' from heading. This policy should apply everywhere. There is a typographical error on third bullet point should read 'of the' and not 'oft he.'

Thaxted Parish Council requires the definition of "substantial pollution."

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over 'buildings at risk.'

Saffron Walden Neighbourhood Plan Steering Group advises the deletion of 'Design' from heading. This policy should apply everywhere.

THE THAXTED SOCIETY supports the policy.

Developers/landowners/site promoters

- Policy EN2 not in conformity with NPPF guidance para 132-134
- Paras 132-134 relate specifically to designated heritage assets i.e. the more important the asset the more weight attached to it
- Policies in the Local Plan need to make the distinction to be consistent with NPPF
- NPPF states that if harm is deemed substantial then the proposal needs to achieve substantial benefits to outweigh that harm.
- Planning balance exercise to be undertaken by decision maker and not as an embargo on development with a visual impact on an asset.
- Policy to be amended to reflect guidance

Individuals

- The policy is supported.
- Policy is essential to ensure that the development at Easton Park does not damage views from Littles Easton Conservation Area especially the church, Church Row, Rectory and the ponds of Easton Manor.
- NUGV will have a significant visual impact.
- Where are the Conservation Area Appraisals located?
- Explanation of Article 4 Directions required.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The policy would have a significant positive impact on the protection and enhancement of the district's heritage assets by preventing the loss of culturally important buildings and ensuring that the characters of historic areas do not lose their quality and reason for being designated. In protecting historic landscapes this policy also positively impacts on landscape.

The inclusion of additional information on renewable energy installation within Conservation Areas provides greater clarity for the type of equipment accepted. It is recommended that a similar stance within the policy that acknowledges the incompatibilities between the protection and enhancement of heritage assets and energy efficiency measures be included regarding the incompatibility between such assets and SuDS.

Alternatives Considered

Paragraph 126 of the NPPF requires the Local Plan to promote the conservation and enjoyment of the historic environment. In order to do this it states that local planning authorities should take into account the following:

- “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.”

The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

It is recommended that a similar stance within the policy that acknowledges the incompatibilities between the protection and enhancement of heritage assets and energy efficiency measures be included regarding the incompatibility between such assets and SuDS.

Officer Response

Proposed changes to plan

Protecting the Significance of Conservation Areas

Policy EN3

This policy and supporting text was responded to by 11 people/organisations.

Support	4
Object	3
Comment	4

Overarching Summary

- Policy supported
- Developments resulting in increased traffic and pollution within Conservation areas will not be permitted
- Policy conflicts with SP6 (Easton Park) as it does not conserve or enhance the character of the conservation area
- NUGC will be damaging to the character, appearance and significance of the Conservation Area within Great Chesterford.
- UDC not proactive in countryside preservation enforcement
- EN3 contrary to NPPF advice which requires balancing exercise between harm to asset and public benefits.

- Detrimental effect of increased air traffic at Stansted Airport on setting of conservation areas to be taken into account
- This policy considered to require more detail or an SPD

Statutory consultees and other bodies

Historic England supports the policy.

Saffron Walden Town Council recommends addition that that developments resulting in increased traffic and pollution within Conservation areas will not be permitted

Great Dunmow Town Council believes that Policy EN3 conflicts with SP6 – How does Easton Park, conserve or enhance the character of the Conservation Area as identified in the (Conservation Area) Appraisal?

Great Chesterford Parish Council believes that NUGC will be damaging to the character, appearance and significance of the Conservation Area within Great Chesterford.

Thaxted Parish Council supports the policy.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over ‘buildings at risk.’

Saffron Walden Neighbourhood Plan Steering Group notes that this policy needs more explanation or an SPD. Should development that undermines the overall beauty of an area be avoided?

Stansted Neighbourhood Plan Steering Group believes that this policy needs more explanation or an SPD. Should development that undermines the overall beauty of an area be avoided?

THE THAXTED SOCIETY

Clarification on impact is needed. The degree and acceptable impact made must be assessed but not a question of ‘whether’ as all additional development do affect conservation areas.

Developers/landowners/site promoters

- EN3 as drafted means development will only be permitted where it is not detrimental to the character, appearance or significance of a conservation area. This is contrary to the NPPF advice as balancing is required between harm to asset and public benefits.

Individuals

- Detrimental effect of increased air traffic at Stansted Airport on setting of conservation areas to be taken into account

Significant, Temporal and Secondary Effects

The Policy will have positive impacts on the historic environment adjacent to Conservation Areas to the extent that Listed Buildings would be protected from neighbouring insensitive development. There will also be positive impacts associated with townscape. It is recommended that the policy is expanded to include the protection of non-designated heritage assets that may be within or adjacent to Conservation Areas.

Alternatives Considered

Paragraph 126 of the NPPF requires the Local Plan to promote the conservation and enjoyment of the historic environment. In order to do this it states that local planning authorities should take into account the following:

- “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.”

The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

It is recommended that the policy is expanded to include the protection of non-designated heritage assets that may be within or adjacent to Conservation Areas.

Officer Response

Proposed changes to plan

Development Affecting Listed Buildings

Paragraphs 10.9-10.14 and Policy EN4

This policy and supporting text was responded to by 14 people/organisations.

Support	6
Object	5
Comment	3

Overarching Summary

- Policy appears to prioritise renewable energy provision over protection and enhancement of historic environment
- As drafted policy seeks to apply less stringent test contrary to NPPF paragraph 132
- Policy currently conflicts with NPPF in affording greater weight to the provision of renewable energy equipment
- Delete entire Policy paragraph 3 and associated bullets points
- Should locally listed buildings be referenced in conservation area appraisals?
- Proposals for works on locally listed buildings to be accompanied by structural surveys if not referenced in conservation area appraisals

- Should be case-by-case examination of applications supported by meaningful enforcement
- UDC regarded as lax and slow in enforcement in countryside as evidenced by damage to hedgerows, and at 'risk buildings'
- An embargo on development based on visual impact on an asset is contrary to NPPF guidance
- Policy should be amended to reflect NPPF guidance
- Paragraph is considered misleading to readers
- Wording to be amended to align with NPPF para 128 regarding significance and not reasons for listing
- An embargo on development based on visual impact on an asset is contrary to NPPF guidance
- More information required for a listed building application than indicated in para 10.14
- Policy criteria contradicts statutory obligations as it does not ensure preservation of a building's special interest
- Support for sympathetic treatment of applications seeking restoration to reveal significance of heritage asset

Statutory consultees and other bodies

Historic England notes that Policy appears to prioritise renewable energy provision over protection and enhancement of historic environment by seeking to apply less stringent test than otherwise acceptable under statutory provisions. NPPF paragraph 132 states that on considering impact of development on significance of a designated asset then great weight should be given to asset's conservation. The Policy currently conflicts with NPPF in affording greater weight to the provision of renewable energy equipment. Entire paragraph 3 and associated bullet points should be deleted from the policy. Historic England considers that the paragraph is misleading to readers. The wording should be amended to require applications to explain the significance of a building or structure in line with NPPF paragraph 128 rather than the reason for listing. Historic England reiterates that any works affecting the special architectural or historic interest of a listed building require consent depending on specifics of building and works proposed. Criteria outlined in Policy do not determine whether or not special interest is preserved and this contradicts with statutory obligations. Many Historic Buildings exempt from Part L of the Building Regulations where compliance would alter the character and appearance.

Stansted Neighbourhood Steering Group notes that NPPF paragraph 128 requires more information in applications for development affecting listed buildings than is proposed in paragraph 10.14. Addition requested, "...identification of significance of asset and an explanation of the impact of the proposals on significance of asset in Historic Impact assessment."

Saffron Walden Town Council, Thaxted Parish Council supports sympathetic treatment to applications respecting historic nature of building as well as querying whether there should be reference to locally listed buildings in conservation area appraisals.

Stansted Neighbourhood Steering Group considers that Policy should be extended to Local Listings. If not add, "Proposals for works to a listed building should be accompanied by a structural survey."

Saffron Walden Neighbourhood Steering Group supports policy by requests extension of policy to include Local Listing.

THE THAXTED SOCIETY supports the policy subject to careful case-by-case examination and enforcement of policy.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over 'buildings at risk.'

Developers/landowners/site promoters

- An embargo on development based on visual impact on an asset is contrary to NPPF guidance
- Decision maker should undertake a balancing exercise between visual impact and proposal's benefits
- Policy should be amended to reflect NPPF guidance

Individuals

No comments received

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There are over 3,700 listed buildings or structures within the District which have been designated as such due to their special architectural and historical interest. Measures should be adopted to conserve, and where possible enhance, these buildings which in the District vary widely both in age, character and their vernacular materials. There will be significant positive impacts associated with the preservation of Listed Buildings by not permitting development that may negatively impact on the quality and appearance of these heritage assets. The policy also safeguards listed buildings by allowing in exceptional circumstances renovation and works related to a change in use providing they preserve the historic nature of the building. The policy may also positively impact on aspirations to reduce the contributions to climate change through the inclusion of additional information on renewable energy installation for Listed Buildings which provides greater clarity for the type of equipment accepted. This has the potential to increase the amount of locally based renewable energy schemes being developed within historic settlements.

Alternatives Considered

Paragraph 126 of the NPPF requires the Local Plan to promote the conservation and enjoyment of the historic environment. In order to do this it states that local planning authorities should take into account the following:

- "the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation."

The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Scheduled Monuments and Sites of Archaeological Importance

Paragraphs 10.15 – 10.17 and Policy EN5

This policy and supporting text was responded to by 14 people/organisations.

Support	3
Object	7
Comment	4

Overarching Summary

- Policy title should be changed to Archaeology
- Seeking preservation in situ could be strengthened if supporting text elaborates how this could be achieved
- No terms of reference provided to what would constitute a need that would outweigh the importance of an asset
- Significance of a designated asset should be given greater weight to that asset's conservation (NPPF paragraph 132)
- Draft policy does not accord with NPPF paragraphs 132-135
- Application of NPPF paragraphs 131-135 test on identification of harm
- Objective of first paragraph not clear and could be interpreted to say that even if preservation in situ was possible it would not be necessary if development is considered to outweigh importance of the asset
- Second paragraph, Heritage England object on the basis that NPPF paragraph 128 requires applicants to provide a description of any heritage assets affected including contribution made by the asset
- Paragraph 4 wording, does not indicate requirement for actual excavation, investigation and recording but only a provision to be made
- No reasoned justification for inclusion of a renewable energy provision regarding scheduled monuments and sites of archaeological importance.
- Objection to prioritisation of renewable energy provision over protection and enhancement of the historic environment by seeking to apply a less stringent test.
- Heritage England requests removal of entire fourth paragraph and its associated bullet points from the policy.
- Policy as currently drafted fails to secure conservation of scheduled monuments

- West of Braintree Garden Community will significantly affect Andrewsfield
- Impact NUGV would not meet the Policy criterion of impact being reversible
- Historic Environment Assessment for Great Chesterford and Little Chesterford (July 2016) identifies topography as making major positive contribution to setting of Heritage assets
- SA Environment Report (July 2017) acknowledges that it is not known whether mitigation could be achieved

Statutory consultees and other bodies

Historic England advises changing policy title to Archaeology to reflect wider reaching scope. Seeking preservation in situ could be strengthened if supporting text elaborates how this could be achieved e.g. via design modification, layout, drainage, landscaping, siting and location of foundations. The second part of the second sentence provides no terms of reference to what would constitute a need that would outweigh the importance of an asset. According to NPPF paragraph 132 the significance of a designated asset should be given greater weight to that asset's conservation. Draft policy does not accord with NPPF paragraphs 132-135. On identification of harm then NPPF paragraphs 131-135 test should be applied. NPPF facilitates a balancing exercise based on merits of a scheme and specific public benefits it may bring. Not appropriate for local plan policy to include a lesser version of the NPPF paragraphs 131-135 test. Objective of first paragraph not clear and could be interpreted to say that even if preservation in situ was possible it would not be necessary if development is considered to outweigh importance of the asset. Second paragraph, Heritage England object on the basis that NPPF paragraph 128 requires applicants to provide a description of any heritage assets affected including contribution made by the asset. Amend wording in policy to read, "in situations where there is evidence to suggest that historic assets or their settings would be affected....." According to paragraph 4 wording, no requirement for actual excavation, investigation and recording but only a provision to be made. Amend policy to reflect requirement. Supporting text and policy should advise how this will be secured whether by imposition of a suitably worded condition or a legal agreement and this will ensure actual work is carried out as well as outlining the Council's expectations. Clear guidance is expected on archaeological recording and submission of records with appropriate public record e.g. Historic Environment Records for archaeological remains not to be retained in situ.

Heritage England objects considerably to the part of policy relating to installation of renewable energy equipment within scheduled monuments. Draft policy appears to prioritise renewable energy provision over protection and enhancement of the historic environment by seeking to apply a less stringent test. Scheduled Monument Consent (SMC) required for such works and policy conflicts with statutory obligations. Despite compliance with all the criteria list except 4th bullet point could result in SMC refusal.

Requirement for development to preserve or enhance special interest or significance is a fundamental requirement of the policy and not only those associated with installation of renewable energy equipment. Again in direct conflict with NPPF paras 131-135.

There is no reasoned justification for inclusion of a renewable energy provision regarding scheduled monuments and sites of archaeological importance. Lack of explanatory text

further impedes interpretation of the policy and application. It is requested that the entire fourth paragraph and its associated bullet points be removed from the policy.

Policy as currently drafted fails to secure conservation of scheduled monuments and if applied could potentially allow harm to valuable and finite assets.

Saffron Walden Town Council supports the policy.

Great Dunmow Town Council considers it a serious error that Saved Policy (Historic Landscapes) protects historic landscapes but replacement policies EN5 & EN6 do not set out protection of landscapes.

Stansted Neighbourhood Steering Group and Saffron Walden Neighbourhood Steering Group note that archaeological conditions should apply to all sites. Significant archaeological finds need to remain as an asset and integrated into the landscape as an attraction/monument of local interest. Suggestion to include a policy requiring integration of significant archaeological finds into the design of a development.

Thaxted Parish Council suggests reconsidering design to compliment archaeological find e.g. glass pavement coverings.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over 'buildings at risk.'

THE THAXTED SOCIETY supports the policy.

Developers/landowners/site promoters

No comments received.

Individuals

- NUGV contains a designated Scheduled Monument (SM29399) and it is a significant development constraint on NUGV site
- Likelihood of unrecorded sites and finds in NUGV development site such as Bronze Age cemeteries and historic settlements
- Historic Environment Assessment for Great Chesterford and Little Chesterford (July 2016) identifies topography as making major positive contribution to setting of Heritage assets
- Open aspect of Temple should be retained
- SA Environment Report (July 2017) acknowledges that it is not known whether mitigation could be achieved
- Impact NUGV would not meet the Policy criterion of impact being reversible
- What is planned for archaeological finds on the NUGV site?
- Proposed West of Braintree Garden Community will substantially affect Andrewsfield, a WW2 airfield currently used for pilot training and helping with weather forecast.
- Remove redundant apostrophe on word "applicants"

Significant, Temporal and Secondary Effects

There are over 3,700 listed buildings or structures within the District which have been designated as such due to their special architectural and historical interest. Measures should be adopted to conserve, and where possible enhance, these buildings which in the District vary widely both in age, character and their vernacular materials. There will be significant positive impacts associated with the preservation of Listed Buildings by not permitting development that may negatively impact on the quality and appearance of these heritage assets. The policy also safeguards listed buildings by allowing in exceptional circumstances renovation and works related to a change in use providing they preserve the historic nature of the building. The policy may also positively impact on aspirations to reduce the contributions to climate change through the inclusion of additional information on renewable energy installation for Listed Buildings which provides greater clarity for the type of equipment accepted. This has the potential to increase the amount of locally based renewable energy schemes being developed within historic settlements.

Alternatives Considered

Paragraph 126 of the NPPF requires the Local Plan to promote the conservation and enjoyment of the historic environment. In order to do this it states that local planning authorities should take into account the following:

- “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.”

The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

It is recommended that that, regarding the Policy’s renewable energy criteria, an assessment of the significance of harm is required as per other development schemes. In addition, it is recommended that the Policy as a whole include some guidance to developers as to enhancements to Scheduled Monuments that may be at risk through appropriate schemes

Officer Response

Proposed changes to plan

Historic Parks and Gardens

Paragraphs 10.18-10.19 and Policy EN6

This policy and supporting text was responded to by 17 people/organisations.

Support	6
Object	5

Overarching Summary

- Correct Register title to Register of Parks and Gardens of Special Historic Interest
- Delete third sentence as it appears to imply a distinction in considerations between Audley End and Bridge End gardens from other sites of national importance albeit not Grade 11* listed.
- Essex Garden Trust's Historic Designed Landscapes of Essex: Handbook Part 3 constitutes a local list
- Applications to be accompanied by a statement of significance and assessment of proposed development's impact on significance
- Issue is not reasons for designation but asset's significance
- Amend to read Historic England and not English Heritage
- Proposed addition to text, "...in identification of the significance of the asset and the need to explain the impact of the proposals on the significance of the asset in a Historic Impact Assessment."
- Policy should refer to settings of historic parks and gardens
- Impacts to views to be added to list in policy
- No development should be permitted
- Development integral to function of park to be permitted subject to planning conditions
- Historic Parks and Gardens are subject to the same NPPF considerations as listed buildings, conservation areas and scheduled monuments
- Historic England concerned about reference to 'material harm'
- Ancient and veteran trees to be afforded highest protection and to be lost to development in exceptional circumstances
- Policy should not place any embargo on all development causing an impact but should undertake a balancing exercise on harm and benefits

Statutory consultees and other bodies

Stansted Neighbourhood Steering Group advises that correct title is the Register of Parks and Gardens of Special Historic Interest

Stansted Neighbourhood Plan Steering Group notes that significance and any harm to that significance should be assessed as part of an application in a historic landscape. Suggestion to add following to text, "...in identification of the significance of the asset and the need to explain the impact of the proposals on the significance of the asset in a Historic Impact Assessment."

Essex Gardens Trust advises replacing paragraph with, "Applications which might affect a historic landscape, park or garden should be accompanied by a statement of significance and an assessment of how that significance would be affected by the development."

Essex Gardens Trust paragraph to be better replaced by, "Applications which might affect a historic landscape or park or garden, whether on the National Heritage List or included in the

Essex Gardens Trust Handbook for Uttlesford: should be accompanied by a statement of significance and an assessment of how the impact of the development on that significance.”

Essex Gardens Trust notes that Essex Garden Trust’s Historic Designed Landscapes of Essex: Handbook Part 3 is an inventory of sites in UDC. The Handbook identifies 7 sites with statutory protection, 14 other undesignated heritage assets and effectively constitutes a local list. Third sentence should be omitted as it appears to imply that development might be acceptable in other cases and only in exceptional cases for Audley End Park and Bridge End Gardens. **Historic England** welcomes policy on conservation of historic parks and gardens but policy should be amended to refer to their settings. As designated heritage assets Historic Parks and Gardens are subject to the same NPPF considerations as listed buildings, conservation areas and scheduled monuments. On identification of harm, NPPF test is triggered. Historic England concerned about reference to ‘material harm’ as policy should seek to conserve and where appropriate enhance the design, character, appearance and historic significance of District’s registered parks and gardens.

Saffron Walden Town Council supports policy but should be amended to read, “Development that is integral to the function of the park will be permitted provided that” and attach planning conditions.

Great Dunmow Town Council considers it a serious error that Saved Policy ENV9 (Historic Landscapes) protects historic landscapes but replacement policies EN5 & EN6 do not set out the same level of landscape protection.

Thaxted Parish Council considers that no development should be permitted and the policy should be amended to reflect this.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over ‘buildings at risk.’

Stansted Neighbourhood Plan Steering Group notes that views to, from and within a historic park or garden are a key characteristic of the typology and one of the most common adverse impacts. Impacts to views should be added to policy. Proposed suggestions; add ‘views’ to list; change ‘plantations’ to ‘vegetation’ as this could comprise herbaceous borders, parkland trees, hedgerows, copses and woodlands.

The Woodland Trust considers that any ancient or veteran trees within historic parks and gardens should be given the strongest level of protection. The Trust wants assurance that such trees should be lost to development in most wholly exceptional circumstances.

Saffron Walden Neighbourhood Plan Steering Group and THE THAXTED SOCIETY support the policy.

Developers/landowners/site promoters

- The Policy is contrary to NPPF advice as the policy places an embargo on all development causing an impact rather than balancing impacts and benefits accrued. Policy needs rewording.

Individuals

- Policy supported

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Measures should be adopted to conserve, and where possible enhance, historic parks and gardens. There will be positive impacts associated with the preservation of historic parks and gardens by not permitting development that may negatively impact on the quality and appearance of these heritage assets. Impacts are limited in so far as enhancement is not implicit within the policy.

Alternatives Considered

Paragraph 126 of the NPPF requires the Local Plan to promote the conservation and enjoyment of the historic environment. In order to do this it states that local planning authorities should take into account the following:

- “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.”

The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

It is recommended that the policy seek to enhance such assets where possible through any development proposals related to such assets.

Officer Response

Proposed changes to plan

Non-Designated Heritage Assets of Local Importance

Paragraphs 10.20-10.22 and Policy EN7

This policy and supporting text was responded to by 13 people/organisations.

Support	9
Object	2
Comment	2

Overarching Summary

- Policy considered clear and accords with NPPF guidance
- Separate policy for non-designated heritage assets is welcome

- Stronger policies and enforcement action on countryside preservation and buildings at risk required from UDC
- Query on location of Local List of Heritage Assets in Local Plan Document
- Delete sentence re- paragraph 10.22 as UDC cannot be identify new heritage assets on an ad hoc basis
- Policy supported

Statutory consultees and other bodies

Historic England welcomes a separate policy for non-designated heritage assets. The policy is considered clear and in accordance with NPPF.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over ‘buildings at risk.’

Saffron Walden Town Council, Thaxted Parish Council, Stansted Neighbourhood Plan Steering Group, Saffron Walden Neighbourhood Plan Steering Group and THE THAXTED SOCIETY support the policy.

Developers/landowners/site promoters

- NPPF paragraph 13 relates specifically to non-designated heritage assets and the policy test should be applied in these cases. A balanced judgement should be reached having regard to the scale of any harm and significance of the heritage asset. Policy EN7 to be reworded to reflect NPPF guidance.

Individuals

- Query on location of Local List of Heritage Assets as there is no such document in the Historic Environment section of the “Local Plan Evidence and Background Studies”
- Non designated heritage sites cannot simply be identified in an ad hoc basis and therefore this sentence should be deleted
- Policy supported

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There will be significant positive impacts on the historic environment as a result of the policy’s stance on non-designated heritage assets. Minor positive impacts are highlighted due to the resistance of harm to such assets with no policy aspiration to enhance such assets where possible.

Alternatives Considered

Paragraph 126 of the NPPF requires the Local Plan to promote the conservation and enjoyment of the historic environment. In order to do this it states that local planning authorities should take into account the following:

- “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.”

The Policy is in direct compliance with the NPPF and Historic England guidance on Local Plans. Any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

It is recommended that the policy seek to enhance such assets where possible through any development proposals related to such assets.

Officer Response

Proposed changes to plan

Natural Environment

Paragraphs 10.23 -10.24 and Policy EN8

This supporting text was responded to by 16 people/organisations.

Support	8
Object	3
Comment	5

Overarching Summary

- Incorrect cross-reference to NE1 instead of EN9
- An SPD and clearer forms required
- Policy and paragraph 10.24 supporting text fail to demonstrate a distinction between hierarchy of sites as required by NPPF paragraph 113 therefore policy is **unsound** as drafted as not in accordance with NPPF paragraph 113
- More detail required on how UDC intends to, “optimise conditions for wildlife and habitats to improve biodiversity and tackle habitat loss and fragmentation
- Easton Park development cannot demonstrate EN8 principles
- S106 contributions should be used to promote woodland cover, extend and create new meadows
- The proposed Flich Way Local Nature Reserve should be mentioned and supported in the Local Plan
- Visitor pressure on Hatfield Forest should be acknowledged as well as the impact of population and visitor growth from cumulative developments

Statutory consultees and other bodies

Essex County Council Environment, Sustainability and Highways notes that an omission in not including ECC Country Parks and The Friends of the Flitch Way 's proposal for Flitch Way to become a Local Nature Reserve. The Local Nature Reserve will comprise a 20m wide (ideally 100m wide) buffer zone between the Flitch Way and new development. Local Plan should recognise and support proposal.

National Trust states that pressure on Hatfield Forest should be acknowledged as well as the impact of population and visitor growth from cumulative developments.

Natural England: Policy and paragraph 10.24 supporting text fail to demonstrate a distinction between hierarchy of sites as required by NPPF paragraph 113. Natural England would like to see more detail on how UDC intends to, "optimise conditions for wildlife and habitats to improve biodiversity and tackle habitat loss and fragmentation." As drafted policy is **unsound**.

Environment Agency supports the general overarching policy.

National Trust points out incorrect cross-reference to NE1 rather than EN9.

Great Dunmow Town Council considers that the policy conflicts with SP6 because the development of Easton Park cannot demonstrate Policy EN8 principles.

Saffron Walden Town Council, Thaxted Parish Council and Thaxted Parish Council support the policy.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over 'buildings at risk.'

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group support policy but say an SPD and clearer forms are required. Also need to improve wildlife corridors.

Developers/landowners/site promoters

- Incorrect reference to NE1 instead of EN9

Individuals

- S106 agreements should be used to increase woodland cover and work with local wildlife conservation groups to enhance and extend existing as well as create woodland, meadows with emphasis on planting indigenous species and active management
- Policy supported

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There will be significant positive impacts associated with biodiversity and the natural environment as a result of this policy. For further detail as to the specifics of impacts in the wider Plan and more focused policy, please see the appraisal of Policy EN9 below.

Alternatives Considered

Please refer to the appraisal of Policy EN9 below.

Proposed Mitigation Measures / Recommendations

Please refer to the appraisal of Policy EN9 below.

Officer Response

Proposed changes to plan

Protecting the Natural Environment

Paragraph 10.25 -10.31and Policy EN9

This policy and supporting text was responded to by 27 people /organisations.

Support	6
Object	9
Comment	12

Overarching Summary

- The Local Plan should acknowledge existing problems and additional pressures on Hatfield Forest arising from housing developments
- Requirement of a policy required in Local Plan to protect Hatfield Forest
- Reference to Hatfield Forest in Chapter 3 of the Local Plan should be with regards to protection of the environment and not about promoting growth.
- Paragraph 3.31 should be amended by removing Hatfield Forest from 3rd and moving it to the 4th bullet point.
- Query on whether Local Geological Sites (LoGS) are shown as Geological Sites on Policies Map Key
- Environmental protection of Boxted Wood will be impossible with the proposed development of West of Braintree Garden Community
- Paragraph 10.29 wording would be more effective if included in Policy EN8 wording
- Paragraph 10.29 objective is not included in Policy EN9
- Sites such as Hatfield Forest and Aubrey Buxton are under threat because of failure by new development to provide enough amenity space for local need
- Policy should reference the creation of additional parks and sites as currently it is about protecting existing sites rather than creation of new space.
- Automatic refusal of planning permission due to a reduction in biodiversity and geodiversity value is not an approach in accordance with NPPF guidance
- Paragraph 3 of concern as it allows significant harm to biodiversity and geodiversity

- Requirement of a biosecurity protocol method statement is recommended

Statutory consultees and other bodies

National Trust reiterates the need for the Local Plan to acknowledge existing problems and pressures that additional housing development will place on Hatfield Forest. National Trust states that it has tried to engage with UDC to raise awareness of the deteriorating condition of Hatfield Forest. UDC through the Local Plan should recognise the threats to Hatfield Forest from housing development and provide appropriate protection through policies. Appropriately worded policy should ensure that any new development close to Hatfield Forest must assess impacts. If negative impacts on landscape or biodiversity cannot be avoided, policy should require impact to be mitigated and only where adequate mitigation is not possible should they be compensated.

National Trust objects to the mention of Hatfield Forest in relation to Vision for London Stansted Cambridge Corridor in paragraph 3.31. Any mention of Hatfield Forest should be removed from 3rd bullet point and moved to 4th bullet point which is concerned with the protection of the environment rather than promoting growth and capitalising on the Forest.

Woodland Trust considers that paragraph 10.29 wording would be more effective if included in Policy EN8 wording. Policy should include protection of ancient and veteran trees. Proposed addition to Policy EN8, “Although not protected by national legislation, development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland and ancient or veteran trees will be refused.”

Environment Agency is supportive of the thrust of the policy but raise the following issues; ‘harm’ to biodiversity can be a result of development causing introduction of invasive species and introduction of a biosecurity method statement. Recommended addition to policy as 5th bullet point under second paragraph to read, “A biosecurity protocol method statement is required for all development proposals to ensure the introduction of invasive non-native species is prevented.” Also recommended is wording to cover the provision of ecological buffer strips along river corridors and seeking opportunities for de-culverting. Recommended to insert following as the final sentence to Policy EN9, “Development proposals with river frontages should make provision for ecological buffer strips with a view to protecting and where appropriate enhancing water dependant habitats and species. Where development proposals will be carried out on land with a watercourse currently culverted, opportunity for de-culverting and restoration to an open watercourse should be sought as a means of creating blue infrastructure and enhancing the development site”.

Woodland Trust considers that Policy EN9 can reinforce the protection of ancient woodland under Policy EN8 by specifying that biodiversity offsetting should not be used to justify loss of irreplaceable habitats such as ancient woodland. Measures should include woodland creation and planting of street trees. Woodland Trust would like planning conditions, S106 and CIL contributions to be used as a means of securing street tree planting.

National Trust considers that Policy EN9 should specify on or off-site as development of a site may increase visitor pressure on nationally designated sites.

Forestry Commission concludes that there are no compensatory measures that can be applied to lost Ancient Woodland as it is irreplaceable. Policy supporting a 'nett gain' on trees is in accordance with the Natural Capital Committee proposals.

Stansted Neighbourhood Plan Steering Group considers that new development should also provide new countryside parks and sites e.g. Southern Country Park part of the St Michael's development in Bishop's Stortford. First sentence should include green infrastructure. It is proposed to add the following to 1st sentence, "or an adverse effect on the green infrastructure network."

Saffron Walden Town Council queries whether the Policy should reference the creation of additional parks and sites. Amendment of policy recommended to include new parks and sites.

Thaxted Parish Council considers that the policy should reference the creation of additional parks and sites as currently it is about protecting existing sites rather than creation of new space.

Birchanger Parish Council requires assurance that no future development of any kind will impact the small areas of ancient woodland and areas of ancient coppices and Birchanger Wood.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over 'buildings at risk.'

Saffron Walden Neighbourhood Plan Steering Group considers that sites such as Hatfield Forest and Aubrey Buxton are under threat because of failure by new development to provide enough amenity space for local need. Residents from Stansted, Takeley and Dunmow travel to Hatfield Forest and cause damage. New developments should provide new countryside parks.

THE THAXTED SOCIETY supports the policy.

Developers/landowners/site promoters

- Automatic refusal of planning permission due to a reduction in biodiversity and geodiversity value is not an approach in accordance with NPPF guidance.

Individuals

- Query on whether Local Geological Sites (LoGS) are shown as Geological Sites on Policies Map Key
- Environmental protection of Boxted Wood will be impossible with the proposed development of West of Braintree Garden Community
- Paragraph 10.29 objective is not included in Policy EN9
- Paragraph 3 of concern as it allows significant harm to biodiversity and geodiversity
- Development should not be permitted if it causes significant harm as off-setting significant harm is not considered sufficient

- Green roofs on new builds and refits encouraged as they encourage biodiversity and mitigate water run-off as well as improve thermal and acoustic insulation
- UDC to ensure undertaking of appropriate surveys regarding wildlife
- West of Braintree development will affect Roman remains in Boxted Wood
- Possibility of a munitions dump in the vicinity of Boxted Wood
- SSSIs located in Impact Risk Zones of the NUGV site
- A11 Local Wildlife site ,a Public Right of Way are within the NUGV site also Crave Hall Meadow, Burton Wood (Ancient Woodland), Hildersham Wood and Bush Park are in close proximity to the NUGV site
- Natural environment presents a significant development constraint to NUGV development
- Paragraph on significant harm undermines the principles of protection and enhancement of the natural environment
- Doubts on whether 'appropriate compensation measures 'can make up for such harm
- Last Policy paragraph should require all applications within 10km of Stansted Airport should be referred to the Airport Authority
- Protection of biodiversity and geodiversity should be immutable and if no suitable alternatives then further building should not be permitted
- Local Plan needs to identify areas of wildlife importance and enhancements adjacent to built-up areas so as to improve local environments
- Harm to biodiversity can result from development introducing invasive species
- Requirement of a biosecurity protocol method statement is recommended
- Recommendation to provide buffer strips along river corridors as well as seeking de-culverting opportunities

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The policy ensures a significant positive impact on the natural environment. Where the conservation of existing habitats and species is not possible, mitigation measures are required.

There will be positive impacts associated with social objectives where this policy seeks to contribute to green infrastructure through the provision on site or a contribution to new open spaces. This indirectly ensures positive impacts on health and wellbeing, strengthened by a policy requirement of linked green networks. This will be of key importance in light of the allocated new settlements within the Plan as well as the general quantum of growth required in the District

Alternatives Considered

Chapter 11 of the NPPF requires the planning system to contribute to and enhance the natural and local environment. Planning policy should minimise impacts on biodiversity and geodiversity by preventing harm to geological conservation interests and promoting the preservation, restoration and re-creation of priority habitats, ecological networks and priority species. The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Traditional Open Spaces and Trees

Policy EN10

This policy and supporting text was responded to by 14 people/organisations.

Support	2
Object	4
Comment	8

Overarching Summary

- Definition of traditional open space which policy seeks to protect is not provided
- Designation of open space to be based on a robust comprehensive evidence base that clearly sets out value of space and reasons for its protection
- Policy needs redrafting to refer to planning balance exercise where only when harm significantly and demonstrably outweighs the benefits will a proposal be refused
- Policy should be more flexible
- Policy to state historic role or importance in townscape open space
- Development sites required to undertake Arboriculture Surveys and Arboriculture Impact Assessments
- Policy insufficient as it should seek to increase traditional open space, trees
- Policy should include creation of new spaces
- Tree survey to accompany planning applications
- Hedgerows to be included in policy
- Policy appears to imply that need for development outweighs amenity value
- Requirement to provide definition of amenity value

Statutory consultees and other bodies

Historic England welcomes an inclusion of the policy and the requirement to maintain traditional open spaces and trees but states that the policy should refer to the fact that open spaces such as village greens and commons are often historic places and may form important aspects of the townscape.

Saffron Walden Town Council considers the Policy insufficient as it should seek to increase traditional open space, trees and include provision for creation of new spaces. Policy should include hedgerows. Trees to be given higher value and loss should not be permitted. Cost of maintenance should not be used as an excuse.

Saffron Walden Neighbourhood Plan Steering Group believes that the policy should include hedgerows and trees should be accorded a higher value. The loss of trees should not be permitted where unnecessary and more tree planting should be encouraged. UDC should provide more planted environments without using maintenance cost as an excuse.

Stansted Neighbourhood Plan Steering Group note that the policy deals with trees on a very superficial level as the policy does not even require a Tree Survey to accompany an application. They believe that the policy should require an Arboriculture Survey and Arboriculture Impact Assessment on development sites. Also suggested is the requirement for policies to;

- promote tree and woodland planting;
- Protect trees and woodland of amenity value;
- Promote good standards of tree care and woodland management;
- Promote retention of trees, woodlands, hedgerows, ponds and manmade features of landscape significance;
- Encourage adequate landscape treatment of new development including long term; management strategies and responsibilities; and
- Promote the planting of street trees – reference should be made to the Woodland Trust.

Thaxted Parish Council are of the opinion that the policy should seek to increase existing traditional open space and trees as well as making provision in the policy to encourage creation of new open spaces.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over ‘buildings at risk.’

THE THAXTED SOCIETY is concerned about the phrase ‘where the need for development outweighs their amenity value’ because it is considered too broad and pro development. They need a clarification on amenity value.

Developers/landowners/site promoters

- The policy needs to be flexible with regards to loss of mature trees in circumstances where community benefits arising outweigh impact on mature trees

Individuals

- Uttlesford should set open space provision targets as it has the lowest level of accessible open space in Essex
- Definition of traditional open space which policy seeks to protect is not provided
- Designation of open space should be predicated on a robust comprehensive evidence base that clearly sets out value of space and reasons for its protection
- Policy needs redrafting to refer to planning balance exercise where harm significantly and demonstrably outweighs the benefits will a proposal be refused
- Requirement of particular care in preserving ‘native’ or unmanaged woodlands

- Concern about permitting partial, cumulative or total loss of traditional open space where need for development outweighs amenity value
- Strengthen plan by deletion of 'seek to' and replacement with 'should provide net gains'
- Policy should state that local consultation would precede any decision on need for development outweighing amenity value
- Request to remove Protected Open Space of Environmental Value (land between Station Road and Longhedges (Saffron Walden) designation in private ownership

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There are open spaces of high environmental quality including village greens, commons and large mature gardens in many of the towns and villages in the District. It is important to protect these spaces where they are locally important for their community or environmental value. The policy seeks to retain traditional open spaces and trees which are of importance, pending the design of proposals and the extent of any loss. This will have positive impacts on biodiversity and the character of the landscape. There will also be positive implications on the local historic environment in many cases.

The Council has the power to designate Tree Preservation Orders (TPOs) in the District and as such, the policy could go further to state how these would be a starting point for developers to identify what constitutes an 'important tree specimen'. Regardless of this, as the authority responsible for designating TPOs in the District, the stance of the Council is correct in not using TPOs as the sole determinant for planning applications regarding important trees.

There will be positive impacts on health where it protects open spaces; forming part of the green infrastructure within towns and villages. Green infrastructure which includes parks, open spaces, playing fields, woodlands, allotments and private gardens also provide social benefits as a public amenity.

Alternatives Considered

Paragraph 74 of the NPPF seeks to retain existing open spaces unless they are proven to be surplus to requirements or would be replaced by an equivalent or better provision elsewhere. Paragraph 114 also requires local planning authorities to plan positively for the protection and management of green infrastructure. The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

The Council has the power to designate Tree Preservation Orders (TPOs) in the District and as such, the policy could go further to state how these would be a starting point for developers to identify what constitutes an 'important tree specimen'.

Officer Response

Proposed changes to plan

Flood Risk

Paragraphs 10.34 -10.37 and Policy EN 11

This policy and supporting text was responded to by 14 people/organisations.

Support	3
Object	5
Comment	6

Overarching Summary

- Supporting text not consistent with national policy on Guidance for Flood Risk and Coastal Change
- Recommended paragraph amendments provided
- Text to reflect that Essex County Council Environment, Sustainability and Highways is the s Lead Local Flood Authority and statutory consultee for surface water flood management
- Most up-to-date references should be used and appropriately referenced
- Flooding will continue to be a problem
- Funding mechanisms (e.g. S106 agreements) should be included
- Recommendation to further consider whether surface water flooding is a risk in the district
- No development should be permitted in Flood Zone 3
- Recommendation to amend paragraph 10.34 as follows: *“All development should be located in areas at low risk of all forms of flooding. The main risk in the District is from river or fluvial flooding. Development in certain locations can cause flood risk elsewhere as a result of increased runoff. Surface water run-off from new development should be controlled as near to the source as possible and ideally within the boundary of the development. Just over 96% of the District lies within Flood Zone 1 where there is a low probability of fluvial and tidal flooding. The scale of development required in the Local Plan period can be provided on land which is at the lowest risk of fluvial and tidal flooding and all new built development is expected to be located in this zone. When locating development and placing development within a site, all forms of flooding should be considered. The sequential test will be used to ensure new development takes place in the areas with the lowest probability of all forms of flooding and, where necessary, the exception test will be used. Full details of the sequential and exception tests are set out in the National Planning Practice Guidance” (paragraph 10.34, page 132).”*
- Recommendation to amend paragraph 10.34 as follows: *“A site-specific flood risk assessment will be required for new development sites in accordance with the Environment Agency’s Standing Advice. All major development should include a drainage strategy which should be submitted for review for the Lead Local Flood Authority which is in line with their requirements. The Council will work with developers, the Environment Agency and the Lead Local Flood Authority to achieve sustainable local flood mitigation measures as part of development. Any residual risk should be able to be safely managed with safe access and escape routes where required and access by emergency services”.*

- Supporting text quoted references are not the most up to date and reference should be made to the most up-to-date surface water risk map available namely the Environment Agency's Risk Surface Water Flooding Maps
- Policy should include funding mechanisms such as S106 Agreements towards the stated goal of managing residual flood risks resulting from developments
- Contrary to paragraph 10.35 a site-specific flood risk assessment is not directly required under the Environment Agency's Standing Advice but is a requirement of NPPF,NPPG: Flood Risk and Coastal Change

Statutory consultees and other bodies

Essex County Council Environment, Sustainability and Highways objects to the supporting text and recommends that that paragraph 10.34 should be amended as follows so as to be consistent with national policy on the Guidance for Flood Risk and Coastal Change(DCLG 2014: *"All development should be located in areas at low risk of all forms of flooding. The main risk in the District is from river or fluvial flooding. Development in certain locations can cause flood risk elsewhere as a result of increased runoff. Surface water runoff from new development should be controlled as near to the source as possible and ideally within the boundary of the development. Just over 96% of the District lies within Flood Zone 1 where there is a low probability of fluvial and tidal flooding. The scale of development required in the Local Plan period can be provided on land which is at the lowest risk of fluvial and tidal flooding and all new built development is expected to be located in this zone. When locating development and placing development within a site, all forms of flooding should be considered. The sequential test will be used to ensure new development takes place in the areas with the lowest probability of all forms of flooding and, where necessary, the exception test will be used. Full details of the sequential and exception tests are set out in the National Planning Practice Guidance" (paragraph 10.34, page 132)."*

It is also recommended that UDC further consider whether surface water flooding is a risk in the district. It is believed that the justification text only serves to highlight fluvial flooding as a risk in the district.

Essex County Council Environment, Sustainability and Highways advise that it is the Lead Local Flood Authority and requires a drainage strategy to be submitted for review for all major development. It is recommended that the supporting text be amended as follows, *"A site-specific flood risk assessment will be required for new development sites in accordance with the Environment Agency's Standing Advice. All major development should include a drainage strategy which should be submitted for review for the Lead Local Flood Authority which is in line with their requirements. The Council will work with developers, the Environment Agency and the Lead Local Flood Authority to achieve sustainable local flood mitigation measures as part of development. Any residual risk should be able to be safely managed with safe access and escape routes where required and access by emergency services"*.

Essex County Council Environment, Sustainability and Highways object to the supporting text as the quoted references are not the most up to date. It is noted that reference should be made to the most up-to-date surface water risk map available namely the Environment

Agency's Risk Surface Water Flooding Maps. It is recommended that 'fluvial' be deleted from the first sentence.

Essex County Council Environment, Sustainability and Highways advises that the paragraph should include provisions for funding mechanisms such as S106 Agreements towards the stated goal of managing residual flood risks resulting from developments.

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group believe that flooding is likely to continue being a problem. They recommend deletion of 'where possible' from the first sentence.

Thaxted Parish Council and Saffron Walden Town Council support the supporting text particularly as all development should be located in areas of low risk of flooding.

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group believe that there should be no development in Flood Zone 3 given levels of flooding in recent years. With reference to the 3rd paragraph of the Policy it is recommended to delete 3a or 3b and add 'no development in Flood Zone 3 will be permitted.' Another proposed addition is to Policy paragraph 4 is 'Development in Flood Zones 3(a) and 3(b) will only be considered where all other sites and opportunities have been exhausted and in exceptional circumstances.'

Essex County Council Environment, Sustainability and Highways object to the Policy and recommend amendment to ensure that due consideration is given to all flooding and not just focus on fluvial flooding. They recommend an amendment to read 'A sequential approach will be applied to all proposals in order to direct development to areas at the lowest probability of all forms of flood risk in order to avoid flood risk to people and property, unless the proposal has met requirements of the sequential test and the exception test. The policy should refer to the role of Essex County Council Environment, Sustainability and Highways as the Lead Local Flood Authority. A drainage strategy should be submitted for all major developments in accordance with the Essex SuDs Design Guide. Reference should also be made to the Environment Agency's Risk of Water Flooding Map. It is noted that all proposals of 1 hectare or above in Flood Zone 1 and for development in Flood Zones 2, 3a or 3b must be accompanied by a flood risk assessment that sets out the mitigation measures for the site and agreed with the relevant authority.

Environment Agency support the policy and point out that development opportunities in Flood Zone 3b, the Functional flood plain are restricted irrespective of the developer submitting a flood risk assessment and mitigation measures. They recommend inclusion of the following to the fourth paragraph 'Development in Flood Zone 3b, the functional flood plain, must accord with those categories in Table 3 Flood Risk Vulnerability Classification which are described as appropriate for this Flood Zone'

It is pointed out that contrary to paragraph 10.35 a site-specific flood risk assessment is not directly required under the Environment Agency's Standing Advice but is a requirement of NPPF.NPPG: Flood Risk and Coastal Change.

Saffron Walden Town Council recommend addition to fourth paragraph to read 'and any development in flood zones.' Also recommended to add 'Development in Flood Zones 3(a) and 3(b) will only be considered where all other sites and opportunities have been exhausted

and in exceptional circumstances.’ It is also recommended to add, ‘Green roofs will be encouraged in new builds to attenuate water run-off and thereby reduce flood risk.’

Anglian Water Services Ltd. wish to see specific reference to foul drainage and sewage treatment in Policy EN11 and the following wording is recommended ‘All new development proposals will need to demonstrate that adequate foul water treatment and disposal exists or can be provided in time to serve development.’

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over ‘buildings at risk.’

THE THAXTED SOCIETY supports the policy.

Thaxted Parish Council recommends the replacement of ‘All’ with ‘any’ in Policy text paragraph 4 at addition

Developers/landowners/site promoters

No comments received.

Individuals

- Why not proscribe any development not in Flood Zone 1 unless exceptional circumstances are demonstrated and robust and extensive flood mitigation measures are proposed for new development.
- NUGV has several areas of fluvial risk where development would need to be avoided and mitigation required to alleviate impacts on Great Chesterford and River Cam
- Sustainable Urban Drainage Systems (SuDs) likely to decrease flooding risk to Great Chesterford but the SA Environment Report (July 2017) recognised that development is likely to be constrained by mitigation measures
- UDC should also protect ground water resources
- Risk of net water loss due to boreholes used for sewerage treatment, agriculture and golf courses
- UDC needs to commission an assessment of the sustainability of water resource use by any development and insist that housing development work to minimise water extraction
- The Andrewsfield area acts as a natural absorber of rainwater and slows delivery into River Ter and concreting land will make floods in Stebbing Green and in new development more likely
- Query on location of National Planning Practice Guidance
- Query on location of the following documents : Uttlesford Strategic Flood Risk assessment (SFRA 2016); The Environment Agency’s Fluvial Risk Maps and the Essex Local Flood Risk Management Strategy

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Development should be directed to areas at low risk from flooding. The main risk in the District is from fluvial flooding to which this policy applies. It is important to ensure that new development does not increase flood risk elsewhere and that surface water runoff is controlled as near to the source as possible and ideally within the boundary of the development, although this is covered in a separate surface water flood risk policy within the Plan. There will be significant positive impacts on SA objective 5 in reducing the risk of fluvial flooding. There will also be secondary positive impacts associated with health.

Alternatives Considered

Paragraph 100 of the NPPF states that “Local Plans should be supported by 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”. Any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed at this stage.

Officer Response

Proposed changes to plan

Surface Water Flooding

Paragraphs 10.38 – 10.39 and Policy EN12

This policy and supporting text was responded to by 17 people/organisations.

Support	4
Object	6
Comment	7

Overarching Summary

- Paragraph 10.39 should be amended to refer to Essex SuDs Design Guide instead of SuDs guidance
- Exclusion of car parks and hard standings from incorporation of SuDs queried
- Run-off rates should be greenfield sites restricted to 1 in 1 greenfield rate and brownfield sites to be restricted to greenfield rate and where non-viability is demonstrated then a minimum 50% betterment on existing run-off rates should be sought
- Query basis of UDC’s information on an increase in water pollution associated with SuDs because SuDs do not increase pollution
- Last policy paragraph should refer to long-term maintenance of SuDs systems as well as bird hazard management plan

- Inadequacies in the policy such as exclusion of car parks from the requirement to incorporate SuDs.
- SuDs is likely to reduce risk of flooding to Great Chesterford but the SA Environment Report (July 2017) recognises development likely to be constrained by mitigation measures

Statutory consultees and other bodies

Essex County Council Environment, Sustainability and Highways recommend amending paragraph 39 to read ‘Applicants should take account of Essex SuDs Design Guide produced by Essex County Council in accordance with the Flood and Water Management Act 2010 or other relevant guidance.’

Essex County Council Environment, Sustainability and Highways query the exclusion of carparks and hard standings from incorporation of SuDs. Emerging national policy should aim to ensure that SuDs are expected for carparks and hard standings. It is recommended that the Local Plan should ensure that even if development is minor it should be considered for SuDs provision. Also recommended is that greenfield sites should be restricted to 1 in 1 greenfield rate and brownfield sites to be restricted to greenfield rate and where non-viability is demonstrated then a minimum 50% betterment on existing run-off rates should be sought. Essex County Council Environment, Sustainability and Highways queries UDC’s information on an increase in water pollution associated with SuDs because SuDs do not increase pollution. Reference should be made to Environment Agency’s climate change allowances and the appropriate allowance should be included within approved drainage schemes.

Woodland Trust supports the use of SuDs but notes that the policy does not specify the role played by trees in helping to prevent, alleviate surface water flooding especially in urban areas. Trees are a useful component of SuDs. The Woodland Trust policy paper illustrates benefits of trees for urban flooding “Trees in Our Towns – the role of trees and woods in managing urban water quality and quantity.”

Stansted Neighbourhood Plan Steering Group notes that a drainage engineer unlikely to include green roof calculations in a SuDs scheme. It is suggested to amend the last sentence of paragraph 10.38 to read ‘For smaller developments a green roof or rainwater harvesting should be considered.’ Both features would contribute to a sustainable solution and the green roof would provide benefits for biodiversity. Stansted Neighbourhood Plan Steering Group queries whether this is an opportunity to insist on permeable streets. Recommended to add a requirement on how and who will maintain SuDs. Plenty of green space should be included within developments to offset localised flooding through surface water. Use of green roofs should be encouraged. The policy should be amended to include car parks and make provision for other surface materials.

Saffron Walden Neighbourhood Plan Steering Group suggests that new developments could be required to hold water in reservoirs and incorporate a drinking water site. It is suggested to delete ‘excluding extensions, car parks and hard standings.’ Green roofs should be encouraged in new buildings.

Saffron Walden Town Council and **Thaxted Parish Council** query whether it is possible to indicate preference on surface area material such as a type of wet/pour or porous material other than tarmac.

Elsenham Parish Council notes that there are inadequacies in the policy such as exclusion of car parks from the requirement to incorporate SuDs. Run-off into open water courses should be prohibited where water course leads into a drainage system. The last Policy sentence should be amended to include a requirement that development within 10km of Stansted Airport must be referred to the Airport Authority.

Manchester Airport Group (MAG) recommends that the last policy paragraph should refer to long-term maintenance of SuDs systems as well as bird hazard management plan.

Anglian Water services Ltd. supports the requirement to use SuDs and an alternative method of surface water disposal only where it is demonstrated that there are no reasonable alternatives. This is consistent with surface water hierarchy and would help ensure that new development does not increase the risk of surface water and sewer flooding.

The Thaxted Society regards SuDs and ancillary systems and treatments as a clear example of successful application of sustainability principles.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over 'buildings at risk.'

Developers/landowners/site promoters

No comments received.

Individuals

- Query on location of SuDs Guidance produced by Essex County Council and the Flood water Management Act 2010 or other relevant guidance?
- Query on location of 'relevant guidance' referred to in policy paragraph 3
- NUGV has several areas of fluvial risk where development would need to be avoided and mitigation measures required to alleviate impacts on Great Chesterford and River Cam. SuDs is likely to reduce risk of flooding to Great Chesterford but the SA Environment Report (July 2017) recognises development likely to be constrained by mitigation measures.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

The policy has a significant positive impact on minimising the risk of flooding by stipulating that all new development incorporate Sustainable Drainage Systems (SuDS), and by highlighting the Environment Agency's requirements for those new developments near main rivers, ordinary water courses and culverts. The significant impacts are further strengthened by the inclusion of text which encourages retrofitting of SuDS to existing development. The requirement for SuDS would also improve water quality which, along with the aim of river restoration, would positively impact on the natural environment through habitat creation in

certain schemes and providing more natural water systems. Improvements to water quality by SuDS positively support a reduction in pollution along with the option for incorporating alternative solutions to the application of SuDS where there is a significant risk of pollution to waters bodies. There will however be some uncertainty regarding the incorporation of SuDS in schemes within and adjacent to Conservation Areas, or could otherwise have an effect on the historic environment.

Alternatives Considered

Paragraph 103 of the NPPF requires local planning authorities to ensure that proposed development is appropriately flood resilient and resistant and that it gives priority to the use of sustainable drainage systems. Any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

It is recommended that the policy be expanded to include the Council's stance of ensuring that SuDS are implemented alongside Plan objectives to enhance and protect the historic environment, assets and their settings.

Officer Response

Proposed changes to plan

Protection of Water Resources

Paragraphs 10.40 – 10.45 and Policy EN13

This policy and supporting text was responded to by 16 people/organisations.

Support	7
Object	4
Comment	5

Overarching Summary

- Recommended to reconsider some of the policy provisions set out in Policy EN13
- Addition of '.....the amenities of existing local residents' to fourth paragraph
- Essex SuDs Design Guide and successor documents to inform emerging policy
- policy as the comprehensive coverage and wording of policy complements Environment Agency's internal water resources policy
- Support for water efficiency target of 110/litres /person/day within the policy
- Building Regulations 2010 require consumption of occupiers of new homes not to exceed 125/litres /person/day and this should be addressed through the Building Regulations
- Additional requirements need to be fully evidenced
- Unclear whether costs of the requirement for this infrastructure and impact on development viability have been assessed

- What plans have been made to ensure enough water for the new developments since East Anglia has the lowest amount of rainfall in the UK?
- NUGV located within groundwater protection zone and a risk based approach required to demonstrate that NUGV is protective of groundwater from potential contaminating activities
- Have the responsible water companies factored additional investment into their Asset Management Planning (AMP) process?

Statutory consultees and other bodies

Stansted Neighbourhood Plan Steering Group supports the policy but an addition is recommended to fourth paragraph point 2 to read ‘.....the amenities of existing local residents.’

Saffron Walden Town Council and Thaxted Parish Council recommend an amendment to policy to read ‘Development which incorporates water recycling (i.e. from rain water used for toilet facilities) will be considered favourably’.

Saffron Walden Neighbourhood Plan Steering Group and The Thaxted Society support the policy.

Essex County Council Environment, Sustainability and Highways recommends to reconsider some of the policy provisions set out in Policy EN13 as well as consider the Essex SuDs Design Guide and successor documents to assist in developing the emerging policy. Essex County Council Environment, Sustainability and Highways as that Lead Local Flood Authority seek further discussions with UDC on Protection of Water Resources. Discharge to ground is considered preferential over discharging water off-site.

Environment Agency is generally supportive of the policy as the comprehensive coverage and wording of policy complements Environment Agency’s internal water resources policy.

Harlow District Council confirms that the water efficiency target of 110/litres /person/day within the policy is supported.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over ‘buildings at risk.’

Developers/landowners/site promoters

- Changes to Building Regulations 2010 require consumption of occupiers of new homes not to exceed 125/litres /person/day and this should be addressed through the Building Regulations
- Any additional requirements need to be fully evidenced and the Local Planning Authority should consider the impact of using standards as part of the Local Plan Viability Assessment
- Unclear whether costs of the requirement for this infrastructure and impact on development viability have been assessed

- According to NPPF paragraph 162, Local Planning Authorities have to work with providers to assess the quality and capacity and take account of the need for strategic infrastructure within their areas

Individuals

- Paragraph 10.41 spelling mistake on third line, should read 'customers' not 'costumers'
- What plans have been made to ensure enough water for the new developments since East Anglia has the lowest amount of rainfall in the UK?
- NUGV is located within the total and outer groundwater source protection zones for a potable source
- Evidence base does not include a strategy by water providers for provision of a sustainable supply to meet OAHN
- Drainage and infiltration systems to be appropriately designed so that aquifer recharge is not prohibited by development over large swathes of Greenfield catchment
- NUGV located within groundwater protection zone and Environment Agency will need a risk based approach demonstrating that NUGV is protective of groundwater from potential contaminating activities
- Possibility of the Environmental Agency restricting development in terms of density or location and siting of some activities (e.g. waste water management) if not mitigated
- Is there enough water in the system to provide for new homes?
- Have infrastructure implications of additional capacity been considered as part of the plan?
- Location of new water storage, pipes and recycling plants
- How much will the infrastructure cost?
- Have the responsible water companies factored additional investment into their Asset Management Planning (AMP) process?
- Will additional capacity be built to come on stream as houses are built?
- Has impact of adding extra treated water to existing water courses been established?
- What are the ecological and flood risk impacts?

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There are a number of groundwater protection zones in Uttlesford and a major aquifer lies under the majority of the northern half of the district. It is important that these sources are protected because they provide drinking water and also maintain the flow in main rivers. Development needs to minimise its impact on the environment by adopting environmental best practice and necessary measures to limit pollution to acceptable limits. This policy directly seeks to protect the quality of water resources within the district which, along with new measures detailing when the use of deep soakaways will be permitted, would have positive impacts on pollution control and the water environment. In preventing contamination of groundwater sources which supply a significant amount of local drinking water this policy also positively impacts on health. Furthermore, there will be significant positive impacts on resource use and infrastructure provision where the policy ensures that new development will only be permitted if it is fully supported by water infrastructure and also seeks to minimise the consumption of water.

Alternatives Considered

Paragraphs 109 of the NPPF states that the planning system should contribute to, and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from water pollution. Any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Minerals Safeguarding

Paragraph 10.46 and Policy EN14

This policy and supporting text was responded to by 8 people/organisations.

Support	6
Object	2
Comment	0

Overarching Summary

- Policy considered as duplication of policy adopted Essex Minerals Local Plan 2014 and needs modification to clarify relationship
- Amendment sought in second paragraph specifying Consultation with Essex County Council as the Minerals Planning Authority
- Policy considered too onerous and not in accordance with NPPF paragraph 143
- Blanket policy seeking refusal of permission where minerals will be sterilised is contrary to guidance as Local Planning Authorities should encourage prior extraction of minerals where practicable and feasible

Statutory consultees and other bodies

Essex County Council Environment, Sustainability and Highways welcomes the policy and likely to result in more effective avoidance of mineral sterilisation. The policy is considered as duplicating that set out in the adopted Essex Minerals Local Plan 2014 and this needs to be modified to clarify the relationship. An amendment is sought after the second paragraph by addition of 'Consultation with the Essex County Council as the Minerals Planning Authority must be undertaken on development exceeding these thresholds in accordance with the adopted Minerals Local Plan.'

Stansted Neighbourhood Plan Steering Group, Saffron Walden Neighbourhood Plan Steering Group and Thaxted Society support the policy.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over 'buildings at risk.'

Developers/landowners/site promoters

- Policy considered too onerous and not in accordance with NPPF paragraph 143 which state that Local Planning Authorities should set out policies to encourage prior extraction of minerals where practicable and feasible
- Blanket policy seeking to refuse development where minerals will be sterilised is therefore contrary to guidance

Individuals

No comments received.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Known locations of mineral resources of national and local importance need to be protected and safeguarded to ensure long-term security of minerals supply, and to ensure their presence is factored into decisions about future land-use when proposals for other development arise. Essex County Council, the Minerals Planning Authority for Essex, includes within their emerging Replacement Minerals Local Plan Policy S8 – 'Safeguarding mineral resources and mineral reserves' the requirement that "Essex district/ borough/ city councils should identify any safeguarded sites on their own Policies Map for their relevant administrative area". In addition to mapping County MSAs and MCAs as required, the Council have included such policy within the Local Plan to provide a context for the inclusion of MSAs and MCAs in the Proposals Map and to make applicants aware of the protocol for dealing with applications that affect these areas. The policy will have a positive impact on the efficient use of resources as the policy seeks to ensure that potential mineral resources within the district are not diminished by proposed development. The policy also refers specifically to assessing safeguarded areas for mineral resources of economic importance when non minerals proposals are submitted. Where minerals safeguarding occurs this is intrinsically linked to future growth in the County and will have positive economic impacts, however not within the remit of the Plan and employment development. There will also be some theoretical incompatibility with objectives to meet housing needs in the District. As such, uncertain impacts have been highlighted.

Alternatives Considered

Paragraph 143 of the NPPF requires local planning authorities to define Minerals Safeguarding Areas (MSA) and Minerals Consultation Areas (MCA) in Local Plans and set out policies that encourage the extraction of minerals where practical and environmentally friendly before necessary non-mineral development takes places. The NPPF goes on to say in paragraph 144 that local planning authorities should not normally permit non-mineral development proposals in mineral safeguarding areas where they might constrain potential

future use for these purposes. Any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Environmental Protection

Paragraph 10.47

This policy and supporting text was responded to by 2 people/organisations.

Support	0
Object	0
Comment	2

Overarching Summary

- No provision of credible strategy for tackling air pollution and traffic congestion in Saffron Walden
- UDC not taking into account cumulative effects of new development
- Saffron Walden cannot sustain the level of development without serious infrastructure improvements

Statutory consultees and other bodies

No comments received.

Developers/landowners/site promoters

No comments received.

Individuals

- No provision of credible strategy for tackling air pollution and traffic congestion in Saffron Walden
- UDC not taking into account cumulative effects of new development
- Severe lack of pedestrian crossings especially north of the town
- Saffron Walden cannot sustain the level of development without serious infrastructure improvements
- Redundant apostrophe on word authorities

Sustainability Appraisal June 2017

No policies to appraise.

Officer Response

Proposed changes to plan

Pollutants

Paragraphs 10.48 – 10.51 and Policy EN15

This policy and supporting text was responded to by 8 people/organisations.

Support	5
Object	1
Comment	2

Overarching Summary

- Recommendation to reconsider some of the policy provisions as well as Essex SuDs Design Guide and successor documents
- Attention to be paid to schools and hospitals in proximity airport due to additional air and road traffic generated by Stansted Airport
- Compensation to listed buildings of significant heritage importance to facilitate repairs caused by increased pollution and air traffic vibration
- Noise assessments should be undertaken on a 24-hr basis so as to assess cumulative impacts on directly affected towns and villages
- Suggestion to add 'Any pollutants used or stored on site during construction of the development must be removed following completion of the development. Any such storage area must subsequently be verified as fit for public use and be accompanied by a test and inspection report to that effect.'
- Mitigation maybe required for individual properties e.g. occupants of Church St., Museum St. and George St. receiving grant payments for cleaning or maintenance

Statutory consultees and other bodies

Essex County Council Environment, Sustainability and Highways recommends UDC to reconsider some EN15 policy provisions as well as consider the Essex SuDs Design Guide and successor documents that may assist in developing the emerging policy. Further discussion sought to clarify policy wording and ensure robustness and effectiveness.

Thaxted Parish Council notes that special attention should be paid to schools and hospitals close to the airport due to additional air and road traffic generated by Stansted Airport. Listed

buildings of significant heritage importance should be granted compensation to facilitate repairs from increased pollution and air traffic vibration. Noise assessments should be undertaken on a 24-hr basis so as to assess cumulative impacts in built up areas where towns and villages are directly affected.

Saffron Walden Town Council suggests addition of 'Any pollutants used or stored on site during construction of the development must be removed following completion of the development. Any such storage area must subsequently be verified as fit for public use and be accompanied by a test and inspection report to that effect.'

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over 'buildings at risk.'

Stansted Neighbourhood Plan Steering Group supports and considers that the policy is important in helping to protect ancient buildings. Clarification is required on whether 'occupants' refers to existing or future residents in the proposed development.

Saffron Walden Neighbourhood Plan Steering Group supports the policy but believes that mitigation maybe required for individual properties e.g. occupants of Church St., Museum St. and George St. receiving grant payments for cleaning or maintenance.

Thaxted Society supports the policy.

Developers/landowners/site promoters

No comments received.

Individuals

No comments received.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

This policy seeks to control pollution and minimise instances where pollution negatively impacts on sensitive receptors. The policy stipulates that the impact on the natural and historic environment will be protected from development proposals that cause material disturbance or nuisance to them. This promotes a secondary positive impact for biodiversity and elements of the historic environment. Where development need is greater the policy requires mitigation measures to minimise the level of disturbance and nuisance caused by new development. This would improve the health and wellbeing of those affected by the development and promotes positive solutions.

Alternatives Considered

The Policy is borne from national requirements. Paragraph 109 of the NPPF requires planning to 'contribute to and enhance the natural and local environment by [...] preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability'. As such, it is considered that any deviation from the Policy approach

could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA. Specific pollution issues are included within thematic policies elsewhere within the Plan as appropriate.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Air Quality

Paragraphs 10.52-10.53 and Policy EN16

This policy and supporting text was responded to by 22 people/organisations.

Support	3
Object	6
Comment	13

Overarching Summary

- How can it be pollution attributed to new development be measured and mitigated?
- Objection to policy as it does not include provision for measurement or mitigation as well as not mentioning the impact of new development
- Objective of plan should be minimisation of traffic movements and development of non-fossil fuel transport
- M11 and A120 should both have 100-metre width zones
- Urgent need to tackle poor air quality in Saffron Walden town centre
- Construction of a partial or full relief road would remove HGVs and other traffic from the town centre
- Query on how, when and by whom will air quality be assessed and also will monitoring be ongoing?
- Need to recognise importance and role in removal of certain pollutants when planted in the right locations
- Query of existence of past emission reports
- UDC Air Quality Action Plan does not contain any measurable mitigation actions nor does it set a target date for lifting the Air Quality Management Area
- No account being taken of cumulative effect on air quality despite explicit instructions from DEFRA
- “Phrases such as ‘reasonable and proportionate’ render policy utterly ineffective”
- All allocated sites except two will generate traffic through town thereby exacerbating the problem

Statutory consultees and other bodies

Saffron Walden Town Council notes ‘..... there is a risk that levels do not meet.....’ – is this not fact rather than speculation? Query on measuring and mitigating and proving that development has contributed to worsening pollution. Objection to policy as drafted and should be amended to include provision for measurement or mitigation as well as making reference to the impact of new development.

Thaxted Parish Council recommends amendment of policy to include provision for measuring or mitigation and also make a reference to impact of new development.

Littlebury Parish Council believes that minimising traffic movements and developing non-fossil fuel transport should be explicit objectives within the plan accompanied by detailed proposals of how this can be achieved. High quality planting on the NUGV site to ensure that buildings merge into the landscape is recommended. The plan should include an objective to maximise use of the local countryside for exercise and recreation alongside food production, nature conservation and the retention of traditional vernacular buildings and rural features.

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group note that the M11 and A120 have similar traffic speeds but different zone widths and this should be 100-metre zones for both roads.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over ‘buildings at risk.’

Sustainable Uttlesford urges that there is an urgent need to tackle poor air quality in Saffron Walden Town centre. Also suggested is the necessity of the construction of a partial or full relief road to remove HGVs and other traffic from the town centre. The suggested road links are between Little Walden Road and Windmill Hill and Radwinter/Thaxted Roads to Newport Road may be facilitated by additional housing in future local plans.

Stansted Neighbourhood Plan Steering Group query how, when and by whom will air quality be assessed? Will monitoring be ongoing? Congestion hotspots cited in village at Grove Hill/ Lower Street /Chapel Hill and Chapel Hill/Cambridge Road . Air quality in Stansted Mountfitchet needs assessment and if necessary an AQMA established.

Woodland Trust object to policy due to its failure to recognise the important role of trees which when planted at right locations can contribute to removal of certain pollutants from the air.

The Thaxted Society supports the policy.

Developers/landowners/site promoters

No comments received.

Individuals

- Concern about emission pollution in Saffron Walden and effect on residents' health
- Additional 85 homes on Little Walden Road and Plan for NUGV
- Query on whether there are any plans to ease traffic flow through Saffron Walden
- Query on past emission reports if any
- Air quality improvement depends on a measurable plan of action that includes rewards for good activity and penalty for detrimental activity
- UDC Air Quality Action Plan does not contain any measurable mitigation actions nor does it set a target date for lifting the Air Quality Management Area
- Continued approval of development without taking into account cumulative effect on air quality despite explicit instructions from DEFRA
- Proposed NUGV's 5,000 homes located adjacent to A11, north of junction with M11
- 2017 Air Quality Annual Status indicates that no air quality monitoring has taken place on the site
- No evidence of air quality assessment in relation to NUGV which is located adjacent to A11 and Crematorium
- Air quality impact assessments required to demonstrate a constraint along the western boundary and around the Crematorium
- Phrases such as 'reasonable and proportionate' render policy utterly ineffective
- Need for a requirement to submit evidence both positive and negative or neutral on the cumulative impact of any development
- Policy considered overall fair but lack of definition of 'reasonable and proportionate' provided developers with reason to argue that small increases in pollution levels are acceptable
- Despite UDC's acknowledgement of air quality problem all allocated sites except two will generate traffic through town thereby exacerbating the problem

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There is one Air Quality Management Area (AQMA) designated within the District. It covers a large area within Saffron Walden and has been designated in response to high levels of nitrogen dioxide at particular road junctions. Air quality issues can be seen as possible alongside the M11 and in line with the level of growth in the broad area also the A120. The policy seeks to address air quality issues by proposing that new developments which are likely to impact designated air quality management areas (AQMAs) assist in reducing the level of air pollution. Where cumulative impacts of developments in a local area are to be considered and mitigated against, there would be a significant positive impact on reduction in pollution and also health. A zone of 100 metres on either side of the central reservation of the M11 and a zone 35 metres either side of the centre of the A120 have been identified as particular areas to which this policy applies and this is deemed appropriate in line with the strategic road network as a focus of sustainable growth in the District.

Alternatives Considered

The Policy is borne from national requirements. Paragraph 124 of the NPPF states that 'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local

areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan'. As such, it is considered that any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Contaminated Land

Paragraph 10.54 and Policy EN17

This policy and supporting text was responded to by 6 people/organisations.

Support	5
Object	1
Comment	0

Overarching Summary

- Stronger policies and enforcement required from UDC

Statutory consultees and other bodies

Saffron Walden Town Council, Thaxted Parish Council, Saffron Walden Neighbourhood Plan Steering Group, Stansted Neighbourhood Plan Steering Group and The Thaxted Society all support the policy.

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over 'buildings at risk.'

Developers/landowners/site promoters

No comments received.

Individuals

No comments received.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Proposals on contaminated land need to take proper account of the contamination and remediation works should adopt mitigation measures to protect the environment. In addition, the NPPF directs planning policy to support the re-use of brownfield land. The policy will have a positive impact on the sustainable use of land. In seeking to prevent pollution of water bodies the policy would also assist the conservation and improvement of the water environment. The remediation of contaminated land would also have a positive impact on protecting species and potentially improve habitats, whilst also having positive impacts on health and reducing pollution.

Alternatives Considered

The Policy is borne from national requirements. Paragraph 109 of the NPPF states that ‘the planning system should contribute to and enhance the natural and local environment by [...] remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate’. As such, it is considered that any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Noise

Paragraphs 10.55 – 10.57 and Policy EN18

This policy and supporting text was responded to by 12 people/organisations.

Support	4
Object	5
Comment	3

Overarching Summary

- Policy EN18 in conflict with SP6 due Easton Park being affected by noise pollution from nearby Stansted Airport
- Proposed Stansted Airport expansion to 44.5mppa will worsen the pollution
- Recommended addition to policy “All activity should comply with BS5228:2009 Code of Practice for noise and vibration control on construction and open sites.”
- EN18 not in accordance with NPPF paragraph 109 which refers to unacceptable adverse noise and not adverse levels of noise as stated in UDC policy
- West Of Braintree Garden Community will be subjected to maximum noise and air pollution due being located under the eastbound flight path of aircraft departing Stansted Airport

Statutory consultees and other bodies

Dunmow Town Council believes that Policy EN18 is in conflict with Policy SP6 because of Easton Park will be affected by noise and pollution due its proximity to Stansted Airport. The proposed airport expansion to 44.5mmpa would exacerbate the pollution.

Stansted Neighbourhood Plan Steering Group and Saffron Walden Neighbourhood Plan Steering Group both note that Stansted residents are considerably affected by noise from helicopters and testing of aircraft engines during maintenance. Possible mitigation could be by ensuring that developments are completed in no more than 5 years.

Thaxted Parish Council recommends addition policy text to read 'All activity should comply with BS5228:2009 Code of Practice for noise and vibration control on construction and open sites.'

Wendens Ambo Parish Council is looking for stronger policies and action by UDC. UDC has not been very active in preservation of the countryside e.g. in preservation of hedgerows, little action on overcutting, and 42 protected hedges have been damaged by cutting at the wrong time. Also UDC has been slow to act over 'buildings at risk.'

The Thaxted Society supports the policy.

Developers/landowners/site promoters

- Policy EN18 does not reflect NPPF paragraph 109 because the policy refers to adverse levels of noise whilst NPPF Paragraph 109 refers to unacceptable adverse noise

Individuals

- West of Braintree development will be located in an area of maximum noise and air pollution since it is under the eastbound flight path of aircraft departing Stansted Airport
- Query on location of the London Airport Noise Strategy and Action Plan 2013-2018 (Building on a Sound Foundation)
- Policy fails to mention how the London Stansted Noise Strategy and Action Plan may be breached by the proposed airport expansion and impact on the Garden Community located adjacent to the airport
- Query on location of UDC's Noise Impact Technical Guidance and UDC's Noise Assessment Technical Guidance

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There will be no positive impacts resulting from this policy on the relevant SA objectives relating to reducing pollution and improving health through reducing the likelihood of noise to be experienced by new sensitive receptors. It is recognised that locating noise sensitive development away from sources of noise and mitigate impacts where appropriate would be beneficial. New development should not expect to experience noise disturbance, and new residents would not experience the associated negative health impacts this can cause.

Alternatives Considered

There can be considered no reasonable alternatives to the preferred policy approach in line with Paragraph 109 of the NPPF. This states that ‘the planning system should contribute to and enhance the natural and local environment by [...] preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution’. Any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Light Pollution

Paragraph 10.58 -10.59 and Policy EN19

This policy and supporting text was responded to by 13 people/organisations.

Support	4
Object	5
Comment	4

Overarching Summary

- Requirement to specify criteria on design
- Street lamp design an important element of street furniture
- Concern over urbanisation effect of light pollution on villages
- Policy is in conflict with SP6 due to proximity of Easton Park to High Wood SSSI
- Bosted Wood “one of the darkest areas in the district” will be destroyed by the local plan
- NUGV proposal does not address adverse impact on the landscape and surrounding communities of light pollution from a highly visible development

Statutory consultees and other bodies

The Thaxted Society supports the plan subject to clarification on criteria and design. Street furniture in Thaxted such as street lamps has an impact on both the conservation area and community cohesion. The Society’s policy is resistance to creeping urbanisation and street lamp design is as important as function.

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group recommend additional wording to the policy effect that lights should be a heritage design in Conservation areas.

Takeley Parish Council raises concern over light pollution causing urbanisation of villages. UDC should ensure that lights operate or match operating hours of commercial premises.

Great Dunmow Town Council considers that the Policy is in conflict with SP6 due to Easton Park being adjacent to High Wood SSSI.

Thaxted Parish Council and **Saffron Walden Town Council** support the policy.

Developers/landowners/site promoters

No comments received.

Individuals

- Light pollution from the proposed development at Easton Park would be difficult to mitigate unless substantial and immediate mature planting is designed into the plan
- Boxted Wood, one of the darkest areas in the District, will be destroyed by the Local Plan
- NUGV proposal does not address adverse impact on the landscape and surrounding communities of light pollution from a highly visible development.
- NUGV is located in a prominent landscape position and has high sensitivity to change/development and the Uttlesford Landscape Character Assessment recommended that new development should be small scale on valley sides and should respond to the historic settlement pattern, form and building materials
- NUGV site will be unable to follow historic settlement pattern due to topography and strong possibility of coalescence with Great Chesterford. Difficulty in seeing how adverse visual impact can be avoided. Any mitigation measures would constrain development.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

There will be no positive impacts resulting from this policy on the relevant SA objectives relating to reducing pollution and improving health through reducing the likelihood of light pollution to be experienced by existing sensitive receptors. Particularly there will be significant positive impacts on reducing the impact of light pollution, however minor positive impacts can be expected through protection based criteria that recognise the impacts that can be forthcoming on environmental factors and heritage assets.

Alternatives Considered

There can be considered no reasonable alternatives to the preferred policy approach in line with Paragraph 125 of the NPPF. This states that 'by encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.. Any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

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CHAPTER 11 COUNTRYSIDE

Introduction

Paragraph 11.2

This policy and supporting text was responded to by 1 person / organisation.

Support	-
Object	-
Comment	1

Overarching Summary

- Development depleting the countryside as well as destroying the natural habits and demolition of historic buildings.

Statutory consultees and other bodies

No comments received.

Developers/landowners/site promoters

No comments received.

Individuals

- Development in the form of mass minute homes is eating up the countryside and destroying natural habitats as well as the demolition of historic rural buildings

Sustainability Appraisal June 2017

No policies to appraise.

Officer Response

Proposed changes to plan

Protection of Landscape Character

Policy CI

This policy and supporting text was responded to by 22 people/organisations.

Support	8
Object	8
Comment	6

Overarching Summary

- Policy considered as not seeking landscape enhancement
- Recommendation to change wording from “material harm”
- NUGC regarded as in conflict With Policy C1 principles regarding settlement pattern, scale, density and cross views
- Careful lighting installations in public and private developments to reduce visual impact in rural areas
- Policy supported for protection of panoramic views
- Thaxted’s historic character believed to be under threat from increasing levels of development especially, inappropriate design and lack of enforcement
- Policy considered not contrary to NPPF principles (paragraph 14)
- Policy considered overly restrictive and fails to recognise positive improvements and mitigations that development can provide

Statutory consultees and other bodies

Historic England considers that the Policy does not seek landscape enhancement and refers to ‘material harm’ and changing this wording is recommended. The objective of protecting and enhancing landscape is recognition of its links to the cultural heritage.

Saffron Walden Town Council and Thaxted Parish Council support the policy especially the protection of panoramic views.

Great Chesterford Parish Council regards NUGC as being at odds with Policy C1 since the development will a significant adverse impact on cross views and the settlement pattern. Material harm will be caused to the historic settlement pattern in scale and density; landscape patterns and character, filed patterns and historic lanes.

Little Chesterford Parish Council considers that the NUGV development is contrary to Policy C1 as stated in terms of cross valley views, panoramic views and material harm to the historic settlement pattern especially in scale and density. The promoter’s indicative plans shows development on hillsides and this is contrary to the historic development pattern on hillsides.

Littlebury Parish Council considers that the careful design of lighting installations in both private and public developments is important in reducing the visual impact of new developments whilst maintaining the rural character of the area.

THE THAXTED SOCIETY notes that Thaxted's historic character predominates but is susceptible to being overwhelmed by increasing levels of development and inappropriate design where vigilant care, mitigation and enforcement are lacking.

Saffron Walden Neighbourhood Plan Steering Group and **s Stansted Neighbourhood Plan Steering Group** support the policy but consider that hedgerows should be protected as some are ancient and Uttlesford's Protected Lanes should be referenced.

Developers/landowners/site promoters

- Policy overly restrictive and fails to recognise positive improvements and mitigations that development can provide
- Policy inconsistent with NPPF which emphasizes the importance of balancing adverse impacts and benefits.
- Approach that restricts development on the basis of material harm regardless significance of harm and potential for mitigation is contrary to NPPF principles Paragraph 14
- Policy C1 is not framed in line with NPPF guidance
- Policy needs rewording to allow decision makers to undertake a NPPF compliant planning balancing exercise
- Objection to policy approach as it effectively prevents development that has a view
- NPPF requires protection of valued landscapes and Policy C1 is non-compliant
- Sufficient controls in place elsewhere to give such matters the appropriate level of protection and therefore policy in its entirety should be deleted

Individuals

- Key area of concern is the protection of habitats and the Greenbelt
- Policy C1 principles are unachievable in NUGV because the historic settlement pattern cannot be followed due to the topography of the area
- NUGV poses a strong possibility of coalescence with Great Chesterford
- NUGV will have an adverse visual impact and any mitigation measures would constrain development
- Development of all three proposed Garden Communities will cause all the harms that Policy C1 is seeking to protect against
- Development at Easton Park does not comply with Policy C1 principles
- Easton Park supports a variety of wildlife and concern is raised over deer herds using the park and deer safe corridors would be lost to development
- What precise measures will be put in place to protect the three Protected Lanes that bound the Easton Park development site?
- NUGV will be highly visible from South Cambs and the environmentally sensitive Cam Valley
- NUGV will cause permanent destruction of upland, the skyline, good quality agricultural land and urbanise an essentially rural landscape that has a sensitivity to change
- Destruction of the countryside is unacceptable and ruining it for current and future generations

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Uttlesford District is made up of 26 different landscape character areas which each have individual profiles detailing their visual, historic and ecological characteristics as well as their sensitivities to change. Sensitivities to change are particularly high where there are open skylines and cross valley views. There are other notable landscape features in Uttlesford District, such as historic parklands, parks and gardens; historic lanes; and historic field patterns, greens, commons and roadside verges, the impact on which should be considered when determining proposals. The policy would make landscape character a specific consideration when assessing development proposals both within settlement boundaries and beyond them. This would have a significant positive impact on landscapes. The policy seeks to avoid harm to those landscape patterns, woodland areas, hedgerows, individual trees and vistas across the district which have important landscape value. Similarly, the policy would have a significantly positive impact on the integrity and character of the historic environment within the district which may have a far wider area of influence than features already designated. Historic landscapes comprise features of historical importance therefore by protecting these landscapes this policy would maintain these assets.

Alternatives Considered

The NPPF states that the planning system should contribute to protecting and enhancing valued landscapes and that Landscape Character Assessments should be undertaken to support the Local Plan. The Policy is in direct compliance with the NPPF and any deviation from the Policy approach could be considered unsustainable or otherwise not distinctly different to warrant assessment within this SA.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

Re-use of Rural Buildings

Policy C2

This policy and supporting text was responded to by 10 people/organisations.

Support	5
Object	1
Comment	4

Overarching Summary

- Policy welcomed by Historic England as it will protect heritage assets or enhance the countryside
- Policy offers opportunity to identify a potential role for re-use of agricultural in supporting rural economy
- Use of Dutch Barn footprints for dwellings should be avoided
- Construction of agricultural buildings as a pretext to provide a future dwelling footprints should be avoided
- Delete last Policy Bullet point as is heading of next paragraph and Policy C3 title

Statutory consultees and other bodies

Historic England welcomes the requirement for re-use of rural building to protect or enhance the countryside. This will help protect heritage assets and the character of the countryside. Policy is an opportunity to identify potential role that re-use of rural buildings could contribute in supporting the local rural economy.

East Hertfordshire District Council suggests that last bullet point in Policy C2 text should be deleted because it is covered in Policy C3.

THE THAXTED SOCIETY supports the policy but considers that more stringent conditions should be attached to avoid use of a rudimentary Dutch Barn as a footprint for a dwelling or vice versa. Construction of agricultural building as pretext for providing future dwelling footprints should be avoided.

Saffron Walden Town Council, Thaxted Parish Council and Stansted Neighbourhood Plan Steering Group recommend removal of last bullet point from Policy text as it is the heading of paragraph 11.8 and Policy C3 title.

Saffron Walden Neighbourhood Plan Steering Group supports the policy.

Developers/landowners/site promoters

No comments received.

Individuals

- Policy supported
- Policy C3 last bullet point is heading for Paragraph 11.8
- Once last bullet point is removed then semi-colon on penultimate bullet point is redundant and should be deleted.

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

This policy would have positive impacts on the natural environment where a criterion stipulates that development will only be permitted where it protects or enhances the character of the countryside and its biodiversity value. The policy will also have significant positive secondary effects on landscape, through re-use, and also the sustainable use of land. Impacts on the historic environment are uncertain in association with the possibility that

redundant rural buildings are historic in nature and could be non-designated heritage assets that otherwise are not covered by policy within the Plan.

Alternatives Considered

An alternative approach was considered:

- Alternative C2 (a): For the re-use of rural buildings outside development limits to be limited to employment purposes; or if demonstrably unviable, then for another non-residential use, or for residential use only if all other types of use are demonstrably unviable (as proven either by marketing or an independent assessment). Although paragraph 28 of the NPPF requires Local Plans to promote a strong rural economy by enabling the growth and expansion of rural businesses and enterprises through the conversion of existing buildings. Nevertheless, Permitted Development rights allow the change of use of agricultural buildings for a range of uses subject to certain criteria being met. The Preferred policy approach only applies in those cases where planning consent is required. The implications of the Policy are that not all buildings will necessarily be appropriate for some form of beneficial use; however the alternative can be seen to conflict with the possibility that rural buildings may be suitable for non-employment uses and a general presumption in favour of sustainable of non-employment development in such areas. For this reason the alternative has been rejected in favour of a less constrained approach as espoused in the Policy. The alternative is also likely to lead to fewer schemes being viable in rural areas, which remain redundant and do not improve local landscape and townscape as a result. For this reason the alternative has been rejected.

Proposed Mitigation Measures / Recommendations

It is recommended that the Policy be expanded to protect and enhance those rural buildings that are not listed but have value as non-designated heritage assets.

Officer Response

Proposed changes to plan

Change of Use of Agricultural Land to Domestic Garden

Policy C3

This policy and supporting text was responded to by 6 people/organisations.

Support	3
Object	3
Comment	0

Overarching Summary

- Permitted rights should not be included
- Proposed Garden Communities do not meet Policy C3 criteria
- Proposed garden Communities will change the character and appearance of the countryside

- Policy rewording require to ensure that domestic gardens cannot be used for house building
- Policy may give rise to domestic infill in form of annexes on originally designated agricultural land

Statutory consultees and other bodies

THE THAXTED SOCIETY supports the policy.

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering suggest that permitted development rights should not be included.

Developers/landowners/site promoters

No comments received.

Individuals

- Proposed large scale development will change the character and appearance of the countryside
- Disagree that New Garden Communities meet the Policy C3 criteria, also an explanation required on how criteria is being met
- Policy has potential to give rise to domestic infill e.g. annexes on originally agricultural land
- Reword policy to ensure that domestic gardens cannot be used for house building

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Changes of use from agricultural land to domestic garden can materially change the character and appearance of the surrounding countryside and landscape. The policy seeks to control changes to land use in order to preserve the character and appearance of the countryside which will ensure positive impacts on landscape through its preservation. However, agricultural land is an economic resource and it is uncertain what impact this policy will have on protecting high grade agricultural land. The impact on soils has therefore been marked as uncertain. This is also the case regarding the historic environment and the alteration of any field boundaries. Despite this, other policy exists within the Plan to ensure that historic field patterns are protected.

Alternatives Considered

An alternative approach was considered:

- Alternative C3 (a): To have no policy regarding the change of use of agricultural land to a domestic garden.
There will be negative and uncertain impacts on relevant sustainability criteria arising from this alternative. Since the adoption of the Adopted Local Plan 2005 there have been a number of applications for changes of use to residential garden land which have been approved. The Council propose keeping the policy, as per the adopted Local Plan 2005, because it has successfully controlled development, by resisting inappropriate extensions of domestic gardens into the countryside. There has also been consistent support for this policy by Inspectors in the past and therefore this alternative has not been progressed.

Officer Response

Proposed changes to plan

New Community Facilities within the Countryside

Paragraph 11.9

This policy and supporting text was responded to by 3 people/organisations.

Support	-
Object	-
Comment	3

Overarching Summary

- Reference to be made to Essex Rural Strategy 2016-2020 (RCCE 2016) and successor documents published by Essex Rural Partnership to help promote vibrant, mixed and sustainable rural communities
- Suggestion to add 'indoor and outdoor sports facilities' to the list in paragraph.

Statutory consultees and other bodies

Essex County Council Environment, Sustainability and Highways suggest that UDC refer to Essex Rural Strategy 2016-2020 (RCCE 2016) and successor documents published by Essex Rural Partnership to help promote vibrant, mixed and sustainable rural communities.

Saffron Walden Neighbourhood Plan Steering Group and Stansted Neighbourhood Plan Steering Group suggest addition of 'indoor and outdoor sports facilities' to the list in paragraph.

Developers/landowners/site promoters

No comments received.

Individuals

No comments received.

Sustainability Appraisal June 2017

No policies to appraise.

Officer Response

Proposed changes to plan

New Community Facilities within the Countryside

Policy C4

This policy and supporting text was responded to by 9 people/organisations.

Support	4
Object	2
Comment	3

Overarching Summary

- Recognition that in principle outdoor sports facilities may be justified in the countryside beyond development limits is welcome
- Outdoor sports facilities requiring access to natural resources may not be met in urban areas due to land take and locational requirements
- Community facilities and other built amenities should not be permitted beyond development limits except in exceptional circumstances
- Policy as drafted make no provision for expansion or improvement of community facilities in the countryside
- Flexibility required to meet community needs
- Policy to be amended to require a Landscape Assessment on application

Statutory consultees and other bodies

Sport England welcomes policy due to recognition that in principle outdoor sports facilities may be justified in the countryside beyond Development Limits of settlements. Many outdoor sports facilities that require access to natural resources have land take or locational requirements which prevent being met within urban areas.

Historic England recommends that the policy is amended to require development to have regard to the historic environment. Development should be considered in the context of a Landscape Assessment which should accompany an application.

THE THAXTED SOCIETY considers that 'community facilities' might include other built amenities not sport related and as such should not be allowed outside development limits

other than in extreme circumstances. Provision of such built amenities beyond the town's core is contrary to The Thaxted Society's policy.

Saffron Walden Town Council, Thaxted Parish Council and Saffron Walden Neighbourhood Plan Steering Group support the policy.

Developers/landowners/site promoters

- The principle of deeming community facilities acceptable beyond development limits is welcome
- Policy as drafted does not include provision for expansion of existing community facilities with the countryside to meet needs
- Policy as drafted restricts improvement of existing facilities in future
- Flexibility required to meet specific community needs
- UDC to use exemplar scheme where sports pitches and new community centre were funded wholly by enabling development.

Individuals

- Private or public facilities do not replace the long walks and bicycle rides on traffic free countryside lanes

Sustainability Appraisal June 2017

Significant, Temporal and Secondary Effects

Paragraph 70 of the NPPF states that planning policies should “plan positively for the provision and use of shared space, community facilities [...] and other local services to enhance the sustainability of communities and residential environments.” The Council consider that the provision of new or replacement sport and recreational facilities beyond development limits is acceptable, and this is shared within this assessment with a large proportion of historic settlements within the District and a scarcity of suitable land within development limits. There will be positive impacts where new facilities will be permitted beyond development limits in the above listed circumstances. This will have significant positive impacts on health and well-being. Although the policy does not include any environmental considerations within the necessary qualifying criteria, the policy is a single issue theme outlining the principle of new community facilities within the countryside, and other policies apply for such protection and enhancement within the Plan.

Alternatives Considered

An alternative approach was considered:

- Alternative C4(a): To have no policy regarding new community facilities within the Countryside

There will be uncertain impacts on relevant sustainability criteria arising from this alternative however it should be acknowledged that both the Policy and this alternative seek to locate new facilities within development limits in the first instance. The Council considers it is important to have a policy specifying the type of development which is appropriate i.e. not only playing fields but also built development such as club-houses etc. It therefore rejected the alternative of deleting the policy as this would create uncertainty as to the future provision of such new facilities.

Proposed Mitigation Measures / Recommendations

No mitigation measures or recommendations are proposed.

Officer Response

Proposed changes to plan

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CHAPTER 12 - RESIDENTIAL SITE ALLOCATIONS

General comments

- No audit trail as to why sites regarded as eligible in SLAA are not allocated.

Arkesden – Type B Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Buildings to rear of Mulberry House, Wenden Road, Arkesden		0.85	NEW
The site is Brownfield, having a number of buildings, commercial uses, and planning permission already granted for two dwellings. It is the considered view of this practice that the Local Planning Authority have overlooked this brownfield site, which by virtue of National and Local Policy should be allocated and promoted for re development.			

Birchanger – Type A Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
328 Birchanger Lane		0.7 ha	NEW
Justification: Green Belt boundary at this location has not been delineated in accordance with the latest national policy.			

Clavering – Type A Village

Land south of Oxleys Close.

Statutory Consultees and other bodies

Historic England

Policy should include reference to preserving the nearby listed buildings and their settings, and consider archaeological potential.

Essex County Council

Surface water management: Flood Zone 1 (FZ1). There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land West of Clavering Primary School, Stortford Road, Clavering, Essex, CB11 4PE	Indicative 30 dwellings, land for school – playing fields and parking.	3.64	07Cla15
Justification: An access is proposed from Stortford Road, overcoming the objection raised in the SLAA. Clavering is one of the more sustainable Type A villages with many local facilities. The site performs well in the SLAA and its non-allocation is not justified.			
Land west of the Cricketers, Hill Green		1.2	09Cla15

Justification: Of development sites in Hill Green, this site is closest to village centre and has no existing development or planning issues. Development of site will support existing facilities at Hill Green. Site represents a logical infill and does not encroach into countryside.

Debden – Type A Village

Land west of Thaxted Road, Debden

Statutory Consultees and other bodies

Historic England

Reference should be made in the supporting text to the proximity of listed buildings to the south of the site and the need to take them into account in working up development proposals. It is important that any development of this site will need to preserve the listed buildings and their settings. These requirements should be included in the policy and supporting text of the Plan

Essex County Council

Surface water management FZ1, Potentially some surface water flooding to the very south of site associated with nearby watercourse. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance

Individuals

- Object on the grounds of being outside development limits, effect on neighbouring properties, could exacerbate flooding issues, loss of agricultural land, scale inappropriate for small village, detrimental impact on visual aesthetics.

Elsenham – Key Village

General

Individuals

The following should be added to the Constraints for all sites in Elsenham parish, and to the Old Goods Yard site in Henham parish:

- Road access is exceedingly poor, making the village unsuitable for further development, as was found by the Inspector when he rejected the previous draft local plan in December 2014;
- The proximity of Stansted Airport means that there are restrictions on open attenuation ponds because of the increased risk of bird strikes, making for difficulties in surface water disposal; The position on a major watershed, with Stansted Brook / Stort / Lee / Thames to the south and the Cam / Great Ouse leading to the Wash to the north, means that the village is on the boundary of two water areas, making for difficulties in sewage disposal and in the acceptance of responsibility by either authority for flooding in boundary areas; Stansted Brook has a tendency to flood, making further run-off inadvisable;
- The southern part of Elsenham is in the Stansted Airport Countryside Protection Zone;
- The main-line railway which runs through the village makes some adjacent sites unsuitable for development;
- The local shops are inadequate, and there is no possibility of further provision in the village owing to over-development;
- Recreation provision is inadequate, and there is no possibility of further provision in the village owing to over-development; The doctors' surgery is heavily over-subscribed, and there is little possibility of further provision in the village owing to over-development.

Land south of Rush Lane, Elsenham

Statutory Consultees and other bodies

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings. These requirements should be included in the policy and supporting text of the Plan.

Essex County Council

Surface water management FZ1, some surface water flooding associated with railway line and brook to south of site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Elsenham Parish Council

The site surroundings are misrepresented in the DLP - the site is beyond the recognisable built-up boundary and extends into the open countryside which surrounds Elsenham. The access is unsuitable - the roads and footways fall short of adopted standards. Moreover, access is an essential feature of any development and an allocation in the Local Plan cannot rely on untested future proposals. The open space proposal, if any, is relied upon but no details are provided. Existing landscape features - the strong southern edge of Elsenham is marked by the substantial tree belt and hedgerow to the south of Rush Lane - could be lost. The SHLAA assessment is that the site in terms of landscape quality is one of "*relatively high sensitivity to change*". The CPZ review has seemingly excluded the site as prompted in the SHLAA without substantive justification. This conveniently removes the strong (and long-standing) constraint against development of the site. There may be a flood risk issue at the south of the site where Stansted Brook runs close to the boundary. In short, there is no justification or need for the Rush Lane site to contribute to housing numbers and the site has become 'suitable' only by disregarding strong constraints.

Developers, Agents and Landowners

Supported by agents acting for landowner

Individuals

Both the extra houses and the site are not suitable. Elsenham already had significant development. Village has inadequate roads, services and facilities which do not have capacity for additional population. Access road in state of disrepair, unable to sustain construction traffic, and often restricted by on-street parking. The road suffers from flooding. The site takes surface water runoff from the roads and was previously used for growing cress because of its high water table. Removal of trees would impact on nature and wildlife. Development will alter the character of the area from rural boundary to urbanised suburb. The site is very near the railway and should be considered unsafe. Development would impinge on the public footpath running through the site. The extra traffic through the Lane will disrupt a hitherto quiet cul-de-sac and the traffic will terminate at the shops and a busy roundabout in the centre of the village. A viable recreational space will be difficult to provide as the site is on north-south sloping land. The site is near Fullers End, a sensitive area containing a number of Grade II listed buildings.

Elsenham Nurseries, Stansted Road

Statutory Consultees and other bodies

Essex County Council

Surface water management FZ1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Forestry Commission

Concerns over the potential impact on the Ancient Woodland at the northern end but expect that Uttlesford will be putting some conditions on the planning permission to mitigate this.

Stansted Neighbourhood Plan Steering Group
Sites with permission will cause congestion on Grove Hill. Suggest new roads and routes out of Elsenham

Individuals

Further development at Elsenham should be avoided unless and until the problems of access, especially via Grove Hill, are resolved.

Hailes Wood, Elsenham (site completed 2017)

Statutory Consultees and other bodies

Historic England

Any development of the site therefore has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

Essex County Council

Surface water management. Detailed Planning permission granted and development commenced / seems to be built on map. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Individuals

This site is now completed and comprised 35 dwellings and not 32.

Land North of Stansted Road

Statutory Consultees and other bodies

Essex County Council

Surface water management - Detailed Planning permission granted 2015. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Forestry Commission

Concerns over the potential impact on the Ancient Woodland at the northern end but expect that Uttlesford will be putting some conditions on the planning permission to mitigate this.

Stansted Neighbourhood Plan Steering Group

Sites with permission will cause congestion on Grove Hill. Suggest new roads and routes out of Elsenham

Individuals

The 'Sporting complex' to which reference is made in the site description is a playing field.

Land south of Stansted Road

Statutory Consultee and other bodies

Historic England

Any development of the site therefore has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

Essex County Council

Surface water management - Planning permission granted 2016 and partly built. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Stansted Neighbourhood Plan Steering Group

Sites with permission will cause congestion on Grove Hill. Suggest new roads and routes out of Elsenham

Individuals

The site is ineligible for development as it lies within the CPZ. Constraints should include a nearby employment site could conflict with residential properties.

Land west of Hall Road

Statutory Consultees and other bodies

Historic England

Any development of the site therefore has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings. These requirements should be included in the policy and supporting text of the Plan.

Essex County Council

Surface water management: (Fluvial) Flood zone and surface water flooding associated with Stansted Brook to south of site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Education: This allocation should clarify the boundary between residential and school uses so as to fix the 1ha (5pprox..) of land alluded to and ensure that, in so far as possible, it meets the criteria for education land set out in ECC Developers' Guide to Infrastructure Contributions.

Developers, Agents and Landowners

As permission has lapsed the scheme appears to be not deliverable or viable and the site should no longer be allocated. Provision of additional land for the school is now in jeopardy and the County Council are now planning to expand the school within its existing constrained site.

Individuals

Permission has now lapsed. The site is in the CPZ, rendering it ineligible for development. Stansted Brook forms the southern boundary.

Land north of Leigh Drive (site with planning permission)

Statutory Consultees and other bodies

Essex County Council

Surface water management: There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Elsenham Parish Council

The boxes headed 'Site specific policy' and 'Site description' are both wholly incorrect, having been copied from the previous entry, Land west of Hall Road, Elsenham. The southern boundary as shown on the illustration wanders too far to the south, and includes part of the turning head at the end of Leigh Drive and part of the Spinney. See the outline plan with application UTT/15/3090/OP, which gives a reasonable representation of the correct boundary.

Stansted Neighbourhood Plan Steering Group

Sites with permission will cause congestion on Grove Hill. Suggest new roads and routes out of Elsenham

Individuals

Details of the site are incorrect and are a duplication of that given for the land west of Hall Road. The line of the boundary of the site is incorrect; namely, the eastern end of the southern boundary line is shown as directly bordering the northern edge of No. 21 Leigh Drive property. The correct line of the boundary is defined by the land described as Land at Stansted Road, Elsenham, owned by Elsenham Parish Council. This proposal would be overdevelopment of an area that is already being developed. Access issues and reduction of existing amenity to existing neighbouring residencies are obvious. The current developers should be made to keep to promises made to use the land for the benefit of the community

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land north east of Elsenham	4000 dwellings. Alternative new settlement		07EIs15
Justification: Benefits of proposed Elsenham New Settlement - Synergy with London Stansted Airport; site availability and deliverability; land under single control; provides option for strategic growth based on a) existing rail infrastructure at Elsenham. b)No on-site heritage assets, ecological or wildlife designation constraints c) no Green Belt or Country Protection Zone designation constraints d) proposed (Southern Road Link – SLR) offers comprehensive solution to highway access for the new settlement			
Land to the west of Station Road	70 dwellings	4ha	03EIs15
Justification: Site is located in sustainable location within walking distance of key services and facilities. The proposed level of trip generation and the outlined trip distribution would not result in a severe impact on the local highway network. With mitigation measures, development would have minimal impact on ecological issues. Surface and foul water can be attenuated on site where necessary and discharged from the site with no increased off-site flood risk.			
Land north of Stansted Road	40	3.1 ha	04EIs15
Justification: Elsenham is a key village with a good range of local services and facilities. The site is contained by its surroundings. Development would round off the existing village in this location. Highways report concludes that development is unlikely to cause a material impact on the operation of the local highway network. Mitigation measure can be put in place to protect Ancient Woodland. There are a number of commonplace options available to achieve the surface water drainage of the development. Noise from the M11 and air quality issues can be mitigated.			
Land north of 23-25 Bedwell Road and West of 3 Bedwell Road, Ugley Green. (adjacent to Elsenham village)		0.41	03UgI15
Justification: Site is sustainably locate, Elsenham and surrounding area has wide range of local facilities and services; this proposal would help to meet the local need for small dwellings, and site forms unused land on the edge and abuts a tightly drawn Development Limits.			

Felsted – Type A Village

Former Ridleys Brewery, Hartford End,

Statutory Consultees and other bodies

Historic England

Felsted Grade II* listed Hartford End Mill located to the south west of the site, the Mill frontage is shared with Mill House and Bridge, both separately Grade II listed in their own right, the buildings form a picturesque group. The open nature of the listed buildings setting and relationship with surrounding river and landscape has been well preserved. The proposed site allocation would be confined to the far west corner at the junction between Mill Lane and B1417. Historic maps show that the proposed site allocation has been occupied development over a number of years; the proposed site allocation would largely adhere to existing lines development which the Brewery occupied. Provided it did not encroach further to the north or west than shown in order to preserve the open nature of the historic landscape. Any development of the site therefore has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan. Planning permission was granted in 2016, we note that HE was not consulted upon this application.

Essex County Council

Surface water management: Some of the site to the south is in flood zone 2 and 3. Surface water flood risk in a 1 in 30 year flood event and 1 in 100 year flood event associated with flood zone as well as the west of the site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Land east of Braintree Road, Felsted

Statutory Consultees and other bodies

Historic England

Site is located immediately adjacent to a Grade II listed property known as the Watch House which lies just to the south of the site. Work is underway to develop the site; the Plan makes no mention of when the permission to facilitate this was granted.

Essex County Council

Surface water management: Development already commenced on site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land rear of Cavendish, Causeway End	10-14 dwellings	0.7 ha	15Fel15
Justification: Development of the site represents a sustainable and deliverable site, forming a small to medium scale extension to the existing village, helping to meet local housing need and sustain the vitality of Causeway End Felsted. Felsted has a range of services and facilities. Future growth of the village will need to avoid harm to the conservation area. Site is in Flood Zone 1. There are no biodiversity or transport constraints to development.			
Land at Newhouse Farm	Residential and / or C2 use extra care accommodation.	1.8	(29Fel16) (Not published)

<p>Justification: Development of the Site represents a sustainable and deliverable site for residential development. It will form a suitable and modest extension to the existing village, helping to meet local housing need and sustain the vitality of Felsted which has a range of services and facilities. Future growth of the village will need to avoid harm to the conservation area. The site is relatively flat and featureless. Site is in Flood Zone 1. The Site is not subject to any significant ecological, environmental or landscape designations / constraints that would prohibit its development for housing.</p>			
Station Road	Residential, relocated doctor's surgery and open space	6	01Fel15
<p>Justification: Felsted should be allocated some housing given the range of services and facilities in the village. The site received a positive response in the Council's SLAA.</p>			
Land east of Braintree Road (site 1)	30 dwellings	2.3 ha	17Fel15
<p>Justification: Felsted has the facilities and services to sustain additional development and arguably should be classified as a key village Site was promoted through the call for sites for housing and a care home. The care home element is no longer being promoted. The land has significant, tall and mature screening to the B road frontage, to the adjacent residential property to the north, to Site 2 to the south. It would be served off the estate road which serves the existing housing scheme to the south and would therefore be seen in this residential context. The site has no overriding constraints. It is scrubland and classified as mostly Grade 3 agricultural land.</p>			
Land east of Braintree road (site 2)	30 dwellings	1.4 ha	18Fel15
<p>Justification: Felsted has the facilities and services to sustain additional development and arguably should be classified as a key village. The site would need to be accessed through the owner's other land at Site 1. The land is entirely classified as Grade 3 agricultural land but has no current or likely future viable use as commercial agricultural land.</p>			
Land north west of Bannister Green	5-14 dwellings	0.8	04Fel15
<p>Justification: The SLAA concludes that this site is deliverable for 5 dwellings.</p>			
Land south of Watch House Green, Braintree Road	34 dwellings	1.69	05Fel15
<p>Justification: The land has strong defensible boundaries in the form of landscaping and existing housing development. The SLAA concludes that the site is deliverable subject to a satisfactory access. The owner believes that the access arrangements from Braintree Road would be satisfactory.</p>			
Chaffix Farm, Braintree Road, Felsted	5	0.95	06Fel15

Justification: The SLAA concluded that the site is deliverable and that a smaller scale of development which does not extend as far east so as not to close the gap with Watch House Green may be suitable. This is reflected in the deliverable capacity of 5 dwellings).

Various parcels of land at Sparlings Farm, Gransmore Green	1. Employment	2.35	21Fel15
	2. Employment	1.5	22Fel15
	3. Residential	20,8	23Fel15
	4. Residential	1.1	24Fel15
	5. Residential	7.7	25Fel15
	6. Residential	3.88	26Fel15
	7. Residential	8.23	27Fel15

Justification: Gransmore Green is an accessible village by the road network, including as used by public transport. It is close to the A120 and B1256 east/west routes with linkages to Stansted Airport, a major employer. Sites are also close to Chelmsford and Bromfield Hospital which can be reached by public transport from Felsted. Felsted and Rayne have a range of services and facilities.

Flitch Green – Type A Village

Land off Tanton Road, Flitch Green

Statutory Consultees and other bodies

Essex County Council

Surface water management: Development commenced on site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Land at Webb Road and Hallett Road, Flitch Green

Statutory Consultees and other bodies

Essex County Council

Surface water management: FZ1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Great Chesterford – Key Village

See also Little Chesterford

Inset Map for Great Chesterford

Individuals

The Inset Map for Great Chesterford shows the Crown House Hotel as Protected Open Space which I believe to be wrong.

Land at Thorpe Lea, Walden Road, Great Chesterford

Statutory Consultees and other bodies

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the heritage assets and their settings. These requirements should be included in the policy and supporting text of the Plan.

Essex County Council

FZ1, slight spot of surface water flood risk for 1 in 100 flood event. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Land north of Bartholomew Close, Great Chesterford

Statutory Consultees and other bodies

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

Essex County Council

Surface water management: FZ1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Individuals

Access to this site is very dangerous and no development should be allowed.

New World Timber and Great Chesterford Nursery, London Road,

Statutory Consultees and other bodies

Historic England

Any development of the site therefore has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan. Planning permission to develop the site was granted in December 2014.

Essex County Council

Surface water management: FZ1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance. Surface water management

Great Dunmow - Town

Land East of St Edmunds Lane

Statutory Consultees and other bodies

Essex County Council

Surface water management

FZ1. Some surface water flooding associated with watercourse east of site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

Land West of Chelmsford Road, Great Dunmow

Statutory Consultees and other bodies

Essex County Council

Surface water management:

FZ1, some surface water flood risk associated with watercourse on site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance

Transport:

The sixth bullet should read 'transport assessment', not 'transport statement', as the development is more than 50 units.

Education

3rd bullet point: This policy should specifically allocate the 2.1ha of land defined in the signed s106 agreement (in the interests of certainty / deliverability).

It is not ECC policy to ask developers to '*provide schools*' - in addition to the land required, the developer will make an appropriate '*contribution towards the provision of pre-school and primary education facilities*'.

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

South East Education and Skills Funding Agency

The next version of the Local Plan should seek to provide further detail about these site specific requirements for schools, based on the latest evidence of identified need and demand in the Infrastructure Delivery Plan and Essex County Council's 10 year plan for meeting the demand for school places. This should include clarifying where possible the requirements for the delivery of new schools, including when they should be delivered to support housing growth (i.e. appropriate trigger points), the minimum site area required (and number of forms of entry needed where this has not already been stated), any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary.

West of Woodside Way

Statutory Consultees and other bodies

Essex County Council

Surface water management

FZ1, some surface water flooding associated with watercourse north of site.

Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Transport

The 4th bullet should read 'transport assessment', not 'transport statement', as the development is more than 50 units.

Education

There is an extant s106 agreement and this site should allocate 2.1ha of D1 use land (in the interests of certainty / deliverability) that meets the criteria for education sites set out in ECC's Developers' Guide to Infrastructure Contributions.

Minerals and Waste

The site is located within a Mineral Safeguarded Area and falls within the thresholds set out within the Essex Minerals Local Plan. The policy supporting the allocation must include a clause requiring the preparation of a Mineral Resource Assessment as follows:

'Prior to approval of development, a Mineral Resource Assessment must be prepared, in consultation with the Mineral Planning Authority, to assess the need for prior extraction.'

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings,

and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

14 Stortford Road, Perkins Garage

Statutory Consultees and other bodies

Essex County Council

Surface water management: FZ1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

Any development of the site therefore has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

Brick Kiln Farm

Statutory Consultees and other bodies

Essex County Council

Surface water management

Development commenced Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

North of Ongar Road

Statutory Consultees and other bodies

Essex County Council

Surface water management

FZ1, There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance

Transport

The 4 th bullet should read “transport assessment”, not “transport statement”, as the development is more than 50 units.

Historic England

It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

South of Ongar Road

Statutory Consultees and other bodies

Essex County Council

Surface water management

FZ1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the heritage assets and their settings. These requirements should be included in the policy and supporting text of the Plan.

Woodlands Park, Sectors 1 - 3, Great Dunmow

Statutory Consultees and other bodies

Essex County Council

Surface water management

FZ1, surface water flow to north of the site associated with pond (outline consent granted).

Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Transport:

The 4th bullet should read 'transport assessment', not 'transport statement', as the development is more than 50 units.

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

Great Dunmow Town Council

Comparing the saved policy GD5 with new policy, the following has been noted: 'community facilities' stated as a requirement in GD5b) are missing in the new policy. 'substantial landscaping' etc stated as a requirement in GD5d) are missing in the new policy.

Woodlands Park, Sector 4, Little Easton (Great Dunmow)

Statutory Consultees and other bodies

Essex County Council

Surface water management:

Development started on site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Minerals

The site is are located within a Mineral Safeguarded Area and falls within the thresholds set out within the Essex Minerals Local Plan. The policy supporting the allocation must include a clause requiring the preparation of a Mineral Resource Assessment as follows: *Prior to approval of development, a Mineral Resource Assessment must be prepared, in consultation with the Mineral Planning Authority, to assess the need for prior extraction.*

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the heritage assets and their settings. These requirements should be included in the policy and supporting text of the Plan.

Oaklands, Ongar Road

Statutory Consultees and other bodies

Essex County Council

Surface water management

FZ1, slight spot of surface water flooding east of site in 1 in 100 year flood event. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the heritage assets and their settings. These requirements should be included in the policy and supporting text of the Plan.

Land west and south-west of Great Dunmow

Statutory Consultees and other bodies

Essex County Council

Surface water management:

FZ1, surface water flooding associated with watercourse in north and east of site for 1 in 30 and 1 in 100 flood event. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Transport:

The planning application should be accompanied by a Transport Assessment and Travel Plan. The application site should include provision for the Great Dunmow Flitch Way Link (a bridleway around Great Dunmow connecting the Flitch Way).

Education:

1st bullet point (secondary school site): This should refer to '*new secondary school provision*' as it may form the site for a relocated Helena Romanes school, rather than an entirely new school.

This allocation should be designated as 'enabling development'. The soundness of the Local Plan as a whole would be undermined if the new secondary school provision is not viable and the 400 homes are built regardless of the necessary increase in capacity.

The precise boundary of the 14 hectares should either be identified or it being D1 use land that meets the criteria for education sites set out in ECC's Developers' Guide to Infrastructure Contributions must be started. Land next to the A120 is unlikely to be acceptable due to noise.

5th bullet point (cycleway / footpaths links): It is unclear which primary school is being referred to. Great Dunmow Primary is closest but this site and development is considered likely to be served by new school on West of Woodside Way.

Likewise, links must be to Helena Romanes school as well as any new provision on this allocation.

Minerals

The site is located within a Mineral Safeguarded Area and falls within the thresholds set out within the Essex Minerals Local Plan. The policy supporting the allocation of these sites must include a clause requiring the preparation of a Mineral Resource Assessment as follows:

'Prior to approval of development, a Mineral Resource Assessment must be prepared, in consultation with the Mineral Planning Authority, to assess the need for prior extraction.'

Historic England

The site is a large site located immediately adjacent to the Grade II listed Highwood Farm, Round House and Folly Farm. Stortford Road is a Roman Road and the Great Dunmow Conservation area sits to the north east of the proposed site. An urban extension to Great Dunmow should consider the town's distinctive character and heritage; organic development consistent with the grain of the town is to be preferred. There is also a danger of development butting up to the Flitch Way and new A120, although we note and support the reference to a substantial landscape buffer along the boundary with the Flitch Way (bullet point 8). Previous comments made by Historic England on 2nd January 2014, made reference to the preservation of land south of the Flitch Way, west and east of Buttleys Lane which was to be safeguarded for playing fields. The policy is not clear on this point but this area should be kept free from built development as part of the setting to the town. The allocation of this site should consider the cumulative impacts of other allocations nearby. The reference in the policy to have regard to the setting of the Grade II listed Folly Farm and Great Dunmow Conservation Area is welcomed, as is the requirement for an archaeological assessment. It is recommended that the policy refer to the need to have consideration of Highwood Farm and the Round House in addition to that of Folly Farm. The use of 'enabling development' in the policy could be confused with the references in the NPPF to development required to secure the future conservation of heritage assets (NPPF, paras 55

and 140). We recommend the policy is amended appropriately to meet the circumstances of this proposal.

Sport England

In order to provide clarity on what will be expected to be provided on the replacement school site in terms of playing fields in order to ensure that the replacement facilities accord with Sport England's playing fields policy and NPPF paragraph 74 the policy should be amended to 1) Confirm that the site is allocated for replacement school playing fields and that the replacement playing fields will include provision for a replacement floodlit artificial grass pitch to replace that displaced from the existing Great Dunmow Leisure Centre/Helena Romanes School site; and 2) Confirm that the replacement playing fields (both natural and artificial) will need to be at least equivalent in quantity and quality to the facilities that they will replace and that they will need to be planned to allow community use outside of school hours

South East Education and Skills Funding Agency

The next version of the Local Plan should seek to provide further detail about these site specific requirements for schools, based on the latest evidence of identified need and demand in the Infrastructure Delivery Plan and Essex County Council's 10 year plan for meeting the demand for school places. This should include clarifying where possible the requirements for the delivery of new schools, including when they should be delivered to support housing growth (i.e. appropriate trigger points), the minimum site area required (and number of forms of entry needed where this has not already been stated), any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary.

Developers, Agents and Landowners

- Owner and developer support allocation subject to amending policy to read 'a minimum of 400 dwellings' to be consistent with the Neighbourhood Plan and removing reference to including at least 1% serviced custom build/self build plots as there are concern over the delivery and quality of smaller separate development on an otherwise large scale housing scheme. Discussions could take place at planning application stage instead.
- HRS support the approach to identifying and enabling the replacement of the existing school.

Individuals

Planning permission for sites to the south of Dunmow should be subject to the need to provide land and finance for the completion of the Flitch Way bridle way to give pedestrian off road access to a relocated school and as a sustainable transport corridor.

Land at Helena Romanes School

Statutory Consultees and other bodies

Essex County Council

Surface water management

FZ1, few area of surface water flood risk across the site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

There are several Grade II listed which border the site as well as the Great Dunmow Conservation Area. The policy states that development is required to protect the setting of the listed buildings to the east of the sites and the nearby conservation area, this is welcomed but it is recommended that the is amended so that its addresses the Grade II listed Newton Hall and its associated Grade II listed cottage to the immediate west of the site. It is particularly important that any development here, close to the town centre, should be consistent with Dunmow's historic grain and character. The use of 'enabling development' in the policy could be confused with the references in the NPPF to development required to

secure the future conservation of heritage assets (NPPF, paras 55 and 140). We recommend the policy is amended appropriately to meet the circumstances of this proposal.

Sport England

No objection is made to the principle of this allocation but the policy needs to clarify

1. Confirmation that the replacement school playing field provision (both natural turf playing fields and artificial grass pitch) at the Buttleys Lane site will need to make at least equivalent playing field provision in terms of quantity, quality and community accessibility.

2. Confirmation that the new school including its playing fields will be completed and available for use before any development commences on this site in order to ensure continuity of access to the sports facilities for both school and community users.

3. Confirmation that that the Great Dunmow Leisure Centre will remain operational throughout the construction of the development in order to safeguard access to this important community facility.

4. Consideration given to whether the inclusion of the artificial grass pitch (AGP) within the allocation (and therefore its relocation to the new school site in Great Dunmow policy 3) is appropriate in practice. The AGP on this site is a dual use facility which forms an integral part of the leisure centre. If the AGP is to be relocated, sufficient space would need to be found and the new school would need to be planned and designed to facilitate significant community use outside of school hours. The AGP would also be costly to relocate and may affect development viability. There would also be a need to provide ancillary facilities that are suitable for community use such as changing and car parking. As the AGP would need to be floodlit and would be intensively used, consideration should also be given to the suitability of relocating it to the new school site in planning terms due to the potential impact in terms of the environment (noise and lighting) and highways (A120). Consideration should also be given to whether removing the AGP from the leisure centre would have any consequential implications for the sustainability of the leisure centre as AGPs are usually one of the main income generators for leisure centres. Collectively, it is considered that the above issues would justify a review of whether the AGP be included in the proposed site allocation although it is acknowledged that if the AGP was retained, there would be a need for school users to travel off-site to access it in its current location if the school was relocated.

South East Education and Skills Funding Agency

The next version of the Local Plan should seek to provide further detail about these site specific requirements for schools, based on the latest evidence of identified need and demand in the Infrastructure Delivery Plan and Essex County Council's 10 year plan for meeting the demand for school places. This should include clarifying where possible the requirements for the delivery of new schools, including when they should be delivered to support housing growth (i.e. appropriate trigger points), the minimum site area required (and number of forms of entry needed where this has not already been stated), any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary.

Developers, Agents and Landowners

- HRS support the approach to identifying and enabling the replacement of the existing school.

Individuals

This school should be kept and a second school should be built. Moving the school to Buttley's lane provides a very long walk for many Dunmow residents.

Wood Field, Woodside Way

Statutory Consultees and other bodies

Essex County Council

Surface water management

FZ1, some surface water flood risk to west of site associated with watercourse. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Transport

There is no obvious access from the proposed allocation to highway. Further consideration must be given as to how this will be achieved.

Historic England

The site lies to the north of Stortford Road which, as a Roman Road, may have archaeological potential. This should be considered in the policy and supporting text.

Woodland Trust

Object to inclusion of site as it is likely to cause damage and/or loss to areas of ancient woodland adjacent to the boundary. Adjacent to Hoglands Wood, Broomhills - ancient woodland (AW), ancient semi natural woodland (ASNW) and plantation on ancient woodland site (PAWS)

Developers, Agents and Landowners

- Support the inclusion of Wood Field, Woodside Way

Land south of B1256 (Stortford Road) and West of Buttleys Lane

Statutory Consultees and other bodies

Essex County Council

Surface water management

FZ1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Transport

The 3rd bullet should read 'transport assessment', not 'transport statement', as the development is more than 50 units.

Historic England

Several Grade II listed buildings are located relatively nearby; these include Highwood Farmhouse, the Round House, and the Gatehouse to Easton Lodge as well as Stortford Road which is a Roman Road with archaeological potential. Any development of the site has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve the heritage assets and their settings. These requirements should be included in the policy and supporting text of the Plan. The allocation of this site should consider the cumulative impacts of other allocations nearby.

Great Dunmow Town Council

This site is outside of the Town Development Area as defined in the Neighbourhood Plan Policy DS1:TDA. The N.Plan Steering Group and the Town Council vigorously defends this policy as public consultation revealed a very strong local commitment to the rural setting of Great Dunmow and a strong resistance to coalescence with neighbouring communities. The N.Plan was voted for by 93% of voting residents, and was approved and adopted by the District Council. The inclusion of this allocation would go against this. There is no reason for the development to be in that particular location and its situation directly opposite the ancient woodland and SSSI High Wood would put the latter at risk from light pollution (contrary to draft policy EN19).

Great Dunmow Neighbourhood Plan Steering Group

The site is outside of the Town Development Area as identified in Neighbourhood Plan Policy DS1:TDA. The Steering Group vigorously defends this policy as public consultation

revealed a very strong commitment to the rural setting of Great Dunmow and a strong resistance to coalescence with neighbouring communities. The Neighbourhood Plan was approved by the District Council and by the people of Great Dunmow (93% of those voting voted in favour of adopting the Neighbourhood Plan) and its policies must be upheld. There is no reason for this development to be in this particular location and its situation directly opposite SSSI High Wood would put the latter at risk from light pollution.

Developers, Agents and Landowners

- Agent on behalf of landowner supports allocation
- Agent objects to this allocation as it is considered an unsustainable location being detached from the town centre.

Individuals

- Substantial developments which expand the boundaries of the town, changing the character and sustainability of the town, generating too much traffic and pollution.
- Concerned that the developments include infrastructure and that if the infrastructure is not delivered then all the developments in the town may not be sustainable. This need for infrastructure will be used to justify the developments.
- This is too close to the proposed Easton Park development. There really must be some separation between Great Dunmow and other settlements.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Dunmow Park	120 dwellings	3.5 ha	09GtDun15

Justification: The site is in a sustainable location and within walking distance of a number of facilities within Great Dunmow Town Centre. Development in this location would therefore promote sustainable modes of transport. The site is well serviced by bus routes. The site is also bound to the north and west by existing residential development and lies abutting the existing settlement boundary.

The Yard, Stortford Road	Residential or employment	1.3 ha	03GtDun15
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Justification: The adjoining land to the east has been allocated and the inclusion of this site would make a logical extension as it is contained by the Stortford Road and A120.

Land at Hoglands Great Dunmow (Little Easton Parish)	80	2.3	04LtEas15
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Justification: Access to the site is currently available from Park Road, Little Easton; albeit a brand new access from Woodside Way could also be constructed to serve the site. There are no listed buildings or conservation area in the vicinity and the site is located in Flood Zone 1. The slope, trees on site and the Hoglands Wood to the south are not considered constraints on development.

Land at Tiggers, Ongar Road	4 (net)	0.49	NEW
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Justification: The use of the site would remain residential, in keeping with neighbouring properties and the character of the area. There would be a net increase of four dwellings and the site density would be about 10 dph. This would be lower than the adjacent modern estates, but would be in keeping with the existing character of Ongar Road and this edge-of-town setting. The site, which has historically been considered suitable for development, is in

a sustainable location and within reasonable walking/cycling distance of local amenities, including employment, schools, nurseries, shops, churches and community facilities in Great Dunmow. It is well served by primary and major road networks, with good public transport links to allow access to neighbouring settlements and major transport infrastructure. No existing trees or hedges would be removed as part of this redevelopment. There are no ponds and there is no evidence of wildlife or protected species on the land

Great Hallingbury – Type B Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land south of Beldhams Lane, Bishops Stortford	180	6.52	03GtHal15

Justification: The site represents sustainable development between the existing town edge and the sewage works with the allotments in between. The site is well located to Bishop's Stortford town centre, railway station and bus stops. The site is currently located within the Green Belt; however, the proposal would not result in the merging of neighbouring settlements and has been demonstrated to be possible with only minimal impact on the wider landscape. The benefits of delivering housing within walking and cycling distance of the town centre of Bishop's Stortford and the railway station along with the proximity to the existing bus service that stops along Beldhams Lane would outweigh the harm caused by the loss of land within the Green Belt and should be reconsidered.

Great Sampford – Type A Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Site east of Sparepenny Lane, Great Sampford		3.3	01GtSam15

Justification: The village is a sustainable location for development with a church, pub and school. This site could provide much needed affordable housing.

Hatfield Broad Oak – Type A Village

Hatfield Broad Oak Inset Map

Individuals

- Object to the removal of the notation of Protected Open Space of Environmental Value from Great Chalks as currently shown in Adopted Local Plan. The site is constrained by the Conservation Area, numerous listed buildings, restricted highway access onto the High Street, and impact on neighbours' amenity. However, the designation of Protected Open Space of Environmental Value offers the strongest protection against development and the ensuing loss of this open space and trees which are visually important in the village landscape. The designation should be reinstated.

- As the local District Councillor I am against development in the grounds of Great Chalks and represent the residents of HBO in making this objection to any consideration of this land under any iteration or development of the local plan. In addition, a survey was carried out by the High Street residents last year where 19 out of 20 residents were opposed to development.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land north of Hammonds Road	24	1.2	New
Justification: Hatfield Broad Oak has range of services and facilities. The site lies on the eastern side of the settlement occupying a position behind existing hedgerow planting and away from the Hatfield Broad Oak Conservation Area and away from a concentration of nearby occupiers.			

Land south of Newbury Meadow, off Cage End Road	30	1	06HBO15
Justification: The site scored very highly against the criteria of suitability, achievability and availability.			

Land north of Newbury Meadow	10-12	0.45	07HBO16
Additional/alternative site(s) proposed	Additional/alternative site(s) proposed	Additional/alternative site(s) proposed	Additional/alternative site(s) proposed
Justification: The village is a sustainable settlement which is clearly able to tolerate further sensible expansion without the need for development to creep too far out beyond the proposed 'development limits' and without impact on the Conservation Area, the Ancient Monument to the north of the village or the 'Protected Open Space' within its centre. The site is immediately adjacent to the 'development limits' of the village and clearly forms an in-fill site between the village hall to the east, operational factory units to the west and housing (which is also outside of the village 'development limits') to the south.			

Hatfield Heath – Key Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land west of Mill Lane	35	6.7	04HHea15 (partly) Plus land to north (egg packing plant)
Justification: The site is considered to be suitable for residential development according to the UDC SHLAA. The site is supported by a site-specific Green Belt Assessment and is previously developed land. Additional housing should be identified in Hatfield Heath in order to meet the needs of the community and in accordance with the Settlement Hierarchy. This site would be ideally positioned for release from the GB.			

Land at High Pastures, Stortford		2	New
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Road			
Justification: The site is well contained by mature, tall hedgerows and trees and is associated with the sheds and storage yard, as well as the adjacent residential properties and built development and is suitable for release from the Green Belt.			

Land east and west of Mill Lane		0.8 (east) 0.6 (west)	04HHea15 (southern part) plus new area to east of Mill Lane
Justification: The Area consists of a rectangular meadow to the east of Mill Lane, and unmanaged orchard/ scrub land to the west of Mill Lane. It is considered that if the sites subject of this representation were assessed, it would be very likely to achieve the same conclusion as the assessment of 04HHea15, with the only planning constraint to its delivery being the current designation for Green Belt. The site is therefore considered to meet the test of suitability and would represent a sustainable development site within Hatfield Heath.			

Land at Cox Ley	70	3.7	03HHea15
Justification: The site is ideally located close to the village centre. It is within the Council's evidence base that the site does not fully meet the purposes of the Green Belt and would be suitable for release - " <i>There may be scope of some development in the south-east of the land parcel without causing coalescence but the overall openness and scale of the gap is important to restricting the merging of settlements</i> ". The site is not within a conservation area, nor are there any immediate listed buildings nearby. According to the Environmental Agency, the site lies outside of any flood zone.			

Henham – Type A village

Former Goods Yard and Elsenham Goods Yard (North)

Statutory Consultees and other bodies

Essex County Council

Surface water management Flood Zone 1, surface water flooding associated with Old Mead Lane. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Henham Parish Council and Ugley Parish Council comment that the whole of the site benefits from planning permission and not just the northern part.

Individuals

Ensure development of 16 units on Old Mead Road is counted and described as Old Mead Road and not Old Mead Lane. Site is partially within Elsenham and closer to Elsenham and therefore should be included in allocation for Elsenham. Constraints should include proximity of railway and lack of public footpath

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
School Lane, Henham	36	1.13	04Hen15
Justification: In a recent appeal the Inspector found the site a sustainable location, would not result in harm to the character of the area or wider countryside, and would cause no material harm in terms of highway safety and would provide for suitable mitigation in relation to biodiversity enhancement requirements. The sole reason for the Inspector rejecting the			

appeal related to a rectifiable deficiency in the unilateral undertaking.

Blossom Hill /Land north of Chickney Road	10-12	1.24	07Hen16 (part)
Justification: The rejection of this site has not been justified or informed by the findings of the Sustainability Appraisal.			

Cricket Field, Mill Road	70-90	8.87	New
Justification: The site is within walking distance of village amenities; it is wholly within Flood Risk Zone 1 and is not subject to any ecological or landscape designations.			

Land adjacent to Grind Hall	5	0.7	03Hen15
Justification: This urban edge site, by virtue of National and Local Policy should be allocated.			

High Roding – Type A Village

Meadow House Nursery

Statutory Consultees and other bodies

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the heritage assets and their setting. These requirements should be included in the policy and supporting text of the Plan.

Essex County Council

Surface water management: Flood Zone 1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Littlebury – Type B Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land east of Cambridge Road	Up to 18 dwellings	0.6	01Lit15
Justification: Two representations have been made by different agents for the same site, although one site extends further north. This is a brownfield site. There is an existing footpath to Rectory Farmhouse and informal footpath linking to the site which can be upgraded to adoptable standards. The loss of the existing employment uses can be offset by the provision of live/work units. The site is not within the conservation area and provides an opportunity to improve the setting of the listed building to the south. The site is largely free from any physical constraints; it is located within Flood Zone 1 with flat topography.			

Leaden Roding – Type A Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land north of Stortford Road	13	0.5	01LRod15
<p>Justification: The site is adjacent to the village settlement boundary and easily accessible. Development in this location would provide a valuable link between the western edge of the village and the local amenities along Stortford Road. The site is well enclosed by physical boundaries and would not promote unwarranted development sprawl. Its development would be in-keeping with the existing development patterns in the village and along Stortford Road specifically. Additional housing should be identified in Leaden Roding in order to meet the needs of the community and in accordance with the Settlement Hierarchy. This site would be ideally positioned for release from the Green Belt.</p>			

Little Chesterford – Type B Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land north east of London Road, Great Chesterford (Little Chesterford Parish)	132	6.6	03LtChe15
<p>Justification: Great Chesterford is a medium sized village with a range of services and facilities including a rail station and access to the M11. The site is largely free from any physical constraints; it is located within Flood Zone 1. The site does not contain any listed buildings, and additional landscaping would appropriately safeguard the setting of nearby listed buildings.</p>			

Land to the south-west of London Road Great Chesterford (Little Chesterford Parish)	100	3	04LtChe15
<p>Justification: The Council's assessment of the site through the SHLAA is that this site is sustainable. Issues raised by the Parish Council can be mitigated. Site could be developed in two phases of 50 dwellings.</p>			

Land adjacent Manor Cottages	10	0.5	05LtChe15
<p>Justification: The village is close to Great Chesterford which contains a range of facilities and services, there are employment opportunities at Chesterford Research Park. The village is served by high frequency bus service between Cambridge and Saffron Walden</p>			

Little Dunmow – Type B Village

Dunmow Skips Site

Statutory Consultees and other bodies

Essex County Council

Surface water management: Detailed planning permission already granted. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land north of Flitch Green, Little Dunmow	750 dwellings	48.45	parts of 02LtDun15 and 03GtDun15

Justification: Site could accommodate housing and services and facilities as the first phase of a Garden Community totalling 2,000-3,000 dwellings incorporating land to the west. The Sustainability Appraisal recognises that the site performs well in sustainability terms. Site is in central location on the A120 corridor with links to M11 and A12 and south to Chelmsford. A landscape scheme could soften any forms of built development by integrating the proposal into the landscape. The setting of these listed buildings can be protected through the design and layout of the proposals, including through appropriate landscaping and boundary treatments, as well as the positioning of amenity greenspace within the site. Site is entirely within flood zone 1. The site is not constrained by the need for prior mineral extraction and land restoration, and development could go ahead without delay.

Little Easton – Type B Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land to the rear of the Stag PH	28	2	03LtEas15

Justification: Type B villages should see some development to ensure the long term sustainability of the village and ensuring a mixed and balanced community. Representation proposes a mixed use scheme that provides a logical and sustainable extension to the existing settlement boundary and one that is tailored to address local needs, including the provision of a new community shop.

Little Hallingbury – Type A Village

Land at Dell Lane

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

Any development of the site therefore has the potential to impact upon Wallbury Camp heritage asset. It is important that any development of this site will need to preserve the heritage asset and their setting. These requirements should be included in the policy and supporting text of the Plan.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land at Wright's Green, south of Goose Lane	"suitable for range of development uses"	4.24	03LtHal15
Justification: The site is a logical location for expansion of the village contained by the M11.			

Land at Motts Green, land to the east of Lower Road and south west of Wrights Green	"suitable for a range of development uses"	3.23	02LtHal15
Justification: The site is a logical location for expansion of the village with infill development			

Manuden – Type A Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land north of Stewarts Way The Street		4.5	02Man16 plus additional land to the north west
Justification: The site is relatively featureless with the exception of trees and hedges on the boundaries. It is not subject to any constraints or designations. It adjoins the development limits. It is in flood zone 1. Manuden benefits from a range of facilities. The site has the potential to incorporate additional facilities and services for the village including potentially a village shop. 02Man16 was considered suitable for housing and that this larger site shares the same characteristics that made 02Man16 suitable.			

Newport – Key Village

Bricketts, London Road, Newport

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance

NEWP 2 Bury Water Lane/Whiteditch Lane, Newport

Statutory Consultees and other bodies

Essex County Council

Surface water management: Development has commenced on site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

Newport Conservation Area is located to the east of the site and Shortgrove Hall Grade II Registered Park and Garden lies to the west of site. Any development of the site therefore has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve the conservation area and Registered Park and Garden and their settings. These requirements should be included in the policy and supporting text of the Plan.

Land opposite Branksome, Whiteditch Lane, Newport

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

The Newport Conservation Area is located to the east of the site and Shortgrove Hall Grade II Registered Park and Garden lies to west of site. Any development of the site has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve the heritage assets

Individuals

Concerned is raised about access to this site. The narrow lanes are not suitable or the amount of car journeys required. Also traffic will be routed over a crossing used by Newport school pupils to move from one part of their school to another.

Land south of Wyndhams Croft, Whiteditch Lane, Newport

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance

Historic England

Newport Conservation Area is located to the south of the site long with two Grade II listed buildings, Shortgrove Hall Grade II Registered Park and Garden lies to west of site. Any development of the site therefore has the potential to impact upon this heritage asset. It is important that any development of this site will need to preserve the heritage asset and their setting. These requirements should be included in the policy and supporting text of the Plan.

Land west of Cambridge Road, Newport

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1, no shown surface water flooding on site. Surface flooding associated with railway line to west of site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

The site is located opposite three Grade II listed structures which include the gates and piers at the west entrance to Shortgrove Park, the wall of the Carnation Nursery, and the bridge over the River Cam. Shortgrove Hall itself is a Grade II Registered Park and Garden. Any development of the site therefore has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

Reynolds Court, Gaces Acre, Newport

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1, some ponding of surface water in 1 in 30 and 1 in 100 flood events. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

There are number of heritage assets surrounding this site including the Newport Conservation Area, the Grade I listed Church of St Mary the Virgin, and several Grade II listed buildings. Any development of the site therefore has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

Land at Holmwood, Whiteditch Lane, Newport

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

The setting of Shortgrove Hall Grade II Registered Park and Garden to west of site should be considered. The requirement in the policy for a Landscape and Visual Impact Assessment is welcomed.

Land at Bury Water Lane, Newport

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

The Newport Conservation Area is located to the east of the site; development at the proposed site could also have the potential to impact upon the setting of the Grade I listed Church of St Mary the Virgin. Therefore, proposals on this site will need to have regard to the setting of this heritage asset. Reference should also be included in the supporting paragraph to the need to protect the setting of these heritage assets. The requirement in the policy for a Landscape and Visual Impact Assessment is welcomed.

Individuals

Permission was given for this site on 1st November 2016 for 'Residential care home facility (up to 50 beds) together with an extra care development (up to 90 units comprising of apartments and cottages) all within Use Class C2; associated communal facilities.

The text on this document is vague and doesn't mention the care home. It is shown as only 81 units. And the site map is incorrect - the one published is a duplicate of the nearby Cala Homes development of 84 houses. So the figure is understated by 59.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land at London Road	94	4.6	06New15
Justification: Newport has a good range of services and facilities. Site was included in the Submission Plan 2014. Site not constrained by landscape or conservation reasons			

Land at Bury Water Lane		0.7	07New15
Justification: Newport has a good range of services and facilities. Site not constrained by			

landscape or conservation reasons

The Piggeries,
Debden Road

8

0.3

01New15

Justification: Newport is a sustainable location for development and this site is well located for local services.

Land south of Wicken
Road

150

6.1

04New15

Justification: Newport has an excellent range of services and facilities. The proximity of the site to the M11 motorway to the south and west, and the village of Newport to the north and east creates a distinct barrier between the site and the surrounding landscape. Thus it is considered that the scenic quality of the surrounding landscape will not be detrimentally affected by the proposed development. Subject to good design, the proposals will have a negligible to low impact upon the setting of the church and no impact upon other built heritage assets in the village. Vehicular access to the site can be achieved from Wicken Road through the provision of a simple priority junction and the network has sufficient capacity to accommodate the impact of the development. The site is in Flood Zone 1.

Quendon and Rickling – Type A Village

Ventor Lodge

Statutory Consultees and other bodies

Historic England

Development of this site is likely to impact upon the setting of heritage assets. It is important that any development of this site will need to conserve and where opportunities arise enhance the conservation area and preserve the listed buildings and its setting therefore high quality design is encouraged. These requirements should be included in the policy and supporting text of the Plan.

Essex County Council

Surface water management: Flood Zone 1, surface water flow across the west of site.

Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Land east of Foxley House

Statutory Consultees and other bodies

Historic England

Development of this site is likely to impact upon the setting of heritage assets. The policy identifies that development of the site must respect the setting of the conservation area; this is a welcome inclusion but should be expanded to include consideration of the setting of the adjacent listed buildings. The cumulative impact of development of these three adjacent sites must be considered so that development integrates into the existing urban grain and form, and that the established character of the settlement is preserved

Essex County Council

Surface water management: Flood Zone 1, significant part of the site is at risk of surface water flooding across the site in a 1 in 30 and 1 in 100 flood event. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Quendon and Rickling Parish Council

In view of the recent scale of development in the village the allocation of this site would need substantial investment in the village. Specifically we would want to see under S106, or the like, the provision of a new Community Hall plus further recreational provisions. We also have grave concerns that the sewage system is close on capacity in Quendon. Should 19 homes be provided we would want to see a mixture of Affordable Homes plus provision for the elderly or less able, by supplying for example, 1 bedroom units.

Individuals

The development within the non-garden communities should be subject to the same principles that govern the garden communities, in order to deliver the same benefits for the community. This development, as proposed, is simply an exercise in a developer dumping another identikit housing estate in an inappropriate setting, eroding the distinctive character of the village. It brings no benefit to the community. The school is full, the sewerage is dysfunctional, the traffic is atrocious and adding more houses will only make matters worse.

Land south of Foxley House

Statutory Consultees and other bodies

Historic England

Development of this site is likely to impact upon the setting of heritage assets.

Essex County Council

Site under construction. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land north east of Belchamp's Lane, Rickling Green		6.4	New
Justification: The village is a sustainable location for development with a range of services and facilities. The site is largely free from any physical constraints, it is located within Flood Zone 1 and is well-screened by a large hedgerow containing mature trees to the south and comprises a logical extension to the existing settlement and can be assimilated into the built development of the settlement without any adverse visual impact on the surrounding countryside and setting of the village in longer views. Development of the site provides the opportunity to formalise pedestrian access directly between the playing fields and the green, to improve the existing playing fields and potentially provide a clubhouse along with housing development to help meet the district needs over the plan period. A new highway access could be provided onto Belchamp's Lane at the existing field access point, with adequate visibility. Retention of the playing fields with enhanced landscape planting will help to safeguard the wider setting of the conservation area. Finally; the residential development of this site could potentially enable junction improvements of Belchamp's Lane with the B1383.			
Land south west of Brick Kiln Lane, Coney Acre, Rickling Green		1.5	New
Justification: The village is a sustainable location for development with a range of services and facilities. The site is a logical infill and the entrance to the settlement being contained from distant views by the adjoining woodland. The site is free from physical constraints, it is located in Flood Zone 1 and there are no significant changes in level.			
Land at Quendon	20	2.52	04Que15

Glebe, (south) London Road			
Justification: The site is well located to the school and bus stops. There are no natural features on the site. Boundary hedgerows would be retained and incorporated into the development where possible. The site is bounded by residential properties in all directions.			

Land at Quendon Glebe (north) London Road	10	0.85	05Que15
Justification: The site is well located to the school and bus stops. There are no natural features on the site. Boundary hedgerows would be retained and incorporated into the development where possible. The site is bounded by residential properties to the north, agricultural land to the east and The Parish Church to the south.			

Radwinter – Type A Village

Land north of Walden Road

Statutory Consultees and other bodies

Essex County Council

Surface water management: Some of the eastern part of this site in Flood Zone 3. Surface water flooding associated with river across eastern half of the site. This should be taken into account when designing the site and drainage scheme. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

The Radwinter Conservation Area is located to the west and the Grade II listed Village School. It is recognised that the site is already underway.

Saffron Walden – Town

Saffron Walden Inset Map

Landowner

Piece of land between Station Road and Longhedges, Saffron Walden is designated Protected Open Space of Environmental Value. This is private land and an integral part of the garden to 2 Longhedges. No other privately owned land seems to be identified as protected open space and the notation should be removed.

General Comments

Individuals

- Opposed to any further housing development within Saffron Walden unless there is a significant increase in primary and secondary school places and an increase in provision of GPs, sport and recreation facilities and open spaces.
- No building should be allowed on the flood meadows near Freshwell Street and the pond.
- Walden School must be retained as a school, whether or not any other secondary schools are later built in the town.
- Concerned about the impact of housing on traffic congestion in Saffron Walden. There needs to be a new road to route new housing on the east of the town to Audley End station and M11, thereby preventing it from going through the town centre.

- The Ashdon Road is already full of congestion and road rage so steps need to be taken to ease flow of traffic on this road.

Developers, Agents and Landowners

- Saffron Walden is considered well located and suited to accommodate additional growth. The town has significant heritage, is served by a wide variety of services and visitor attractions; it has access to Audley End railway station and is served by a number of regular bus services and is in close proximity to M11.

Land south of Radwinter Road, Saffron Walden

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1, few minor spots of surface water flood risk areas in 1 in 100 flood event. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Education: This policy should specifically allocate the 1.2ha. of land defined in the signed s106 agreement. A further 0.9ha of land adjacent to it should be safeguarded by a D1 use class allocation.

Saffron Walden Town Council object to this proposed site.

Land r/o The Kilns, Thaxted Road, Saffron Walden

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1, significant surface water flooding in 1 in 30 and 1 in 100 flood events. Should be taken into account when designing the scheme. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Individuals

- This land was originally designated for retail/commercial use
- danger of being extended further into adjacent open spaces which will hopefully not be used as a reason to allow further development beyond the current 'town boundaries' which would be greatly detrimental to the quality of life for existing and even new residents in respect of traffic congestion, pollution and stretched services.

Former Wills and Gambier Site, 119 Radwinter Road, Saffron Walden

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1, surface water flooding to south of site in 1 in 30 and 1 in 100 flood events. This should be taken into account when designing the scheme. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Land at Ashdon Road Commercial Centre, Saffron Walden

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1, some surface water flooding in a 1 in 30 and 1 in 100 flood events. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Former Willis and Gambier Site, 121 Radwinter Road Saffron Walden

Statutory Consultees and other bodies

Essex County Council

Surface water management: Site under construction. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Saffron Walden Neighbourhood Plan Group considers that the 42 bed care home needs to be included in this site.

Moore's Garage, Thaxted Road, Saffron Walden

Statutory Consultees and other bodies

Essex County Council

Surface water management: Site is under construction. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Saffron Walden Neighbourhood Plan Group comment that there is no mention of retail/commercial development of this site.

Land west of Lime Avenue, Saffron Walden

Statutory Consultees and other bodies

Historic England

Development of this site is likely to impact upon the setting of heritage assets. It is important that any development of this site will need to conserve and where opportunities arise enhance the conservation area and preserve the listed buildings and its setting. The development should be of high quality design. These requirements should be included in the policy and supporting text of the Plan.

Essex County Council

Surface water management: Flood zone to west of site associated with the Slade. Surface water flow across the site in a 1 in 100. This flow should be taken into account when designing the drainage scheme. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Wendens Ambo Parish Council object as this is another greenfield site behind an area already over-crowded with vehicles, on-road parking and poor access. The proposal is made despite the acknowledgment that there is a big flood risk to this area.

Land south of Tiptofts Lane, Thaxted Road, Saffron Walden

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Transport: It is assumed that this site will access highway via the internal road network. It has not been demonstrated Tiptoft Lane is suitable for additional vehicular access.

Land north and south of Thaxted Road, Saffron Walden

Statutory Consultees and other bodies and other bodies

Historic England

The Grade II listed Barn at Herbert Farm is located to the south of the proposed site. There are no other known designated heritage assets within the site or nearby which would be affected. The requirement for a Landscape and Visual Impact Assessment and responsive layout/ design is welcomed. There is, however, the potential for development to impact upon the overall character and setting of the town including views into the historic town centre. Development in this location could also impact on transport movements and in turn affect the historic environment within and surrounding the town. It is recommended that a Heritage Impact Assessment is undertaken for this allocation.

Essex County Council

Surface water management: Flood Zone 1, surface water flooding for 1 in 30 and 1 in 1 in 100 flood events associated with watercourses on site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Saffron Walden Town Council objects to this allocation. Attention is drawn to the appeal which was dismissed, and it is considered that nothing has changed to move from this position and it is noted therefore that the site must still be considered unsustainable in light of no changes to traffic flow, traffic management or air quality management.

Wendens Ambo Parish Council object to this site on the grounds that it is a greenfield site and given its location, the additional impact on local roads will be severe without a new road to alleviate congestion on this side of Saffron Walden. Planning permission already granted on this side of the town is more than sufficient and is already causing transport difficulties and putting pressure on schools and other services.

Saffron Walden Neighbourhood Plan group object to the site being included in the allocation as there are better sites that could help provide a 2Form Entry school.

WeAreResidents.org objects to this allocation. It has been found on appeal to be an unsustainable location; there are adverse traffic and air quality impacts; the site area is larger than that required for 150 dwellings and could lead to incremental growth.

Saffron Walden Skate Group consider that the southern part of the site (south of Thaxted Road) offers the opportunity to create two new and exciting buildings, one housing an Emergency Hub for local police, fire and ambulance services and the other a Community Hub for people of all ages, together with extensive land for exercise and creative use. We think that Saffron Walden has a need for innovative landscaping, outdoor exercise facilities, a bike track, a cafe and green space for informal use and having fun. The Group thinks that this housing site offers the best opportunity for community gain in Saffron Walden.

Developers, agents and Landowners

- Freehold owner of the land supports the allocation for 150 dwellings. A Transport Impact and Accessibility Review commissioned by the developers demonstrates that the impact of 150 dwellings is not significant. The design of the scheme could incorporate the southern section of a link road between Thaxted Road and Radwinter Road if required. An Air Quality assessment concluded in changes in concentrations at all receptor locations as negligible, except in one location which predicted a slight increase. A desktop report concludes that there is low likelihood of the site being contaminated. The site comprises both Grade 2 and Grade 3A agricultural land reflecting the majority of the district. It is therefore important that where agricultural land is lost to development it is sustainably located such as this site.
It is considered inappropriate to allocate the 20ha site as shown for 150 dwellings and therefore propose that the area of land to be allocated for development is reduced to 7.92 ha comprising part of the land to the north of Thaxted Road, adjacent to Rylestone Way and north of The Kilns. The policy should just refer to Land north of Thaxted Road and no reference should be made to land south of Thaxted Road. The policy needs to provide guidance on whether or not the allocation needs to make provision for the delivery of the southern section of a link road between Thaxted Road and Radwinter Road. Consequential changes need to be made to the inset map.
- Site supported by agents for land to south of Saffron Walden and suggest that allocated land south of Thaxted Road should be developed for housing and not recreational uses therefore making client's site a logical extension of Saffron Walden in the years to come.

Individuals

- Support as a means of providing sustainable affordable housing with community allotment space and start up business potential, and modes of transport other than the car. It was also enable the development of The Hub community asset.
- Object to any building to the rear of Tukes Way and Peal Road, (land south of Thaxted Road). Understand the land would be transferred to the local council for leisure activities – what would this entail?
- Object to scale of development and the additional traffic that this will create
- Object to loss of agricultural land and land for wildlife.
- Site has been previously rejected and should be rejected again
- Plan fails to address the infrastructure problems facing the town through these allocations and developing land to the east of the town will exacerbate those infrastructure problems, namely transport issues of people driving through the town to get to supermarkets, railway station, leisure and other services.
- Is the statement that development must have no adverse impact on the AQMA an unequivocal statement by UDC that, if the development would bring even a negligible increase in NO2 levels at junctions that exceed the legal limits, mitigation measures that bring the levels down to current ones must be agreed before development is approved? Or is this just a preference?
- It is vitally important that housing development for this site is kept to the East to ensure the future viability of a link road to Radwinter Road.
- Housing Development on the parcel of land to the rear of the Lord Butler Leisure Centre and the 'Linear Strip' should be opposed and this land safeguarded for leisure and open space activities. The 'Linear Strip' was originally created and insisted upon by Uttlesford Planners to ensure that housing development did not encroach further than that which existed at that time.

Land at Viceroy Coaches, to r/o 10-12 Bridge Street, Saffron Walden

Statutory Consultees and other bodies

Historic England

The policy requires development of this site have consideration for the conservation area and number 12 Bridge Street but makes no mention of the other nearby heritage assets. Proposals on this site will need to have regard to the setting of all relevant nearby heritage assets. Development of this site is likely to impact upon the setting of these heritage assets. It is important that any development of this site will need to conserve and where opportunities arise enhance the conservation area and preserve the listed buildings and its setting. The development should be of high quality design. These requirements should be included in the policy and supporting text of the Plan.

Essex County Council

Surface water management: Flood zone and surface water flooding associated with river to north of site.

Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Transport: It has not been demonstrated that this proposed allocation can provide safe access onto Bridge Street. Further investigation is required.

Saffron Walden Town Council supports this proposed site.

Wendens Ambo Parish Council objects to the site on the grounds of over-development/density of housing and inappropriate scale given difficult and tight access onto main road through the town. Density of housing may also increase flood risk for neighbours further down Bridge Street who are already at risk of flooding. This is another site in a

conservation area and the density of housing proposed is unlikely to be compatible with the area or the quality of life of residents.

Saffron Walden Neighbourhood Plan Group comment that there is no mention of the Grade 2 listed building to be conserved.

WeAreResidents.org suggests additional text stating that the grade 2 listed building will be protected.

Jossaumes, Thaxted Road, Saffron Walden

Statutory Consultees and other bodies

Historic England

The policy itself makes no reference to the onsite listed building, although it is mentioned in the supporting text, and subsequently there is no provision for its conservation or enhancement, or its setting. The policy omits to reference the proximity of the Conservation Area, as a designated heritage asset its setting must also be considered. We object to the wording proposed as the policy does not differentiate between the listed building and the industrial buildings thus demolition of the onsite industrial buildings would allow the listed building, the earliest Gas Works building in East Anglia, to be lost.

The policy should be amended to ensure development of this site will have regard to the conservation and enhancement of the onsite listed building and its setting, and to the Saffron Walden Conservation Area. In the absence of these provisions we object to this site allocation. It is noted that a Landscape and Visual Impact Assessment would be required; we would recommend that the policy also specifies the need for a Heritage Statement to accompany any prospective applications.

Essex County Council

Surface water management: Flood Zone 1. There is no evidence of surface water flooding on site according to surface water flood maps. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Saffron Walden Town Council supports this proposed site.

Saffron Walden Neighbourhood Plan Group comments that the existing buildings should be retained and included in the Local Listing.

WeAreResidents.org suggests additional text stating the main gasworks building should be retained and built into the development.

Land at De Vigier Avenue, Saffron Walden

Statutory Consultees and other bodies

Historic England

There are no designated heritage assets within or near the site. The proposed site would not project beyond the eastern most points of the existing development, the small number of dwellings proposed means that the site could be developed and successfully integrated into the existing urban grain; as such the reference in the policy to base design and layout on the findings of a Landscape and Visual Impact Assessment is welcomed.

Essex County Council

Surface water management: Flood Zone 1, surface water flow across north west corner in 1 in 100 year flood event. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Transport: There is no obvious access from the proposed allocation to highway. Further consideration must be given as to how this will be achieved.

Saffron Walden Town Council object to this allocation as this is an area loved and protected by local residents.

Saffron Walden Neighbourhood Plan group object as this site is already designated as a green space in a 1988 S106 agreement.

WeAreResidents.org consider this an unsustainable site as it currently provides significant natural benefits in an area largely devoid of them.

Individuals

- Object to the allocation of this site as Ashdon Road is already very dangerous even without taking into account the traffic from the Ridgeons development.
- Site is home to a wide range and extensive numbers of fauna which warrant protection;
- Development of the site is contrary to policies EN8 and EN9.

56 High Street, Saffron Walden

Statutory Consultees and other bodies

Historic England

The site contains the Grade II listed entrance arch to numbers 56, 58, and 60 High Street, the site is also located within the Saffron Walden Conservation Area. The policy makes reference to the presence of these heritage assets and states that development should not adversely impact upon them or their setting which is welcomed. Further emphasis should be placed on the presence of neighbouring listed buildings and the need to have regard for their setting. It is important that any development of this site will need to conserve and where opportunities arise enhance the conservation area and preserve the listed buildings and its setting. The development should be of high quality design. These requirements should be included in the policy and supporting text of the Plan.

Essex County Council

Surface water management: North of the site is in Flood zone 2 & 3. There a few spots of surface water flooding in a 1 in 100 year surface water event. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Wendens Ambo Parish Council object on the grounds of over-development/density of housing proposed in a conservation area with a listed building on the site.

Saffron Walden Neighbourhood Plan Group comment that retail to be retained at Ground Level throughout the development and first/subsequent floors made residential. Also, asks can the High Street/George Street not be added to this site? Scout Hut must be retained or provision made for an alternative

WeAreResidents.org suggests additional text stating that the ground floors of the development should be maintained for retail and commercial use.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Former Pulse Flexible Packaging ltd factory, Radwinter road	Range of uses	2	New
Justification: The site is brownfield and located within the settlement boundary. Site is suitable for redevelopment and local plan should allow for flexibility for the site to come forward for a range of options such as residential, retail, care, retirement and commercial.			

Land at Harvey Way / Ashdon Road	5	0.17	36Saf15
Justification: Underutilised private land within the town development limits. Development would provide a visual benefit by strengthening of the streetscene via unified frontages on both Harvey Way and Ashdon Road. Combined with the need to maximise development within settlements, it is considered that the benefits of development on the site would outweigh the loss of the open space. Open space designation should be removed facilitating the development of the site as a windfall site.			

Land to the south of Saffron Walden.	132	6.6	08Saf15
Justification: Site bounded by residential development to the north west; access is available from Thaxted Road through land in same ownership. Site is in Flood Zone 1. Site could be developed in conjunction with allocated land south of Thaxted Road.			

Land east of Little Walden Road	85	3.69	10Saf15
Justification: Development permitted on appeal for up to 85 dwellings and therefore needs to be included as a commitment.			

Land at Shire Hill Farm	100-200	25.7	11Saf15
Justification: Site performs a second phase to the site south of Radwinter Road which will lead to a better overall design. It will unlock the delivery of the 2 form entry primary school. Site was dismissed following the testing of a significantly larger capacity than being promoted. WeAreResidents.org considers this site a reasonable alternative to the land north of Thaxted Road. It could accommodate 75 dwellings and provide land for a second form entry to the primary school, it is not visible to the town and is closer walking distance to core amenities.			

Sewards End – Type B Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land at 6 Walden Road	50	1.8	02Sew15
Justification: Site has no specific features or designations which would constrain development. Site well related to village. Site is 2km east of Saffron Walden and much of the town's existing and proposed employment is located on the eastern side of the town. Bus service provides a useful connection to the town. The site is within easy cycling distance of Saffron Walden. A new primary school is being provided on eastern side of town. Development is acceptable in traffic and transport terms.			

Site adjacent Village	36	4	05Sew15
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Hall			
Justification: Swards End is a thriving community. Site is in close proximity to new primary school being provided in Saffron Walden. Development will support sustainability of village and neighbouring villages.			
Land east of Swards End	38	3	03Sew15
Justification: Site is vacant former agricultural land. It is not constrained by Green Belt or Countryside Protection Zone.			

Stansted Mountfitchet – Key Village

2 Lower Street, Stansted Mountfitchet

Statutory Consultees and other bodies

Essex County Council

Surface water management: Development commenced. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Land at Walpole Farm

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood zone on Cambridge road, Surface water flow on site for 1 in 30 and 1 in 100 flood events. This should be taken into consideration when designing the site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Education: ECC understands that this site has an extant s106 agreement relating to it that includes provision of Early Years & Childcare facilities land. Assuming that is still required (as appears likely given current position on local provision) reference to an associated land allocation for D1 use is missing.

Developers, Agents and Landowners

- Object to the reduction of the site capacity to 147. The site had outline permission for 160 units and the approved reserved matters is for 147. This does not justify the lowering of the capacity from that allowed for under the outline permission and the 160 capacity should be restored.

Mead Court, Stansted Mountfitchet

Statutory Consultees and other bodies

Essex County Council

Surface water management: Development commenced. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Land at Elms Farm, Stansted Mountfitchet

Statutory Consultees and other bodies

Essex County Council

Surface water management: In flood zone 2 and 3. Surface water flooding in 1 in 30 and 1 in 100 associated with flood zone. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Land West of 8 Water Lane, Stansted Mountfitchet

Statutory Consultees and other bodies

Essex County Council

Surface water management: In flood zone, surface water flooding in 1 in 30 and 1 in 100 associated with brook Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

There are no designated heritage assets within the site, nor are there any nearby which would be affected. The site is a brownfield site adjacent to a rail line and existing residential development. The scale and layout of proposed development of this site should be considered so that any new development integrates into the existing urban fabric. The requirement for a Landscape and Visual Impact Assessment is therefore welcomed.

Land east of Cambridge Road (B1383) and west of High Lane,

Statutory Consultees and other bodies

Essex County Council

Surface water management: Flood zone to north of site. Surface water flooding associated with brook in a 1 in 30 and 1 in 100 rainfall event. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

This site is located next to site Land at Walpole Farm, Stansted Mountfitchet which already benefits from permission. Together these sites will constitute a substantial urban extension to the settlement. There are no designated heritage assets within the site boundary or nearby which would be affected directly however the cumulative impact of development upon the townscape of the settlement should be considered.

Stansted Mountfitchet Neighbourhood Plan Group comments that policy proposes development at too high a density (40 dwellings on 1.2 ha) for an edge of village locations. Densities should be lower at the edge of the village to allow hedgerows on important gateway roads to Stansted to be retained and views preserved.

Developers, Agents and Landowners

- Allocation supported. It is a well-contained, triangular site contained by roads and existing development. This land adjoins an existing established settlement, and one which is identified through the Local Plan's evidence as being one of the most sustainable to accommodate housing growth in the District.
- Unsustainable location and significantly greater landscape and environmental impacts compared to other sites such as Pines Hill.

Individuals

- Too much damage has already been approved for the northern approach into the village.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land north of Stansted Mountfitchet		15	07Sta15,
		24	24Sta16,
		45	25Sta16,
		15	15Sta15,
		9	12Sta15
Justification: Stansted Mountfitchet is a sustainable location for growth. The development limits have been drawn tightly and act as a constraint to sustainable growth. The rejection of sites has not been fully justified through the sustainability appraisal. The sites are not subject			

to any ecological, heritage or environmental designations that suggest it is unsuitable for housing. A comprehensive development of sites would allow for a suitable layout to be achieved with adequate landscaping mitigating any impact of development extending into the countryside.

Land west of Stansted Mountfitchet		40 ha	13Sta15 800
Justification: The site is within walking distance of a range of services and facilities within the village. The site lies adjacent to the settlement boundary. It is not subject to any physical constraints and is located in Flood Zone 1. It is not subject to any ecological designations. The north eastern corner of the site lies within the Conservation area providing the opportunity to provide high quality development that will have a positive impact on the character of the area.			

Land at Pines Hill	70	2.5	02Sta15
Justification: This is a well screened site already partly developed with commercial and residential uses and is sustainably located close to existing services. The site does not perform any greenbelt function.			

Land east of High Lane and north of The Croft		3.4	17Sta15
Justification: The site is within easy walking distance of a range of services and facilities and is not constrained by Green Belt.			

The Stables, May Walk, Elsenham Road	50	4.2	New
Justification: The site is a logical extension to Elsenham. Site has access to footpath and bus route and is well contained minimising any impact on its wider countryside location.			

Manor Farm, north east of Church Road	130	8.83	New
Justification: The site is within 500 metres of the village centre and its various services, employment, and transport connections. It is also on the right side of the village for those using cars to travel to Bishop's Stortford, the Airport and M11 & A120. There are no designated heritage assets on the site. The site can be accessed from two crossings at Church Lane and off the private drive to the Manor House and Manor House Cottage. A mini-roundabout to the Walson Way junction with Church Lane could be explored as a further possible entrance to the site, if required. The site is in Flood Zone 1.			

Stebbing – Type A Village

Inset Map for Stebbing

Developers, Agents and Landowner

The Development Limits for Stebbing exclude existing and proposed development on the south-west side of Brick Kiln Lane which we suggest should logically be included within the Development Limits. Planning permission has been granted for 5 dwellings along the

frontage between Oak Cottage and Appledore (UTT/15/0515/OP) which consolidates development along Brick Kiln Lane.

Land at the east of Parkside and r/o Garden Fields

Statutory Consultees

Essex County Council

Surface water management: Flood Zone 1, no shown surface water flood risk on site.

Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Developers, Agents and Landowners

On behalf of the landowner we support this site allocation, subject of planning permission granted 17 February 2015 (UTT/14/1069/OP). The proposals for residential development on the site are being progressed.

Individuals

There is and cannot be an adequate access to this site.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land at Bran End		0.55	02Ste15
Justification: Site would form a logical extension to the village in conjunction with the delivery of open space and the conservation of rural resources.			

Land at Stebbing		2.2	08Ste16
Justification: Sites offer scope to development area of land nearer the road avoiding area subject to flooding. Development of the sites would provide a greater choice of housing in the village and assist in sustaining the school in addition to other services.			

Takeley – Key Village

Land at Dunmow Road, Little Canfield, Takeley

Statutory consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1, no shown surface water flood risk on site.

Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Brewers End, Takeley

Statutory consultees and other bodies

Essex County Council

Surface water management: Development Commenced. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

There are listed buildings nearby and the site is adjacent to a Roman Road which increases archaeological potential. No reference to these issues has been made in the policy.

Chadhurst, Takeley

Statutory consultees and other bodies

Essex County Council

Surface water management: Development commenced. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

Any development of the site has the potential to impact upon heritage assets. It is important that any development of this site will need to preserve the listed buildings and their settings, and consider archaeological potential. These requirements should be included in the policy and supporting text of the Plan.

North View and 3 The Warren, Little Canfield (Takeley)

Statutory consultees and other bodies

Essex County Council

Surface water management: Development commenced. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Land at Tree Tops, Dunmow Road, Little Canfield

Statutory consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1, no shown surface water flood risk on site. Some surface water flooding shown on Dunmow Road in 1 in 30 and 1 in 100 rainfall event.

Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Land between 1 Coppice Close and Hillcroft, south of B1256 Takeley Street, Takeley

Statutory consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1, slight spot of surface water flood risk in a 1 in 100 rainfall event. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Takeley Parish Council objects to the allocation because it is in the Countryside Protection Zone and is too close to a SSSI to prevent encroachment.

Developers, Agents and Landowners

- Allocation is supported. The site is not within the CPZ as stated in the draft policy.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land opposite Smiths Green	40-50	1.75	New
Justification: This is an infill vacant site and is clear of trees and vegetation.			

Land at Great Canfield Road	200	5	04GtCan15
Justification: Takeley has direct access to community facilities, including Priors Green neighbourhood centre. The site is not subject to any national, local or other landscape designations and is well contained within the landscape. A landscape appraisal has confirmed that through sensitive landscaping, green infrastructure provision and good quality design, any impact of a development on the countryside and the character of Takeley could be minimised. A study has demonstrated that the proposed development would not give rise to unacceptable ecological impacts.			

Land to the south of land at Great Canfield Road		14.6	New Additional land to 04GtCan15 above
Justification: There are no known constraints that would preclude development on this land and it should be considered as a potential option for delivering additional housing growth in Takeley.			

Land north of Priors Green	1200		10Tak15
Justification: The site can provide for a sustainable, mixed-use residential-led extension to the Key Village of Takeley. It can deliver a new community of houses, primary and secondary school, new country park to relieve pressure on Hatfield Forest, local centre. The location of the site between the built form of Takeley and the A120, and its relatively flat topography will ensure that the impact of this proposal on the surrounding landscape will be limited. The A120 provides a strong durable boundary that will prevent further development towards the airport and therefore development will not have a significant impact on the role of the CPZ. Masterplanning can ensure the setting of many of the heritage assets will remain largely unchanged. The new community would be delivered through the Town and Country Planning Association's garden development principles. ECC are joint landowners and land value capture will, in part, be returned to the public purse.			

Thaxted – Key Village

Land off Wedow Road

Statutory consultees and other bodies

Essex County Council

Surface water management: FZ1, no shown surface water flood risk on site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Thaxted Society support the policy

Individuals

- Further development at the top of Wedow Road is completely inappropriate given the narrow road access, which even goes down to single track width at the junction with Town Street. With parked cars, this area cannot cope with further traffic.

Land east of the Mead

Statutory consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1, no shown surface water flood risk on site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

There are no known designated heritage assets within the site or near to it which would be affected. Consideration should be given to the integration of new development into the existing urban grain and to the relationship of the settlement with the surrounding the landscape. The policy requirement for a Landscape and Visual Impact Assessment to be undertaken to inform design and layout is therefore welcomed.

Thaxted Parish Council and Thaxted Neighbourhood Plan Group object to the allocation. The latter makes their comments based on the findings of consultation events for the Neighbourhood Plan. The allocation of this site is objected to on the grounds that it has become a significant wildlife habitat, the roof line of the development would have an impact on views and the setting of the Grade 1 listed church and there appears to be an unsatisfactory means of access utilising a road already serving a large number of dwellings for which it was never intended, and putting further strain on the junction with Weaverhead Land and The Tanyard. It is considered that the former Claypits Farm buildings off Bardfield Road is a better site.

The Thaxted Society object to the allocation as the site has previously been designated for 'community' purposes. The community has come to rely upon that designation. It forms a buffer between two new developments. As such it should be re-designated for community use or recreation.

Developers, Agents and Landowners

- Allocation supported. The site has become an isolated section of open countryside, with residential to the north and east, that is better related to the urban form and layout of Thaxted, rather than the field pattern of the surrounding countryside. Thaxted is a sustainable location for appropriate scale development. A Transport Statement demonstrated that vehicular access to the east through the substantially constructed development to the east and along Wedow Road is achievable and suitable; including the current support of the landowner of that land to the east. Pedestrian, cycle and emergency access to the west, into the Mead, would be possible as part of an access strategy to give additional connectivity for sustainable modes of transport. The Mead is on a notably lower ground level than the Site, the vehicular route along the Mead would not flow into the Site because the ground level difference is too steep.

Individuals

- This area of scrub has been left untouched for a number of decades and has developed into a valuable local wildlife area, the development of the site for housing would undoubtedly lead to its destruction.
- Recent survey by Essex Biodiversity Project identified a wide range of flora and fauna. A range of birds and butterflies have been recorded on the site.
- There is an opportunity through the Planning Process to establish a wildlife corridor from the Sampford Road to the Mead and across to Copthall Lane Woods.
- Road access would need to be from the Sampford Road, as Wedow Road cannot take the extra traffic this would generate (narrow, many parked cars, narrowing to single width at junction with Town Street).

Molecular Products Ltd, Mill End

Statutory consultees and other bodies

Essex County Council

Surface water management: Flood Zone 1, surface water flow shown across the site in a 1 in 30 and 1 in 100. Should be taken into account when designing scheme. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

The policy itself makes no reference to the onsite listed buildings, the setting of those opposite, or to the site's location within a conservation area. The supporting text does mention the listed buildings but only in respect of considering them a constraint, the policy itself contains no provision of the conservation or enhancement of the listed buildings. Development of this site will impact upon these heritage assets. It is recommended that the policy is amended to ensure development of this site has regard for the special architectural

and historic interest of the onsite listed buildings and their settings, as well as having regard to the setting of the listed building opposite. The policy should also require development on the site to preserve or enhance the character or appearance of the conservation area. In the absence of such amendments we object to this site allocation.

Thaxted Society support the policy

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land south of Sampford Road	100	12.3	04Tha15
Justification: Thaxted plays an important role in serving its surrounding community. The site is located within walking distance of the majority of services and facilities in the village, and new development will play an important role in servicing such facilities. Adequate highway visibility can be achieved as the proposed access within either adopted highway land or within land within the control of the developer. It is considered that residential development of the site could be undertaken within the setting of the views to the spire and tower of the Grade I listed St. John the Baptist Church and to its north-northeast, respecting the requirements of national and local planning policy and guidance.			

Copthall Lane	54		09Tha15 (Part north of the river)
Justification: Thaxted has a range of services which means it can accommodate further development. The site forms a natural extension to land to the north-west which received planning permission in May 2014 under the Phase 1 section of development also by Linden Homes. The inclusion of this land would complete this area of development and also make the best use of the existing land. The site is not within a flood risk area, it is in proximity to services and facilities.			

Claypits Farm		1.07	14Tha15
Justification: This is a brownfield site which has an unsightly built form. Development provides the opportunity to enhance the local environment. The site is supported by the Parish Council and the Neighbourhood Plan group as an alternative to Land east of the Mead			

Land between Barnards Fields and Copthall Lane		2.2	13Tha15
Site would represent an infill between existing built form and the public highway and would not encroach onto open exposed land beyond the outer boundaries of the settlement built form.			

Wicken Bonhunt – Type B Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land to the east of Keeper's Cottage		0.91	New
Justification: Whilst Wicken Bonhunt does not have a large amount of services and facilities it is in close proximity to local centres of Newport and Clavering. Site would be a logical infill and lies within Flood Zone 1			

Widdington – Type B Village

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land rear of Meadow Cottage, High Street	15-20	1.34	02Wid15

Justification: Widdington does have a reasonable level of facilities that would support a small housing allocation, helping to keep the village socially and economically viable. Site is well contained by mature vegetation to three of its boundaries which should mean any development would not be unduly intrusive in the landscape.

Wimbish – Type A Village

Land at Mill Road

Statutory consultees and other bodies

Essex County Council

Surface water management: Development commenced. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Individuals

- Development of a dwelling on a plot opposite the barracks has been refused because of its rural location yet land at Mill Road which is also a rural location have been allowed. These decisions lack transparency.

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Carver Barracks			NEW

Justification:

Statutory consultees and other bodies

- Takeley Parish Council comments that permission for extra houses which are not needed in the planned period should not be given now, when Carver Barracks will be surplus to requirements in 2033. District Council should be using the time to liaise with the Government re: a proper garden village in this location rather than consider green areas like Little Easton that cannot be serviced separately from the M11. Carver Barracks is noted as close enough to the M11 that an access point may also be able to be made providing a better and more sustainable traffic improvement.
- Sustainable Uttlesford suggest that consideration should be given to the inclusion of a policy in the Local Plan to safeguard the Carver Barracks site following the announcement by Dept of Defence about the possible closure of the barracks in the early 2030s.

Individuals

- Carver Barracks may not be appropriate, but what is happening with the Barracks? MoD have future plans and what is available already on that site, especially housing, will impact on Uttlesford, especially Wimbish and Debden. Should something be put in the plan either way, with MoD or without?

CHAPTER 13 Non Residential Allocations

General Comments

Statutory consultees and other bodies

Anglian Water

Anglian Water has made an initial assessment of the implications for non-residential sites for Anglian Water's existing water recycling infrastructure. Where there is a need for improvements to be made to the existing foul sewerage network to accommodate the allocation site it is suggested that this included in the wording of the relevant policy.

Allocations

Great Chesterford – Land Adjacent to Community Centre

Statutory Consultees and other bodies

Historic England

Site is allocated for education/ community use. Site is located to the east of three scheduled monuments and Great Chesterford Conservation Area. This will be a sensitive site to develop as it will have the potential to impact upon the setting of these heritage assets. The policy makes reference to the need for development at this site to consider heritage and archaeology which is welcomed. It is requested that the policy is expanded to refer specifically to the need to consider the setting of the heritage assets.

Essex County Council

Majority of site in flood zone 2 and 3. Surface water flood risk across the site in a 1 in 30 and a 1 in 100 rainfall event. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance Transport There is no obvious access from the proposed allocation to highway. Further consideration must be given as to how this will be achieved.

Development Opportunity Sites, Great Dunmow

Statutory Consultees and other bodies

Historic England

Depot and post office yard to the east of New Street. Site is surrounded by Grade II listed buildings and borders the Great Dunmow Conservation Area. Policy does not mention these heritage assets and development of this site could impact their settings. Recommend policy is amended to have regard to the setting of these heritage assets.

Council Depot to the north of Livermore Court and east of New Street. Located within the Great Dunmow Conservation Area and neighbours a number of Grade II listed buildings. Town's Grade II* listed War Memorial is to northwest of the site. Policy does not mention these heritage assets and development of this site could impact their settings. It is recommended that the policy and supporting text is amended to have regard for the setting of these heritage assets

Essex County Council

Surface water management Council Depot: FZ1, no shown surface water flood risk on site
Post Office yard: FZ1, no shown surface water flood risk on site Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Development Opportunity Sites, Saffron Walden

Statutory Consultees and other bodies

Historic England

Fire Station and Laundry: Contains Grade II Listed 13 Gold Street and within the Saffron Walden Conservation Area. Are a number of Grade II listed buildings near the site, whilst Grade II* Jubilee House sits to the north east. Policy does not mention these heritage assets. Development of this site could impact their settings. Recommend policy is amended to ensure development of the site has regard to special architectural or historic interest of onsite listed building and setting of nearby heritage assets. Development of the site should seek to preserve/ enhance character or appearance of the conservation area. In absence of such amendments object to site allocation.

Emson Close/ Rose and Crown Walk r/o Boots: Is a sensitive site to develop as site is within the Saffron Walden Conservation Area and proximity to a number of listed buildings, such as Grade II* listed Barclays Bank and The Priory which border site. Policy does not mention these heritage assets. Development of this site could impact them. Recommend policy is amended to ensure development of site has regard to special architectural/ historic interest of listed buildings which border site and may directly affect by development on the site and their settings. Development of the site should seek to preserve or enhance the character or appearance of the conservation area.

56 High Street. Site contains Grade II listed entrance arch to numbers 56, 58, and 60 High Street and is located within Saffron Walden Conservation Area. The policy makes reference to the presence of these heritage assets and states that development should not adversely impact upon them or their setting which is welcomed. The policy should place further emphasis on the presence of neighbouring listed buildings and the need to have regard for their setting

Essex County Council

Surface water management The Fire Station: North of site in flood zone. Surface water flood risk in 1 in 30 and 1 in 100 associated with flood zone and on roads around site. Emson Close: FZ1, no shown surface water flood risk on site 56 High Street: Flood zone to north of the site. Surface water flood risk on roads around site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Saffron Walden Town Council

Supports development in the area of 56 High Street.

Saffron Walden Neighbourhood Plan Group

Asks whether the current occupiers of the Fire Station and the laundry have been consulted. In relation to Emson Close they are concerned that parking is vital and will need to be retained as a minimum and possibly increased.

London Stansted Airport – Land north east of Bury Lodge Lane

Statutory consultees and other bodies

Essex County Council.

Surface water management FZ1. Surface water flow across the site in a 1 in 30 and 1 in 100 flood events. Flow should be considered when designing the scheme. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Historic England

There are a number of Grade II listed buildings surrounding the site. The policy should regard for their setting, the site may also have archaeological interest as such the policy should account for this potential and refer to the importance of designated and undesignated heritage assets.

Developers and landowners

Manchester Airports Group(MAG)

- London Stansted Airport: Land north east of Bury Lodge Lane and Policy SA1 Quantum of Development: Should be amended to sqm from sqft.
- Site Area: Inconsistency within the plan to the size of the allocation. Land as allocated by the red line site on page 282 is 55ha and should be used throughout the plan as is the gross land amount. Likely an area of c.43ha will be net developable area but is subject to detailed design work, therefore cannot be considered an accurate figure for the Local Plan at this stage. Conflicts that refer to a '43 Ha' include: SA 1: first paragraph, line 4, Para 5.36 Policy EMP1 (second bullet)
- Clarification required regarding residential and community interests'. Unclear what this means precisely and therefore should be amended/ deleted.
- Final paragraph: Not considered a masterplan or design guidance is required or justified, particularly because sufficient controls will exist within the planning application process. A legal obligation (i.e. S106) agreement is not an appropriate mechanism to control implementation of a masterplan. Control by phased conditions and reserved matters pursuant to a outline permission would be more appropriate. The policy should be amended accordingly.
- Inset Plan: The site as described in the policy does not match the site in the inset plan. The inset plan shows both a yellow and brown policy area, splitting the site in two. This should be revised to show one area with references to SA1, SP11 and EMP1.

Land adjacent to Forest Hall School, Stansted Mountfitchet

Statutory consultees and other bodies

Historic England

Site is allocated for secondary education use. The Grade II* listed Church of St Mary the Virgin is to the northeast and are several Grade II listed buildings located to west/ south

west, including Forest Hall, Parsonage Farmhouse and two associated barns. Development of site could impact setting of these heritage assets, policy should have regard for their setting. Open and rural character of the area should also be considered.

Essex County Council

Surface water management FZ1, some surface water flooding along eastern boundary of plot to the west of the school. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Stansted Mountfitchet Local Centre – East of Cambridge road / Crafton Green

Statutory consultees and other bodies

Historic England

Grade II listed buildings north and south of the site. Western House and 4-8 Cambridge Road border the site. Stansted Mountfitchet Conservation Area sits to the south of the site. Development of this site could impact the setting of these heritage assets. Policy should have regard for their setting.

Essex County Council

STA 4 Stansted Mountfitchet Local Centre - East of Cambridge Road/Crafton Green Surface water management FZ1, some surface water flood risk along eastern boundary Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance

Chesterford Research Park

Statutory consultees and other bodies

Historic England

Physical separation between settlements is an important aspect of the historic character of the area. Distribution of development within the landscape and relationship between settlements should be carefully considered to ensure rural character and setting of the historic settlements is conserved. Area known to have potential archaeological interest; as such the policy should make a reference to this. Is a scheduled monument (Paddock Wood moated site) located to north of the site. Development should have regard to its setting

Essex County Council

Flood Zone1, some surface water flooding associated with watercourses and ponds on site. Mitigation: Developer to design and deliver the surface water drainage according to ECC guidance.

Little Chesterford Parish Council

The employment designations encompasses all of site rather than within development limits, creating a presumption of expansion. In previous versions of the local plan, the full site owned by the park rather than the area within the agreed development limits within the masterplan has been designated as an employment site. Whilst we appreciate that changes to the masterplan would require planning approval, designation of the remainder of the

greenfield site as an employment site indicates a presumption for future expansion to which we strongly object.

Conflict of interest between UDC and owners. As UDC have a 50% share in Chesterford Park and responsible for approving/ monitoring development of Chesterford Park, UDC is no longer impartial

Wendens Ambo Parish Council

There is a perceived conflict of interest for UDC given its recent investment in the site. Support vision for Chesterford Park and further high-quality employment possibilities on site but would like to know why progress to date has been so slow given short distance from similar sites in South Cambridgeshire

The Woodland Trust

Concerned about the site's proximity to adjacent ancient woodland.

Developers and Landowners

Aviva Life and Pensions Ltd

- Chesterford Research Park: In 2017 Aspire (CRP) Limited purchased 50% of the Park with ambitions to further enhance it and deliver growth.
- The current boundary is set out in the Uttlesford Local Plan adopted in 2005.
- A Masterplan for the Park was adopted by the Council in 2003 under the former Local Plan and remains relevant to the development of the Park. The Masterplan envisaged rebuilding and expansion to provide approximately 56,500 sq.m of floorspace.
- Access to the site from B184 was enhanced early in Aviva's ownership with a new section of road and a roundabout on B184.
- Remains some capacity for additional buildings within existing Park Development Zone but this is steadily being developed. A review of the boundaries is therefore appropriate to provide a long term vision for the Park in line with the new Local Plan period to 2033 and to assist with meeting employment needs and requirement for additional employment land as set out in Para. 5.34.
- NPPF states that planning should proactively drive and support sustainable economic development' (para 17). It also states that: 'The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system' (Para 19). Para 20 states that: 'To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century'. Para 21 states that in drawing up local plans, local authorities should: 'plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries. At para 160, NPPF states that Local plans should have a clear understanding of business needs within the economic markets operating in and across their area'. To do so, it suggests they should work closely with the business community to understand their changing needs'. The NPPF therefore, encourages a

positive approach to economic development and the allocation of sites to meet future requirements through development plans.

- Previous Draft Local Plan: No objections raised to extended boundary in the public consultation exercise and went forward as part of the Local Plan for consideration by an Inspector on that basis.
- Call for sites and 2012 draft Local Plan consultation comments presented the extended Park area and included supporting transport and flood risk reports to support extension for employment uses. Proposals is for this additional amount of land reflecting the roll forward of the plan period and the prospects arising from the improving and changing wider economy.
- CRP is one of a number of R & D sites around Cambridge. Collectively represent an important concentration of the research facilities in the UK and are of national significance.
- After Stansted Airport, the Park is the largest concentration of employment in the District.
- Enhancement of the access and construction of a new roundabout on the B184 at an early stage assisted with its efficient operation, as does the Park minibuses services to local railway stations.
- CRP is able to offer a form of employment development that cannot be provided in other employment locations.
- Allocating extended boundary will help meet the B1 business needs and enable a long term strategy to be put in place to provide the infrastructure and facilities needed to accommodate growth.
- Existing Development Zone boundary has not been materially increased since the 1995 Plan.
- Appendix 1 plan shows following: Area within original Development Zone (2005 Local Plan), pink (15.9 ha) Additional area for draft local plan 2012, light brown (9.4 ha) and; current proposal for additional areas, yellow (7.3 ha).
- Estimated that the additional area could accommodate approximately 38,000 sq.m of floorspace.
- Site is well screened by hedge and tree boundaries and will not change.
- New section of access road can be added around western side of CRP to create a compact form of development. Would provide access to 3 further plots in addition to those proposed in the previous Local Plan exercise. The plan shows plots and buildings to illustrate how the area might be laid out although the eventual layout of buildings will depend on the requirements that emerge over time.
- Such a layout would enable same approach to be adopted as elsewhere on the Park in terms of built form and design of the estate road, footways, generous frontage landscaping.
- Western area is close to Nucleus and would readily link into internal path network. Existing woodland to west would largely screen this development area from outside site.
- Two small areas of parking are shown added to development zone on northern boundary and in front of the Mansion. Both were in existence when Aviva acquired the site so this change is only to reflect the present position.
- The plan also shows scope for approximately 2 plots adjacent to the existing Emmanuel Building on the south eastern corner of the Park. This area can be served from the existing access road to the former estate house, Emmanuel Cottage. This area is

defined by woodland to the west, the existing pylon line to the east, which cannot be built under (except for uses such as car parking), with a hedge and line of trees on the Park boundary beyond.

- Provision is proposed for a crèche adjacent to the gate house. There is generally growing demand for childcare. The provision on on-site child care on larger employment sites is good practice. It increases the opportunities for parents to work; it reduces the distance they need to travel for childcare and enables children to be collected promptly.
- Location of proposed crèche has been chosen to enable facility to be accessible without having to pass the security gatehouse. Would make it more practical for other people such as local residents, grandparents etc, to use the creche and collect children. It would also provide some separation from the business areas of the Park. As a site, it is screened by the woodland to the west.
- Site has good accessibility to wider road network. Approximately 2.5 miles from junction 9a of the M11 and 3 miles from Saffron Walden centre. Is highway capacity on B184 and is a roundabout junction at the site access. With later phases, some adjustments to that access roundabout may be required although the details would be for discussion with the highway authority at that time. Further information is contained in the accompanying transport statement, the conclusions of which remain valid and appropriate as part of the consideration of the site at this stage of the Local Plan.
- Are bus stops each side of the roundabout and a footway from those stops into the Park, a distance of about 1km. There is a National cycleway to the west of the M11 and we are aware of the proposals to introduce a cycleway to link Saffron Walden, Little Chesterford and Great Chesterford which the Park has supported. The Park has a Travel Plan and the Park Manager acts as travel plan coordinator, liaising with the occupiers.

Deliverability

- Work has recently been completed on linked buildings at Plots 600 and 700 which are substantial, linked research buildings of 5,570 sq.m. Further upgrading works to existing buildings has been taken out, or is planned to take place in near future. Purchase of 50% of Park by Aspire (CRP) Ltd will further enable its expansion, delivery of growth across the park as part of its acquisition.
- CRP has an established system of foul and surface water drainage which has been developed and expanded as the Park has grown. Surface water drainage is attenuated using a number of ponds around the site. These then discharge into existing watercourses at a controlled rate. This system can be added to as necessary and there is sufficient land available within the outer Park to do this.
- Foul drainage is dealt with in private treatment works on site, which have a modular form, therefore scope to enlarge the works as demand increases. Conclusions of the 2015 report remain valid and confirm there is no unacceptable flood risk or drainage risks within additional development area.
- Gas supplies are adequate and a reservation charge is paid on electricity for 10MVA supply. Water comes from the Park's own boreholes with small supplemental supply from Affinity (the local water company). The combination of the two will provide sufficient water for the full Park expansion.
- Ground conditions/ contamination have been assessed for each plot as it comes forward. Experience to date has been that no significant contamination has been found and that it has not affected the scope to develop the site. Where clearance of buildings has taken place, any relevant materials, such as asbestos, have been disposed of by specialist

contractors. The area of the former old style on-site treatment works was decontaminated when it was decommissioned and replaced. Historically, there was an explosion in a munitions store in the outer Park during the Second World War and clearance was carried out in the post war period. Since Aviva acquired the Park in 2000, checks are made by specialists when each plot is being developed and any risks appropriately managed. This approach will be continued.

- There are no known contamination issues that would affect the extension of the Park as shown.
- CRP ready to develop now; expansion in accordance with existing Local Plan continues. Available sites are marketed, most buildings are constructed in response to specific occupier requirements. Rate of development largely determined by level of demand, not site specific constraints. Rate of development decreased during recession but with revival in economic activity, are signs of increased activity. Site should be considered to be fully available for development at any stage in Plan period but rate of take up suggests development of full site likely to be spread over plan period.
- CRP has been developed in accordance with existing Local Plan policies and adopted Masterplan. Existing Park boundary was established in 1995 Local Plan; review and extension of that boundary is now appropriate and will meet additional employment need identified in the draft plan.
- Areas for expansion of the Park were put forward in the previous draft Local Plan in 2012 and were supported by the Council. Whilst that version of the Plans did not proceed because of inadequacies identified by the Inspector in the housing strategy, the employment strategy which included the expansion of the developable area of the Park - was found to be appropriate.
- In addition to the areas shown in that version of the Plan, these submissions seek the allocation of some additional land to provide for employment growth through to 2033. This statement and the accompanying information shows that this is a deliverable development opportunity, promoted by the owners who have demonstrated their willingness and ability to create modern, high quality employment premises generating a range of new employment opportunities.
- Consider that these allocations should be included in the new Local Plan and reflected in Site Specific Policy LtCHE1 and Site 8 Chesterford Research Park, within Appendix 6.

Omission Sites

Statutory consultees and bodies

Essex County Council

Newport Primary School (land adjacent) Education Site allocation omitted. Allocation in previous draft of local plan, that was adjacent to Newport Primary School, has been removed. A suitable area should be identified and safeguarded for D1 use to allow the school to expand if necessary. This is considered necessary to support current and future sustainable growth within the locality and reflects NPPF requirements (paragraph 72 in particular), including minimising the need to generate extra trip generation for pupils to attend school. NB land to immediate east or south of the school appear most favourable for

this purpose. Note there is a similar policy to that required on page 252 in favour of Forest Hall School.

Sport England

Consideration needs to be given to whether there is a case for allocating new sites for meeting indoor and outdoor sports facility needs that cannot be met on existing sites or through major development allocations. For example, the Sports Facilities Development Strategy has identified a need for additional 3G artificial grass pitches and recommended that a feasibility study to identify a football hub site be completed. If this identifies that a new site is required, a site allocation may be necessary to ensure that the site is safeguarded for such a use. Recommended that in line with separate representations on INF2, a review of the Council's evidence base for sport is undertaken and that this is used to inform and justify the need for additional site allocations for meeting community sports facility requirements.

SERCLE

According to developers when queried at an 'Open Display' on additional hospital facilities being required for such a vast increase in population, responsibility would seem to sit firmly with the NHS to provide the service. Given current financial constraints affecting all aspects of health provision, likelihood of such investment is optimistic if not fantasy. Anecdotally, waiting times for ambulances to discharge their patients at Chelmsford and Colchester may already be up to 6 hours. Surely, it cannot be permissible to create life-threatening situations by disregarding basic requirements.

Developers and Landowners

'Land off B1256/Stortford Road' Little Canfield should be allocated in the emerging Local Plan for mixed employment development, including a Council Depot. The site extends to 6.2ha and is relatively unconstrained. Discussions have been taking place between Uttlesford District Council and our Client over the last 18 months, and a hybrid planning application is currently being prepared for the following development, with full details provided for the Council Depot and outline proposals for the mixed employment uses: Construction of a new Council Depot comprising vehicle workshop, office building, external storage, grounds maintenance storage, parking, landscaping, vehicular access and all supporting infrastructure, together with outline proposals for up to 4.2ha of employment land comprising Business, General Industrial and Storage and Distribution uses (Use Class B1, B2 and/or B8) (with all matters reserved except for access). A number of technical reports have been prepared to support the planning application, which confirms the site is free from constraints and demonstrates the deliverability of the site. Given the quantum of residential development currently underway and planned for in and around Great Dunmow, we believe that additional employment land will provide much needed new jobs in this area to meet demand. Indeed, we understand that updates to the employment evidence base may be commissioned by Uttlesford District Council in due course. We note from the Council's SLAA that the site was assessed as being both available for development and achievable (site reference 09LtCan15). Indeed, the assessment concluded that: Although this is a countryside location, which is prominent from the A120 and B1256, the site, for employment development, is considered to benefit from its location with the A120 Dunmow West junction. It is therefore considered that its

suitability for employment development should be considered further. Notwithstanding the site's location within the countryside, its proximity to the A120 means that the site is considered potentially suitable for employment, and development is considered deliverable. We consequently believe that, in light of the above, 'Land off B1256/Stortford Road' should be allocated in the Local Plan as an employment site, and that amendments should be made to the proposals maps accordingly. The site is free from overriding constraints, and as noted above, a joint hybrid planning application is currently being prepared with Uttlesford District Council for mixed employment uses at the site, as well as a Council Depot.

Land east of Stansted Road, Bishop's Stortford, Birchanger Parish. SLAA ref 06Bir15: Site should be allocated for employment development. The ELR identifies that the Site should be considered for allocation for a range of employment uses. These conclusions are supported by East Herts employment study for Bishop's Stortford. Only apparent reason why the site has not been identified for employment development is that Uttlesford's Green Belt Study concluded that the larger study area including the site should remain part of the Green Belt. At no point does the Council appear to have considered whether the Site alone could be removed from the Green Belt; hence there is no firm basis for its apparent ignoring of the recommendations of both employment studies. The conclusions of the LLA Green Belt Assessment clearly indicate that the Site could be removed from the Green Belt without affecting the purposes and role of the Green Belt.

Junction of Bedlars Green Road and Dunmow Road, Start Hill, Great Hallingbury
The respondent's land at the junction of Bedlars Green Road and Dunmow Road extends to some 2.0 hectares.

The land is well screened and accessible to the highway network, being almost immediately adjacent to Junction 8 of the M11.

Discussions with the Highway Authority have revealed that a junction on to Dunmow Road would be acceptable and an initial design has been agreed. The site is bounded by a number of trees, which can be protected and would be clear of any development. The site has also been the subject of detailed phase one habitat assessments, which reveal that the site could be developed with some ecology mitigation. There is also the possibility of some ecological enhancement, with land being provided as part of any development, as a termination of the Local Wildlife designation of the Flich Way.

Surface water can be managed on the site, as part of a sustainable drainage strategy.

The site is not within the Green Belt; however, it is acknowledged that the land falls within the Countryside Protection Zone (CPZ) around the airport. It should be noted however, that the author of these representations made a similar case to the Draft Local Plan abandoned in 2015, in relation to the recently developed site at Dunmow Road, Start Hill. This site, which is adjacent to the Stansted Distribution Centre, and is now known as Vision Stansted, was also in the Countryside Protection Zone at the time the representations were made. However, having regard to the planning balance, it was allocated for employment use, a planning permission was subsequently granted and the site was quickly built and occupied as predicted, due to the known demand and the lack of available employment sites in the District. This same scenario is being repeated now, it is fair to say that if a business wishes to erect a new employment shed in the District now, there are no sites currently available, which have good accessibility to the strategic highway network. The respondents put the respondent's site forward in a pre-application submission, based on a specific requirement at the time from The Samaritans, for a proposal to build their European Headquarters. Officers

did not support the proposal, simply because the site was not allocated and in view of its location within the CPZ. The Samaritans, frustrated by the lack of available land and the time taken to secure a site, chose to move operations to the USA. The case made to Officers in the pre-app, continues to be valid now. That case includes details of the employment land supply that was available (September 2016) which has not improved and provides details of the list of known requirements for land held by local commercial agents Coke Gearing. The evidence is that allocations for future employment land being placed in just two locations (Chesterford and MAG Northern Ancillary Area) does not assist businesses seeking land that is available now, for non-office related employment development. The airport land is not available in the short to medium term and is entirely dependent on the operations of a private business, who holds the monopoly on the only available of non-office related employment development land in the District, this cannot be a healthy position and does not assist the creation of jobs in the District. The employment policies of the Draft Plan are not consistent with the advice provided to local authorities in the National Planning Policy Framework (NPPF). It cannot be said that the policies and employment strategy as proposed in the Plan, is consistent with the NPPF, which requires at para 21 that :- Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should: set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances; plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

Land at Thaxted Road, (Granite Site) Saffron Walden

- Permission was granted in May 2013 for development of the majority of the Site (2.49 ha) for food and non-food retail development together with an internal access road. Scheme has been part-implemented following construction and opening of the Aldi store in the western quadrant of the Site in July 2015. Revision to Permission is subject of a current Application. If approved, will see development of eastern quadrant of Granite's ownership for non-food development. Expected to complete during 2018. Leaves southern element of the Site (0.62 ha) fronting Thaxted Road remaining. Site is available and expected to come forward by 2018.
- According to Proposals Map, site lies within defined Settlement Boundary and is designated as an Existing Employment Site (EMP1). This covers land outside of Granite's control.
- Support site's position within Settlement Boundary as correctly reflects position as part of wider Saffron Walden urban settlement and the development that has and will take place. Object to designation of site as an Existing Employment Site.

- Conformity with Local Plan Employment Definition: Local Plan defines Employment Land as B Class' uses (see Para 5.4) and excludes other types of employment (or Economic Development as defined by the NPPF) such as retailing (see Para 5.5). This represents a strengthening of site-specific policy compared to the current Local Plan definition which supports retail uses in this location (as part of a wider employment policy) provided the retail policy tests are met.
- Majority of site in Granite's control has consent for retail which has been part implemented. Whilst job creation and economic investment benefits of this part of the site are clear, existing/ immediate uses on site do not constitute 'Employment' for purposes of draft Plan. Therefore designation is inconsistent with existing/ permitted land use and is no reasonable basis to define it as Existing Employment and seek its protection under EMP1.
- Designation serves no reasonable purpose in absence of existing Employment floorspace and available land for such form of development. Designation should be deleted which will ensure the policy is effective and overall supply of Employment land that is genuinely available for development in the Plan period is known.
- 0.62 ha parcel of land that falls outside extent of Food/ Non-Food Permission has been vacant/ available for development for circa 12 years since before the first redevelopment scheme for the Site was granted in 2007 (App Ref: UTT/1788/07/OP).
- Site is appropriate for commercial development due to its location and physical relationship with the existing and emerging retail scheme.
- Para 24 of NPPF is clear that planning policies should avoid long-term protection of land for employment purposes, where there is no reasonable prospect of a site being used for that use. Long-term period that the Site has been designated for employment (since adoption of current Local Plan in 2005) and failure of any B class development to come forward in that time, represents more than adequate evidence of there being no reasonable prospect of B class development coming forward. This also demonstrates that the size, shape and location of the Site is also not suited to employment use / development and can therefore be reasonably released for alternatives.
- Evidence Base documents identify the Site as being (in theory) suitable for B1c, B2 and B8, the very limited land that is actually available following the Retail development renders the actual possibility of such a form of development proceeding as nil.
- Loss of this small parcel of land will not undermine the wider Employment strategy. Residual land parcel is 6% of the net requirement and due to its location on the south-eastern edge of Saffron Walden, there is no prospect of it being of viable interest to suit a strategic industrial land requirement. This has also been demonstrated by its status since the original Local Plan allocation. Site can therefore be removed as an Employment allocation and removed from the strategy in line with NPPF Paragraph 24. 0.62Ha site should be removed from the inset map and Appendix 6.

Land south west of Great Notley / Slamseys Farm Felsted

Some of the sites in the DLP have no potential for further development; they are correctly identified as not being within the range of land available for additional land (Land at Slamsey's Farm, Great Notely) in the future. As such, alternative sites which have the potential to be redeveloped for future employment should be put forward in place of those which cannot. 11Fel15 is no longer being put forward for residential development.

City Meadows / Elsenham Industrial Estate, Gaunts End, Elsenham

Cheergrey objects to the latest proposals for their site at City Meadows, Elsenham in the current draft Local Plan, which only identifies a small part of the overall site as an employment site rather than the site as a whole which was shown in previous versions of the Plan for the following reasons.

1. Change of Policy. Throughout the long period of Plan preparation the Council has been supportive of Cheergrey's plans for further development of the wider site until, without explanation or justification, the current draft Local Plan fails to allocate the site for development, despite being endorsed by the Council in the local Plan process in 2012, 2014, 2015 and 2016. We are at an advanced stage in the process of preparing a planning application and EIA for further development and the recent apparent change of policy has created uncertainty and confusion, which needs to be rectified.
2. Inconsistency with evidence base. There are numerous references in the Plan itself and the Council's own Economic Development Strategy which support further development including references to *Trisail as a prestigious office development ..which is likely to attract further investment*. In addition, every Employment Land Review which has been undertaken on behalf of the Council since 2011 has recommended allocation of further land at City Meadows, Elsenham. Moreover, the Inspector who examined the 2014 Local Plan (which allocated the site) found the employment aspects of the Plan to be sound.
3. Flawed methodology in the Plan. The Plan forecast of future employment needs is based on the historic share of regional employment which Uttlesford has provided. This trend based projection seriously underestimates the true potential for future growth since it is based on an existing baseline which is very low. This approach lacks ambition and does not recognise the potential of City Meadows, Elsenham to attract inward investment and stimulate and diversify the current employment base.
4. Opportunity for Inward Investment. Cheergrey has demonstrated with the Water Circle and TriSail development that there is an opportunity to attract significant inward investment to the District with high quality, flexible office space set in an attractive, mixed use business location. The proximity to the M11/A120 corridor and London Stansted Airport is a major benefit of this location, since Stansted is a core public transport hub with excellent connections by road, rail, air and bus services.
5. Cheergrey Vision for City Meadows, Elsenham. Cheergrey's vision for the site as a whole is to create a mixed use, high quality business location, building on the high architectural and environmental standards which have been established with the Water Circle and TriSail. This is a large, attractive site, in the ownership of an established developer. This location is particularly attractive to larger, high value businesses, serving a regional or national market, that want to expand their operations or move away from central London and international businesses, attracted by the proximity to London Stansted airport. The further allocation of employment land at City Meadows, Elsenham would be of strategic significance to the District in helping to further diversify Uttlesford's business base.

Individuals

- What non-residential allocations are proposed for enabling, or expanding, health facilities across the district? As the population is predicted to increase significantly, this will raise the requirement for hospitals, health centres, doctors' and dentists' surgeries.

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CHAPTER 14 – Delivery and Monitoring

An Introduction to Monitoring and Implementation

Paragraphs 14.1-14.6

This policy and supporting text was responded to by 3 people/organisations.

Support	0
Object	5
Comment	0

Summary of Representations

Overarching Summary

- Monitoring proposals welcomed but concern that thresholds are inadequate or delivery requirements omitted altogether e.g. green space, sports provision and affordable housing.
- Monitoring should be completed annually, rather than waiting until the end of the plan period.
- Concern over the capacity of UDC to monitor development.
- Concern that the existing Plan has been ignored by UDC so monitoring should be central to the Plan.
- Concern that the impact of development on residents should be minimised.
- The default assumption should be that consultation with residents and parish councils is vital e.g. implementation of housing schemes.
- There should be a provision whereby applications will not be considered from developers who have been found to be inadequate in the past.

Statutory consultees and other bodies

WeAreResidents.org

- The monitoring proposals are welcomed, but it is noted how poor some of them are, and the fact that the thresholds proposed are completely inadequate when looked at in relation to, for example, green space, sports provision, or affordable housing.
- It is difficult to assess the monitoring required in the absence of a district wide infrastructure plan. Until this is produced we cannot properly comment on the targets proposed.
- There is no delivery at all proposed of any community facilities or non-playing fields sports provision.
- There is nothing at all on sustainable transport and Objective 1c monitoring does not explain the meaning of smart travel solutions or require the delivery of any.
- Disagree with the focus on the provision of 4 bedroom homes rather than smaller ones and believe that the targets should be changed on accordance with the housing mix we have set out.
- There is nothing at all on schools, health facilities or other community facilities.
- The Appendix 2 targets are proposed only at a point in 2033 - there should be annual monitoring rather than waiting for the end of the Plan period.

Developers, Agents and Land Owners

No comments received.

Comments by Individuals

- UDC do not have the manpower to properly ensure these developments are completed at all, let alone to the high expectations outlined in this document.

- Central to Delivery and Monitoring should be the idea of monitoring to ensure that UDC officers abide by the Plan in every particular. In recent years the existing Plan has been ignored wholesale in various respects including large-scale building outside development limits; large new housing estates built on the Stansted Airport Countryside Protection Zone; ignored provisions to protect the character of the countryside; trees felled; failure to protect public rights of way; and approval of flats over garages with no gardens. The default assumption should be that consultation with residents and parish councils is vital e.g. implementation of housing schemes.
- The impact of developments on local residents should be minimised as far as possible - suggestions included to minimise these impacts.
- There should be a provision whereby applications will not be considered from developers who have been found to be inadequate in the past.

The Approach to Monitoring and the Housing Trajectory Paragraphs 14.7-14.15

This policy and supporting text was responded to by 3 people/organisations.

Support	0
Object	5
Comment	1

Overarching Summary

- Concerns that the Plan is stretching growth to the limits rather than satisfying need. There should reference to a reluctance to spoil any more of the district's communities which have special, mainly rural, characteristics.
- Concerns that the housing trajectory is too dependent on overly optimistic delivery at the garden communities and so will not be able to fulfil the housing requirement over the whole plan period.
- The focus of employment opportunities should be widened, and not just focus on Stansted Airport.
- Some paragraphs in this section are policy statements and should be included earlier in the Plan.

Statutory consultees and other bodies

No comments.

Developers, Agents and Land Owners

No comments.

Comments by Individuals

- The Plan is not about satisfying a need but about stretching growth to the limits. It should not be so.
- Paragraph 14.9 is a statement of policy and so should be included much earlier in the plan.
- The final sentence of Paragraph 14.9 should be expanded to include "and a reluctance to spoil any more of the district's communities which have special, mainly rural, characteristics."
- The published housing trajectory assumes that the new settlements will start to deliver housing by 2021-22. Whilst the Local Plan admits that this is ambitious, experience of bringing forward new settlements in other authorities suggests that it is ambitious to the extent of being unrealistic. The adoption of the Garden Community model involves complex and detailed legal agreements which will need to be completed before master planning can commence. There is also a considerable amount of detailed technical work, especially on transport modelling, drainage and viability on the NUGV site which remains to be undertaken. It is unlikely that these new sites will start to deliver housing completions before the mid 2020s at the earliest. This has major implications for the plan's ability to demonstrate a consistent rate of delivery throughout the plan period or, indeed, to fulfill the full housing requirement over the whole plan period. The effect of delaying the start of delivery to, say, 2025-26 would result in the annual rate of housing delivery dropping from 485 in 2021-22 to 290 in 2024-25 against an annualised rate of 641 and a shortfall of 2,005 over the whole plan period. The estimated rate of build on the new major sites is, however, quite low at 175 pa each at NUGV and Gt Easton and 150 pa West of Braintree. It may be that these figures relate only to market housing (North Essex Garden Communities Concept Options and Evaluation, Colchester BC, Braintree DC & Essex CC, Section 8.4, p.128). When all housing delivery, including affordable is taken into account, average delivery rates of between 220 and 250 across economic cycles are achievable (eg Cambourne, Cambridge Southern Fringe). Factoring in, however, the increased rate of delivery once started, a delay in start until the mid decade would still result in an overall shortfall

of around 670 dwellings over the whole plan period. Thus the excessive dependence on new settlements could, in the absence of very robust evidence that the projected timetable is achievable, result in the plan being found unsound.

- Paragraph 14.10 should state that the Housing Trajectory for the Local Plan is to be found at Appendix 3. This paragraph is a statement of policy and as such should be included much earlier in the Plan.
- The draft Plan places too much emphasis on job opportunities at Stansted Airport. Based on the last ten years, this has proven to be a fragile industry. The Council should work towards spreading the employment risk.

Sustainability Appraisal June 2017

Officer response

Proposed changes to plan

Policy M1- Monitoring and Review

This policy was responded to by 11 people and organisations.

Support	4
Object	2
Comment	8

Summary of Representations

Overarching Summary

- Some support for Policy M1 but detailed wording changes suggested as well as further details and clarification including in relation to the highway and transport infrastructure to support the spatial plan, neighbourhood plans, compulsory purchase order powers for garden communities, 'rolling 5-year land supply'.
- Recommendation that the Plan includes indicators to measure the success of the historic environment policies.
- Details of discussions with Highways England, Essex County Highways and Cambridge County Highways requested.
- Suggestion that a programme of completion/ build rates are agreed with developers at the development planning stage and penalties imposed for variation from these rates.
- Objection to Policy M1 as it is not compliant with the guidance set out in the NPPF and Planning Practice Guidance with regards to the spreading of the backlog over the Plan period. It is also not sufficiently positive when it comes to potential contingencies should the Plan be failing.

Statutory consultees and other bodies

Braintree District Council - Support criteria d in this policy which sets out the potential opportunity to use Compulsory Purchase Order Powers. However as there is a second policy on the monitoring of major projects it is not clear as to whether this criterion could be applied to the garden community, if it was required.

Clare College Cambridge

- Policy M1, Point 4 should include details of the highway and transport infrastructure necessary to support the spatial plan.
- The Sustainability Appraisal for the Areas of Search and Strategic Scenarios consultation sets out AoS (area that equates to NUGC) directs that discussion with South Cambridgeshire will be needed, as the site lies on the boundary of the two districts. Early discussions with Highways England, Essex County Highways, and also Cambridge County Highways is also advised as needed. Has UDC undertaken these discussions?

East Hertfordshire District Council - Support the proposed approach to monitoring the delivery of the Local Plan, in particular the delivery of the three new proposed settlements.

Environment Agency – Supportive of the general thrust of Policy M1.

Historic England – Recommend that the Plan should include indicators to measure how successful historic environment policies are. These can include preparation of a local list, completion of conservation area action plans and management plans. It is noted that a target which seeks a reduction in the number of assets that are classified as heritage at risk is provided which is welcomed.

Saffron Waldon Neighbourhood Plan Steering Group – Supported. Propose amend point b by deleting 'or' and inserting "and".

Saffron Waldon Town Council

- Policy M1, Point 2 should state “rolling 5-year land supply”.
- Policy M1, Point b amend ‘for the market towns and key villages AND (not OR) additional support for Neighbourhood Plans...’

Stansted Neighbourhood Plan Steering Group - Supported. Propose amend point b by deleting ‘or’ and inserting “and”.

Thaxted Parish Council

- Policy M1, Point 2 should state “rolling 5-year land supply”.
- Policy M1, Point b amend ‘for the market towns and key villages AND (not OR) additional support for Neighbourhood Plans...’

Developers, Agents and Land Owners

Gladman

- Objection to Policy M1 as it is not compliant with the guidance set out in the Framework and Planning Practice Guidance with regards to the spreading of the backlog over the Plan period. It is also not sufficiently positive when it comes to potential contingencies should the Plan be failing.

- The PPG firmly promotes the Sedgefield approach as the most appropriate method: “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate’. The choice is not between Sedgefield and Liverpool but between Sedgefield and redistributing need to other authorities where it cannot be met in the first 5 years”. It might be argued that the paragraph doesn’t prevent the application of the Liverpool approach, although the plain wording of the paragraph does not appear to support that interpretation. At the very least, the paragraph creates a strong presumption in favour of the Sedgefield approach, and if the Council wants to rebut it, they must have compelling evidence and reasons to demonstrate that it is not possible to meet the shortfall in the first 5 years of the plan.

- It is considered that the Council should be doing all it can in the early part of the Plan period to meet the backlog of housing need as this backlog represents real people with real housing needs in the immediate future. The Council should be seeking to provide greater flexibility in the Local Plan through the identification of additional smaller sites capable of delivering within the early part of the Plan Period. Gladman is promoting a site in Takeley that could provide such flexibility.

- It is considered that the list of bullet points in the second part of the policy regarding potential housing shortfalls is not sufficiently positive. The bullet point list contains a number of corrective actions that the Council will take if a shortfall in housing delivery should occur. The first bullet point to review the targets does not address the problem of the shortfall, it simply improves the position in mathematical terms and does nothing to identify or tackle the root causes of the delivery problem. This will make the targets in later years even more difficult to achieve. The second bullet point also does little to improve actual delivery in the short term as the preparation of a plan simply takes time and again, does not address the root cause of the delay. The third bullet point does not explain how the mechanism of supporting changes to locations for allocations would work and the final bullet point, although it is a positive measure, will take a considerable amount of time to achieve and will not help delivery in the short term.

- The mechanism that should be employed should a housing shortfall be identified is to allow flexibility in the policies of the Local Plan so that sustainable sites can come forward to deliver housing in the short term both within and on the edge of settlements and to initiate a review of the Local Plan should the shortfall be of a certain magnitude. The wording of any review mechanism needs to be clear, easily understandable, effective and be enforceable (see the recent North West Leicestershire Local Plan Examination). The

wording of the review mechanism should therefore contain a trigger, a start date, an end date that is the control of the Local Planning Authority and should set out the consequences of failing to meet the target dates. The ultimate aim of any review mechanism should be to get the Local Plan review completed in as shorter timeframe as possible.

- Policy M1 should be substantially reviewed to ensure that it is effective and positive and does everything it can to address any shortfalls identified in housing delivery in the most expedient manner.

Comments by Individuals

- Is it possible to create a framework of completion rates for housing developments above a certain number (e.g. 25?) at the detailed planning stage, which creates an enduring obligation on developers to deliver homes at a minimum rate/annum, with suitable effective penalties?

Sustainability Appraisal June 2017

Officer response

Proposed changes to plan

Major Projects Monitoring Including New Garden Communities Paragraphs 14.16-14.21

This supporting text was responded to by 3 people and organisations.

Support	2
Object	1
Comment	0

Summary of Representations

Overarching Summary

- Support for the mechanism to review Garden City allocations if necessary.
- Appendix 3 should contain a separate entry for each Garden Community.

Statutory consultees and other bodies

Saffron Waldon Town Council

- Support Paragraph 14.20 which sets out measures to review the Garden City allocations to ensure that the principle of Garden Cities is not lost.

Developers, Agents and Land Owners

No comments.

Comments by Individuals

- Paragraph 14.19 states that the Housing Trajectory contains a separate entry for each Garden Community, which will be used to monitor progress. However, this is not included in Appendix 3. It should be included or this reference amended to 'will contain'. does not do so.
- Paragraph 14.20 is supported.

Sustainability Appraisal June 2017

Officer response

Proposed changes to plan

Policy M2- Implementation and Monitoring of Major Projects

This policy was responded to by 12 people and organisations.

Support	6
Object	3
Comment	3

Summary of Representations

Overarching Summary

- Support for Policy M2
- Braintree District Council suggest that the West of Braintree GC may require a different delivery model and so require a bespoke policy.
- Braintree District Council and Little Chesterford Parish Council express concern that the contingency measures set out Policy M2 could allow developers to reduce the amount of community facilities, infrastructure, affordable housing and land for non-residential use in the garden community.
- The expected phasing and delivery of highway and transport infrastructure should be delivered before it is needed.
- Support for the delivery rates at West of Braintree Garden Community (Andrewsfield NSC and Galliard Homes) and at North Uttlesford Garden Community (Grosvenor). Support for monitoring and contingency measures.
- Galliard Homes suggest that encouragement should be given in the event that the figure for homes included in the Local Plan can be exceeded (in the case of West of Braintree 970), subject to the provision of suitable infrastructure.
- EA Securities are concerned that the proposed time-frame for the delivery of the Garden Communities and related infrastructure is too optimistic. Suggest that the monitoring review target is amended so as to allow for the provision of alternative sites to deliver housing, specifically reserve sites in Type A Villages.
- Gladman consider that Policy M2 should be substantially reviewed to ensure that it is effective and positive and does everything it can to address any shortfalls identified in housing delivery in the most expedient manner. In particular, it is stated that given that approximately 40% of all new development over the Plan period will take place on the Garden Communities their delivery will need to be closely monitored. The existing reference in Policy M2 that where performance over a rolling three-year period falls more than 25% below the expected rate of completions then a number of actions will be undertaken should be reduced to two years. In addition, the final three bullet points relating to seeking funding for infrastructure, marketing and renegotiating S106 Agreements are development management good practice which should be followed as a matter of course during the lifetime of the strategic development sites. See also response to Policy M1.

Statutory consultees and other bodies

Braintree District Council – The delivery of the West of Braintree Garden Community may be on a different model to that on other projects within UDC. As such it may require a bespoke policy which, as it applies across two local authority areas, could be set out in detail within the site specific DPD, with the broad principles set out here. Housing delivery within the garden communities is of course very important but BDC are concerned that as currently worded the contingency measures set out in the policy could allow developers to try and vary planning conditions to reduce the amount of community facilities, infrastructure contributions or land for non-residential uses in the garden community. The timely provision of these facilities, infrastructure and a mix of uses on the site are a key component of the garden community

principles and are key to the vision for the new standalone new garden community. We do not believe it is the intention of UDC, but the wording within this section may need to be revised to make this clear.

Clare College Cambridge - The expected phasing and delivery of highway and transport infrastructure should be delivered before it is needed.

Environment Agency – Supportive of the thrust of Policy M2 and note applications should include robust information on the expected phasing which should include the timetable and proposed arrangements for infrastructure delivery.

Little Chesterford Parish Council – Concern that the implementation of the contingency measures and the last paragraph of Policy M2 allows developers to get out of North Uttlesford Garden Village planning commitments. This allows UDC and developers to accelerate building by comprising required benefits such as affordable housing and infrastructure, resulting in a flawed design that would be detrimental to all stakeholders.

Saffron Waldon Town Council - Support Policy M2.

Thaxted Parish Council – Support.

Developers, Agents and Land Owners

Andrewsfield New Settlement Consortium (ANSC) – Support the proposed delivery rate of 970 homes at the West of Braintree Garden Community by 2023 within Uttlesford District. The need for the Council to monitor the delivery of homes at the WBGC and the other garden communities within the District is recognised and appropriate contingency measures, as set out by Policy M2, are supported. ANSC fully expect that, together with the land controlled by Galliard Homes at Boxted Wood, will be brought forward to realise at least 970 dwellings by 2033, including appropriate infrastructure as necessary to support the development.

EA Securities – The Council's housing trajectory contained at Appendix 3 of the Draft Local Plan outlines a proposed timeframe of four years (2021/22) before the first residential units are delivered on the first garden community. The anticipated delivery then increases year on year following the implementation of necessary infrastructure requirements and as the other two Garden Communities are brought forward. At present the Council's draft plan does not identify the proposed timeframes for phasing and delivery for key infrastructure, albeit provides an Implementation and Monitoring of Major Projects policy (Policy M2) to ensure the delivery of the garden communities as outlined above. Given that that the Local Plan is unlikely to be adopted before the end of 2019 this timescale seems optimistic. Even if an application was ready for one of the Garden Communities by the end of 2019, discharging all the conditions and beginning to deliver the infrastructure of the scale required in two years does not appear feasible. It is suggested that 2024/2025 is the very earliest that the first Garden Community could begin delivering units and it is unlikely that all three projects could meet this challenging timetable.

The provision of a monitoring tool is in line with the recent Housing White Paper publication; however, it is suggested the monitoring review target is amended to allow for the provision of alternative sites to deliver housing, thereby protecting the Council from unwanted and opportunistic development which it has seen in recent years. This could be done by amending Policy M2 to include the following final bullet point: 'The Council will release the identified reserve sites in Type A Villages.'

It is considered that the focus of reserve sites should be Type A Villages given how underrepresented they are in the current distribution of housing in the emerging plan and the contribution that can be made to rural sustainability by deliver additional growth in these locations. In addition, smaller sites in these locations can be delivered quickly and support existing infrastructure rather than requiring more in order to be delivered. Notwithstanding whether there is an increase of development in Type A Villages separate to increase rural sustainability, it is considered that the reserve sites mechanism is still required to underpin the uncertainty around deliverability of the Garden Communities.

Galliard Homes – Recognises there is a need for measures such as proposed in Policy M2. Similarly, however, every encouragement should be given in the event that the figure for homes included in the Local Plan can be exceeded (in the case of West of Braintree 970), subject to the provision of suitable infrastructure.

Gladman - It is essential, given that approximately 40% of all new development over the Plan period will take place on the Garden Communities, that delivery of the Garden Communities is closely monitored. The policy currently states that where performance over a rolling three-year period falls more than 25% below the expected rate of completions then a number of actions will be undertaken. It is considered that this is too long a timeframe to wait to take corrective action as this level of undersupply would be significant. It is considered that the timeframe for continuous under supply should be reduced to two years. In addition, Gladman has some concerns regarding the corrective actions listed in Policy M2. The final three bullet points relating to seeking funding for infrastructure, marketing and renegotiating S106 Agreements are simply development management good practice which should be followed as a matter of course during the lifetime of the strategic development sites. It should not take three years' under-delivery to trigger these types of actions. In terms of the first bullet, this should relate back to the review mechanism discussed in Gladman's response to Policy M1. It is considered therefore that Policy M2 should also be substantially reviewed to ensure that it is effective and positive and does everything it can to address any shortfalls identified in housing delivery in the most expedient manner.

Grosvenor Britain & Ireland – Support Policy M2 and the positive and proactive approach set out in relation to supporting the delivery of major projects. The proposed delivery of at least 1,900 homes at the NUGC up to the end of the plan period of 2033 is supported.

Comments by Individuals

- Support.

Sustainability Appraisal June 2017

Officer response

Proposed changes to plan

Infrastructure Delivery Paragraphs 14.22-14.24

This supporting text was responded to by 6 people and organisations.

Support	3
Object	2
Comment	1

Summary of Representations

Overarching Summary

- Support for Paragraph 14.22.
- Recent development at Takeley and Elsenham has not been supported by required infrastructure. No strategy to address this at Elsenham.
- Significant concerns over the objectiveness of the Infrastructure Delivery Plan in relation to references to infrastructure requirements and provision at Easton Park Garden Community and at Takeley.
- No clear reason given as to why further growth at Takeley would be difficult to achieve.

Statutory consultees and other bodies

Saffron Waldon Town Council – Support statement in paragraph 14.22.

Thaxted Parish Council – Support statement in paragraph 14.22.

Developers, Agents and Land Owners

- **Countryside Properties UK Limited** – Significant concerns over the objectiveness of the Infrastructure Delivery Plan. It is noted at Table 5 (infrastructure package included within garden community site submissions) that the only physical infrastructure proposed by the promoter of Easton Park is a new fast track/ fast bus service. No reference is made to the requirement for a new junction onto the A120 or Junction 8 improvements. Clarification is sought that the promoters will indeed fund required physical infrastructure, including highways improvements. In contrast, in relation to the land north of Priors Green, Takeley, it is stated that further growth at Takeley would be difficult to achieve given additional pressures that would be placed on M11 Junction 8. It is not clearly stated within the IDP why this conclusion has been drawn. However, detailed discussion with the District and County Councils on this point has indicated that this is related to the assumption that development traffic from the Takeley area will use the B1256 rather than the A120 in trips to/ from Junction 8. This assumption is unjustified and fails to take into account route choice.

Comments by Individuals

- Recent additional growth in the amount of residential properties in the Takeley area, approved by this Council, has not been supported by any increase in required infrastructure – doctors, transport and schooling.
- Lack of supporting infrastructure is self-evidently true of Elsenham, and it is noteworthy that no strategy is proposed to deal with the Council's evident recent failures to provide infrastructure appropriate to the vast new housing estates which have been promoted and approved.

- Support paragraph 14.22. The delivery of infrastructure must be carried out before housing is occupied/ employment sites are in use.

Sustainability Appraisal June 2017

Officer response

Proposed changes to plan

Funding and Delivery
Paragraphs 14.25-14.27

No representations were received to Paragraphs 14.25 – 14.27.

Sustainability Appraisal June 2017

Officer response

Proposed changes to plan

Monitoring the Local Plan Paragraphs 14.28-14.38

This supporting text was responded to by 2 people and organisations.

Support	0
Object	1
Comment	1

Summary of Representations

Overarching Summary

- The updated Strategic Land Availability Assessment has not been made available with the result that the status of sites in Chapter 12 is as at 1 April 2016
- The monitoring report should be issued at defined times and at least annually.

Statutory consultees and other bodies

Elsenham Parish Council - An updated Strategic Land Availability Assessment needs to be available. At the meeting of the Planning Policy Working Group on 6 April 2017 it was stated that the updated Assessment would be available for the meeting on 17 May 2017. It is understood, however, that it remains unavailable at the time of writing, with the result that the status of sites in Chapter 12 is given as of 1 April 2016. The consequent lack of audit trail is a serious deficiency in the current consultation.

Saffron Waldon Town Council - The Monitoring report should be issued/ published at defined times and at least annually.

Developers, Agents and Land Owners

No responses received.

Comments by Individuals

No responses received.

Sustainability Appraisal June 2017

Officer response

Proposed changes to plan

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Chapter 15 – Glossary

No comments

Chapter 16 – Appendix 1 – Replacement Policies

No Comments

Chapter 17 - Appendix 2 - Monitoring Framework

Appendix 2 was responded to by 18 people and organisations.

Support	0
Object	10
Comment	20

Summary of Representations

Overarching Summary

- Detailed comments provided about the approach to monitoring and the wording of the Monitoring Framework including the objectives, targets, performance measures and who collects performance information.

Statutory consultees and other bodies

Diocese of Chelmsford - Objective 1d – This objective is not compliant with the NPPF (paragraph 70) because it does not mention places of worship. It cannot be assumed that places of worship are included if they are not mentioned.

Dunmow and District Chamber of Trade and Commerce - Concern that the Council may not have the ability to monitor the plan given the council has an unsatisfactory track record of monitoring development.

Elsenham Parish Council

Objective 1a – The Parish Council does not agree with the percentages allocated to 1, 2, 3 and 4+ bed dwellings. UDC should consult with Parish Councils on this matter, without the necessity for the lengthy and expensive procedure of producing a Neighbourhood Plan.

Objective 3a – A new second row should be included as follows: Target: No Development to be permitted in Stansted Airport Countryside Protection Zone contrary to policy. Performance Measure: Number of new dwellings permitted within the Countryside Protection Zone. Collected by: UDC.

Environment Agency

Objective 1d – Unclear how Policy INF1 will be monitored under Objective 1d in the Monitoring Framework.

National Trust - Objective 3a – Support for the mechanism for monitoring the condition of SSSIs. However, there needs to be an acknowledgement in the document that Hatfield Forest is already suffering from deterioration due to increased visitor numbers. Without appropriate mitigation from new developments this could worsen. Without acknowledgement of the issues and the requirement for appropriate mitigation there is a strong possibility that this target will not be met.

Saffron Waldon Neighbourhood Plan Steering Group

Objective 1a – Completion of 100 affordable homes per year only gives a total of 2,200 homes across the plan period based on the 40% (i.e. a total of only 5,500) homes without taking into account that a higher proportion of affordable homes are to be built in the new settlements. The target should be 250+ affordable homes per year, which is the need. If this number is not needed then developers should be asked for a smaller percentage provision, e.g. 25% which would enable developers to build a lot more two and three bedroom homes which would make them more affordable as market housing.

Housing Mix proposals are ludicrous and unfounded and will skew the market. Reasons given by ORS are based on history, e.g. adult children staying at home and East Europeans sharing large townhouses. 75% of new market housing should be 3 bed or less, as confirmed by the 2011 census and the latest government English Housing Survey. UDC should not be encouraging developers to build more large houses. The lack of supply of 2 and 3 bedroom homes can mean higher house prices. Suggest the following targets instead: 9% 1 bed; 23% 2 bed; 44% 3 bed; and 24% 4 bed.

Objective 2c – The first bullet point in Objective 2c should be amended to say: 'utilising the agreed capacity of the existing runway' otherwise it conflicts with the Corporate Plan. Planning permission is currently only for 35 mppa.

Objective 3b – Reduction on levels of air pollution is not specific enough. It is suggested that the Plan should say where the information will be reported, how it is accessed, at what intervals and what action is to be taken if the air quality is at dangerous levels.

Saffron Walden Town Council

Objective 1a / Target box - States 100 affordable homes pa but this is insufficient to meet the requirements of the Local Plan. 14,100 homes required of which 40% are affordable = 5,640 affordable homes. 5,640 divided by 22 years of the Local Plan = 256 homes required pa. These targets should be amended to reflect the Local Plan requirements.

Objective 1a – Housing Mix Target – this should not include a significant proportion of 3 & 4 bedroom market housing. How does this cater for families that do not qualify for affordable housing and cannot afford 3 & 4 bedroom houses? This should state 2 & 3 bedroom affordable market housing. The housing mix should be similar to South Cambs – 30% 1 & 2 bed, 40% 3 bed and 30% 4 bed or as outlined in the Neighbourhood Plan for the area.

Objective 1d / target box – Clarification sought as to whether the targets for provision of allotments, sports pitches and public open space meet Sport England standards. Also need targets for indoor facilities.

Objective 1d – “Timely manner” is not defined. This should say at defined, pre-agreed trigger points. Should include reference to community shopping facilities. Broadly support this policy subject to these changes.

Objective 3b – Clarification sought as to the frequency and publication of information about the reduction in levels of air pollution. This should be issued at a defined time and at least annually.

Stansted Neighbourhood Plan Steering Group

Objective 1a – Completion of 100 affordable homes per year only gives a total of 2,200 homes across the plan period based on the 40% (i.e. a total of only 5,500) homes without taking into account that a higher proportion of affordable homes are to be built in the new settlements. The target should be 250+ affordable homes per year, which is the need. If this number is not needed then developers should be asked for a smaller percentage provision, e.g. 25% which would enable developers to build a lot more two and three bedroom homes which would make them more affordable as market housing.

Housing Mix proposals are ludicrous and unfounded. Reasons given by ORS are based on history, e.g. adult children staying at home and East Europeans sharing large townhouses. 75% of new market housing should be 3 bed or less, as confirmed by the 2011 census and the latest government English Housing Survey. UDC should not be encouraging developers to build more large houses. The lack of supply of 2 and 3 bedroom homes can mean higher house prices Suggest the following targets instead: 9% 1 bed; 23% 2 bed; 44% 3 bed; and 24% 4 bed.

Sites are taking too long to develop which is unfair for on new residents living on a building site but paying full council tax. Apart from the new settlements, all sites should be completed over no more than a five-year period for any development less than 1000 homes.

Objective 2c – The first bullet point in Objective 2c should be amended to say: ‘utilising the agreed capacity of the existing runway’ otherwise it conflicts with the Corporate Plan. Planning permission is currently only for 35 mppa.

Objective 3b – Reduction on levels of air pollution is not specific enough. It is suggested that the Plan should say where the information will be reported, how it is accessed, at what intervals and what action is to be taken if the air quality is at dangerous levels.

Takeley Parish Council

Objective 2c – The wording of objective 2c should be amended. Thi is not in line with other policies relating to Stansted Airport. It should read ‘Utilising the full capacity of the existing runway up to permitted development of 35 mppa.’

Thaxted Parish Council

Objective 1a / Target box - States 100 affordable homes pa but this is insufficient to meet the requirements of the Local Plan. 14,100 homes required of which 40% are affordable = 5,640 affordable homes. 5,640 divided by 22 years of the Local Plan = 256 homes required pa. These targets should be amended to reflect the Local Plan requirements.

Objective 1d / Target box – Clarification sought as to whether these targets for provision of allotments, sports pitches and public open space meet Sport England standards.

Objective 3b – Clarification sought as to the frequency and publication of the information about reduction in levels of air pollution within AQMA. This should be issued at a defined time and at least annually.

WeAreResidents.org

- The monitoring proposals are welcomed, but it is noted how poor some of them are, and the fact that the thresholds proposed are completely inadequate when looked at in relation to, for example, green space, sports provision, or affordable housing.
- It is difficult to assess the monitoring required in the absence of a district wide infrastructure plan. Until this is produced we cannot properly comment on the targets proposed.
- There is no delivery at all proposed of any community facilities or non-playing fields sports provision.
- There is nothing at all on sustainable transport and Objective 1c monitoring does not explain the meaning of smart travel solutions or require the delivery of any.
- Disagree with the focus on the provision of 4 bedroom homes rather than smaller ones and believe that the targets should be changed on accordance with the housing mix we have set out.
- There is nothing at all on schools, health facilities or other community facilities.
- The Appendix 2 targets are proposed only at a point in 2033 - there should be annual monitoring rather than waiting for the end of the Plan period.
- It is noted that Policy H6 is at odds with the Monitoring Framework provisions. Policy H6 requires 40% affordable housing which with an annual housing requirement of 640 new homes equates to 256 affordable homes per annum. Objective 1a targets require only 100 affordable homes per annum. This should be amended to 256.

Developers, Agents and Land Owners

No responses from developers, agents and land owners.

Comments by Individuals

Objective 1a

- The Table in Performance Measure, 2011 should not be followed by a new line. Under Target, in 'to provide', there seems to be a gash numeral 7.
- Concern that 91% of new homes will be 3 or 4 bedrooms. Few properties will be low cost and affordable. Safeguarding lower cost housing on the open market is essential. Housing Associations may protect tenants but how will local people afford the cheaper properties being sold if it is a "free for all"?
- Concern over the delivery of affordable and social housing for young local people given that it is planned for 91% of new homes to have 3 or more bedrooms.

Objective 1d

- The provision of playing field space is wholly inadequate. This Local Plan requires less than 10% of that required by the neighbouring local authority of Cambridge.

Objective 2c

- Objective 2c should be amended to correct 'using the full capacity'.
- There is no consideration made to the need to manage the noise and air pollution created by an ever expanding airport.
- UDC should not encourage any further expansion of the airport and should certainly not propose supporting utilisation of the existing runway beyond the existing planning cap of 35 mppa.

Objective 3a

- Support for the policy of safeguarding the historic environment, which is one of Uttlesford's greatest assets. The construction in the recent past of large housing estates close to historic settlements has been misguided and eroded some of the special character of the district. The same mistake should not be repeated in the future.

Objective 3b

- Development should be proscribed in AQMA regions, until mitigation measures have been identified, introduced and shown to be effective.

Chapter 18

Appendix 3 – Housing Trajectory

Appendix 3 was responded to by 5 people/organisations.

	TOTAL
Support	0
Object	2
Comment	3

Overarching Summary

- Braintree District Council suggest that for clarity and ease of reference delivery from the garden communities is separated out from the housing trajectory.
- Suggestion that the projected shortfall of homes could be met in one garden community.
- Concern that the housing trajectory does not match the housing need.
- Questioning of the 14,100 figure and suggestion that the figure should be closer to 11,500.
- Clarity requested in relation to when each year starts and ends.

Statutory consultees and other bodies

Braintree District Council - It may be of benefit to separate out the delivery from the three garden communities in the housing trajectory contained within Appendix 3 for clarity and ease of reference. Part of the work on the joint DPD will be to set out in more detail a housing trajectory and phasing plan for the West of Braintree, particularly focusing on the early stages of delivery. We look forward to continuing to work with UDC and further developing our relationship with officers and officers as we work together in a joined-up way to progress a new garden community at West of Braintree.

Developers/landowners/site promoters

No comments received.

Individuals

- These figures do not add up. There is a projected shortfall of 4,650 homes by 2033, however the Council have made provision for 25,000 new homes in 3 new 'Garden Village' settlements. The projected housing needs of Uttlesford could be met well into the second half of this century with only one of these settlements. This would result in less disruption for less people over a shorter period and more rapid delivery of infrastructure such as schools, doctor's surgeries and shops. For this reason, I consider the Council's draft Local Plan is deeply flawed.
- The assumption that 14,100 new builds will be required over the duration of the Plan has been questioned. Since this has a fundamental impact on the District, we need to re-

examine the arguments behind the value of 14,100. The true figure might be closer to 11,500.

- The total housing need has been divided by the plan period to make an annual figure - there is no analysis of where or when the need is. Housing trajectory should be related to housing need. Housing policies need to be closely related to 'where and when' the housing need is anticipated.
- There is a need to say where each year starts and ends (clearly not 31 Dec./1 Jan.)

Chapter 19

Appendix 4 - Garden Community Principles

23 people and organisations responded to Appendix 4.

Support	6
Object	2
Comment	15

Summary of Representations

Overarching Summary

- Some support for the garden community principles but also concerns that the principles will not be sufficiently adhered to by developers or Uttlesford District Council resulting in housing estates with no infrastructure. Obligations should be legally binding.
- Greater explanation and clarity requested including in relation to the operation of land value capture, delivery of the garden communities and management of the garden communities' assets.
- Environment Agency support the Principle 7 as it seeks to enhance the natural environment and suggest that UDC refer to the recently published TCPA guide - *The Art of Building a Garden City*.
- Some changes suggested to the wording of Principles 8 and 9.
- A more proactive approach to multi-user routes accessible to all vulnerable road users, such as equestrian users, is requested throughout the Plan including in the garden communities.
- Support for a locally-led, innovative and distinct approach to the visions and principles for developing and delivering the three new communities in Uttlesford.

Statutory consultees and other bodies

British Horse Society – Supports the comments made by Essex Bridleways Association with regard to the provision of equestrian access within this Policy.

Environment Agency – Support Principle 7 Development which enhances the natural environment. Suggest the Council will find useful, in helping to inform the development process, the Town and Country Planning Association's recently published practical guide to garden cities: *The Art of Building a Garden City*.

Essex Bridleways Association – It is noted that in Principle 9 there is an aspiration to encourage walking and cycling and this is not objected to. However, for clarification the opportunity to create multi-user routes accessible to all vulnerable road users should be more proactively taken and embedded into the whole Plan.

Saffron Waldon Town Council

Requests clarification on whether it is standard practice for a Garden City to be independently managed.

Principle 3 - "A suitable body will need to be established" this infers that this will be a body separate to UDC. Requests clarification of this point.

Principle 4 - Support "Mixed-tenure homes and housing types that are genuinely affordable for everyone".

Principle 9 - Add "or better connectivity is developed as part of the Garden City principle and infrastructure development".

Thaxted Parish Council

Principle 3 - "A suitable body will need to be established": this infers that this will be a body separate to UDC. Requests clarification on this point.

Principle 9 - Add "or better connectivity is developed as part of the Garden City principle and infrastructure development".

Principle 10 – Welcome and support this.

Developers, Agents and Land Owners

- With reference to the NPPF, the Government's 2014 Prospectus on Locally-led Garden Cities and the 2016 Prospectus on Locally-led Garden Villages, Towns and Cities it is clear that Government policy and guidance endorses the development of new settlements and their delivery following the principles of Garden Cities, however, it is also clear that Government does not consider the imposition of a national defined set of these principles or rules appropriate. Instead, local areas are challenged to adopt innovative approaches and solutions to creating great places based upon a local vision for the community. Having defined its Spatial Vision and Objectives for the District these should play a considerable part in developing the visions for the three new communities. Thinking, such as that of the Town and Country Planning Association, which goes considerably beyond that set out in Appendix 4, and others may play a part in informing approaches, but it is clear the visions and principles for developing and delivering the three new communities should seek to be innovative, distinct and locally led.
- Grosvenor has been appointed by the landowners as development partner for the North Uttlesford Garden Community and support the Council in proactively acting to designate the allocation for up to 5,000 new homes, alongside new infrastructure and amenities needed for a thriving new community. As the early proposals for the North Uttlesford Garden Community are developed, Grosvenor will work closely with the Council, local stakeholders and the community to get the principles for success right and will support the Council in ensuring the Plan allows for an innovative, distinct and locally-led approach to be undertaken.

Comments by Individuals

- It is necessary to embody, state, and reiterate these Garden Community principles throughout the Local Plan including specifically where new housing developments are proposed.
- Support

- Unable to obtain the document referenced as The Garden City Principles published by the TCPA 10 April 2014.
- The reference to the Garden City principles being indivisible and an interlocking framework is repeated twice.
- Principle 1 - Unclear how land value capture works. Further clarification required on how the management company will be formed.
- There seems to be an unintended repeat of the footnote at the end of the section
- Whilst the stated ideas are noble, there is a high risk that the principles get watered down as the promotion progresses. Three very significant land allocations are being proposed with their justification in part based on the local community benefitting from the Garden City principles. It must therefore be completely guaranteed that the obligations promised are legally bound to be provided before any allocation is made.
- “Ideally, this requires a Development Corporation which could be led by a local authority” should be a part of the plan, not just an ideal. Further suggestion that the management organisation of the Garden Community must be clearly and readily accountable to the public. Questioning where is the plan for financing the Garden Communities. Suggestion that topography should also be an essential consideration when designing the settlement.
- Principle 8 - Infrastructure for electric vehicles should be included.
- Concern that a garden community is nothing more than an overwhelming housing estate on the edge of a historic market town, which will be enveloped in additional traffic, fumes and disturbance.
- All previous developments in Uttlesford, despite having Master Plans, have been dramatically changed due largely to changes in economic activity. During previous recessions, developers have demanded that conditions are changed and as a result places like Flitch Green do not have the promised facilities. Concerned that despite the principles recessions will come and infrastructure will not materialise leaving a huge housing estate which sucks the life out of the surrounding towns and villages.
- Uttlesford seems to have renamed but not rewritten the Garden City Principles. Are we referring to Garden Cities or Garden Communities? Requests clarification on which principles will be applied. Questioning whether UDC will ensure that land value is captured for the benefit of the new community (principle 1) and if UDC will ensure that jobs are created within the community (principle 5). It is suggested that UDC should have a firm stance on these principles from the outset, or there is opportunity to be exploited by developers.

Chapter 20

Appendix 5 – Marketing Assessment Information

This appendix was responded to by 5 organisations and one individual.

Support	0
Object	0
Comment	6

Overarching Summary

- Many developments at Thaxted have been allowed as 'exceptions'; indeed much of what has been built at UDC has occurred outside an LP
- Requirements under Appendix 5 should be rigorously reviewed and in some instances strengthened
- Where needed to make a development sustainable (e.g. Forest Hall Park) actual shops and other amenity should be built by the developer as part of the planning permission i.e. a shop or multi - purpose community centre which should be built by the time 30% of the development is complete.
- Under General Criteria, note that the Government has announced plans to abolish leasehold

Statutory consultees and other bodies

The Thaxted Society - Detail herein is critical to the frequent possible 'exceptions' implied within the plan. Many developments at Thaxted have been allowed as 'exceptions'; indeed much of what has been built at UDC has occurred outside an LP. Therefore we strongly urge that requirements under Appendix 5 are rigorously reviewed and in some instances strengthened. It is the business of business when it comes to development to gainsay the LP and LPA. Appendix 5 is an opportunity for UDC to demonstrate both professionalism and mettle in this matter.

Saffron Walden Neighbourhood Plan Steering Group

- Developers ask for too much money for land for e.g. shops which then makes the whole thing unviable. The developer makes it as difficult as possible so that they can reclaim the land for housing. Suggestion: Where needed to make a development sustainable (e.g. Forest Hall Park) actual shops and other amenity should be built by the developer as part of the planning permission i.e. a shop or multi - purpose community centre which should be built by the time 30% of the development is complete.
- General comment: No mention of what constitutes a major or significant development etc. Suggestion: Need to define in housing numbers. Air Quality Assessment Comment: Needs to be more specific Suggestion: Say what pollutants are measured and how frequently.

Developers/landowners/site promoters

- No comments received.

Individuals

- Under General Criteria, note that the Government has announced plans to abolish leasehold.

Sustainability Appraisal June 2017

Not applicable

Chapter 21

Appendix 6 – Existing Employment Sites Schedule

This appendix was responded to by 4 people/organisations.

Support	2
Object	2
Comment	1

Overarching Summary

- Gaunts End is located within the Countryside Protection Zone and no further development should be permitted.
- Allocation of Thremhall Park as a 'Principal Employment Area' is supported and has capacity for additional employment land
- Support identification of M11 Business Park (North) and M11 Business Park (South), Support their allocation in order to safeguard them for employment use and is suitable for extension but as the site is in the Green Belt it would require allocation of additional land
- Hoblongs Industrial Estate If suggested amendments to EMP1 and EMP2 and supporting text (DP3878 to DP3881) are not accepted, then it is requested that the land outlined on the attached plan (comprising the hotel and adjoining development area previously consented for hotel and restaurant uses) is removed from the existing Hoblongs Industrial Estate. This would allow for intended development options to be considered on their merits and brought forward without conflicting with the over rigid policy requirements as set out in EMP1 and EMP2.

Statutory consultees and other bodies

- **Elsenham Parish Council** - Gaunts End - The Parish Council wishes to draw attention to the fact that this site is within Stansted Airport Countryside Protection Zone, and as such it should not attract further development.

Developers/landowners/site promoters

- Support allocation of Thremhall Park as a 'Principal Employment Area'. ELR notes at recommendation R1 that Thremhall has the capacity to provide additional employment land during the Plan period, this is expanded on at Para 8.3.7 of the ELR which notes that, The existing site offers high quality business space within proximity to Stansted Airport and the M11. It is currently very well utilised and there is significant potential to increase the provision of high quality office (B1a) floorspace in this location. R1 also notes the requirement to meet the demand for small office units. Thremhall provides serviced office accommodation and is a key resource for small and medium sized businesses. We do not consider these policies offer sufficiently clear support for the further expansion at Thremhall, notwithstanding that this expansion is envisaged as a component of employment land supply during the Plan period.

- Support identification of M11 Business Park (North) and M11 Business Park (South), Support their allocation in order to safeguard them for employment use. Are suitable for extension, which would allow existing businesses to grow without needing to relocate. As site is in the Green Belt, expansion of site would require allocation of additional land, as per SLAA sites 03Sta15 - 05Sta15. Site benefits include:
 - Well placed for access to strategic road network compared to other proposed employment allocations (including Garden Communities e.g. amount of infrastructure required will significantly delay new development and shouldn't be relied upon to deliver employment land by the Council);
 - It occupies a central location within the M11 London Stansted Cambridge Corridor and the A120 Haven Gateway Corridor providing immediate access as a result of its proximity to a key junction to: Stansted Airport, Harwich and Felixstowe, and Eastlink 120 site in Braintree; -
 - Presents an opportunity to provide unconstrained expansion for sectors in bio-medical, logistics, manufacturing and low carbon industries which have a strong presence in the area;
 - Presents opportunity to ensure strong regional presence of existing employers remain within the local authority area and act as a catalyst for future sustainable growth;
 - Able to contribute towards cross-boundary strategic employment infrastructure; and
 - It is unconstrained for further successive phases of peripheral expansion.
- Hoblongs Industrial Estate If suggested amendments to EMP1 and EMP2 and supporting text (DP3878 to DP3881) are not accepted, then it is requested that the land outlined on the attached plan (comprising the hotel and adjoining development area previously consented for hotel and restaurant uses) is removed from the existing Hoblongs Industrial Estate. This would allow for intended development options to be considered on their merits and brought forward without conflicting with the over rigid policy requirements as set out in EMP1 and EMP2.

Individuals

- As Gaunts End is within the CPZ, there should be a stop on further development beyond that which has already been approved, particularly in view of the acute difficulties in road access as highlighted by two government inspectors

Sustainability Appraisal June 2017

Not applicable

Late Representations

46 representations were received after the close of consultation. This report sets out new issues raised.

Stansted Mountfitchet Parish Council's representation makes the same points as those made by Stansted Mountfitchet Neighbourhood Plan group

Chapter 2 Spatial Portrait, Vision and Objectives

Paragraph 2.11

Individuals

- The plan is putting a lot of reliance on Stansted Airport being the economic driver for the District and therefore you think you should build all the houses needed for the growth of the Airport. As only 18.3% of the workforce to live in Uttlesford the south of the District is being put under more pressure for housing than needed. The district is usually too expensive for airport workers to live in and affordable housing is needed for our own second generation. It is much healthier for a District to have more than one industry that is dominant.

Chapter 3 Spatial Strategy

Policy SP2 – The Spatial Strategy

Individuals

- 3 representations from individuals support the strategy of concentrating development in new settlements.
- This policy reads that Stansted Airport should have support at any cost. It needs to be rewritten to reflect the fact that the airport only has permission to go to 35mppa. There is no reference about the environment versus growth.

Policy SP5 – Garden Community Principles

Statutory Consultees and other bodies

Essex Wildlife Trust considers that the policy should also include a commitment to Green Infrastructure (GI). The GI masterplan for the whole site should be prepared in advance of the built development masterplan and should provide a coherent, ecologically functional network of linked wildlife habitats and public open spaces across each garden community. There needs to be a firm policy commitment to ensuring no net loss, and preferably a net gain, in biodiversity.

It is good practice for a Local Plan to include specific measurable targets that can be monitored – for example net biodiversity gain targets reflecting local priorities for biodiversity (contributing to national targets as appropriate).

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. The gathering of such data, which should include a clear assessment of baseline data, should be embedded in the Strategic Environmental Assessment (SEA) Environmental Report, which requires a holistic assessment of the environmental impacts of plan policies and possible alternatives. 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.

Policy SP6 – Easton Park Garden Community

Statutory Consultees and other bodies

Essex Wildlife Trust have serious concerns regarding the potential adverse impacts of the proposed garden settlement at Easton Park on key wildlife corridors, areas of priority habitat and the loss of connectivity for High Wood SSSI. This policy in its current form is potentially unsound. It requires a commitment to ensure no net loss of biodiversity, and preferably a net gain, in line with the NPPF. Our general comments on Policy SP5 apply.

Individuals

6 further representation of objection from individuals

Policy SP7 – North Uttlesford Garden Community

Statutory Consultees and other bodies

Strethall Parish Council objects to the policy.

Suffolk County Council suggest that any assessment of the impact of the development on the A1307 route between Cambridge and Haverhill should take into account the cumulative growth on the corridor i.e. existing planned growth from West Suffolk and South Cambridgeshire. It should also be seen in the context of the existing issues on this corridor, including road safety, and full assessment should be made of this, including at the A11/ A1307 junction of Fourwentways. Regard would also need to be given to proposals from the Cambridge City Deal.

Essex Wildlife Trust have serious concerns regarding the potential adverse impacts of this proposed garden settlement on the River Cam and surrounding catchment, key wildlife corridors and areas of priority habitat. This policy in its current form is potentially unsound. It requires a commitment to ensure no net loss of biodiversity, and preferably a net gain, in line with the NPPF. Our general comments on Policy SP5 apply.

Individuals

23 further representation of objection from individuals

Policy SP8 – West of Braintree Garden Community

Statutory Consultees and other bodies

Essex Wildlife Trust have serious concerns regarding the potential adverse impacts of this proposed garden settlement at on key wildlife corridors, areas of priority habitat and Local Wildlife Sites, including Bosted Wood. This policy in its current form is potentially unsound. It requires a commitment to ensure no net loss of biodiversity, and preferably a net gain, in line with the NPPF. Our general comments on Policy SP5 apply.

Individuals

3 further representation of objection from individuals

Policy SP10 – Protection of the Countryside

Individuals

- The Countryside Protection Zone is supported but policy must be respected when determining planning applications

Policy SP11 – London Stansted Airport

Individuals

- Object to airport parking being considered outside the airport. This could lead agricultural land being turned into car parks. Planning permission was given to another owner on the airport to build a multi storey car park next to Enterprise House some 2 years ago so competition could be intensified on the airport if that company went ahead with their planning permission.

Chapter 7 Transport

Policy TA5 – New transport Infrastructure and Measures

Individuals

- Improvements to M11 J8 and to the A120 will only take care of all the houses recently built and permitted.

Chapter 9 Design

Policy D2 - Car Parking Design

Individuals

- Object to courtyards or tandem parking as this leads to on street parking which stops the flow of traffic and buses to get through.

Chapter 10 Environment

Policy EN9 – Protecting and Enhancing the Natural Environment

Statutory Consultees and other bodies

Essex Wildlife Trust considers the policy needs amending to require ecological surveys for nationally and locally designated sites and for protected and priority species. There is a lack of a clear policy statement regarding the protection of Local Wildlife Sites. This omission should be rectified and a clear statement included which recognises and protects these important designated habitats.

Priority should be given to the protection, enhancement and management of areas designated for their special landscape and/or biodiversity importance (within Uttlesford these currently include Sites of Special Scientific Interest, Ancient Semi-Natural/Natural Woodland, and Local Wildlife Sites), ensuring their integrity and increasing their ecological resilience in order to enhance landscape character, protect and increase biodiversity, and establish a coherent ecological network resilient to current and future pressures. Local Plans should identify these areas with clear policy and guidance on what will or will not be permitted and where. Protection of existing high quality habitat such as unimproved grassland and irreplaceable habitats such as ancient woodlands should be prioritised over creating new habitats.

An additional statement should be added to the end of the third paragraph “The aim should be to provide net gains in biodiversity.”

The ultimate aim is the formation of an extensive network of linked GI which provides additional, complementary wildlife habitat, landscape quality and public access, and which buffers key habitats from adverse impacts of developed areas and their associated activities. Owing to habitat loss, some species are almost solely dependent on our built structures to roost or nest. In order to ensure that development integrates and enhances biodiversity within urban environments, planning conditions should require all new developments to provide sites for species that nest or roost in the built environment.

Masterplans should characterise the local habitats and key fauna and flora populations, and should include provision for additional areas of habitat, which reflect locally agreed spatial habitat targets and contribute to national and local biodiversity targets. The master-planning process should also increase biodiversity generally. Masterplans should identify:

- the existing key habitat areas to be protected, restored, enhanced and expanded;
- transitional and supplementary habitats as part of the wider green space resource, sustaining more widespread habitats and species;
- measures for maximising the contribution of the built and historic environment to biodiversity;
- existing access and rights of way provisions that are to be protected, enhanced and expanded without compromising the preceding measures.

Open Spaces and Trees

Paragraph 10.32

Individuals

- More public open space is needed. Hatfield Forest is overused. Don't see any plans for any more off site country parks or grounds in the plan.

Policy EN15 - Pollutants

Individuals

Light pollution is a problem in rural areas and this policy need to be very strong and make sure that developers adhere to it.

Chapter 12 – Residential Site Allocations

Littlebury

Additional / Alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
Land between Station Road and Cambridge Road Littlebury	30	0.8	New
Littlebury is in close proximity to Great Chesterford and Audley End railway stations. There is also a bus service. Littlebury is within close proximity of the B1383 and the A11 and M11. The site is bounded by residential development to the south and the B1383 to the east. The site is located in flood zone 1.			

Takeley

Allotion: Land between Coppice Close and Hillcroft, south of B1256 Takeley Street, Takeley
Individuals

- Object to allocation as area in is the CPZ, surrounded by listed buildings and backs onto the Forest.

Wendens Ambo

Additional/alternative site(s) proposed

Site	Capacity	Area (ha)	SHLAA reference
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Land north of Station Road and west of London Road Wendens Ambo	15	0.8	01Wen15 (proposed for employment)
<p>The site is free from any physical constraint; it is located within Flood Zone 1 and has minor alteration in ground levels. The site is well screened by a belt of trees to the south and east. The village has a range of amenities and services and has excellent transport links being served by two bus services and the railway station. The village is in close proximity to junctions on the M11.</p>			

Appendix 2 – Monitoring Framework

Individuals

- Objective 2c Stansted Airport: the wording is different to the other paragraphs dealing with airport matters. The wording must be consistent through the document.

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Committee:	Planning Policy Working Group	Date:	14 December 2017
Title:	Statement of Community Involvement – report of Consultation		
Report Author:	Sarah Nicholas, Senior Planning Officer, 01799 510454	Item for decision:	No

Summary

1. The appended report sets out the representations received, officer comments and recommendations following the consultation on the Statement of Community Involvement.

Recommendations

2. To recommend to Cabinet that the Statement of Community Involvement be adopted subject to the changes as set out in the Report of Representations.

Financial Implications

3. None

Background Papers

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

Representations made on the Statement of Community Involvement

Impact

- 5.

Communication/Consultation	The SCI was subject to a 6 week consultation period
Community Safety	N/A
Equalities	The SCI makes sure that the methods of consultation used are such that all groups can be involved in consultation processes.
Health and Safety	N/A
Human Rights/Legal Implications	N/A
Sustainability	N/A

Ward-specific impacts	ALL
Workforce/Workplace	N/A

Situation

6. The Statement of Community involvement sets out the Council's approach to public consultation and involvement in the preparation of the Local Plan, other development plan documents and in the determination of planning applications.
7. The consultation took place between 2 October 2017 until 10 November 2017
8. Appendix 1 sets out the representations received and officer comments and recommendations. Appendix 2 is the amended Statement showing new text underlined and text to be deleted is shown struck through.

Risk Analysis

9.

Risk	Likelihood	Impact	Mitigating actions
If the Council does not have an up-to-date SCI and has not carried out consultation in accordance with the regulations and the Statement of Community Involvement the Local Plan could be found unsound at examination.	1 - Low	Delays in adopting the Local Plan	Making sure that the SCI is up to date and in accordance with the relevant regulations.

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.

Introduction

The Statement of Community Involvement (SCI) sets out the Council's approach to public consultation and involvement in the preparation of the Local Plan, other development plan documents and in the determination of planning applications.

The Statement of Community Involvement went out on public consultation from the 2nd October 2017 until 10 November 2017. This report sets out the representations received, Officer comment and recommendations and recommendations.

Consultation Responses

In total thirteen representations were received from the following organisations:

- Canal & River Trust
- Chelmsford City Council
- CLH Pipeline Systems Ltd
- Elsenham Parish Council
- Essex Fire & Rescue Service
- Great Chesterford Parish Council
- Hinxton Parish Council
- Highways England
- Hertfordshire County Council Property (Development Services)
- Historic England
- Natural England
- Saffron Walden Town Council
- Thaxted Society

And two representations received from individuals:

- Dr Graham Mott
- Margaret Shaw

General Comments

Chelmsford City Council

Considers that the draft is clear and comprehensive.

The Canal & River Trust

Own and manage the River Stort south of Hockerill Bridge, Hockerill Street, which falls outside of Uttlesford District Council. We therefore would only likely need to be involved in consultation from the Borough if the proposals were so significant that they may impact on the River Stort in this area.

Historic England

Support the general aims and approach to the draft Statement of Community Involvement.

Would find it helpful to receive hard copies of consultation letters, although email is also acceptable.

CLH Pipeline Systems Ltd

Attached a plan of their client's apparatus and asked to be contacted if any works are in the vicinity of the CLH-PS pipeline or to use the online enquiry service.

Hertfordshire County Council Property (Development Services) on behalf of the County Council's services

Have no comment to make on the Statement of Community Involvement (2017) consultation document. However, HCC Property would like to be consulted on all emerging documents.

Hinxton Parish Council

Thank UDC for involving them in the consultation process. They appreciate that, since being a close neighbour means that any decisions Uttlesford District Council make, can be very important to them.

Highways England

Thank Uttlesford for consulting them on the SCI. The following (SCI) has little impact upon the strategic road network so we therefore offer no objection in this case.

Essex County Fire & Rescue Service

Acknowledged receipt of the consultation but made no comments.

Natural England

Thank Uttlesford for consulting them.

They are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining applications. They are unable to comment, in detail, on individual Statement of Community Involvement.

Officer comment and recommendation

These organisations are thanked for their support.

General comments (continued)

Elsenham Parish Council

Trusts that this consultation will itself be summarised and that it will be shown how issues have been addressed.

Officer comment and recommendation

This report, as with previous reports on SCI consultations, will be presented to Planning Policy Working Group and Cabinet for approval.

Saffron Walden Town Council

The statement of community involvement should be customised to meet the individual needs and concerns of local communities and that “one size does not fit all”; the statement therefore requires amending to reflect the discreet and different needs and wants of individual communities.

Officer comment and recommendation

It is not practical or appropriate to produce individual SCI. The engagement methods shown in Table 5 include a variety of methods which can be used as appropriate to the planning policy document, stage of consultation and community.

Great Chesterford Parish Council

A Glossary of Terms would be useful.

Would like to see the stages if a plan is found unsound.

Also note that some authorities include a statement around trying to avoid school holiday times for consultation but if they can't be avoided then an extension to the consultation period will be provided.

Questions whether there should be a full/separate section on the Sustainability Appraisal included in the Statement of Community Involvement.

Questions whether there should be an explanation of 'soundness,' a section on village design statements, conservation area appraisals, parish plans, Article 4 Directions, masterplanning, local transport plan. Also there should be a section on ways to make comments, the ability of Cllrs to call in planning applications.

Comments that the structure is 'harsh' and talks about the local plan before it says who will be engaged. Questions Uttlesford Futures and when they last met. When holding a Public Exhibition the space must be of an appropriate size with sufficient Officers/staff present to answer questions in a timely manner.

Officer comment and recommendation

Agree to include glossary of terms.

Table 2 sets out the obligatory stages of the process and it is not necessary to include stages if a plan is found unsound. The procedure after withdrawal will depend on the reasons behind the withdrawal but will be in accordance with the preceding regulations.

Agree to include text in the section of 'Engagement methods on planning policy documents *'every effort will be made to undertake consultation outside August and the end of the year holiday period. However, where this is unavoidable, due to the need to make progress on development plan preparation, we will seek to ensure that a reasonable part of the consultation period extends beyond these holiday periods.'*

Include reference to Sustainability Appraisal at paragraph 5.4 and in the glossary

5a Include tests of soundness in the glossary

5b Add reference to other community led plans, conservation area appraisals and article 4 directions after paragraph 5.7.

Local Transport Plans are produced by Essex County Council. Any transport studies are technical documents forming part of the evidence base and are not

subject to consultation in their own right. Should the Council require masterplans for the Garden Communities and other large strategic sites they are likely to be prepared as DPDs or SPD and will follow the consultation stages set out in this document.

5c Include text in the section 'Feeding information into decision' on how comments can be made – by letter, email or if the document is published on the portal through consultation portal; that comments cannot be anonymous, that the comments will be published with names and organisation but no other personal details.

5d Uttlesford Futures (which is the name for Uttlesford's Local Strategic Partnership has a strategy for the period 2008 – 2018. Details are available on the website at www.uttlesford.gov.uk/uttlesfordfutures. Uttlesford Futures is included in the Glossary.

5e Include text in the section 'Engagement methods on planning policy documents' that Local Exhibitions will be held in locations relevant to the subject of consultations, in accessible buildings. The council will work with the premises providers in identifying suitable rooms.

Staffing levels will be dependent upon resources.

5f It is considered that the structure of the documents read well. The groups of organisations the council will work with are set out early in the document in Section 3.

Thaxted Society

Overall there is a repeated use of language that is pro development. Whilst we understand that UDC has a duty to be supportive of *sustainable development*, with regard to pre application, p21 6.2, there is only one suggestion that your officers '**can advise on the general acceptability of proposals**', without making clear that this advice may equally be that of unacceptability.

In broad terms therefore there remains at UDC a propensity to favour development, which is a recognised pressure, however such language and detail simply reinforces a single view and takes no care of the fundamentals of SCI and how its form may either frustrate or empower.

We remain committed to working with both officers and Councillors at UDC and are grateful for the opportunity to consult hereto.

Officer comment and recommendation

The Council's approach to planning applications and decision taking is in line with the National Planning Policy Framework which states that '*Local planning authorities should look for solutions rather than problems and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area*'.

Margaret Shaw

Stansted has been misspelt in 5.6 and Table 4.

Unfortunately this seems to be a severely watered down version of the current document.

Some of the important principles p21-23 of the current document have disappeared.

This is almost a non-document, and apart from informing PC's and neighbours about planning applications, says very little about taking their views into account.

Officer comment and recommendation

1 Misspellings will be corrected.

2/3 The Council has made a decision to streamline the document

4 Committee or delegated reports identify the issues to be considered taking reference from planning policy, the issues raised in the representations and consultations. The report then discusses each issue in turn. Although the Appraisal does not specifically refer back to the individual representations, it does deal with the issues raised. Additional text is provided in the section on 'Determining Planning Applications' on how reports are set out.

Dr Graham Mott

This consultation has not been well advertised. It appeared for a few days as one of the four featured links presented on logging into your website. You do not encourage involvement in your Statement of Community Involvement. One of the conclusions must be that you need to advertise consultations more effectively. You now need to make clear where and when the results of the consultation will be found. All of the responses need to be available somewhere, and it needs to be clear where that somewhere might be.

Obviously you also need to make clear how you have responded to the various responses and what action you will be taking and when you will be taking it.

The website needs tidying up.

You have a long way to go before you can be said to engage with the public satisfactorily. You really need at all times to attempt to take the community with you, and to make matters as clear as possible.

Recent Regulation 18 Draft Local Plan consultation. Need to explain acronyms and show the workings and give references.

You need to see community involvement as an opportunity for genuine involvements and improvements. The extent of the change is enormous.

Officer comment and recommendation

Comment noted

Additional text can be provided in the section 'Feeding information into decisions' on comments being made available to view on the consultation portal. This section already mentions consultation statements and that all documents are available on the website and at the council offices. Website address change over time so it is not appropriate to provide links.

See point 2 above

The website makes available a vast amount of information on all aspects of the Council and the District of Uttlesford. The council is continually seeking to ensure the website can be used easily.

Comment noted. The SCI is the document which sets out how the council will engage.

These issues were raised in response to the recent consultation and will be responded to in the future report of representations.

Comment noted. The SCI is the document which sets out how the council will engage.

Section 1: Introduction

Great Chesterford Parish Council

Suggests that an explanation of the two tier planning system would be helpful.

Thaxted Society

The introduction at 1.1 make clear that **planning shapes the places where people**, this is misleading as it ignores previous development without planning and most importantly history and legacy which contribute to places etc as well as having an impact upon current planning.

Officer comment and recommendations

Agree to include text in the introduction on the national and local context in which planning decisions are made.

It is not considered that the phrase 'planning shapes the places where people...'is misleading. Planning considers proposed development and shapes places in the context of the existing character of a location. This is evidenced by policies on protecting listed buildings, conservation areas, open space etc.

Section 2: Overview of the area

Great Chesterford Parish Council

Think the heading is misleading as the section is nothing to do with the overview of the area.

Officer comment and recommendations

Agree – amend title to 'What's it all about?'

Section 4: Principles of Engagement

Elsenham Parish Council

Would like to have an additional comment added: *Undertaking meaningful consultation, after applications for developments are approved.*

Thaxted Society

At 4.3, item four reads **Establishing a sense of etc** again this makes the presumption that such a sense of identity might not a) already exist and b) continue to emerge as a result of legacy. **Recognising** might be a better word here.

Officer comment and recommendation

Agree to additional bullet point saying 'Continued engagement with community and stakeholders after the decision has been made including S106 issues.

Amend text at 4.3 to read 'Recognising and enhancing the sense of identity of the local are...'

Dr Graham Mott

In order to show how far short you are falling of your objections, I will consider in turn each of the bullet points at Section 4.3, key principles of engagement:

Engaging the community and stakeholders in the early stages of plan-making

As far as I am aware, Planning do not take action in order to meet this objective.

There is then some reference to a planning application and an exhibition.

Encouraging pre-application advice, by advising applicants to discuss future development proposals prior to submitting a planning application.

An example is given about a newsletter which was circulated had how it doesn't give the option to respond by email or on-line. In addition nothing about the responses were added to the application.

Undertaking meaningful consultation, before applications for major development are submitted.

In practice this does not happen. Indeed it is difficult to say how it could happen, given the propensity for the outline planning application on many projects to be submitted by one developer with the agreement then being sold on to another undertaking which submits the detailed application. There is then an example of a planning application and undertakings. If you do not propose any particular action, then clearly this objective is meaningless and should be deleted.

Reaching out to those whose voices are seldom heard, being inclusive, fair and representative in the plan-making process.

How exactly do you intend to meet this objective? There is then some examples of planning applications. Before referring to Table 5 which is plan-making consultation and not planning application consultations. There is then a suggestion that each developer or agent, visit each property which may be affected in the area; talk through the proposal and then show how they intend to address any issues arising.

Empowering communities through supporting localism, supporting neighbourhood planning and other community-related planning activities.

I cannot find that anything has been done which might satisfy this objective in Elsenham. There is no neighbourhood planning. There is no planning. All that you do is to consider proposals lodged against a limited set of policies. As I understand it, it is one of your principles that the question of whether there could be a better use of the site is never considered.

Providing the opportunity for feedback, the Council will consider all comments received through consultations on policies and make appropriate changes accordingly.

This is frankly misleading on a level which might arouse pride in a copy-writer for a potential developer intent on showing that his proposals will have not undesired effect on the local community. In the period since the start of 2012 I have written by my count 77 representations to consultations concerning proposals affecting Elsenham. I would be hard put to show that any of these have had the slightest effect; indeed, I believe that you would be hard put to it to show that any have had the slightest effect, much less that you have made any changes as a consequence. The response to consultations relating to planning applications are then summarised but rarely appear to be taken into consideration. Clear guidance on what can or cant be considered should be made available. The present system is all too cosy for you. You invite the public to make representations` but you do not advertise how those representations will be assessed. Then you apply very strict criteria to them, and rule most of them out as irrelevant. At least, I think that's what you do, since the process is far from transparent.

Ensuring consultation is worthwhile and achieves value for money by balancing cost, time constraints and available Council resources.

It is vital that there should be meaningful and ongoing consultation after an application has received detailed approval.

Officer comment and recommendations

This bullet point refers to plan-making and not planning applications. The SCI sets out how people can be kept informed of the Local Plan process and the range of methods of engagement the Council will use to consult.

This bullet point is aimed at applicants.

Paragraph 6.3 encourages applicants to engage with the community. The Council cannot insist on pre-application engagement. There are examples of developers holding exhibitions prior to submitting an application.

The Council aims to reach groups who do not engage with the formal council business of committee meetings through site notices and individual letters in relation to planning applications. In relation to the Local Plan through the methods listed in Table 5.

The initiative for community led plans must come from the community. The council supports such groups through financial assistance for Neighbourhood Plans, advice and guidance from planning officers, Rural Community Council for Essex and the Council employs a consultancy who provides face to face guidance and assistance to Neighbourhood Plan groups.

The Council considers all comments received. Planning committee reports considers in turn each of the planning considerations. The Council has to make its decisions based on national and local planning policy. Text setting out the national and local planning context will be added to the Introduction of the SCI. Agree to additional bullet point saying 'Continued engagement with community and stakeholders after the decision has been made including S106 issues

Neighbourhood Plans

Historic England

Would welcome notification of proposed neighbourhood planning areas, as well as consultation on draft plans. In addition they would welcome consultation at an informal level, in addition to the requirements of the legislation, where issues may benefit from their early involvement.

Officer comment and recommendations

Officers will work with Neighbourhood Plan groups encouraging them to consult with Historic England at an early stage in the process.

Paragraph 5.13 Key Stakeholders

Historic England

Welcome the acknowledgement that they are listed as a Statutory stakeholder.

Great Chesterford Parish Council

Note that the water to Great Chesterford is provided by Affinity Water and they are not listed. Also question as to whether the relevant gas and electricity providers should be listed.

Margaret Shaw

The detailed list of consultees that are in the current document – page 25.4 have been replaced by the generalised list 5.13. It will be all too easy not to keep the list current.

Officer comment and recommendations

Amend list to refer to Waste Water undertakers, water undertakes; Homes and Communities Agency and Greater London Authority. There are numerous gas and electricity suppliers but the provision of the network is National Grid and UK Power Network listed.

Table 2

Great Chesterford Parish Council

Questions whether the Regulation 25 is the correct legislation for adoption.

Officer comment and recommendation

Agree that the table needs to be amended to refer to Adoption (regulation 26).

Paragraph 5.14 Duty to Co-operate

Chelmsford City Council

Notes the recognition for early and meaningful engagement and collaboration with neighbouring authorities as outlined in the NPPF. It also supports the principle of engagement as set out in the SCI with reference to the duty to co-operate set out in a later section.

Will continue to actively engage with Uttlesford District Council on each other's respective Local Plans.

Officer comment and recommendations

Noted.

Section 6 – Planning Applications

Saffron Walden Town Council

To note that the document fails to address why decisions are reached which are contrary to objections or representations submitted by the local community (including residents and town/parish councils).

That where a Town or Parish Council objects to an application which is subsequently approved by UDC (either at officer or Committee level), UDC should be obliged to provide reasons to the Town / Parish Council as to why their objections were not considered grounds for planning refusal.

That Town and Parish Councils should be provided the opportunity to “call in” planning applications to the UDC Planning Committee. Where a Town and Parish Council wishes the application to be determined by UDC Planning Committee (rather than under delegated Officer powers), the application should be determined by Committee as requested; Town and Parish Councils should be empowered to make this request rather than the current system which requires that an application is “called in” by a UDC District Councillor for the ward.

Officer comment and recommendation

Committee or delegated reports identify the issues to be considered taking reference from planning policy, the issues raised in the representations and consultations. The report then discusses each issue in turn. Although the

Appraisal does not specifically refer back to the individual representations, it does deal with the issues raised. Additional text is provided in the section on 'Determining Planning Applications' on how reports are set out.

It is considered that the existing system works well. Town and Parish Councils can ask their ward member to call an application in for determination at committee.

Elsenham Parish Council (EPC)

Table 6, page 22 In the 'Publicity required' column, the first three rows do not include 'neighbour notification', and the last four rows include 'site notice or neighbour notification.' EPC suggest that the provisions concerning neighbour notification are totally inadequate, since on a strict interpretation there would be no necessity for any such notifications to be given under any circumstances. All the row should be amended to show 'site notice' and neighbour notifications' as separate bullets.

Notification to neighbouring parishes – para 6.5. EPC would like to stipulate that applications in named adjacent parishes must always be notified. If such a provision is in place.

would like to see greater transparency for the criteria which determine whether planning applications are delegated to officers. If the Council is able to exercise discretion, then any guidance should be stated. At the very least, a reference should be given to the vaguely indicated 'Planning legislation.'

Feeding into decisions. There is a section under section 5 around feeding into decisions but there isn't one under section 6. EPC believes there is a clear lacuna in the planning application process. Officers' reports summarise representations from the Parish Council and interested individuals, and typically it is stated that the issues raised will be addressed later in the appraisal section. It is often very difficult, however, to determine that points raised have received a due appraisal. Therefore, EPC are of the view that the procedure within section 5 should be repeated on a smaller scale within section 6. EPC have suggested the following wording:

Consultation Statement: *The Council will produce a Consultation Statement which will summarise the main issues raised as a result of consultation on planning applications and show how these have been addressed.*

– Notification of decisions – suggest that an addition should be made to section 6.11, after the first sentence, as follows:

Notification of the decision will also be sent to the Parish Council and to those members of the public who have made representations.

Following approval. The Parish Council state concerns that they are not involved in s106 negotiations and only made aware of them only after the s106 agreement had been signed. In some cases the provisions are not what is needed in

Elsenham. The Parish Council would like to add a new sub-paragraph:

Discussions will be held to include planning officers, representatives of the successful applicants and representation of the Parish Council. The agenda for these discussions will include the provisions of the Section 106 agreement and any issues which might arise as to the integration of infrastructure, amenities and detailed design within the parish.

Officer comment and recommendation

Make it clearer in paragraph 6.4 that all applications will be publicised through a neighbour notification letter, unless the site does not have neighbouring properties when a site notice is more appropriate. Table 6 sets out those circumstances when a site notice or notice in the paper is required in addition to the neighbour notification letter.

It is considered that the existing provision of notifying neighbouring parish councils is adequate. The planning officer will make a judgement as to whether neighbouring parish or town councils need to be consulted.

A link will be provided in the section on 'Determining Planning Applications' to the scheme of delegation on the website. Officers have discretion to take a decision out of delegation to committee but not the opposite.

Planning policy and Development Management are different processes and Development Management cannot be made comparable to Planning Policy in responding to representations. Committee or delegated reports identify the issues to be considered taking reference from planning policy, the issues raised in the representations and consultations. The report then discusses each issue in turn. Although the Appraisal does not specifically refer back to the individual representations, it does deal with the issues raised. Additional text is provided in the section on 'Determining Planning Applications' on how reports are set out.

The Council already notifies those people who made representations of the decision of an application. Parish Councils, their Councillors and individuals are being encouraged to register to use Public Access to receive email alerts on planning applications of interest to them. The text will be amended to make reference to this.

Include text under 'Application Stage' that when required, prior to submission or during determination of an application, discussions will be held between planning officers, and applicants and representative of the parish council to discuss S106 matters.

Margaret Shaw

Table 7 Revised plans. This is the root of a lot of problems – last minute changes to plans just before the planning committee meets – without appropriate notification of interested parties.

Section 6.9 Committee reports. Developers are wise to this and submitting changes after committee reports are prepared. There have been numerous cases where this has occurred and the changes are not circulated in a timely manner to interested parties. In view of this it should be stated that any changes that are submitted that do not allow 21 days for consultation will not be considered by the officers or planning committee until 21 days has passed.

Section 106. There is no mention of Section 106 agreement or the Community Infrastructure Levy (although it was mentioned in the current SCI May 2016). Surely that this is a key area that should be included.

It should be stated in this revised document that Parish/Town Councils, as the key stakeholder and the relevant District Councillor(s) should be formally involved in deciding the detail that should be included in any Section 106 agreement. This should not just be an agreement decided by officers in collusion (sorry discussion) with the developer.

There is a whole additional section required relating to post approval actions. Monitoring of the sites/monitoring of s106 requirements and responding in a timely manner to requests from Parish/Town Councils for intervention.

Officer comment and recommendation

When revised plans are received they will be dealt with as set out in Table 7. If revised plans proposing significant changes are submitted after the Planning Committee Agenda has been published that need consultation officers will seek approval from the Chair to withdraw the item from the agenda to allow for additional consultation.

Additional text to Table 7 on Revised Plans saying - If an application is already on a committee agenda it may be withdrawn from the agenda to allow for further consultation.

Include additional text in the section on 'Determining planning applications' that 'any conditions and Heads of Terms for the Section 106 obligation are included in the committee report of approval.

Agree to additional bullet point at 4.3 saying 'Continued engagement with community and stakeholders after the decision has been made including S106 issues.

Dr Graham Mott

When applications go before the Planning Committee, members of the public have the right to make representations in person. If members of Parish Councils, and members of the public, go to the trouble of addressing meetings, then the least that councillors can do is to show that they have taken on board what has been said.

Respondents addressing meetings of the Planning Committee should be invited to submit copies of their representations so that they can be attached to the minutes, as happens at the Planning Policy Working Group.

Make clear which planning applications are delegated to officers and those that are presented to committee and why.

Officer comment and recommendations

The Planning committee is a regulatory committee whilst the Planning Policy Working Group is advisory and reports to Cabinet. Planning committee minutes list the decisions and do not record the discussion. It is therefore not appropriate for a written account of public speakers to be attached to the minutes.

A link will be provided in the section on 'Determining Planning Applications' to the scheme of delegation on the website. Officers have discretion to take a decision out of delegation to committee but not the opposite.

Paragraph 6.14 – Permission in Principle

Historic England

Request that they are also listed as a statutory consultee in relation to certain types of planning applications as well as in the Brownfield Register process.

Elsenham Parish Council

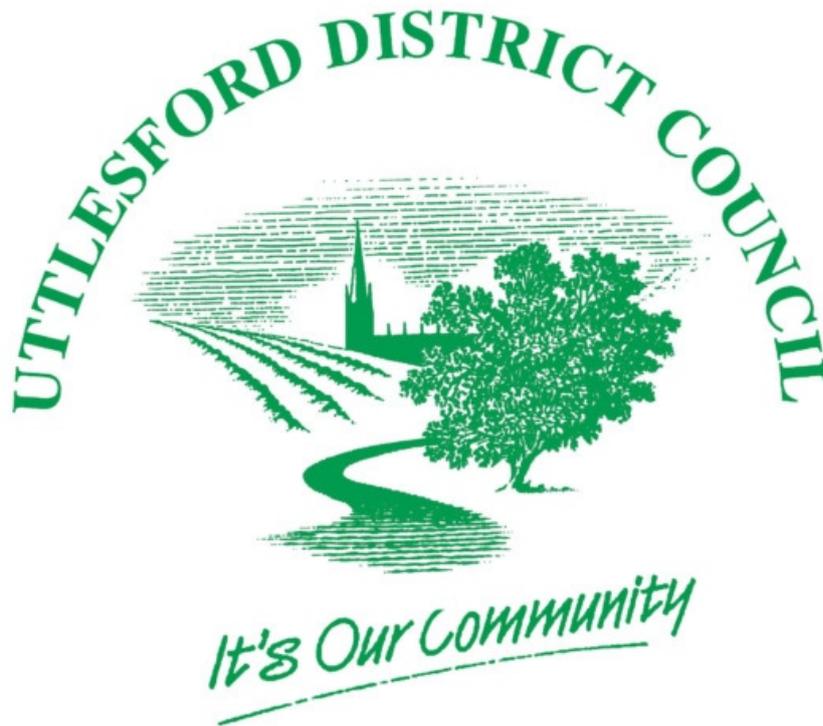
Was not aware of the brownfield land legislative enactment and the location of the register of brownfield land is unknown. They suggest that publicity as to the existence and whereabouts of the register should be improved.

Officer comment and recommendations

The Brownfield Land Regulations require local planning authorities to consult bodies including Historic England if the site falls within a prescribed category (Schedule 4 to the Town and Country Planning (Development Management Procedure) (England) Order 2015). Furthermore local planning authorities must consult any body that they would have been required to consult in relation to an application for planning permission which will include Historic England as appropriate.

The Council is preparing its Brownfield Land Register which needs to be published by 31 December 2017. A report on the Register was considered by Cabinet on 30 December 2017.

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**UTTLESFORD DISTRICT COUNCIL
STATEMENT OF COMMUNITY
INVOLVEMENT**

Consultation Draft

January 2018

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Have Your Say

Uttlesford's Consultation Draft Statement of Community Involvement

The Planning and Compulsory Purchase Act (2004) requires local planning authorities to produce a Statement of Community Involvement (SCI). An SCI sets out how and when stakeholders will be involved in the preparation of planning policy documents and planning applications. The SCI should be kept up to date.

We are seeking your views on Uttlesford's Consultation Draft Statement of Community Involvement (2017). The consultation period runs for six weeks from 2 October 2017 to 10 November 2017.

Where you can view the document

- You can view the document online at: <https://www.uttlesford.gov.uk/sciconsultation>
- Hard copies of the document are also available to view at: The Library Great Dunmow and Council Offices, London Road, Saffron Walden.

How to respond

Please send your comments to:

Email: planningpolicy@uttlesford.gov.uk

By post:

SCI Consultation
Planning Policy
Uttlesford District Council
London Road
Saffron Walden
Essex CB11 4ER

Please note the closing date for comments is 4.30pm on 10 November 2017. All consultation responses received will be given careful consideration in the preparation of the final Statement of Community Involvement.

Glossary

Authority's Monitoring Report (AMR) A report monitoring the effectiveness of the development plan. Monitoring information will be published on the website as soon as practicable

Development Plan The development plan consists of the Development Plan Documents produced by Uttlesford District Council, (or jointly with neighbouring authorities), Essex County Council and Neighbourhood Plan. Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

Development Plan Document (DPD) A document setting out Uttlesford District Council's planning policies and proposals. DPDs are subject to community involvement, consultation and independent examination.

Independent Examination Development Plan Documents are subject to an examination by a planning inspector to rigorously test legal compliance and overall 'soundness'.

Local Development Scheme (LDS) The LDS sets out the timetable for preparing the Local Plan.

Local Plan The term used to describe various Development Plan Documents

Material Consideration A material consideration is any planning matter which is relevant to a particular case.

Minerals and waste development plan documents DPDs prepared by Essex County Council with regards to mineral extraction and waste management

Neighbourhood Planning A new tier of the planning system, introduced under the Localism Act 2011, to give communities more control over the future of their area.

Neighbourhood Plan A type of Neighbourhood Planning, which can establish general planning policies for the development and use of land in a defined neighbourhood area. A Neighbourhood Plan must be in general conformity with the Local Plan, undergo Examination and a Referendum. After adoption, they are part of the statutory development plan and are used (alongside other policy documents) to determine planning applications.

National Planning Policy Framework (NPPF) Sets out the Government's planning policies for England and how these are expected to be applied. It provides guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications. It must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. Additional detail is given to the NPPF through **Planning Practice Guidance** which is the government's on-line, web based guidance on national planning policies.

Planning Inspectorate (PINS) The Planning Inspectorate holds independent examinations to determine whether or not DPDs are 'sound'. The Planning Inspectorate also handles planning and enforcement appeals.

Sound/soundness This describes where a DPD is considered to 'show good judgement' and also to fulfill the expectations of legislation, as well as conforming to national policy. A sound plan is

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Statement of Community Involvement (SCI) The SCI is a document explaining to the community how and when they can be involved in the preparation of the planning policy documents and the determination of planning applications, and the steps that will be taken to encourage this involvement.

Strategic Environmental Assessment (SEA) An SEA is an iterative assessment of the environmental effects of policies and proposals contained in Local Plans.

Supplementary Planning Document (SPD) SPDs do not have 'development plan' status, but are intended to elaborate upon the policies and proposals in DPDs. They can be used as a 'material consideration' in the determination of planning applications.

Sustainability Appraisal (SA) An SA is an assessment of the social, economic and environmental effects of policies and proposals within Local Development Documents.

Sustainable Development Development that is in accord with economic, social and environmental objectives. Development that meets today's needs without compromising the ability of future generations to meet their own needs.

Uttlesford Futures Uttlesford's Local Strategic Partnership which is a collaboration of organisations including the district council, the county council, the local health service and the emergency services. LSPs allow public bodies to work together on projects they wouldn't be able to do on their own. Uttlesford Futures' work is guided by the priorities that are set out in the district's Sustainable Community Strategy 2008-2018.

www.uttlesford.gov.uk/uttlesfordfutures

1 Introduction

1.1 The purpose of planning is to help achieve sustainable development, assisting economic, environmental and social progress for existing and future communities. Planning shapes the places where people live and work, so it is important that communities are able to take an active part in the process. Uttlesford District Council works to improve the quality of lives of people who live, work, or visit the District. One of the ways we do this is by talking to and hearing from individuals and organisations in Uttlesford about their concerns, ideas and ambitions.

1.2 This Statement of Community Involvement (SCI) has been prepared to explain how the Council will engage communities, businesses and organisations in the planning process.

The benefits of community engagement include:

- Resolving potential conflicts between parties at an early stage
- Generating local ownership and fostering community pride
- Creating a better understanding of local community priorities
- Introducing greater clarity and transparency in decision making

The planning system

1.3 The current planning policy system consists of:

- National policy in the form of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development which encourages a culture in which development plays a key role in meeting the needs and aspirations of the area. The NPPF still promotes a plan-led system whereby decisions must be made in accordance with the development plan unless material considerations indicate otherwise.
- Local policy in the form of the Local Plan and Neighbourhood Plans.

2 What's it all about?

What is a statement of community involvement?

- 2.1 The main purpose of a SCI is to set out how the local community, businesses and other organisations with an interest in development in Uttlesford can engage with the planning system. It sets out how the Council will involve the community when preparing planning documents and deciding planning applications. When involving the community in the planning process, account will also be taken of any corporate guidance and strategies adopted by the Council.

Why is a statement of community required?

- 2.2 Local planning authorities are required to produce a SCI under Section 18 (Part 1) of the Planning and Compulsory Purchase Act (2004). The National Planning Policy Framework (NPPF) (2012) states that:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.” (Paragraph 155)

- 2.3 The previous SCI was adopted in February (2016). The Council is now preparing a new Local Plan for the district covering the period 2011-2033 which will contain the planning policies and proposals that will help shape the future of the District. It is considered a suitable time to review the previous SCI alongside the preparation of the new Local Plan. This new SCI will help to ensure that the new Local Plan takes into account recent legislative changes as part of its preparation.

3 Uttlesford's community

3.1 Our 'community' includes all of the individuals, groups and organisations that live, work or operate within the District. We recognise that the different groups that make up our community have different needs and expectations. They also have their own desires, capabilities and capacity to get involved. This SCI Involvement sets out to maximize

Table 1. Uttlesford's Community

the opportunities for everyone in the community to get involved.

LOCAL COMMUNITIES

The interests of local communities are represented by county, district, parish and town councils, all have the capability to be involved. Specific interests can be represented by amenity or interest groups. The community is made up of individuals who have the ability to respond in their own right; however particular sections of local communities can find it harder to get involved.

OTHER AGENCIES

Other organisations can provide valuable views regarding specific development plans. These organisations are easy to identify and generally have the capacity to be involved. Some may need support in understanding the Local Plan process and how it relates to their operations so they are able to contribute effectively.

STATUTORY STAKEHOLDERS

There are certain groups that we have to involve. These include Historic England, Environment Agency, Highways England, Natural England, Essex County Council and parish/town councils.

DEVELOPERS AND LANDOWNERS

Developers are already involved in the planning system and will seek to be involved. Most can be easily identified from previous involvement and have the capability to be involved. Landowners will be keen to understand and consider the implications of any policies/decisions in order to protect their rights to develop or protect their land and its value. Both groups will be supported in being more actively involved in the Local Plan.

SERVICE PROVIDERS

Service providers include local health trusts/clinical commissioning groups, schools, utility and transport providers, emergency services, community development organisations and others. All of these can be easily identified and have the capacity to be involved in the Local Plan process. However we will seek to involve them only when it is relevant for them.

BUSINESS SECTOR

Local businesses range in size from the self-employed and small businesses to larger organisations. Their capacity to be involved also varies. Larger organisations may have the capacity to get more actively involved, whilst smaller organisations may need support in understanding the planning system, how it relates to them and how they can get involved. The Council will continue to improve its engagement with the business community.

4 Principles of engagement

- 4.1 This section sets out the general principles of community engagement. Undertaking consultation is a fundamental part of the planning process.
- 4.2 Uttlesford's Corporate Plan 2017 – 2021 (2017) sets out the headline objective to promote thriving, safe and healthy communities. Improving community engagement is outlined in the Corporate Plan as a core action to achieve this goal.
- 4.3 Our key principles of engagement are:
- Engaging the community and stakeholders in the early stages of plan-making.
 - Encouraging pre-application advice, by advising applicants to discuss future development proposals prior to submitting a planning application.
 - Undertaking meaningful consultation, before applications for major development are submitted.
 - ~~Establishing~~ Recognising and enhancing a sense of identity with the local area, creating a local sense of pride and greater sense of 'community'.
 - Reaching out to those whose voices are seldom heard, being inclusive, fair and representative in the plan-making process.
 - Empowering communities through supporting localism, supporting neighbourhood planning and other community-related planning activities.
 - Providing the opportunity for feedback; the Council will consider all comments received through consultations on policies and make appropriate changes accordingly.
 - Ensuring consultation is worthwhile and achieves value for money by balancing cost, time constraints and available Council resources.
 - Continued engagement with community and stakeholders after a decision has been made on a planning application including S106 issues

5 Plan making

- 5.1 The Council is responsible for plan making. Plan making sets out how an area will develop over time and provides a guide for future development. This part of the SCI sets out the Council's standards and approach for consulting Uttlesford's community in the preparation of, and revisions to, plans and explains who, how and when the Council will consult when preparing planning policy documents.
- 5.2 The legal requirements for consultation and community involvement in plan making are set by the Government in legislation including The Planning and Compulsory Purchase Act (2004) (as amended), the Neighbourhood Planning Act (2017) and The Town and Country Planning (Local Planning) (England) Regulations (2012) (as amended). This legislation sets out the procedure to be followed by local planning authorities in relation to the preparation of local plans and supplementary planning documents including who is to be consulted and which documents must be made available at each stage of the process. However, the legislative requirements do not specify how communities or stakeholders should be involved and accordingly there is flexibility as to how and to what detail the Council undertakes its own process of engagement. Furthermore, the scale and extent of consultation may vary depending on the subject of the planning document. This section of the SCI sets out how the Council will meet these legal requirements.

Planning policy documents

- 5.3 The Planning and Compulsory Purchase Act (2004) (as amended) requires local planning authorities to prepare a statutory development plan that will guide future development within their area. It identifies the locations for housing, employment and other development.
- 5.4 The development plan includes adopted local plans and neighbourhood plans. The development plan sets out the vision and core policies for the future development of a district. Neighbourhood plans set out a vision and policies to shape the development and growth of a local area for a 10, 15 or 20 year period. Once a neighbourhood plan is made, brought into force, it becomes part of the development plan. A local planning authority may also produce non-statutory planning documents such as supplementary planning documents (SPDs). These do not have development plan status and therefore are not subject to independent examination like statutory documents such as

the local plan. Supplementary planning documents are prepared to expand policy or provide further detail to the policies in the development plan. SPDs are a material consideration in planning decisions. Strategic Environmental Assessment (SEA)/Sustainability Appraisal (SA) is a process that will make sure that social, economic and environmental considerations are fully taken into account at every stage of preparation for each development plan document and Supplementary Planning Document. They are subject to consultation as the same time as the Local Plan.

- 5.5 The development plan for Uttlesford is currently made up of the Uttlesford Local Plan (2005), the Essex County Council (ECC) Minerals Local Plan (2016), the ECC Waste Local Plan (2014) and the Great Dunmow Neighbourhood Plan (2016). The Council is presently preparing a new Local Plan covering the period 2011-2033.
- 5.6 There are also a number of emerging neighbourhood plans in Uttlesford, including: Felsted Neighbourhood Plan; Great and Little Chesterford Neighbourhood Plan; Newport and Quendon & Rickling Neighbourhood Plan; Saffron Walden Neighbourhood Plan; Stansted Mountfitchet Neighbourhood Plan; Stebbing Neighbourhood Plan; and Thaxted Neighbourhood Plan¹.
- 5.7 The Council has a number of adopted SPDs. More information on these can be found on the planning policy page of the Council's website². The Planning and Compulsory Purchase Act (2004) (as amended) also requires the Council to maintain a timetable for the preparation and review of the development plan. This is referred to as a Local Development Scheme (LDS). Uttlesford's current LDS can be found at:
- <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=3012&p=0>
- 5.8 The Council will support and encourage communities to develop their own community led plans - Parish Plans and/or Village/Town Design Statements. The Council will continue to work with the Rural Community Council of Essex to encourage this type of participation.
- 5.9 The Council is undertaking a project of updating the Conservation Area Appraisals, serving Article 4 Directions and compiling a Local Heritage List. These will be subject to consultation and use a range of engagement methods listed in Table 5.

¹ <http://www.uttlesford.gov.uk/neighbourhoodplans>

² <http://www.uttlesford.gov.uk/localplan>

When can you get involved?

5.10 The key formal opportunities to get involved in the preparation of planning policy documents are set out in Table 2 and Table 3 below.

Table 2. The Local Plan

The Local Plan		
Preparation stage	What happens	Key time to get involved
Development of the evidence base	The Council undertakes background research and evidence gathering to inform the emerging Local Plan	
Preparation of the Local Plan (Regulation 18)	The Council informs stakeholders and the public that the Local Plan is being produced and consults on the scope of the plan and the issues and options it should consider	
Publication (Regulation 19)	The Local Plan is published for consultation for a six-week period	
Submission (Regulation 22)	After taking into account the representations received on the (Regulation 19) Local Plan, the document will be submitted to the Secretary of State for examination along with other key supporting documents	
Examination (Regulation 26)	An examination is held by an independent Inspector. The Inspector will assess the soundness of the Local Plan. Those people who submitted representations at the (Regulation 19) stage are entitled to be heard at the examination	

The Local Plan		
Preparation stage	What happens	Key time to get involved
Adoption (Regulation 25)	If the Inspector finds the Local Plan sound, the Council will proceed to adopt the Local Plan. This may include modifications recommended by the Inspector	

Table 3. Neighbourhood Plans

Neighbourhood Plans		
Preparation stage	What happens	Key time to get involved
Neighbourhood Area Designation	An application for neighbourhood area designation will be publicised for six weeks (or a minimum of four weeks where the area to which the application relates is the whole of the area of a parish council and is wholly within the area of one local planning authority)	
Preparing a Draft Neighbourhood Plan	The qualifying body gathers baseline information. Engages and consults those living and working in the neighbourhood area, and starts to prepare the draft neighbourhood plan	
Pre-Submission (Regulation 21)	The qualifying body publicises the draft plan for six weeks	
Publicising the Submission Neighbourhood Plan (Regulation 22)	The qualifying body submits the neighbourhood plan to the local planning authority (LPA). The LPA publicises the neighbourhood plan for a period of six weeks. The LPA notifies consultation bodies referred to in the consultation statement	
Examination (Regulation 24)	An examination is held by an independent examiner. The examiner will assess if the neighbourhood plan meets the basic conditions	

Neighbourhood Plans		
Preparation stage	What happens	Key time to get involved
Examiners Modifications	The examiner will form a view on whether the neighbourhood plan meets the basic conditions. This may include modifications. If the Council propose to make a decision which differs from that recommended by the examiner, the Council will notify relevant parties including those who were previously consulted and invite representations for a period of six weeks	
Referendum	Subject to the neighbourhood plan meeting the basic conditions, the Council will issue a decision on if the neighbourhood plan can proceed to referendum	
Adoption (Regulation 25)	If the neighbourhood plan receives the majority of the vote the neighbourhood plan will be brought into force	

KEY



Informal engagement



Formal consultation



Referendum

5.11 As SPDs do not have development plan status, they are not subject to the same process of submission and independent examination as the local plan or neighbourhood plans. However, consultation plays an important role in the production of SPDs. The methods of engagement for planning documents set out in Table 5 below (page 17) equally apply to SPDs. The consultation period will involve at least one round of engagement with a minimum consultation period of four weeks. Following consideration of responses and amendments to the SPD as appropriate, the SPD would then be adopted by the Council. In accordance with the Town and Country Planning (Local Planning) Regulations (2012) (as amended), prior to adoption a consultation statement will be prepared outlining the persons consulted during SPD preparation, a summary of the main issues raised during the consultation and how those comments have been addressed. An adoption statement will also be prepared and made available to view, together with the SPD as soon as reasonably practicable following adoption.

How will you be kept informed of the development of planning policy documents?

5.12 Throughout the process of preparing planning policy documents, from the earliest stages through to adoption, community and stakeholders will be kept informed of progress as follows:

- The Local Development Scheme³
- The planning policy page of the Council's website⁴
- Reports to Cabinet and Council⁵
- A database of all interested parties wishing to receive information on key consultation stages is maintained by the Council. If you wish to be added please contact the Planning Policy Team at the Council by email:

planningpolicy@uttlesford.gov.uk

5.13 Information about neighbourhood plans in Uttlesford is retained on the Planning Policy page of the Council website. Details of current emerging neighbourhood plans and where more information can be obtained is set out in Table 4 below.

³ <http://www.uttlesford.gov.uk/article/3352/Local-Development-Scheme>

⁴ <http://www.uttlesford.gov.uk/planningpolicy>

⁵ <https://uttlesford.cmis.uk.com/uttlesford/DecisionsandNotices.aspx>

Table 4. Examples of emerging neighbourhood plans in Uttlesford

Neighbourhood Plan	More information
Felsted Neighbourhood Plan	http://www.uttlesford.gov.uk/felstednp http://www.felstednp.org.uk/
Great and Little Chesterford Neighbourhood Plan	http://www.uttlesford.gov.uk/chesterfordsnp http://greatechesterford-pc.gov.uk/neighbourhood-plan/
Newport and Quendon & Rickling Neighbourhood Plan	http://www.uttlesford.gov.uk/nqrnp https://www.facebook.com/Newport-Quendon-Rickling-Neighbourhood-Plan-2001363280090063/
Saffron Walden Neighbourhood Plan	http://www.uttlesford.gov.uk/article/3825/Saffron-Walden-Neighbourhood-Plan http://www.waldenplan.org/
Stansted Mountfitchet Neighbourhood Plan	http://www.uttlesford.gov.uk/stanstednp https://www.stanstedneighbourhoodplan.com/what-is-the-plan
Stebbing Neighbourhood Plan	http://www.uttlesford.gov.uk/stebbingnp https://www.stebbingneighbourhoodplan.co.uk/
Thaxted Neighbourhood Plan	http://www.uttlesford.gov.uk/thaxtednp https://www.thaxtednp.com/about-the-plan

Key stakeholders and community groups

- 5.14 The Council is required under the Town and Country Planning (Local Planning) (England) Regulations (2012) (as amended) to consult ‘specific consultation bodies’ and other interest groups which cover the whole range of voluntary, community, special interest, amenity and business interests, referred to as ‘general consultation bodies’.
- 5.15 The list below refers to key types of groups rather than listing every individual group and organisation. The lists are not exhaustive; the Council maintains a comprehensive list of consultees which is updated regularly.

Key Stakeholders:

- Environment Agency
- Historic England
- Natural England

- Network Rail
- Electronic Communications Operators
- National Grid
- UK Power Networks
- ~~Anglian Water~~
- ~~Thames Water~~
- Water and wastewater undertakers
- Homes and Communities Agency
- Hertfordshire and West Essex Clinical Commissioning Groups
- Highways England
- Essex County Council
- East of England Ambulance Service
- Essex and Kent Police
- Essex County Fire & Rescue Service
- Parish and town councils, including those within the District and those that adjoin the District
- Adjoining district councils, such as Braintree District, Chelmsford City, East Hertfordshire District, North Hertfordshire District, Epping Forest District and South Cambridgeshire District councils
- Adjoining county councils – Cambridgeshire County Council and Hertfordshire County Council
- Greater London Authority

5.16 The duty to co-operate was introduced in the Localism Act (2011) and amends the Planning and Compulsory Purchase Act (2004). It places a legal duty on local planning authorities and public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters. This means that the Council must seek to actively engage neighbouring councils and a range of other agencies when preparing and reviewing its planning policies, particularly in relation to strategic priorities and cross-boundary issues. The Council will produce a Duty to Cooperate Statement of Compliance which will be made available for inspection as part of the Local Plan Examination process.

Engagement methods on planning policy documents

- 5.17 The consultation and community involvement methods applied will be proportionate to the nature of the planning policy document being prepared.
- 5.18 **INFORMATION:** The Council will provide information on what the Council is doing, what stage it is at in the preparation of the documents, where documents can be inspected, and how people can get involved.
- 5.19 **CONSULTATION:** Consultation will take place informally during the research stages of documents and formally during the publication stages where people can comment on the Council's proposed policy direction.
- 5.20 **PARTICIPATION:** The Council will carry out participation events such as workshops and forums where people can be more actively involved where appropriate.
- 5.21 Every effort will be made to undertake the consultation outside August and the end of year holiday period. However, where this is unavoidable, due to the need to make progress on development plan preparation we will seek to ensure that a reasonable part of the consultation period extends beyond these holiday periods.
- 5.22 Local exhibitions will be held in locations relevant to the subject of consultation, in accessible buildings. The Council will work with the premises provider in identifying suitable rooms.
- 5.23 A communications and engagement plan will also be prepared where it is appropriate to the scope of a planning document. For each stage of the planning documents preparation this plan will contain the following:
- The key milestones for plan making along with key dates for consultation, indicating when people will be involved.
 - Outline the specific consultation and engagement methods of how people are to be involved and how they can respond.
 - Provide details of document availability.
 - Explain how feedback will be provided and how comments will be taken into account.

Table 5. Engagement methods

	Method	Purpose	Resources
INFORMATION	<p>Media</p> <p>e.g. Publicity in local newspapers; articles in parish magazines; <i>Uttlesford Life</i> magazine⁶</p>	<ul style="list-style-type: none"> • Raising awareness Reaching wide audience • Publicising how to get involved 	<ul style="list-style-type: none"> • High cost efficiency • Staff time to prepare material
	<p>Internet</p> <p>Uttlesford website, emails, <i>Keep me posted</i> e-newsletter; Facebook and Twitter</p>	<ul style="list-style-type: none"> • Up-to-date information about progress and how to get involved • Access to documents to meet minimum requirement. 	<ul style="list-style-type: none"> • High cost efficiency • Posting information online is low cost once established
	<p>Leaflets and posters</p> <p>Promoting the consultation</p>	<ul style="list-style-type: none"> • Raising awareness • Reaching wide audience • Publicising how to get involved 	<ul style="list-style-type: none"> • Medium cost efficiency • Production of material can involve significant costs • Staff time to prepare and distribute material
	<p>Letters</p> <p>to statutory bodies</p>	<ul style="list-style-type: none"> • To meet minimum requirement 	<ul style="list-style-type: none"> • Medium cost efficiency • Staff time to write and administrate posting
	<p>Mailing</p> <p>List of persons and companies wishing to be notified</p>	<ul style="list-style-type: none"> • Keeping people up to date on key stages and how to get involved 	<ul style="list-style-type: none"> • High cost efficiency electronically • Low cost efficiency through the post. Staff time to write and administrate posting

⁶ <http://www.uttlesford.gov.uk/uttlesfordlife>

CONSULTATION	<p>Documents</p> <p>Available to view and comment on via the Council's on-line consultation portal objective</p>	<ul style="list-style-type: none"> • Meeting minimum requirement in allowing everyone the opportunity to comment on draft documents via a range of methods 	<ul style="list-style-type: none"> • High cost efficiency • Staff time updating the on-line consultation period
	<p>Documents</p> <p>Available for inspection at principal and other offices and libraries</p>	<ul style="list-style-type: none"> • Meeting minimum requirement in allowing everyone the opportunity to comment on draft documents 	<ul style="list-style-type: none"> • High cost efficiency • Staff time may be needed to answer questions
	<p>Questionnaires</p> <p>Paper and electronic format</p>	<ul style="list-style-type: none"> • Focus consultation on key questions 	<ul style="list-style-type: none"> • High cost efficiency in electronic format • Low cost efficiency in paper format • Staff time to collate responses
	<p>Parish/town council meetings</p>	<ul style="list-style-type: none"> • Reaching community groups through existing meetings • Gain understanding of views regarding a specific area 	<ul style="list-style-type: none"> • High cost efficiency • Staff time to attend meetings and prepare any material
	<p>Town and Parish Council Forum</p>	<ul style="list-style-type: none"> • Active involvement of local councils 	<ul style="list-style-type: none"> • Low/medium cost efficiency • Staff time to attend and prepare material
	<p>Pre-existing Forums such as Uttlesford's Tenant Forum⁷ and Business Exchange Forum</p>	<ul style="list-style-type: none"> • Disseminate information and canvass opinion from selected groups 	<ul style="list-style-type: none"> • Low/medium cost efficiency • Staff time to attend and prepare material

⁷ <http://www.uttlesford.gov.uk/tenantforum>

	Uttlesford Futures meetings⁸	<ul style="list-style-type: none"> • Active involvement of the Local Strategic Partnership 	<ul style="list-style-type: none"> • Low/medium cost efficiency • Staff time to attend and prepare material
	Citizens Panel⁹	<ul style="list-style-type: none"> • Help gain more understanding of public concerns 	<ul style="list-style-type: none"> • Low/medium cost efficiency • Staff time to attend and prepare material
PARTICIPATION	Focus groups (selected groups of participants with particular characteristics)	<ul style="list-style-type: none"> • Useful for area based or topic specific discussions and presentation of options • Help gain more understanding of public concerns 	<ul style="list-style-type: none"> • Low/medium cost efficiency • Staff time to attend and prepare material
	Workshops	<ul style="list-style-type: none"> • Bringing together representatives from different sectors to be actively involved in identifying issues/options and priorities 	<ul style="list-style-type: none"> • Medium/high: Time is needed for preparation • Specialist skills may be required
	Local exhibitions	<ul style="list-style-type: none"> • Communicating the key messages about the planning document being consulted upon and encouraging people to put forward their views 	<ul style="list-style-type: none"> • Low cost efficiency • Preparation of materials and staff time

⁸ <http://www.uttlesford.gov.uk/uttlesfordfutures>

⁹ <http://www.uttlesford.gov.uk/CitizensPanel>

Feeding information into decisions

- 5.24 The information and comments the Council obtains through participation and consultation with the community and stakeholders will be used to inform the Council's decisions and shape any documents produced.
- 5.25 Formally made comments need to be made either through the consultation portal (if the consultation document is published on the portal), by email or by letter. Respondents are required to provide their name and contact details, preferably email. They will be added to a database which will be used to keep people informed of the next stages in the plan making process. Anonymous comments will not be accepted.
- 5.26 All comments are registered on the consultation portal and are available to view at <http://uttlesford-consult.limehouse.co.uk/portal> Representor's name and organisation, if appropriate, are shown against the comment. Contact details remain confidential.
- 5.27 **Consultation Statement:** The Council will produce a Consultation Statement which will summarise the main issues raised as a result of consultation on planning policy document consultations and how these have been addressed.
- 5.28 It is the responsibility of the planning policy team to prepare planning policy documents, undertake consultation, consider the comments and recommend actions to the Member Working Group and Cabinet, and then implement the decisions of Members. The recommendations should clearly explain the reasoning for the recommendation taking into account the views of stakeholders and consultees.
- 5.29 Cabinet is responsible for approving plans and related documents for consultation and submission. Full Council is responsible for approving the submission and adoption of the Local Plan. Any future changes to the delegation of decisions will be set out in the Council procedures and standing orders.
- 5.30 All documents produced will be available at the Council's principal office and on the Uttlesford website. Planning documents which are being consulted upon will also be sent to the Council's other offices, and local libraries.

6 Planning applications

- 6.1 Involving people in planning application process allows them to influence development as it is being designed and helps to resolve issues more meaningfully.

The pre-application stage

- 6.2 All applicants are encouraged to discuss future development proposals with the Council prior to submitting a planning application. Our development management team can advise on the general acceptability of proposals before they are submitted and explain what information is likely to be required to enable the determination of an application. Further information is contained in the Council's Planning Application Guidance Notes and a Planning Application Checklist. These are available on the Council's website¹⁰.
- 6.3 Applicants are encouraged to involve the community early on their planning applications. Early engagement with local people before a formal application will help to address issues early on may help to avoid unnecessary objections being made at a later stage.

Application stage

- 6.4 Once the application is submitted, the Council must publicise it, consult the relevant parish or town council, and allow people the opportunity to contribute their views in writing or online. The legal requirements for consultation on submitted planning applications is set by the Government in legislation including The Town and County Planning (Development Management Procedure) (England) Order (2015) as amended. These are set out in more detail below. All applications are publicised via the Council's website under Application and Decision Search¹¹. In addition all applications are publicised through a neighbour notification letter or if that is not appropriate by a site notice. Table 6 sets out those circumstances when a site notice or notice in a newspaper is required in addition to the neighbour notification letter. People can register to receive email alerts on planning applications in their area.

¹⁰ <http://www.uttlesford.gov.uk/planningapplicationforms>

¹¹ <http://www.uttlesford.gov.uk/applicationsearch>

Table 6. Engagement on planning applications

Type of development	Publicity required
Development where the application is accompanied by an environmental statement	<ul style="list-style-type: none"> • Notice in the local newspaper • Site notice • Council website
Departure from the development plan	<ul style="list-style-type: none"> • Notice in the local newspaper • Site notice • Council website
Development affecting a public right of way	<ul style="list-style-type: none"> • Notice in the local newspaper • Site notice • Council website
Major development	<ul style="list-style-type: none"> • Notice in the local newspaper • Site notice or neighbour notification • Council website
Development affecting a listed building or its setting	<ul style="list-style-type: none"> • Notice in the local newspaper • Site notice or neighbour notification • Council website
Development affecting a conservation area or its setting	<ul style="list-style-type: none"> • Notice in the local newspaper • Site notice or neighbour notification • Council website
Other development	<ul style="list-style-type: none"> • Site notice or neighbour notification

Table 7. Consultation periods on planning applications

Method of publicity	Consultation period
Notice in a local newspaper	21 days from the date of publication
Site notice	21 days from the date that the notice was first displayed
Neighbour notification letter	21 days from the day on which the notification letter was delivered
Website	21 days from the date of publication
Revised plans	Where revised plans are submitted as part of a planning application these will be given a reduced consultation time period, if consultation is required. <u>An application already on an agenda may be withdrawn from the agenda to allow further consultation.</u>

6.5 In cases where neighbours are to be notified this will be undertaken in writing, either electronically or by letter. The Council will put up site notices when required and also publish planning applications online. Parish councils (and, where appropriate on significant applications, known residents’ associations and local community groups) are notified of individual planning applications in their area. If the planning officer considers the development is likely to have a wider impact, neighbouring parish councils may also be notified.

6.6 Applicants are required to publicise applications where:

- An environmental statement is submitted, after the application has been made to the Council
- Certain types of development for agriculture, forestry and for the demolition of buildings

6.7 When required, prior to submission or during determination of an application, discussions will be held between planning officers, and applicants and representative of the parish council to discuss S106 matters.

Determining planning applications

- 6.8 Planning applications are determined against the Development Plan and other material considerations. Often, planning permission may be granted subject to conditions to ensure that the development is acceptable, or to prevent certain impacts or activities arising from the proposal. There are two ways decisions are made on planning applications determined by the Council: Planning Committee and delegated decisions.
- 6.9 **Planning Committee:** The Planning Committee comprises elected councillors and is responsible for making decisions on applications received by the Council, excluding those which fall within delegated powers unless the application is called in by a councillor for determination by Planning Committee.
- 6.10 Committee reports are available five working days before Committee. On applications reported to Committee the Council operates a policy of public speaking. Details on how to get involved in meetings can be found on the website under Meetings and the Public or by contacting a democratic services officer on 01799 510369.
- 6.11 **Delegated decisions:** The Council receives a large volume of applications each year, and it is impractical for all applications to be determined by the Planning Committee. Planning legislation permits the Council to delegate the determination of certain planning applications to officers rather than the Planning Committee. The scheme of delegation is set out in Part 3 the Council's Constitution available on the website site (www.uttlesford.gov.uk/constitution)
- 6.12 Committee and delegated reports set out the relevant local and national policies; town/parish council comments, comments of consultees, comments of representations; and an appraisal of the issues to be considered in determining the application. If an application is recommended for approval the report will set out any conditions and Heads of Terms for the S106 obligation.
- 7 A decision notice will be sent to the applicant, explaining the reasons why a planning application has or has not been granted planning permission. Notification of the decision will also be sent to those members of the public who have made representations. People or organisations who have registered to receive email alerts on planning applications in their area will automatically be notified. Planning decisions are published on the Council's website under the relevant planning application number. The accompanying officer reports, which set out the planning considerations and make a recommendation of approval or refusal, may also be obtained online.

- 7.1 **Appeals:** If an application is refused or not determined within statutory timeframes, the applicant may exercise their right to appeal. When the Council is notified of an appeal by the Planning Inspectorate, the Council will notify interested parties of the appeal and provide a copy of comments made on the application to the Planning Inspectorate. Interested parties will be advised on how they can participate in the appeal process, including venue and time of any informal hearing or public inquiry.

Outside the planning application process

- 7.2 **Prior approvals:** The Town and Country Planning (General Permitted Development) (England) Order (2015) (GPDO) allows for specific changes of use subject to a prior approval process. The Council will consult adjoining neighbours as required by regulations for all prior approvals. Up-to-date guidance on prior approvals, including neighbour notifications can be found on the planning portal website: www.planningportal.gov.uk.
- 7.3 **Permissions in principle:** The Town and Country Planning (Brownfield Land Register) Regulations (2017) and the Town and Country Planning (Permission in Principle) Order (2017) require local planning authorities to prepare and maintain registers of brownfield land. The Order provides that sites entered on Part 2 of the new brownfield registers will be granted permission in principle. Permission in principle will settle the fundamental principles of development (use, location, amount of development) for the brownfield site giving developers/applicants more certainty. A developer cannot proceed with any development, however, until they have also obtained technical details consent. The technical details consent will assess the detailed design, ensure appropriate mitigation of impacts and that any contributions to essential infrastructure are secured. Both the permission in principle and the technical details consent stages must be determined in accordance with the local development plan, the National Planning Policy Framework and other material considerations. The Council will meet the statutory requirements for consultation including contacting parish and town councils under the Neighbourhood Planning Act (2017) in relation to permissions in principle.

8 Monitoring and Review

- 8.1 This SCI will be subject to annual review through the Authority Monitoring Report. As the success of community involvement techniques are monitored and reviewed, the results will be fed into the preparation of future stages of the Local Plan and other planning policy documents and the consideration of significant planning applications.

9 Contact us

- 9.1 For more information on this Statement of Community Involvement please contact us at:

Planning Policy

Uttlesford District Council
London Road
Saffron Walden
Essex CB11 4ER

Tel: 01799 510346 or 01799 510454 or 01799 510637

Email: planningpolicy@uttlesford.gov.uk

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